Temporary Changes to Technical Specifications Based on the Standard Technical Specifications

Writer's Guide

- TSTF-GG-05-01, "Writer's Guide for Plant-Specific Improved Technical Specifications" (ADAMS Accession No. ML070660229)
  - Section 2.8, "Format Issues Related to Future License Amendments," paragraph 2.8.2, "Temporary Changes:"

Temporary changes are added to the Technical Specifications to allow a one-time, time-limited, or condition-based changes to the stated requirements (e.g., "Not required to be met during Cycle 5" or "Not required to be performed until the first entry into MODE 5 that occurs after the Cycle 12 refueling." Temporary changes added to the Technical Specifications should follow the format described in this document. Do not use footnotes for temporary changes, except as allowed for figures and tables. Temporary changes may be expressed as Notes to the changed requirement or may be explicitly stated as changes to existing requirements. Whichever format is selected, the conditions under which the change applies should be clearly stated. This allows the users of the Technical Specifications to readily identify whether the temporary change applies. Bases should be provided describing the temporary change, the circumstances for its use, and the conditions for its removal from the Technical Specifications.

Excerpt from EXCEL's Course, "Researching and Modifying Plant Technical Specifications"

Temporary Changes

- **Biggest cause of non-standard TS**
- For one-time, time-limited, or condition-based changes (e.g., "Not required to be met during Cycle 5") **follow the standard ITS format**.
- In the ITS, do not use footnotes for temporary changes, except as allowed for figures and tables.
  - Use standard TS format notes to add the exception or to change the existing requirements.

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Temporary Changes

- Clearly state the conditions under which the temporary change applies.
  - "Until Mode 3 is entered for Cycle 12, not required to be met on Control Rod 14."
  - "Prior to EPU implementation, RTP shall be a total reactor core heat transfer rate to the reactor coolant of 2544 MWt. Following EPU implementation, RTP shall be a total reactor core heat transfer rate to the reactor coolant of 2817 MWt."
- Provide Bases describing the temporary change.

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Example: Temporary Action

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. One demand position indicator per bank inoperable for one or more banks.*	D.1.1 Verify by administrative means all RPIs for the affected banks are OPERABLE. AND	Once per 8 hours

*During [redacted] Unit 2 Cycle 22, the Condition of two demand position indicators per bank inoperable for one or more banks is allowed with a Required Action to restore one demand position indicator per bank and a Completion Time of 4 hours provided the Rod Control System is immediately placed in a condition incapable of automatic rod movement and verify by administrative means that the RPIs for the affected banks are OPERABLE and the rods are aligned within 12 steps. If the 4 hour Completion Time is not met, enter Condition E.

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Temporary Action Presented in ITS Format

E. NOTE Only applicable during Unit 2, Cycle 22. --- Two demand position indicators per bank inoperable for one or more banks.	E.1 Place the control rods under manual control. AND E.2 Verify by administrative means all [D]RPIs for the affected banks are OPERABLE. AND E.3 Verify the most withdrawn rod and the least withdrawn rod of the affected banks are ≤ 12 steps apart. AND E.4 Restore one demand position indicator per bank.	Immediately ??? ??? 4 hours




Example: Surveillance Exception

SURVEILLANCE	FREQUENCY
SR 3.8.1.10 ----------NOTES---------- 1. All DG starts may be preceded by an engine prelube period. 2. This Surveillance shall not be performed in MODE 1, 2, 3, or 4. 3. 12 Battery Charger not required to be energized in SR 3.8.1.10(c) until completion of this SR during Unit 1 2011 refueling outage.* ---------- Verify on an actual or simulated loss of offsite power signal in conjunction with an actual or simulated safety injection actuation signal: a. De-energization of emergency buses; b. Load shedding from emergency buses; and c. DG auto-starts from standby condition and energizes emergency loads in $\leq$ 60 seconds.	24 months

*A modification will be installed during or prior to the Unit 1 2011 refueling outage to assure the 12 Battery Charger is automatically powered from its normal bus within 60 seconds. Compliance with this SR will be demonstrated after implementation of the modification.

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Surveillance Exception

- Does the footnote provide any requirement or exceptions?
  - "A modification will be installed during or prior to the Unit 1 2011 refueling outage to assure the 12 Battery Charger is automatically powered from its normal bus within 60 seconds."
    - Statement of Fact. Should be in the Bases.
  - "Compliance with this SR will be demonstrated after implementation of the modification."
    - Not needed. Once the exception expires, SR 3.0.1 requires the SR to be met.

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Surveillance Exception

- Note 3 could have been written:

  "Prior to first entry into Mode 4 of Cycle XX, automatic energization of the 12 Battery Charger emergency load in ≤ 60 seconds is not required to be met."

Example: Deferred Implementation of an LAR

- A plant plans to submit an EPU LAR but defer implementation for over a year.
- What are the options for maintaining the integrity of the TS?
  - Defer implementing pages.
    - LARs are part of the license when issued. How would an emergency amendment to the pages be written?
  - Defer Effective Date for LAR
    - Used for decommissioning TS.
  - Add footnotes
    - Doesn't follow format or usage rules.
  - Include pre- and post- EPU requirements as Notes and separate instrument tables.
    - Works, but may be confusing.
  - Duplicate the specifications with different Applicabilities.
    - Cleanest approach.

Considerations

- It is easy to forget the impact of temporary changes. Footnotes make it easy to overlook.
- For example, extending a Completion Time to permit piping replacement must consider periods when the redundant train must be removed from service for Surveillance Testing of the redundant train or of supported equipment.
  - Could result in a plant shutdown under LCO 3.0.3 if not addressed.
- Review all Actions and SRs and consider other operations that could occur during the use of the temporary change.

Discussion