

ENCLOSURE 3

VOGTLE ELECTRIC GENERATING PLANT

PROPOSED CHANGES TO TECHNICAL SPECIFICATIONS
AS A RESULT OF GENERIC 87-09

INSTRUCTIONS FOR INCORPORATION

The proposed changes to the Vogtle Unit 1 and Unit 2 Technical Specifications would be incorporated as follows:

<u>Remove Page</u>	<u>Insert Page</u>
3/4 0-1 and 3/4 0-2	3/4 0-1 and 3/4 0-2
3/4 1-17 and 3/4 1-18*	3/4 1-17 and 3/4 1-18*
3/4 2-11* and 3/4 2-12	3/4 2-11* and 3/4 2-12
3/4 3-1* and 3/4 3-2	3/4 3-1* and 3/4 3-2
3/4 3-3 and 3/4 3-4	3/4 3-3 and 3/4 3-4
3/4 3-5* and 3/4 3-6	3/4 3-5* and 3/4 3-6
3/4 3-17 and 3/4 3-18*	3/4 3-17 and 3/4 3-18*
3/4 3-19* and 3/4 3-20	3/4 3-19* and 3/4 3-20
3/4 3-21 and 3/4 3-22	3/4 3-21 and 3/4 3-22
3/4 3-23 and 3/4 3-24	3/4 3-23 and 3/4 3-24
3/4 3-27	3/4 3-27
3/4 3-27a and 3/4 3-28*	3/4 3-27a and 3/4 3-28*
3/4 3-45 and 3/4 3-46*	3/4 3-45 and 3/4 3-46*
3/4 3-49 and 3/4 3-50	3/4 3-49 and 3/4 3-50
3/4 3-53 and 3/4 3-54*	3/4 3-53 and 3/4 3-54*
3/4 3-61 and 3/4 3-62*	3/4 3-61 and 3/4 3-62*
3/4 3-65 and 3/4 3-66*	3/4 3-65 and 3/4 3-66*
3/4 3-71 and 3/4 3-72*	3/4 3-71 and 3/4 3-72*
3/4 3-79 and 3/4 3-80*	3/4 3-79 and 3/4 3-80*
3/4 4-37 and 3/4 4-38*	3/4 4-37 and 3/4 4-38*
3/4 7-9 and 3/4 7-10*	3/4 7-9 and 3/4 7-10*
3/4 7-25 and 3/4 7-26*	3/4 7-25 and 3/4 7-26*
3/4 7-27 and 3/4 7-28*	3/4 7-27 and 3/4 7-28*
3/4 8-19 and 3/4 8-20*	3/4 8-19 and 3/4 8-20*
3/4 9-7 and 3/4 9-8*	3/4 9-7 and 3/4 9-8*
3/4 9-9* and 3/4 9-10	3/4 9-9* and 3/4 9-10
3/4 9-13 and 3/4 9-14	3/4 9-13 and 3/4 9-14
3/4 11-1 and 3/4 11-2*	3/4 11-1 and 3/4 11-2*
3/4 11-5 and 3/4 11-6	3/4 11-5 and 3/4 11-6

* Overleaf page containing no change.

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ENCLOSURE 3 (CONTINUED)

PROPOSED CHANGES TO TECHNICAL SPECIFICATIONS
AS A RESULT OF GENERIC 87-09

INSTRUCTIONS FOR INCORPORATION

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3/4 11-7 and 3/4 11-8	3/4 11-7 and 3/4 11-8
3/4 11-11* and 3/4 11-12	3/4 11-11* and 3/4 11-12
3/4 11-13 and 3/4 11-14	3/4 11-13 and 3/4 11-14
3/4 11-15 and 3/4 11-16	3/4 11-15 and 3/4 11-16
3/4 11-17 and 3/4 11-18	3/4 11-17 and 3/4 11-18
3/4 12-1* and 3/4 12-2	3/4 12-1* and 3/4 12-2
3/4 12-13 and 3/4 12-14	3/4 12-13 and 3/4 12-14
B 3/4 0-1	B 3/4 0-1, B 3/4 0-2, and B 3/4 0-3
B 3/4 0-1a and B 3/4 0-2	B 3/4 0-4 and B 3/4 0-5
B 3/4 0-3	B 3/4 0-6

* Overleaf page containing no change.

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comply with ACTION requirements, the plant may have entered a MODE in which a new specification becomes applicable. In this case, the time limits of the ACTION requirements would apply from the point in time that the new specification becomes applicable if the requirements of the Limiting Condition for Operation are not met.

Specification 3.0.2 establishes that noncompliance with a specification exists when the requirements of the Limiting Condition for Operation are not met and the associated ACTION requirements have not been implemented within the specified time interval. The purpose of this specification is to clarify that (1) implementation of the ACTION requirements within the specified time interval constitutes compliance with a specification and (2) completion of the remedial measures of the ACTION requirements is not required when compliance with a Limiting Condition of Operation is restored within the time interval specified in the associated ACTION requirements.

Specification 3.0.3 establishes the shutdown ACTION requirements that must be implemented when a Limiting Condition for Operation is not met and the condition is not specifically addressed by the associated ACTION requirements. The purpose of this specification is to delineate the time limits for placing the unit in a safe shutdown MODE when plant operation cannot be maintained within the limits for safe operation defined by the Limiting Conditions for Operation and its ACTION requirements. It is not intended to be used as an operational convenience which permits (routine) voluntary removal of redundant systems or components from service in lieu of other alternatives that would not result in redundant systems or components being inoperable. One hour is allowed to prepare for an orderly shutdown before initiating a change in plant operation. This time permits the operator to coordinate the reduction in electrical generation with the load dispatcher to ensure the stability and availability of the electrical grid. The time limits specified to reach lower MODES of operation permit the shutdown to proceed in a controlled and orderly manner that is well within the specified maximum cooldown rate and within the cooldown capabilities of the facility assuming only the minimum required equipment is OPERABLE. This reduces thermal stresses on components of the primary coolant system and the potential for a plant upset that could challenge safety systems under conditions for which this specification applies.

If remedial measures permitting limited continued operation of the facility under the provisions of the ACTION requirements are completed, the shutdown may be terminated. The time limits of the ACTION requirements are applicable from the point in time there was a failure to meet a Limiting Condition for Operation. Therefore, the shutdown may be terminated if the ACTION requirements have been met or the time limits of the ACTION requirements have not expired, thus providing an allowance for the completion of the required actions.

The time limits of Specification 3.0.3 allow 37 hours for the plant to be in the COLD SHUTDOWN MODE when a shutdown is required during the POWER MODE of

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with the provisions of the ACTION requirements. The provisions of this specification should not, however, be interpreted as endorsing the failure to exercise good practice in restoring systems or components to OPERABLE status before plant startup.

When a shutdown is required to comply with ACTION requirements, the provisions of Specification 3.0.4 do not apply because they would delay placing the facility in a lower MODE of operation.

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 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. It is not intended that this provision be used repeatedly as a convenience to extend surveillance intervals beyond that specified for surveillances that are performed during normal operation. The limitation of Specification 4.0.2 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. This provision is 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 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 requirements of a Limiting Condition for Operation that is subject to enforcement action. Further, the failure to perform a surveillance within the provisions of Specification 4.0.2 is a violation of a Technical Specification requirement and is, therefore, a reportable event under the requirement of 10 CFR 50.73(a)(2)(i)(B) because it is a condition prohibited by the plant's Technical Specification.

If the allowable outage time limits of the ACTION requirements are less than 24 hours or a shutdown is required to comply with ACTION requirements, e.g., Specification 3.0.3, a 24-hour allowance is provided to permit a delay in implementing the ACTION requirements. This provides an adequate time limit to complete Surveillance Requirements that have not been performed. The purpose of this allowance is to permit the completion of a surveillance before a shutdown is required to comply with ACTION requirements or before other remedial measures would be required that may preclude completion of a surveillance. The basis for this allowance includes consideration for plant conditions, adequate planning, availability of personnel, the time required to performed the surveillance, and the safety significance of the delay in completing the required surveillance. This provision also provides a time limit for the completion of Surveillance Requirements that become applicable as a consequence of MODE changes imposed by ACTION requirements and for completing Surveillance Requirements that are applicable when an exception to the requirements of Specification 4.0.4 is allowed. If a surveillance is not completed within the 24-hour allowance, the time limits of the ACTION requirements are applicable at that time. When a surveillance is performed within the 24-hour allowance and the Surveillance Requirements are not met, the time limits of the ACTION requirements are applicable at the time that the surveillance is terminated.