ATTACHMENT I to JPN-93-003

PROPOSED TECHNICAL SPECIFICATION CHANGES
REMOVAL OF THE 3.5 LIMIT ON
EXTENDING SURVEILLANCE INTERVALS

(JPTS-89-026)

New York Power Authority

JAMES A. FITZPATRICK NUCLEAR POWER PLANT
Docket No. 50-333
DPR-59

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1.0 (cont'd)

opened to perform necessary operational activities.

2. At least one door in each airlock is closed and sealed.

3. All automatic containment isolation valves are operable or de-activated in the isolated position.

4. All blind flanges and manways are closed.

N. Rated Power - Rated power refers to operation at a reactor power of 2,436 MWt. This is also termed 100 percent power and is the maximum power level authorized by the operating license. Rated steam flow, rated coolant flow, rated nuclear system pressure, refer to the values of these parameters when the reactor is at rated power.

O. Reactor Power Operation - Reactor power operation is any operation with the Mode Switch in the Startup/Hot Standby or Run position with the reactor critical and above 1 percent ratad thermal power.

P. Reactor Vessel Pressure - Unless otherwise indicated, reactor vessel pressures listed in the Technical Specifications are those measured by the reactor vessel steam space sensor.

Q. Refueling Outage - Refueling outage is the period of time between the shutdown of the unit prior to refueling and the startup of the Plant subsequent to that refueling.

R. Safety Limits - The safety limits are limits within which the reasonable maintenance of the fuel cladding integrity and the reactor coolant system integrity are assured. Violation of such a limit is cause for unit shutdown and review by the Atomic Energy Commission before resumption of unit operation. Operation beyond such a limit may not in itself result in serious consequences but it indicates an operational deficiency subject to regulatory review.

S. Secondary Containment Integrity - Secondary containment integrity means that the reactor building is intact and the following conditions are met:

1. At least one door in each access opening is closed.

2. The Standby Gas Treatment System is operable.

3. All automatic ventilation system isolation valves are operable or secured in the isolated position.

T. Deleted

Amendment No. 14, 134,

1.0 (cont'd)

U. Thermal Parameters

1. Minimum critical power ratio (MCPR)- Minimum value of the ratio of that power in a fuel assembly which is calculated to cause some point in that fuel assembly to experience boiling transition to the actual assembly operating power for all fuel assemblies in the core.

2. Fraction of Limiting Power Density - The ratio of the linear heat generation rate (LHGR) existing at a given location to the design LHGR.

3. Maximum Fraction of Limiting Power Density - The Maximum Fraction of Limiting Power Density (MFLPD) is the highest value existing in the core of the Fraction of Limiting Power Density (FLPD).

4. Transition Boiling - Transition boiling means the boiling region between nucleate and film boiling. Transition boiling is the region in which both nucleate and film boiling occur intermittently with neither type being completely stable.

V. Electrically Disarmed Control Rod

To disarm a rod drive electrically, the four amphenol type plug connectors are removed from the drive insert and withdrawal solenoids rendering the rod incapable of withdrawal. This procedure is equivalent to valving out the drive and is preferred. Electrical disarming does not eliminate position indication.

W. High Pressure Water Fire Protection System

The High Pressure Water Fire Protection System consists of: a water source and pumps; and distribution system piping with associated post indicator valves (isolation valves). Such valves include the yard hydrant curb valves and the first valve ahead of the water flow alarm device on each sprinkler or water spray subsystem.

X. Staggered Test Basis

A Staggered Test Basis shall consist of:

a. A test schedule for "n" systems, subsystems, trains or other designated components obtained by dividing the specified test interval into "n" equal subintervals.

b. The testing of one system, subsystem, train or other designated component at the beginning of each subinterval.

Y. Rated Recirculation Flow

That drive flow which produces a core flow of 77.0×10^6 lb/hr.

3. Limiting Conditions for Operation

3.0 General

Applicability:

Applies to the general LCO requirements of Section 3.

Objective:

To specify the general requirements applicable to each Limiting Condition for Operation listed in Section 3.

Specification:

A. Limiting Conditions for Operation and ACTION requirements shall be applicable during the OPERATIONAL CONDITIONS (modes) specified for each specification.

B. Adherence to the requirements of the Limiting Condition for Operation and associated ACTION within the specified time interval shall constitute compliance with the specification. In the event the Limiting Condition for Operation is restored prior to expiration of the specified time interval, completion of the ACTION statement is not required.

C. In the event a Limiting Condition for Operation and/or associated ACTION requirements cannot be satisfied because of circumstances in excess of those addressed in the specification, the unit shall be placed in COLD SHUTDOWN within the following 24 hours unless corrective measures are completed that permit operation under the permissible ACTION or until the reactor is placed in an OPERATIONAL CONDITION (mode) in which the specification is not applicable. Exceptions to these requirements shall be stated in the individual specifications.

4. Surveillance Requirements

4.0 General

Applicability:

Applies to the general surveillance requirements of Section 4.

Objective:

To specify the general requirements applicable to each surveillance requirement in Section 4.

Specification:

A. Surveillance Requirements shall be applicable during the OPERATIONAL CONDITIONS (modes) specified for individual Limiting Condition for Operation unless otherwise stated in the individual Surveillance Requirements.

B. Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the specified surveillance interval.

C. Performance of a Surveillance Requirement within the specified time interval shall constitute compliance with OPERABILITY requirements for a Limiting Condition for Operation and associated ACTION statements unless otherwise required by the specification. Surveillance requirements do not have to be performed on inoperable equipment.

4.0 BASES

A. This specification provides that surveillance activities necessary to insure the Limiting Conditions for Operation are met and will be performed during the OPERATIONAL CONDITIONS (modes) for which the Limiting Conditions for Operation are applicable. Provisions for additional surveillance activities to be performed without regard to the applicable OPERATIONAL CONDITIONS (modes) are provided in the individual Surveillance Requirements.

B. Specification 4.0.B establishes the limit for which the specified time interval for Surveillance Requirements may be extended. It 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). It also provides flexibility to accommodate the length of a fuel cycle for surveillances that are performed at each refueling outage and are specified with an 18 month surveillance interval. It is not intended that this provision be used repeatedly as a convenience to extend surveillance intervals beyond that specified for surveillances that are not performed during refueling outages. The limitation of this specification is based on engineering judgement and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the Surveillance Requirements. The limit on extension of the normal surveillance interval ensures that the reliability confirmed by surveillance activities is not significantly reduced below that obtained from the specified surveillance interval.

C. The provisions of this specification set forth the criteria for determination of compliance with the OPERABILITY requirements of the Limiting Conditions for Operation. Under this criteria, equipment, systems or components are assumed to be OPERABLE if the associated surveillance activities have been satisfactorily performed within the specified time interval. Nothing in this provision is to be construed as defining equipment, systems or components OPERABLE, when such items are found or known to be inoperable although still meeting the Surveillance Requirements.

D. This specification ensures that surveillance activities associated with a Limiting Condition for Operation have been performed within the specified time interval prior to entry into an applicable OPERATIONAL CONDITION (mode). The intent of this provision is to ensure that surveillance activities have been satisfactorily demonstrated on a current basis as required to meet the OPERABILITY requirements of the Limiting Condition for Operation.

Under the terms of this specification, for example, during initial plant start-up or following extended plant outage, the applicable surveillance activities must be performed within the stated surveillance interval prior to placing or returning the system or equipment into OPERABLE status.

Attachment II to JPN-93-003

SAFETY EVALUATION FOR PROPOSED TECHNICAL SPECIFICATION CHANGES REMOVAL OF THE 3.5 LIMIT ON EXTENDING SURVEILLANCE INTERVALS (JPTS-89-026)

I. DESCRIPTION OF THE PROPOSED CHANGES

The proposed changes to the James A. FitzPatrick Technical Specifications propose to remove the 3.5 limit on extending surveillance intervals and delete an associated definition of Surveillance Frequency as discussed below.

Minor changes in format, such as type font, margins or hyphenation, are not described in this submittal. These changes are typographical in nature and do not affect the content of the Technical Specifications.

Pages 5 and 6, Specification 1.0.T

Replace the current definition:

> "Surveillance Frequency - Periodic surveillance tests, checks, calibrations, and examinations shall be performed within the specified surveillance intervals. These intervals may be adjusted ±25 percent. The interval as pertaining to instrument and electric surveillance shall never exceed one operating cycle. In cases where the elapsed interval has exceeded 100 percent of the specified interval, the next surveillance interval shall commence at the end of the original specified interval."

with the word "Deleted."

Page 30, Specification 4.0.B

Replace the current Specification:

> "Each Surveillance Requirement shall be performed within the specified time interval with:
>
> 1. An allowable variation of ± 25% of the surveillance interval,
>
> 2. A total maximum combined interval time for any three (3) consecutive surveillance intervals not to exceed 3.5 times the specified surveillance interval."

with the following Specification:

> "Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25

percent of the specified surveillance interval."

Page 30e, Bases 4.0.B

Replace the current Bases Section:

"The provisions of this specification provide allowable tolerances for performing surveillance activities beyond those specified in the normal surveillance interval. These tolerances are necessary to provide operational flexibility because of scheduling and performance considerations."

with the following Bases Section:

"Specification 4.0.B establishes the limit for which the specified time interval for Surveillance Requirements may be extended. It 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). It also provides flexibility to accommodate the length of a fuel cycle for surveillances that are performed at each refueling outage and are specified with an 18 month surveillance interval. It is not intended that this provision be used repeatedly as a convenience to extend surveillance intervals beyond that specified for surveillances that are not performed during refueling outages. The limitation of this specification is based on engineering judgement and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the Surveillance Requirements. The limit on extension of the normal surveillance interval ensures that the reliability confirmed by surveillance activities is not significantly reduced below that obtained from the specified surveillance interval."

Delete the phrase "C. Continued" from the top of the right column.

II. PURPOSE OF THE PROPOSED CHANGES

The purpose of the proposed changes to the James A. FitzPatrick Technical Specifications is to remove the Specification 4.0.B limit of 3.5 (this is different from the Standard Technical Specifications limit of 3.25) on extending surveillance intervals as well as remove the associated definition of "Surveillance Frequency" in Specification 1.0.T. The proposed changes conform to NRC Generic Letter 89-14 (Reference 1) guidance because the changes to Specification 4.0.B and the associated Bases Section are almost identical to those proposed in the Generic Letter. The only differences are minor changes to the Bases Section made to correct the specification reference, a clarification of the last sentence in the Bases and the

proposed deletion from Specification 1.0.T of the associated definition made for consistency.

Specification 4.0.B permits surveillance intervals be extended up to 25 percent of the specified interval. This extension facilitates the scheduling of surveillance activities and allows surveillances to be postponed when plant conditions are not suitable for conducting a surveillance, for example, under transient conditions or other ongoing surveillance or maintenance activities. Specification 4.0.B also limits extending surveillances so that the combined time interval for any three consecutive surveillance intervals shall not exceed 3.5 times the specified surveillance interval.

Specification 1.0.T defines "Surveillance Frequency" as periodic surveillance tests, checks, calibrations and examinations within specified intervals and repeats the Specification 4.0.B allowance for 25 percent adjustments in surveillance intervals. It also limits surveillance intervals by requiring surveillances to be scheduled from the last scheduled surveillance rather than the adjusted date that the surveillance is performed.

III. SAFETY IMPLICATIONS OF THE PROPOSED CHANGES

The proposed changes to the Technical Specifications will result in a net improvement to plant safety for surveillances performed on refueling and on a routine basis. The changes will not require modification of any plant structures, systems or components and will not alter the conclusion's of the plant's accident analyses as documented in the FSAR or the NRC staff's SER.

The Authority has reviewed Generic Letter 89-14 and concurs with the NRC staff that elimination of the 3.5 limit on surveillance interval extension will have an overall positive effect on safety. The Generic Letter removed a 3.25 limit on extending consecutive surveillance intervals. The limit in the FitzPatrick Technical Specification 4.0.B is 3.5.

Experience has shown that an 18-month surveillance interval, with the provision to extend it by 25 percent, is usually sufficient to accommodate normal variations in the length of a fuel cycle. However, the NRC staff has routinely granted requests for one-time exceptions to the limit on extending refueling surveillances because the risk to safety is low in contrast to the alternative of a forced shutdown to perform these surveillances. Therefore, the limitation on extending surveillances has not been a practical limit on the use of the 25 percent allowance for extending surveillances that are performed on a refueling outage basis.

The use of the allowance to extend surveillance intervals by 25 percent can also result in a significant safety benefit for surveillances that are performed on a routine basis during plant operation. This safety benefit is incurred when a surveillance interval is extended at a time that conditions are not suitable for performing the

surveillance. Examples of this include transient plant operating conditions or conditions in which safety systems are out of service because of ongoing surveillance or maintenance activities. In such cases, the safety benefit of allowing the use of the 25 percent allowance to extend a surveillance interval would outweigh any benefit derived by limiting three consecutive surveillance intervals to the 3.5 limit.

Specification 1.0.T is a definition of "Surveillance Frequency" that is generally repetitive of other specifications and that must be changed for consistency with the changes made to Specification 4.0.B. Standard Technical Specifications (Reference 2) have no definition like Specification 1.0.T and it is therefore being deleted as unnecessary. The safety significance of the deletion is evaluated by looking at the four sentences of the Specification:

1. The first sentence states that surveillances will be performed within specified intervals. It is unnecessary since it is redundant to individual surveillance specifications.

2. The second sentence identifies the 25 percent adjustment allowed by Specification 4.0.B. It is unnecessary since it is redundant.

3. The third sentence limits instrument and electric surveillance intervals to one operating cycle. It is unnecessary since it is redundant to individual surveillance specifications. Additionally, it could be confusing if interpreted as a limit of 18 months (i.e., an operating cycle) on the 25 percent adjustment of Specification 4.0.B. It should not be interpreted in this manner.

4. The last sentence limits surveillance intervals by requiring surveillances to be scheduled from the last scheduled surveillance rather than the adjusted date that the surveillance is performed. For example, if an 18 month surveillance was performed after 22 months, the next surveillance would be scheduled for 14 months later. The effect is to replace the 3.5 limit of Specification 4.0.B with the 3.25 limit (i.e., the duration of the last adjustment) of the Standard Technical Specifications. This limit is being removed for consistency with the Technical Specification change to Specification 4.0.B. Plant procedures (Reference 3) will retain this limitation under the control of plant management.

On the basis of the above considerations, the removal of the 3.5 limit in Specification 4.0.B and the associated deletion of Specification 1.0.T will have an overall positive impact on safety.

IV. EVALUATION OF SIGNIFICANT HAZARDS CONSIDERATION

Operation of the FitzPatrick plant in accordance with the proposed Amendment would not involve a significant hazards consideration as defined in 10 CFR 50.92, since it

would not:

1. involve a significant increase in the probability or consequences of an accident previously evaluated.

   The proposed changes will not require modification to any plant structures, systems or components. Surveillance test effectiveness and operability as determined by testing will remain the same. The proposed changes will not alter testing. The small change in reliability will not be of a nature to initiate an accident and will not effect the consequences of an accident since mitigating systems are still available.

2. create the possibility of a new or different kind of accident from any accident previously evaluated.

   The proposed changes will not require modification to any plant structures, systems or components. The changes remove the limitation for extending surveillance intervals, remove the associated definition and revise Bases accordingly. The nature of the changes preclude the possibility of a new or different kind of accident.

3. involve a significant reduction in a margin of safety.

   The proposed changes to remove the limit on surveillance interval extensions and associated definition will not cause a significant reduction in the margin of safety. Removal of the limit results in a small increase to allowable surveillance intervals. This would not result in a significant degradation in the reliability of systems and components under surveillance. Adherence to the limit could require forced shutdown to perform surveillance or the performance of surveillance when conditions are not suitable. It could also require routine surveillances when conditions are not suitable. The safety benefits of removing the limit are more significant than the small increase in the surveillance interval for consecutive extensions.

V. IMPLEMENTATION OF THE PROPOSED CHANGES

Implementation of the proposed changes will not adversely affect the ALARA or Fire Protection Programs at the FitzPatrick plant, nor will the changes affect the environment. Removal of the limit on surveillance interval extensions will have no affect on these programs or the environment.

VI. CONCLUSION

The changes, as proposed, do not constitute an unreviewed safety question as defined in 10 CFR 50.59. That is, they:

1. will not change the probability nor the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the Safety Analysis Report;

2. will not increase the possibility of an accident or malfunction of a type different from any previously evaluated in the Safety Analysis Report; and

3. will not reduce the margin of safety as defined in the basis for any technical specification.

The changes involve no significant hazards consideration, as defined in 10 CFR 50.92.

VII. REFERENCES

1. NRC Generic Letter 89-14, J. G. Partlow to All Licensees of Operating Plants, Applicants for Operating Licenses, and Holders of Construction Permits, dated August 21, 1989 regarding "Removal of the 3.25 Limit on Extending Surveillance Intervals."

2. NUREG-1433 "Standard Technical Specifications In General Electric Boiling Water Reactors (BWR/4)," Revision 0 dated September 1992.

3. James A. FitzPatrick Nuclear Power Plant Administrative Procedure AP-4.1, "James A. FitzPatrick Surveillance Test Program," Revision 8 dated November 4, 1992.

4. James A. FitzPatrick Nuclear Power Plant Updated Final Safety Analysis Report Sections 13.8.3, 17.2.11, 17.2.12 and 17.2.14.

5. James A. FitzPatrick Nuclear Power Plant Safety Evaluation Report (SER), dated November 20, 1972, and Supplements.

ATTACHMENT III to JPN-93-003

PROPOSED TECHNICAL SPECIFICATION CHANGES
REMOVAL OF THE 3.5 LIMIT ON
EXTENDING SURVEILLANCE INTERVALS
MARKUP OF TECHNICAL SPECIFICATION PAGES

(JPTS-89-026)

New York Power Authority

JAMES A. FITZPATRICK NUCLEAR POWER PLANT
Docket No. 50-333
DPR-59

1.0 (cont'd)

opened to perform necessary operational activities.

2. At least one door in each airlock is closed and sealed.

3. All automatic containment isolation valves are operable or de-activated in the isolated position.

4. All blind flanges and manways are closed.

N. Rated Power - Rated power refers to operation at a reactor power of 2,436 MWt. This is also termed 100 percent power and is the maximum power level authorized by the operating license. Rated steam flow, rated coolant flow, rated nuclear system pressure, refer to the values of these parameters when the reactor is at rated power.

O. Reactor Power Operation - Reactor power operation is any operation with the Mode Switch in the Startup/Hot Standby or Run position with the reactor critical and above 1 percent rated thermal power.

P. Reactor Vessel Pressure - Unless otherwise indicated, reactor vessel pressures listed in the Technical Specifications are those measured by the reactor vessel steam space sensor.

Q. Refueling Outage - Refueling outage is the period of time between the shutdown of the unit prior to refueling and the startup of the Plant subsequent to that refueling.

R. Safety Limits - The safety limits are limits within which the reasonable maintenance of the fuel cladding integrity and the reactor coolant system integrity are assured. Violation of such a limit is cause for unit shutdown and review by the Atomic Energy Commission before resumption of unit operation. Operation beyond such a limit may not in itself result in serious consequences but it indicates an operational deficiency subject to regulatory review.

S. Secondary Containment Integrity - Secondary containment integrity means that the reactor building is intact and the following conditions are met:

1. At least one door in each access opening is closed.

2. The Standby Gas Treatment System is operable.

3. All automatic ventilation system isolation valves are operable or secured in the isolated position.

T. Surveillance Frequency - Periodic

Deleted

Amendment No. 14, 144

1.0 (cont'd)

surveillance tests, checks, calibrations, and examinations shall be performed within the specified surveillance intervals. These intervals may be adjusted ±25 percent. The interval as pertaining to instrument and electric surveillance shall never exceed one operating cycle. In cases where the elapsed interval has exceeded 100 percent of the specified interval, the next surveillance interval shall commence at the end of the original specified interval.

U. Thermal Parameters

1. Minimum critical power ratio (MCPR)- Minimum value of the ratio of that power in a fuel assembly which is calculated to cause some point in that fuel assembly to experience boiling transition to the actual assembly operating power for all fuel assemblies in the core.

2. Fraction of Limiting Power Density - The ratio of the linear heat generation rate (LHGR) existing at a given location to the design LHGR.

3. Maximum Fraction of Limiting Power Density - The Maximum Fraction of Limiting Power Density (MFLPD) is the highest value existing in the core of the Fraction of Limiting Power Density (FLPD).

4. Transition Boiling - Transition boiling means the boiling region between nucleate and film boiling. Transition boiling is the region in which both nucleate and film boiling occur intermittently with neither type being completely stable.

V. Electrically Disarmed Control Rod

To disarm a rod drive electrically, the four amphenol type plug connectors are removed from the drive insert and withdrawal solenoids rendering the rod incapable of withdrawal. This procedure is equivalent to valving out the drive and is preferred. Electrical disarming does not eliminate position indication.

W. High Pressure Water Fire Protection System

The High Pressure Water Fire Protection System consists of: a water source and pumps; and distribution system piping with associated post indicator valves (isolation valves). Such valves include the yard hydrant curb valves and the first valve ahead of the water flow alarm device on each sprinkler or water spray subsystem.

X. Staggered Test Basis

A Staggered Test Basis shall consist of:

a. A test schedule for "n" systems, subsystems, trains or other designated components obtained by dividing the specified test interval into "n" equal subintervals.

b. The testing of one system, subsystem, train or other designated component at the beginning of each subinterval.

Y. Rated Recirculation Flow

That drive flow which produces a core flow of 77.0 x 10^6 lb/hr.

3. Limiting Conditions for Operation

3.0 General

Applicability:

Applies to the general LCO requirements of Section 3.

Objective:

To specify the general requirements applicable to each Limiting Condition for Operation listed in Section 3.

Specification:

A. Limiting Conditions for Operation and ACTION requirements shall be applicable during the OPERATIONAL CONDITIONS (modes) specified for each specification.

B. Adherence to the requirements of the Limiting Condition for Operation and associated ACTION within the specified time interval shall constitute compliance with the specification. In the event the Limiting Condition for Operation is restored prior to expiration of the specified time interval, completion of the ACTION statement is not required.

C. In the event a Limiting Condition for Operation and/or associated ACTION requirements cannot be satisfied because of circumstances in excess of those addressed in the specification, the unit shall be placed in COLD SHUTDOWN within the following 24 hours unless corrective measures are completed that permit operation under the permissible ACTION or until the reactor is placed in an OPERATIONAL CONDITION (mode) in which the specification is not applicable. Exceptions to these requirements shall be stated in the individual specifications.

4. Surveillance Requirements

4.0 General

Applicability:

Applies to the general surveillance requirements of Section 4.

Objective:

To specify the general requirements applicable to each surveillance requirement in Section 4.

Specification:

A. Surveillance Requirements shall be applicable during the OPERATIONAL CONDITIONS (modes) specified for individual Limiting Condition for Operation unless otherwise stated in the individual Surveillance Requirements.

B. Each Surveillance Requirement shall be performed within the specified time interval with:

1. An allowable variation of ±25% of the surveillance interval,

2. A total maximum combined interval time for any three (3) consecutive surveillance intervals not to exceed 3.5 times the specified surveillance interval.

C. Performance of a Surveillance Requirement within the specified time interval shall constitute compliance with OPERABILITY requirements for a Limiting Condition for Operation and associated ACTION statements unless otherwise required by the specification. Surveillance requirements do not have to be performed on inoperable equipment.

Insert A

INSERT A

Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the specified surveillance interval.

4.0 BASES

A. This specification provides that surveillance activities necessary to insure the Limiting Conditions for Operation are met and will be performed during the OPERATIONAL CONDITIONS (modes) for which the Limiting Conditions for Operation are applicable. Provisions for additional surveillance activities to be performed without regard to the applicable OPERATIONAL CONDITIONS (modes) are provided in the individual Surveillance Requirements.

B. The provisions of this specification provide allowable tolerances for performing surveillance activities beyond those specified in the normal surveillance interval. These tolerances are necessary to provide operational flexibility because of scheduling and performance considerations.

C. The provisions of this specification set forth the criteria for determination of compliance with the OPERABILITY requirements of the Limiting Conditions for Operation. Under this criteria,

Insert B

C. Continued

equipment, systems or components are assumed to be OPERABLE if the associated surveillance activities have been satisfactorily performed within the specified time interval. Nothing in this provision is to be construed as defining equipment, systems or components OPERABLE, when such items are found or known to be inoperable although still meeting the Surveillance Requirements.

D. This specification ensures that surveillance activities associated with a Limiting Condition for Operation have been performed within the specified time interval prior to entry into an applicable OPERATIONAL CONDITION (mode). The intent of this provision is to ensure that surveillance activities have been satisfactorily demonstrated on a current basis as required to meet the OPERABILITY requirements of the Limiting Condition for Operation.

Under the terms of this specification, for example, during initial plant start-up or following extended plant outage, the applicable surveillance activities must be performed within the stated surveillance interval prior to placing or returning the system or equipment into OPERABLE status.

INSERT B

Specification 4.0.B establishes the limit for which the specified time interval for Surveillance Requirements may be extended. It 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). It also provides flexibility to accommodate the length of a fuel cycle for surveillances that are performed at each refueling outage and are specified with an 18 month surveillance interval. It is not intended that this provision be used repeatedly as a convenience to extend surveillance intervals beyond that specified for surveillances that are not performed during refueling outages. The limitation of this specification is based on engineering judgement and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the Surveillance Requirements. The limit on extension of the normal surveillance interval ensures that the reliability confirmed by surveillance activities is not significantly reduced below that obtained from the specified surveillance interval.