



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION V

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ENCLOSURE 1

MAR 18 1987

MEMORANDUM FOR: Harold R. Denton, Director  
Office of Nuclear Reactor Regulation

FROM: J. B. Martin, Regional Administrator  
Region V

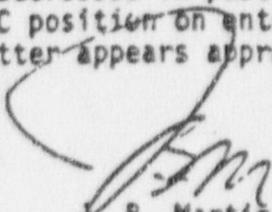
SUBJECT: INTENTIONAL ENTRY INTO TECHNICAL SPECIFICATION  
LIMITING CONDITION FOR OPERATION 3.0.3

As the result of our review of a recent event which occurred at the Palo Verde site, wherein a shift supervisor intentionally bypassed an engineered safety feature as an apparent operational convenience, and thereby entered limiting condition for operation (LCO) 3.0.3, Region V has concluded that it may be beneficial for the NRC to reiterate to both the NRC staff and power reactor licensees, the intent of LCO 3.0.3 and our expectations concerning licensee management control of entry into LCO 3.0.3. Licensee entry into this section of the Technical Specifications appears to occur for one of the following three reasons:

- Unintentional entry due to equipment failure, design error, procedural error, or personnel error, which places the facility outside the ACTION statement of other LCO's.
- Intentional entry to perform a maintenance or surveillance task on equipment with some type of unusual design feature which necessitates entry into LCO 3.0.3 to perform the task.
- Intentional entry for operational convenience.

Region V recognizes that occasional entry into LCO 3.0.3 for surveillance or maintenance purposes may be appropriate, however, this activity should be well thought-out in advance and strictly controlled by management oversight and appropriate procedures. Further, licensees should be encouraged to eliminate, where practical, those design features which result in repeated entries into LCO 3.0.3. Region V contends that intentional entry into LCO 3.0.3 for operational convenience should not be made, except under extremely unusual circumstances where a detailed review by the licensee has concluded that no reduction in safety will result.

Although this issue may have been addressed in past NRC guidance to licensees, a reiteration of the NRC position on entry into LCO 3.0.3 via an Information Notice or a Generic Letter appears appropriate.

  
J. B. Martin, Regional Administrator  
Region V

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BASES

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.

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