

Attachment I

Marked-Up Pages from
McGuire and Catawba
Technical Specifications

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SURVEILLANCE REQUIREMENTS

4.0.1 Surveillance Requirements shall be met during the OPERATIONAL MODES or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement.

4.0.2 Each Surveillance Requirement shall be performed within the specified time interval with Δ

• maximum allowable extension not to exceed 25% of the surveillance interval, ~~but~~

~~• The combined time interval for any three consecutive surveillance intervals shall not exceed 3.25 times the specified surveillance interval.~~

4.0.3 Failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by Specification 4.0.2, shall constitute noncompliance with the OPERABILITY requirements for a Limiting Condition for Operation. The time limits of the ACTION requirements are applicable at the time it is identified that a Surveillance Requirement has not been performed. The ACTION requirements may be delayed for up to 24 hours to permit the completion of the surveillance when the allowable outage time limits of the ACTION requirements are less than 24 hours. Surveillance Requirements do not have to be performed on inoperable equipment.

4.0.4 Entry into an OPERATIONAL MODE or other specified condition shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation have been performed within the stated surveillance interval or as otherwise specified. This provision shall not prevent passage through or to OPERATIONAL MODES as required to comply with ACTION requirements.

4.0.5 Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2, and 3 components shall be applicable as follows:

- a. Inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR 50, Section 50.55a(g)(6)(i);

APPLICABILITY

BASES

Specifications 4.0.1 through 4.0.5 establish the general requirements applicable to Surveillance Requirements. These requirements are based on the Surveillance Requirements stated in the Code of Federal Regulations, 10 CFR 50.36(c)(3):

"Surveillance requirements are requirements relating to test, calibration, or inspection to ensure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions of operation will be met."

Specification 4.0.1 establishes the requirement that surveillances must be performed during the OPERATIONAL MODES or other conditions for which the requirements of the limiting Conditions for Operation apply unless otherwise stated in an individual Surveillance Requirement. The purpose of this specification is to ensure that surveillances are performed to verify the operational status of systems and components and that parameters are within specified limits to ensure safe operation of the facility when the plant is in a MODE or other specified condition for which the associated Limiting Conditions for Operation are applicable. Surveillance Requirements do not have to be performed when the facility is in an OPERATIONAL MODE for which the requirements of the associated Limiting Condition for Operation do not apply unless otherwise specified. The Surveillance Requirements associated with a Special Test Exception are only applicable when the Special Test Exception is used as an allowable exception to the requirements of a specification.

~~Specification 4.0.2 establishes the conditions under which the specified time interval for Surveillance Requirements may be extended. Item a. permits an allowable extension of the normal surveillance interval to facilitate surveillance scheduling and consideration of plant operating conditions that may not be suitable for conducting the surveillance; e.g., transient conditions or other ongoing surveillance or maintenance activities. Item b. limits the use of the provisions of item a. to ensure that it is not used repeatedly to extend the surveillance interval beyond that specified. The limits of Specification 4.0.2 are based on engineering judgment and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the Surveillance Requirements. These provisions are sufficient to ensure that the reliability ensured through surveillance activities is not significantly degraded beyond that obtained from the specified surveillance interval.~~

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Specification 4.0.3 establishes the failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by the provisions of Specification 4.0.2, as a condition that constitutes a failure to meet the OPERABILITY requirements for a Limiting Condition for Operation. Under the provisions of this specification, systems and components are assumed to be OPERABLE when Surveillance Requirements have been satisfactorily performed within the specified time interval. However, nothing in this

New T.S. Basis 4.0.2 for McGuire

4.0.2 The provisions of this specification provide allowable tolerances for performing surveillance activities beyond those specified in the nominal surveillance interval. These tolerances are necessary to provide operational flexibility because of scheduling and performance considerations. The phrase "at least" associated with a surveillance frequency does not negate this allowable tolerance; instead, it permits the more frequent performance of surveillance activities.

The allowable tolerance for performing surveillance activities is sufficiently restrictive to ensure that the reliability associated with the surveillance activity is not significantly degraded beyond that obtained from the nominal surveillance interval. It is not intended that the allowable tolerance be used as a convenience to repeatedly schedule the performance of surveillances at the allowable tolerance limit.

APPLICABILITY

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APPLICABILITY

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Specification 4.0.3 establishes the failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by the provisions of Specification 4.0.2, as a condition that constitutes a failure to meet the OPERABILITY requirements for a Limiting Condition for Operation. Under the provisions of this specification, systems and components are assumed to be OPERABLE when Surveillance Requirements have been satisfactorily performed within the specified time interval. However, nothing in this provision is to be construed as implying that systems or components are OPERABLE when they are found or known to be inoperable although still meeting the Surveillance Requirements. This specification also clarifies that the ACTION requirements are applicable when Surveillance Requirements have not been completed within the allowed surveillance interval and that the time limits of the ACTION requirements apply from the point in time it is identified that a surveillance has not been performed and not at the time that the allowed surveillance interval was exceeded. Completion of the Surveillance Requirement within the allowable outage time limits of the ACTION requirements restores compliance with the requirements of Specification 4.0.3. However, this does not negate the fact that the failure to have performed the surveillance within the allowed surveillance interval, defined by the provisions of Specification 4.0.2, was a violation of the OPERABILITY

New T.S. Basis 4.0.2 for Catawba

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Attachment II
Justification and Safety Analysis

Many surveillances have a specified surveillance interval of 18 months. Generally, an 18-month surveillance interval is intended to allow the surveillance to be performed when the unit is shut down during a refueling outage. Therefore, the actual time interval for the performance of these surveillances is dependent on the length of a fuel cycle, but it cannot exceed 18 months plus the 25 percent allowance. The safety benefit of performing these surveillances during a plant shutdown is that systems do not have to be removed from service at a time that they are required to be operable. This minimizes the amount of time which systems are unavailable during power operation due to surveillance requirements, thereby minimizing the impact on safety. In a few instances, the TS specifically require some surveillances to be performed during a plant shutdown. When a limit is reached on extending an 18-month interval, a forced plant shutdown to perform these surveillances is generally the only alternative short of a license amendment that defers the performance of these surveillances until the end of the fuel cycle.

Usually, the length of a fuel cycle would not exceed 18 months by more than the 25 percent allowance, i.e., 4-1/2 months. A more common situation has been to encounter the 3.25 limit on the combined time interval for three consecutive surveillance intervals. The NRC staff has routinely approved one-time amendment requests to waive the performance of 18-month surveillances until the end of the fuel cycle when they would exceed the 3.25 limitation on consecutive surveillances yet would not exceed the 25 percent allowance for extending the 18-month surveillance interval. A forced shutdown to perform these surveillances is not justified from a risk standpoint to avoid exceeding the 3.25 limit when extending these surveillances is within the 25 percent allowance. Because the 18-month surveillances are performed during a refueling outage when the plant is in a desirable condition for conducting these surveillances, the risk of the alternative to perform some of these surveillances during plant operation is greater than the impact on safety of exceeding the 3.25 limit and using the 25 percent allowance to extend these surveillances.

In addition to its application to refueling outage surveillances, the use of the 25 percent allowance for extending surveillance intervals can have a safety benefit when it is used during plant operation. When plant conditions are not suitable for the conduct of surveillances due to safety systems being out-of-service for maintenance or due to other ongoing surveillance activities, safety is enhanced by the use of the allowance that permits a surveillance interval to be extended. In such cases, the safety benefit of extending a surveillance interval up to 25 percent would exceed the risk reduction derived by conforming to the 3.25 limitation. Furthermore, there is a large administrative and logistical burden that is associated with tracking the use of the 25 percent allowance for prior surveillance intervals to ensure compliance with the 3.25 limit. This results in a diversion of resources and attention from more safety significant activities.

Based on the above discussion, it can be concluded that the proposed change is justified and will not reduce safety.

Attachment III

No Significant Hazards Consideration

The following analysis is provided, in accordance with 10 CFR 50.91, to determine whether the proposed change will involve a significant hazards consideration. This determination will be made using the criteria of 10 CFR 50.92.

- 1) The proposed amendment will not result in a significant increase in the probability or consequences of any accident previously evaluated in the FSAR.

The 3.25 surveillance interval extension limit is not considered in the stations' accident analyses (FSAR Chapter 15). Also, the surveillance intervals will continue to be constrained by the requirement that the actual surveillance interval may not exceed the specified interval by more than 25%.

- 2) The proposed amendment will not create the possibility of a new or different kind of accident not previously evaluated.

The proposed change will not modify, delete, or add any systems or components. Therefore, no new failure modes or accident scenarios will be created. No tests or experiments will be revised, so no new initiating event or unanalyzed condition can be created. Administrative changes to surveillance procedures will be minor and will not create a safety concern.

- 3) No significant reduction in a margin of safety will occur.

Deletion of the requirement "any three consecutive intervals must not exceed 3.25 times the interval" will not significantly affect equipment reliability. This exemption will allow all surveillance intervals to be constrained by the maximum allowable extension of 25 percent of the specified surveillance interval which will enhance safety when used during plant operation. Normal scheduling would still be at the specified surveillance interval.

Guidance has been provided in 51 FR 7744 for the application of standards to license change requests for determination of the existence of amendments which are and are not considered likely to involve significant hazards considerations. This proposed amendment does not involve a significant relaxation of the criteria used to establish safety limits, a significant relaxation of the bases for the limiting conditions for operations. Therefore, based on the guidance provided in the Federal Register and the criteria established in 10 CFR 50.92(e), the proposed change does not constitute a significant hazards consideration.