

ENCLOSURE 1

PROPOSED TECHNICAL SPECIFICATION CHANGE

SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2

DOCKET NOS. 50-327 AND 50-328

(TVA-SQN-TS-88-05)

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APPLICABILITY

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:

- a. A maximum allowable extension not to exceed 25% of the surveillance interval, but
- b. The combined time interval for any 3 consecutive surveillance intervals shall not exceed 3.25 times the specified surveillance interval.

4.0.3 ~~Failure to perform a Surveillance Requirement within the specified time interval shall constitute a failure to meet the OPERABILITY requirements for a Limiting Condition for Operation. Exceptions to these requirements are stated in the individual Specifications. 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 specified 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).

Replace
entire
paragraph
with
revised
Specification
4.0.3

FP

Revised Specification 4.0.3

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.

APPLICABILITY

BASES

instead, provided the other specified conditions are satisfied. In this case, this would mean that for one division the emergency power source must be OPERABLE (as must be the components supplied by the emergency power source) and all redundant systems, subsystems, trains, components and devices in both divisions must also be OPERABLE. If these conditions are not satisfied, action is required in accordance with this specification.

MODES 5 or 6, Specification 3.0.5 is not applicable, and thus the individual LIMITATION statements for each applicable Limiting Condition for Operation in these MODES must be adhered to.

4.0.1 This specification provides that surveillance activities necessary to insure the Limiting Conditions for Operation are met and will be performed during the OPERATIONAL MODES or other conditions for which the Limiting Conditions for Operation are applicable. Provisions for additional surveillance activities to be performed without regard to the applicable OPERATIONAL MODES or other conditions are provided in the individual Surveillance Requirements. Surveillance Requirements for Special Test Exceptions need only be performed when the Special Test Exception is being utilized as an exception to an individual Specification.

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 value and permits the performance of more frequent surveillance activities.

The tolerance values, taken either individually or consecutively over 3 test intervals, are sufficiently restrictive to ensure that the reliability associated with the surveillance activity is not significantly degraded beyond that obtained from the nominal specified interval.

~~4.0.3 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.~~

Replace
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with revised
Specification
4.0.3 bases

SEP 17 1980

Revised Technical Specification 4.0.3 Bases

This specification 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 requirements of 10 CFR 50.73(a)(2)(i)(B) because it is a condition prohibited by the plant's Technical Specifications.

If the allowable outage time limits of the ACTION requirement are less than 24 hours (the allowable outage time limits are defined as the first timeframe encountered in the ACTION requirement) 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 perform 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.

Surveillance Requirements do not have to be performed on inoperable equipment because the ACTION requirements define the remedial measures that apply. However, the Surveillance Requirements have to be met to demonstrate that inoperable equipment has been restored to OPERABLE status.

APPLICABILITY

BASES

Replace
entire
paragraph
with
revised
Specification
4.0.4
bases.

~~4.0.4 This specification ensures that the surveillance activities associated with a Limiting Condition for Operation have been performed within the specified time interval prior to entry into an OPERATIONAL MODE or other applicable condition. 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 startup or following extended plant outages, the applicable surveillance activities must be performed within the stated surveillance interval prior to placing or returning the system or equipment into OPERABLE status.~~

4.0.5 This specification ensures that 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 will be performed in accordance with a periodically updated version of Section XI of the ASME Boiler and Pressure Vessel Code and Addenda as required by 10 CFR 50.55a. Relief from any of the above requirements has been provided in writing by the Commission and not a part of these technical specifications.

This specification includes a clarification of the frequencies for performing the inservice inspection and testing activities required by Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda. This clarification is provided to ensure consistency in surveillance intervals throughout these technical specifications and to remove any ambiguities relative to the frequencies for performing the required inservice inspection and testing activities.

Under the terms of this specification, the more restrictive requirements of the Technical Specifications take precedence over the ASME Boiler and Pressure Vessel Code and applicable Addenda. For example, the requirements of Specification 4.0.4 to perform surveillance activities prior to entry into an OPERATIONAL MODE or other specified applicability condition takes precedence over the ASME Boiler and Pressure Vessel Code provision which allows pumps to be tested up to one week after return to normal operation. And for example, the Technical Specification definition of OPERABLE does not grant a grace period before a device that is not capable of performing its specified function is declared inoperable and takes precedence over the ASME Boiler and Pressure Vessel Code provision which allows a valve to be incapable of performing its specified function for up to 24 hours before being declared inoperable.

REVISED SPECIFICATION 4.0.4 BASES

4.0.4 establishes the requirement that all applicable surveillances must be met before entry into an OPERATIONAL MODE or other condition of operation specified in the Applicability statement. The purpose of this specification is to ensure that system and component OPERABILITY requirements or parameter limits are met before entry into a MODE or condition for which these systems and components ensure safe operation of the facility. This provision applies to changes in OPERATIONAL MODES or other specified conditions associated with plant shutdown as well as startup.

Under the provisions of this specification, the applicable Surveillance Requirements must be performed within the specified surveillance interval to ensure that the Limiting Conditions for Operation are met during initial plant startup or following a plant outage.

When a shutdown is required to comply with ACTION requirements, the provisions of Specification 4.0.4 do not apply because this would delay placing the facility in a lower MODE of operation.

APPLICABILITY

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.

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- b. The combined time interval for any 3 consecutive surveillance intervals shall not exceed 3.25 times the specified surveillance interval.

Replace entire paragraph with revised Specification 4.0.3

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- b. Surveillance intervals specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda for the inservice inspection and testing activities required by the ASME Boiler and Pressure Vessel Code and applicable Addenda shall be applicable as follows in these Technical Specifications:

<u>ASME Boiler and Pressure Vessel Code and applicable Addenda terminology for inservice inspection and testing activities</u>	<u>Required frequencies for performing inservice inspection and testing activities</u>
Weekly	At least once per 7 days
Monthly	At least once per 31 days
Quarterly or every 3 months	At least once per 92 days
Semiannually or every 6 months	At least once per 184 days
Every 9 months	At least once per 276 days
Yearly or annually	At least once per 366 days.

Revised Specification 4.0.3

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APPLICABILITY

BASES

3.0.5 (Continued)

specified conditions are satisfied. In this case, this would mean that for one division the emergency power source must be OPERABLE (as must be the components supplied by the emergency power source) and all redundant systems, subsystems, trains, components and devices in both divisions must also be OPERABLE. If these conditions are not satisfied, action is required in accordance with this specification.

In MODES 5 or 6, Specification 3.0.5 is not applicable, and thus the individual ACTION statements for each applicable Limiting Condition for Operation in these MODES must be adhered to.

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Revised Technical Specification 4.0.3 Bases

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4.0.5 This specification ensures that 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 will be performed in accordance with a periodically updated version of Section XI of the ASME Boiler and Pressure Vessel Code and Addenda as required by 10 CFR 50.55a. Relief from any of the above requirements has been provided in writing by the Commission and is not a part of these Technical Specifications.

This specification includes a clarification of the frequencies for performing the inservice inspection and testing activities required by Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda. This clarification is provided to ensure consistency in surveillance intervals throughout these Technical Specifications and to remove any ambiguities relative to the frequencies for performing the required inservice inspection and testing activities.

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REVISED SPECIFICATION 4.0.4 BASES

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Under the provisions of this specification, the applicable Surveillance Requirements must be performed within the specified surveillance interval to ensure that the Limiting Conditions for Operation are met during initial plant startup or following a plant outage.

When a shutdown is required to comply with ACTION requirements, the provisions of Specification 4.0.4 do not apply because it is would delay placing the facility in a lower MODE of operation.

ENCLOSURE 2

PROPOSED TECHNICAL SPECIFICATION CHANGE

SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2

DOCKET NOS. 50-327 AND 50-328

(TVA-SQN-TS-88-05)

DESCRIPTION AND JUSTIFICATION FOR
PROPOSED REVISION TO SPECIFICATIONS
4.0.3 AND 4.0.4

ENCLOSURE 2

Description of Change

Tennessee Valley Authority proposes to modify the Sequoyah Nuclear Plant Units 1 and 2 Technical Specifications to revise specifications 4.0.3 and 4.0.4 for the purpose of improving and clarifying their applicability. These changes are consistent with the provisions of Generic Letter (GL) 87-09. The following provides a description of each proposed change.

1. Surveillance Requirement (SR) 4.0.3

Clarification statements have been added to SR 4.0.3 to include a 24-hour delay to action requirements to permit completion of a missed surveillance when the limits of the action requirements are less than 24 hours.

2. Bases to Specification 4.0.3

Additional clarification statements have been added and expanded to define the basis for the 24-hour allowance. These include consideration for plant conditions, adequate planning, availability of personnel, the time required to perform the required surveillance, and the safety significance of the delay in completing the required surveillance. The bases also state that, if the 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 the surveillance is terminated.

3. SR 4.0.4

A clarification statement has been added to note that the provisions of specification 4.0.4 shall not prevent passage through or to operational modes as required to comply with action requirements.

4. Bases to Specification 4.0.4

The bases to specification 4.0.4 have been modified to better define the specific conditions under which surveillance requirements must be met. The first condition applies to plant startups. Under this condition, all applicable surveillance requirements must be performed within the specified surveillance interval to ensure that the limiting conditions for operation (LCO) are met.

The second condition applies to when a plant shutdown is required to comply with action requirements. Under this condition, the provisions of specification 4.0.4 for performance of applicable surveillances do not apply because this would delay placing the facility in a lower mode of operation.

GL 87-09 recommended changes to three technical specifications (i.e., 3.0.4, 4.0.3, and 4.0.4). SQN is pursuing only two of the three changes. Attachment 1 to enclosure 2 provides a discussion of why specification 3.0.4 will not be pursued by TVA.

Reason for Change

The proposed changes to specifications 4.0.3 and 4.0.4 were provided in GL 87-09 as part of the recent initiative by NRC to improve technical specifications.

1. Specification 4.0.3

The modification to specification 4.0.3 is an administrative change that remedies the problem of unnecessary shutdowns caused by missed surveillances. Specification 4.0.3 states that the failure to perform a surveillance within the specified time interval shall constitute a failure to meet the LCO's operability requirements. Therefore, if the surveillance is not performed, the LCO would not be met.

Generally, the action requirements include a specified time interval that permits corrective action to be taken to satisfy the LCO. The completion of a missed surveillance within the time interval satisfies specification 4.0.3.

Some action requirements have time limits less than 24 hours, which does not establish a practical time limit for completion of a missed surveillance requirement. If surveillances cannot be completed within these time limits, a plant shutdown would usually be required. Even if the action requirements include remedial measures that would permit continued operations, they may be stated in such a way that they could prevent the performance of the required surveillance.

A plant shutdown would also be required if the missed surveillance applies to more than the minimum number of systems or components required to be operable for operation. In this case, the action requirements of the individual specification (or specification 3.0.3) would require a shutdown because multiple components or systems may be affected.

2. Specification 4.0.4

The proposed change to specification 4.0.4 is an administrative change that remedies conflicts that exist between specifications 4.0.3 and 4.0.4 with regard to mode changes.

Specification 4.0.4 prohibits entry into an operational mode or other specified condition when surveillance requirements have not been performed within the specified surveillance interval. A conflict with specification 4.0.4 exists when a mode change is required as a consequence of shutdown action requirements and when the surveillance requirements that become applicable have not been performed within the specified surveillance interval. For example, the plant could previously have been in a mode for which the surveillance requirements were not applicable; and as a result, the surveillance may not have been performed within the specified time interval. Consequently, the action requirements of the LCO associated with these surveillance requirements apply; and the unit may have to be placed in a lower mode of operation than that required by the original shutdown action requirement. This problem has been alleviated by the proposed change to specification 4.0.3 to permit a delay of up to 24 hours in the applicability of the action requirements.

A conflict continues to exist with specification 4.0.4 because this requires performance of the surveillances before entering a mode for which they apply. The proposed change to specification 4.0.4 resolves this problem by making specification 4.0.4 not applicable when a mode change is required to comply with action requirements. The conflict is eliminated because the provisions of the change clarify the conditions for which mode changes are allowed.

Justification for Change

The proposed changes to specifications 4.0.3 and 4.0.4 provide improvements and clarifications that remove unnecessary operational restrictions that could lead to unnecessary plant shutdowns. These improvements are both purely administrative in nature and do not affect plant hardware or the facility. A detailed justification for each proposed change is provided below.

1. Specification 4.0.3

Specification 4.0.3 states that failure to perform a surveillance within the specified time interval shall constitute a failure to meet the LCO's operability requirements. Therefore, if a surveillance requirement is not met as a result of the failure to schedule the performance of the surveillance, the LCO would not be met. The LCO's action requirements must then be met when the surveillance that verifies the operability of a system or component is not performed because the component or system is considered inoperable.

Some action requirements have a specified time interval that will allow the completion of a missed surveillance. The time limit may, however, be of such short duration less than 24 hours that performance of a missed surveillance could not be accomplished. A plant shutdown would usually be required if the surveillance cannot be completed. A missed surveillance does not make a system or component inoperable. To assume that systems or components are inoperable solely on the fact that a surveillance requirement has not been performed is overly conservative. Because some action requirements do not provide an appropriate time limit for performing a missed surveillance, the proposed change to specification 4.0.3 to allow a 24-hour delay of the required action would provide a reasonable time for performing the missed surveillance.

Additional justification for this change exists in the area of safety. Conducting a missed surveillance would normally occur during the shutdown process. In some cases, the completion of the missed surveillance could terminate the shutdown requirement. It is undesirable to expedite completion of a missed surveillance during a plant shutdown because this forces the plant into a transient condition during a controlled shutdown. Changes in plant condition offer the potential for an upset that could lead to a demand for the system or component being tested. This potential is unfavorable and could increase the risk to the plant and public safety.

2. Specification 4.0.4

Specification 4.0.4 prohibits entry into an operational mode or other specified condition when surveillance requirements have not been performed within the specified surveillance interval. The purpose of the specification is to ensure that systems and components meet their operability requirements before entry into a mode for which the system or component is required for safe operation. In the case of a plant shutdown required by action requirements, a conflict can exist between the requirement for performance of surveillances and the shutdown action requirements. Because specification 4.0.4 requires that surveillances be performed before entering a mode for which they apply, both the surveillance requirements and the action requirements must be met during the shutdown process to remain in compliance with specification 4.0.4.

It is undesirable to require performance of surveillances during plant shutdowns for two reasons. First, the plant would be in a transient state with changing plant conditions. This offers the potential for a plant upset that could lead to a demand for the system or component being tested. Generally, systems or components are taken out of service to allow performance of a surveillance test. This creates an undue risk to the plant and public safety to remove systems or components while the plant is undergoing changes in state.

Second, the demand on plant operators to expeditiously complete a required surveillance could further increase the potential for a plant upset and unduly challenge the plant safety systems. The risk associated with completing a surveillance during a plant shutdown is nonconservative and could delay placing the facility in a lower mode of operation when shutdown action requirements are in effect. The conservative alternative is to clarify specification 4.0.4 to state that the requirement for performance of surveillances does not apply when a shutdown is required to comply with action requirements.

ENCLOSURE 3

PROPOSED TECHNICAL SPECIFICATION CHANGES

SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2

DOCKET NOS. 50-327 AND 50-328

(TVA-SON-TS-88-C)

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS

Significant Hazards Evaluation

TVA has evaluated the proposed TS change 88-05 and determined that it does not represent a significant hazards consideration based on criteria established in 10 CFR 50.92(c). Operation of SQN in accordance with the proposed amendment will not:

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed changes are administrative in nature and do not impact or affect plant hardware. The improvements provided by these changes could decrease the probability of a plant transient by minimizing unnecessary plant shutdowns. The clarification of specifications 4.0.3 and 4.0.4 eliminates a conflict that could: (1) increase the potential for a plant upset, and/or (2) challenge plant safety systems. Consistent application of these administrative specifications will reduce the potential for human error during plant shutdowns and will result in a safer conduct of operation. These changes will in no way affect the operability of plant equipment or hardware. Consequently, the level of safety is not reduced.

- (2) Create the possibility of a new or different kind of accident from any previously analyzed.

No new accident scenarios will be created by these changes because the proposed changes are administrative in nature and do not impact or affect plant hardware. The administrative change to specification 4.0.3 for allowing a 24-hour delay of action requirements provides a practical time limit for completing a missed surveillance. The alternative to delaying the action requirement would be to attempt the performance of the missed surveillance in a time interval less than 24 hours (i.e., some action requirements have corrective time intervals of only one or two hours). The time constraints imposed by the action requirement for completing a missed surveillance create the potential for a plant transient and challenge to safety systems.

The administrative change to specification 4.0.4 will clarify the conditions under which the provisions of this specification apply. The new provisions of specification 4.0.4 remove the time restrictions for performing surveillances during the shutdown process and allows the

shutdown action requirements to take precedence over the surveillance requirements. These provisions prevent delays in placing the facility in a lower mode of operation and remove the pressure on the plant staff to expeditiously complete required surveillances. This results in a safer, more controlled operational environment during plant shutdowns. The possibility for a new or different kind of accident from any previously analyzed has not been created.

- (3) Involve a significant reduction in a margin of safety.

The provisions of specification 4.0.4 have been modified to allow the shutdown action requirements to take precedence over the surveillance requirements. This is desirable because it prevents a delay in the shutdown of the facility resulting from the performance of surveillances. This administrative change raises the margin of safety by removing the potential for human error and plant upsets that could occur during the performance of surveillances.

Specification 4.0.3, which provides the 24-hour delay for performance of a missed surveillance, will increase the margin of safety by providing a reasonable time limit for the completion of a missed surveillance. Completing missed surveillances within narrow timeframes of less than 24 hours places an undue demand on the plant staff and increases the risk of a plant upset and challenge to safety systems.

By allowing the 24-hour delay to complete missed surveillances, unnecessary shutdowns and plant transients are averted.

ATTACHMENT 1

Additional guidance was provided in GL 87-09 for modifying specification 3.0.4. The GL discusses the problem with specification 3.0.4 regarding unnecessary restrictions on mode changes.

Discussion of the Problem

Specification 3.0.4 states that entry into an operational mode shall not be made unless the LCO is met without reliance on the provisions of the action requirements. Its intent is to ensure that a higher mode of operation is not entered when required equipment is inoperable or when parameters exceed their specified limits.

This precludes a plant startup when actions are being taken to satisfy an LCO, which--if not completed within the time limits of the action requirements--would result in a plant shutdown to comply with the action requirements. In certain cases, the action requirements would permit continued operation of the facility for an unlimited period of time. Generally, the individual specifications that allow continued operation note that specification 3.0.4 does not apply (exception). The concern expressed in the GL is that the exceptions to specification 3.0.4 have not been consistently applied.

Change to Specification 3.0.4 Proposed in the GL

The change to specification 3.0.4 as given in the GL would define the conditions under which its requirements do apply. Specification 3.0.4 would be revised to state:

Entry into an OPERATIONAL MODE or other specified condition shall not be made when the conditions for the Limiting Conditions for Operation are not met and the associated ACTION requires a shutdown if they are not met within a specified time interval. Entry into an OPERATIONAL MODE or specified condition may be made in accordance with ACTION requirements when conformance to them permits continued operation of the facility for an unlimited period of time.

As a consequence of this modification to specification 3.0.4, the individual exceptions (indicating that specification 3.0.4 does not apply) would no longer be needed. The GL states that a revision to delete the noted exceptions would avoid confusion about the applicability of specification 3.0.4.

Reasons For Not Incorporating the Proposed Change to SQN's Specification 3.0.4

Discussions with the Operations Staff, shift technical advisors, and members of the Plant Operations Review Staff indicate that SQN's current technical specifications provide clear guidance as to the applicability of 3.0.4. SQN's technical specifications have been reviewed and found to contain consistent application of the exemptions to specification 3.0.4.

The proposed revision as provided by GL 87-09 would not provide significant benefit to SQN's present technical specifications in resolving the problem of inconsistent application of the exceptions to specification 3.0.4. Removing these exemptions could, in some cases, result in misinterpretations of the applicability of specification 3.0.4 when the individual exemptions are not specifically provided with each action requirement. Furthermore, the revised specification would require constant reference between the system or component specification and 3.0.4. The present format has the 3.0.4 exception within each system/component specification. TVA believes that for SQN the present format provides a clearer approach that is less likely to lead to an error of application or interpretation.

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