

ENCLOSURE 2

VOLUME 5

TURKEY POINT NUCLEAR GENERATING STATION UNIT 3 AND UNIT 4

IMPROVED TECHNICAL SPECIFICATIONS CONVERSION

ITS SECTION 3.0 LCO AND SR APPLICABILITY

Revision 1

LIST OF ATTACHMENTS

- 1. ITS Section 3.0 – LCO and SR Applicability**

ATTACHMENT 1

ITS Section 3.0 – LCO and SR Applicability

**Current Technical Specification (CTS) Markup
and Discussion of Changes (DOCs)**

~~SECTIONS 3.0 AND 4.0~~
~~LIMITING CONDITIONS FOR OPERATION~~
~~AND~~
~~SURVEILLANCE REQUIREMENTS~~

A01

3.4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS

3.4.0 APPLICABILITY

LIMITING CONDITIONS FOR OPERATION

LCO 3.0.1 3.0.1 LCOs shall be met during the MODES or other specified conditions in the Applicability, except as provided in LCO 3.0.2, LCO 3.0.7, LCO 3.0.8, and LCO 3.0.9

LCO 3.0.2 3.0.2 Upon discovery of a failure to meet an LCO, the ACTIONS shall be met, except as provided in LCO 3.0.3 and LCO 3.0.7. If the LCO is met or is no longer applicable prior to expiration of the specified time interval, completion of the ACTION(S) is not required unless otherwise stated.

LCO 3.0.3 3.0.3 When a Limiting Condition for Operation is not met, except as provided in the associated ACTION requirements, within 1 hour action shall be initiated to place the unit, as applicable, in:

- a. At least HOT STANDBY within the next 6 hours,
b. At least HOT SHUTDOWN within the following 6 hours, and
c. At least COLD SHUTDOWN within the subsequent 24 hours.

Exceptions to these requirements are stated in the individual specifications.

Where corrective measures are completed that permit operation under the ACTION requirements, the action may be taken in accordance with the specified time limits as measured from the time of failure to meet the Limiting Condition for Operation.

This specification is not applicable in MODES 5 or 6.

LCO 3.0.4 3.0.4 When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall only be made:

- a. When the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time;
b. After performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate; exceptions to this Specification are stated in the individual Specifications; or
c. When an allowance is stated in the individual value, parameter, or other Specification.

This Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.

A01

INSERT 1

is not provided, or if directed by the associated ACTIONS, the unit shall be placed in a MODE or other specified condition in which the LCO is not applicable. Action shall be initiated

A04

A01

3.0 LCO
APPLICABILITY

~~LIMITING CONDITIONS FOR OPERATION (Continued)~~

LCO 3.0.10 3.0.5 ~~Limiting Conditions for Operation including~~ the associated ~~ACTION requirements~~ shall apply to each unit individually unless otherwise indicated as follows:

- a. Whenever the ~~Limiting Conditions for Operation~~ refers to systems or components which are shared by both units, the ~~ACTION requirements~~ will apply to both units simultaneously.
- b. Whenever the ~~Limiting Conditions for Operation~~ applies to only one unit, this will be identified in the APPLICABILITY section of the specification; and
- c. Whenever certain portions of a specification contain operating parameters, Setpoints, etc., which are different for each unit, this will be identified in parentheses, footnotes or body of the requirement.

LCO 3.0.5 3.0.6 Equipment removed from service or declared inoperable to comply with ~~ACTION requirements~~ may be returned to service under administrative controls solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to LCO ~~3.0.1 and~~ 3.0.2 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY.

LCO 3.0.6 3.0.7 When a supported system LCO is not met solely due to a support system LCO not being met, the ~~ACTIONS~~ associated with this supported system are not required to be entered. Only the support system LCO ACTIONS are required to be entered. This is an exception to LCO 3.0.2 for the supported system. In this event, an evaluation shall be performed in accordance with Specification ~~6.8.4.g~~, "Safety Function Determination Program (SFDP)." If a loss of safety function is determined to exist by this program, the appropriate ~~ACTIONS~~ of the LCO in which the loss of safety function exists are required to be entered.

When a support system's ~~ACTION~~ directs a supported system to be declared inoperable or directs entry into ~~the ACTIONS~~ for a supported system, the applicable ~~ACTIONS~~ shall be entered in accordance with LCO 3.0.2.

LCO 3.0.7 ← INSERT 2

LCO 3.0.9 ← INSERT 3

A01

A01

A03

A01

A08

A03

A01

A03

A09

L01

A01

A09

INSERT 2

- 3.0.7 Test Exception LCO 3.1.8 allows specified Technical Specification (TS) requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. Compliance with Test Exception LCOs is optional. When a Test Exception LCO is desired to be met but is not met, the ACTIONS of the Test Exception LCO shall be met. When a Test Exception LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall be made in accordance with the other applicable Specifications.

L01

INSERT 3

- 3.0.9 When one or more required barriers are unable to perform their related support function(s), any supported system LCO(s) are not required to be declared not met solely for this reason for up to 30 days provided that at least one train or subsystem of the supported system is OPERABLE and supported by barriers capable of providing their related support function(s), and risk is assessed and managed. This specification may be concurrently applied to more than one train or subsystem of a multiple train or subsystem supported system provided at least one train or subsystem of the supported system is OPERABLE and the barriers supporting each of these trains or subsystems provide their related support function(s) for different categories of initiating events.

If the required OPERABLE train or subsystem becomes inoperable while this specification is in use, it must be restored to OPERABLE status within 24 hours or the provisions of this specification cannot be applied to the trains or subsystems supported by the barriers that cannot perform their related support function(s).

At the end of the specified period, the required barriers must be able to perform their related support function(s) or the supported system LCO(s) shall be declared not met.

APPLICABILITY

(SR) APPLICABILITY

SURVEILLANCE REQUIREMENTS

SR 3.0.1 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. 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. Surveillance Requirements do not have to be performed on inoperable equipment.

Annotations: in the Applicability for individual LCOs, SRs, specified, the SR, INSERT 4, specified Frequency, or variables outside specified limits, be failure to meet the LCO except as provided in SR 3.0.3

SR 3.0.2 4.0.2 Each Surveillance Requirement shall be performed within the specified time interval with a maximum allowable extension not to exceed 25% of the surveillance interval. If an ACTION item requires periodic performance on a "once per . . ." basis, the above frequency extension applies to each performance after the initial performance. Exceptions to this Specification are stated in the individual Specifications.

Annotations: INSERT 5, Completion Time

SR 3.0.3 4.0.3 If it is discovered that a Surveillance was not performed within its specified frequency, then compliance with the requirement to declare the Limiting Condition of Operation not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified frequency, whichever is greater. This delay period is permitted to allow performance of the Surveillance. A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.

Annotations: LCO, INSERT 6

If the surveillance is not performed within the delay period, the Limiting Condition of Operation must immediately be declared not met, and the applicable ACTION(s) must be entered.

Annotations: LCO, Condition

When the Surveillance is performed within the delay period and the Surveillance is not met, the Limiting Condition of Operation must immediately be declared not met, and the applicable ACTION(s) must be entered.

Annotations: LCO, Condition

SR 3.0.4 4.0.4 Entry into a MODE or other specified condition in the Applicability of an LCO shall only be made when the LCO's Surveillances have been met within their specified frequency, except as provided by Specification 4.0.3. When an LCO is not met due to Surveillances not having been met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with Specification 3.0.4.

Annotations: SR 3.0.3, LCO

This provision shall not prevent entry into MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.

4.0.5 DELETED

a. DELETED

A01

INSERT 4

Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO.

INSERT 5

The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met.

A10

For Frequencies specified as "once," the above interval extension does not apply.

M02

L01

INSERT 6

The delay period is only applicable when there is a reasonable expectation the Surveillance will be met when performed.

3.0 SR

APPLICABILITY

A01

~~SURVEILLANCE REQUIREMENTS (CONTINUED)~~

- ~~b. DELETED~~
- ~~c. DELETED~~
- ~~d. DELETED~~
- ~~e. DELETED~~
- ~~f. DELETED~~

A01

SR 3.0.5 4.0.6 Surveillance Requirements shall apply to each unit individually unless otherwise indicated as stated in Specification 3.0.5 for individual specifications or whenever certain portions of a specification contain surveillance parameters different for each unit, which will be identified in parentheses, footnotes or body of the requirement.

LCO 3.0.10

A01

PLANT SYSTEMS

3/4.7.6 SNUBBERS

LIMITING CONDITION FOR OPERATION

~~3.7.6 All snubbers shall be OPERABLE. The only snubbers excluded from the requirements are those installed on nonsafety-related systems and then only if their failure or failure of the system on which they are installed would have no adverse effect on any safety-related system.~~

LA01

~~APPLICABILITY: MODES 1, 2, 3, and 4. MODES 5 and 6 for snubbers located on systems required OPERABLE in those MODES.~~

ACTION:

~~With one or more snubbers inoperable on any system, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status and determine the impact on the attached component by evaluation in accordance with Specification 4.7.6, or declare the attached system inoperable and follow the appropriate ACTION statement for that system.~~ ← INSERT 7

LCO 3.0.8

M01

SURVEILLANCE REQUIREMENTS

~~4.7.6 Each snubber shall be demonstrated OPERABLE by performance of the Snubber Testing Program in Specification 6.8.4.m.~~

LA01

INSERT 7

- LCO 3.0.8 3.0.8 When one or more required snubbers are unable to perform their associated support function(s), any affected supported LCO(s) are not required to be declared not met solely for this reason if risk is assessed and managed, and:
- a. the snubbers not able to perform their associated support function(s) are associated with only one train or subsystem of a multiple train or subsystem supported system or are associated with a single train or subsystem supported system and are able to perform their associated support function within 72 hours; or
 - b. the snubbers not able to perform their associated support function(s) are associated with more than one train or subsystem of a multiple train or subsystem supported system and are able to perform their associated support function within 12 hours.

At the end of the specified period the required snubbers must be able to perform their associated support function(s), or the affected supported system LCO(s) shall be declared not met.

ADMINISTRATIVE CONTROLS

PROCEDURES AND PROGRAMS (Continued)

I. Surveillance Frequency Control Program

This program provides controls for Surveillance Frequencies. The program shall ensure that Surveillance Requirements specified in the Technical Specifications are performed at intervals sufficient to assure the associated Limiting Conditions for Operations are met:

- a. The Surveillance Frequency Control Program shall contain a list of frequencies of those Surveillance Requirements for which the frequency is controlled by the program.
- b. Changes to the frequencies listed in the Surveillance Frequency Control Program shall be made in accordance with NEI 04-10, "Risk-Informed Method for Control of Surveillance Frequencies," Revision 1.
- c. The provisions of Surveillance Requirements 4.0.2 and 4.0.3 are applicable to the frequencies established in the Surveillance Frequency Control Program.

See ITS
5.0

m. Snubber Testing Program

~~This program conforms to the examination, testing and service life monitoring for dynamic restraints (snubbers) in accordance with 10 CFR 50.55a inservice inspection (ISI) requirements for supports. The program shall be in accordance with the following:~~

- a. ~~This program shall meet 10 CFR 50.55a(g) ISI requirements for supports.~~
- b. ~~The program shall meet the requirements for ISI of supports set forth in subsequent editions of the Code of Record and addenda of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (BPV) Code and the ASME Code for Operation and Maintenance of Nuclear Power Plants (OM Code) that are incorporated by reference in 10 CFR 50.55a(a) subject to the use and conditions on the use of standards listed in 10 CFR 50.55a(b) and subject to Commission approval.~~
- c. ~~The program shall, as required by 10 CFR 50.55a(b)(3)(v), meet Subsection ISTA, "General Requirements" and Subsection ISTD, "Preservice and Inservice Examination and Testing of Dynamic Restraints (Snubbers) in Light-Water Reactor Nuclear Power Plants".~~
- d. ~~The 120-month program updates shall be made in accordance with 10 CFR 50.55a(g)(4), 10 CFR 50.55a(g)(3)(v) and 10 CFR 50.55a(b) (including 10 CFR 50.55a(b)(3)(v)) subject to the conditions listed therein.~~

LA01

n. Reactor Coolant Pump Flywheel Inspection Program

Each Reactor Coolant Pump flywheel shall be inspected at least once every 20 years by either conducting an in-place ultrasonic examination over the volume from the inner bore of the flywheel to the circle of one-half the outer radius, or by conducting a surface examination (magnetic particle and/or liquid penetrant) of exposed surfaces of the disassembled flywheel.

See ITS
5.0

DISCUSSION OF CHANGES ITS 3.0, LCO AND SR APPLICABILITY

ADMINISTRATIVE CHANGES

- A01 In the conversion of the Turkey Point Nuclear Generating Station (PTN) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 5.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS) and additional Technical Specification Task Force (TSTF) travelers included in this submittal.

These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.

- A02 CTS 3.0.1 states that Limiting Conditions for Operation (LCOs) shall be met during the MODES or other specified conditions in the Applicability, except as provided in LCO 3.0.2. ITS LCO 3.0.1 states, "LCOs shall be met during the MODES or other specified conditions in the Applicability, except as provided in LCO 3.0.2, LCO 3.0.7, LCO 3.0.8, and LCO 3.0.9." This results in the addition to the phrase "except as provided in LCO 3.0.2," LCO 3.0.7, LCO 3.0.8, and LCO 3.0.9 in ITS LCO 3.0.1. ITS LCO 3.0.7 describes Test Exceptions LCOs, which are exceptions to other LCOs. ITS LCO 3.0.8 addresses snubber inoperabilities, which is also an exception to other LCOs. ITS LCO 3.0.9 addresses barrier inoperabilities which is also an exception to other LCOs. Changes resulting from the incorporation of ITS LCO 3.0.7, LCO 3.0.8 and LCO 3.0.9 are discussed in Discussion of Change (DOC) A09, M01, and L01, respectively.

This change is acceptable because adding the exceptions for ITS LCO 3.0.7, LCO 3.0.8, and LCO 3.0.9 prevent a conflict within the Applicability section. This addition is needed for consistency in the ITS requirements and does not change the intent or application of the Technical Specifications.

- A03 CTS uses the terms Action to describe the prescribed remedial measures under designated conditions to be completed within a specified time when an LCO is not met. Included in the CTS Action(s) are the designated conditions and time interval in which the Action must be completed. ITS uses the terms Condition, Required Action, and Completion Time to describe the prescribed remedial measures under designated conditions to be completed within a specified time when an LCO is not met.

This change is acceptable because the change does not result in a change to the intent or application of the Technical Specifications, but merely reflect editorial preferences in the ITS.

- A04 CTS 3.0.3, in part, is applicable "When a Limiting Condition for Operation is not met, except as provided in the associated ACTION requirements." ITS LCO 3.0.3 expands those applicability requirements so that the requirement is applicable "When an LCO is not met and the associated ACTIONS are not met, an associated ACTION is not provided, or if directed by the associated ACTIONS." This changes the CTS to add two new applicability conditions.

**DISCUSSION OF CHANGES
ITS 3.0, LCO AND SR APPLICABILITY**

- ITS LCO 3.0.3 is applicable when the LCO is not met and there is no applicable ACTION to be taken.

This change is acceptable because it is consistent with the current understanding and application of CTS 3.0.3.

- ITS LCO 3.0.3 is applicable when directed by the associated ACTIONS. The CTS and the ITS contain such requirements. Any technical changes related to directing LCO 3.0.3 entry in an ACTION will be discussed in the affected Technical Specifications.

This change is acceptable because it is consistent with the current understanding and application of CTS 3.0.3.

These changes are designated as administrative because they do not result in any technical changes to the Technical Specifications.

A05 CTS 3.0.3, in part, states that within one hour action shall be initiated to place the unit in a MODE in which the Specification does not apply by placing it, as applicable, in: at least Hot Standby within the next 6 hours, at least Hot Shutdown within the following 6 hours, and at least Cold Shutdown within the subsequent 24 hours. ITS LCO 3.0.3 states that action shall be initiated within 1 hour to place the unit, as applicable, in MODE 3 within 7 hours, MODE 4 within 13 hours, and MODE 5 within 37 hours. This changes the CTS by using the sum of the times (i.e., the ITS Completion Time of 37 hours to enter MODE 5 is the same as the sum of the CTS allowance of 1 hour, 6 hours, 6 hours, and 24 hours) instead of sequential times (i.e., each time is measured from the completion of the previous step). The stated times in CTS 3.0.3 and ITS 3.0.3 are listed below:

<u>Mode</u>	<u>Title</u>	<u>CTS Time to Enter Mode</u>	<u>ITS Time to Enter Mode</u>
--	(Current Mode)	1 hour to begin action	1 hour to begin action
3	Hot Standby	within the next 6 hours	7 hours
4	Hot Shutdown	within the following 6 hours	13 hours
5	Cold Shutdown	within the subsequent 24 hours	37 hours

The purpose of CTS 3.0.3 is to establish the shutdown requirements that must be implemented when an LCO is not met and the condition is not specifically addressed in the associated ACTION requirements. The delineated time limit allows the unit to be placed in a safe shutdown MODE when the plant cannot be maintained within the limits for safe operation. The time limit, specified in CTS 3.0.3 to reach the lower MODES of operation, permits the shutdown to

DISCUSSION OF CHANGES ITS 3.0, LCO AND SR APPLICABILITY

proceed in a controlled manner that is well within the specified maximum cooldown rate. Furthermore, the time limit is within the cooldown capabilities of the plant 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. In the CTS, this is accomplished by allowing a total of 37 hours for the plant to be in Cold Shutdown when a shutdown is required during the MODE of Operation. In the absence of specific guidance within the CTS, current PTN practice if the unit is in a lower MODE of Operation and a CTS 3.0.3 shutdown is required, is to apply the time limit for reaching the lower MODE of operation (i.e., each time limit is measured from the time the previous MODE is reached). In the ITS, the time limits for ITS LCO 3.0.3 allow 37 hours for the unit to be in MODE 5 when a shutdown is required during MODE 1 operation. If the unit is in a lower mode of operation when an ITS LCO 3.0.3 shutdown is required, the time limit for reaching the next lower MODE applies (i.e., if the plant is in MODE 3, 13 hours is allowed to reach MODE 4). The ITS 3.0 Bases gives a detailed discussion on the use of applying the allowed outage times when the unit is in a lower MODE when ITS 3.0.3 is entered. This is further explained, with examples, in the discussion of Section 1.3, "Completion Times." This change is acceptable because the ITS and CTS both allow 37 hours to reach MODE 5 from power operation. In addition, the CTS 3.0.3 statement "within one hour action shall be initiated to place the unit in a MODE in which the Specification does not apply" has been editorially reworded in ITS LCO 3.0.3 to "the unit shall be placed in a MODE or other specified condition in which the LCO is not applicable. ACTION shall be initiated within 1 hour to place the unit..." These changes are considered changes to the CTS presentation. These changes are designated as administrative as they apply rules of usage established by ITS without resulting in technical changes to the Technical Specifications.

- A06 CTS 3.0.3 states "Where corrective measures are completed that permit operation under the ACTION requirements, the ACTION may be taken in accordance with the specified time limits as measured from the time of failure to meet the Limiting Condition for Operation." ITS LCO 3.0.3 states "Where corrective measures are completed that permit operation in accordance with the LCO or ACTIONS, completion of the actions required by LCO 3.0.3 is not required. LCO 3.0.3 is applicable in MODES 1, 2, 3, and 4."

This change is acceptable because the changes to CTS 3.0.3 are editorial. Both the CTS and ITS state that LCO 3.0.3 can be exited if the LCO which led to the entry into LCO 3.0.3 is met, or if one of the ACTIONS of that LCO is applicable. The CTS requirement also specifies that the time to complete the ACTIONS in the LCO is based on the initial failure to meet the LCO. Reentering the LCO after exiting LCO 3.0.3 does not reset the ACTION statement time requirements. This information is not explicitly stated in ITS LCO 3.0.3 but is true under the multiple condition entry concept of the ITS.

These changes are designated as administrative because there is no change in the intent or application of the CTS 3.0.3 requirements.

**DISCUSSION OF CHANGES
ITS 3.0, LCO AND SR APPLICABILITY**

- A07 CTS 3.0.3 states, in part, that "LCO 3.0.3 is not applicable in MODES 5 and 6". ITS states that "LCO 3.0.3 is only applicable in MODES 1, 2, 3, and 4". CTS 3.0.3 and ITS LCO 3.0.3 require the unit to be placed only as low as COLD SHUTDOWN (MODE 5). Once the unit is in MODE 5, there are no further requirements associated with CTS 3.0.3 or ITS LCO 3.0.3. Thus, CTS 3.0.3 and ITS LCO 3.0.3 are effectively only applicable in MODES 1, 2, 3, and 4, and the addition of the sentence merely reflects editorial preferences used in the ITS.

This change is designated as administrative because there is no change in the intent or application of the CTS 3.0.3 requirements.

- A08 CTS 3.0.6 provides an exception to other LCO applicability TS stating, in part, "This is an exception to LCO 3.0.1 and 3.0.2 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY." ITS LCO 3.0.5 (re-numbered CTS 3.0.6) states, in part, "This is an exception to LCO 3.0.2 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY. This changes the CTS by removing the LCO 3.0.1 exception. This change is being made so that the ITS accurately reflect a previously approved license amendment.

The purpose of CTS 3.0.6 is to allow returning declared inoperable equipment to service to perform required testing. To allow the returning to service of declared inoperable equipment an exception to the requirements of LCO 3.0.2 is needed, however, an exception to LCO 3.0.1 is not. LCO 3.0.1 states that LCOs shall be met during Modes or other specified conditions in the Applicability, which does not need to be excepted during the returning of declared inoperable equipment to service. This change is acceptable because it is not needed to implement LCO 3.0.5 and has been justified by a previous approved amendment but was erroneously not incorporated by the amendment. By letter dated July 31, 2019 (ML19148A744) ISTS LCO 3.0.6 was added under License Amendment (LA) 287 and 281 for Turkey Point Unit 3 and Unit 4, respectively. License Amendment 287/281 revised TS 3.0.1 and TS 3.0.2 as well as adding TS 3.0.7 (ISTS LCO 3.0.6). This LA revised CTS 3.0.1, removing the reference to the exception in CTS 3.0.6; however, it did not revise CTS 3.0.6 to similarly remove the reference to CTS 3.0.1. This change is designated as administrative because it corrects an oversight error from a previously approved LA.

- A09 ITS LCO 3.0.7 is added to the CTS. ITS LCO 3.0.7 states "Test Exception LCOs 3.1.8, "PHYSICS TEST Exceptions – MODE 2" allows specified Technical Specification (TS) requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. Compliance with Test Exception LCOs is optional. When a Test Exception LCO is desired to be met but is not met, the ACTIONS of the Test Exception LCO shall be met. When a Test Exception LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall be made in accordance with the other applicable Specifications."

DISCUSSION OF CHANGES ITS 3.0, LCO AND SR APPLICABILITY

This change is acceptable because the CTS contain test exception specifications that allow certain LCOs to not be met for the purpose of special tests and operations. However, the CTS does not contain the equivalent of ITS LCO 3.0.7. As a result, there could be confusion regarding which LCOs are applicable during special tests. LCO 3.0.7 was crafted to avoid that possible confusion. LCO 3.0.7 is consistent with the use and application of CTS test exception Specifications and does not provide any new restriction or allowance. This change is designated as administrative because it does not technically change the Technical Specifications.

A10 CTS 4.0.2 states, "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." ITS Surveillance Requirement (SR) 3.0.2 states, "The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met. For Frequencies specified as "once," the above interval extension does not apply. If a Completion Time requires periodic performance on a "once per . . ." basis, the above Frequency extension applies to each performance after the initial performance. Exceptions to this Specification are stated in the individual Specifications." This results in several changes to the CTS.

- CTS 4.0.2 states, "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." ITS SR 3.0.2 states, in part, "The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency." This change is being made to be consistent with the ITS terminology and to clarify the concept of the specified SR Frequency being met.

This change is acceptable since it does not change the intent of the requirements.

- ITS SR 3.0.2 is more specific regarding the associated Frequency by stating, "as measured from the previous performance or as measured from the time a specified condition of the Frequency is met." This direction is consistent with the current use and application of the Technical Specifications.

This change is acceptable because the ITS intent is the same as the CTS requirement.

- ITS SR 3.0.2 adds to the CTS "For Frequencies specified as "once," the above interval extension does not apply." This is described in DOC M01.

The changes, except as discussed in DOC M01, are designated as administrative because they reflect presentation and usage rules of the ITS without making technical changes to the Technical Specifications.

DISCUSSION OF CHANGES ITS 3.0, LCO AND SR APPLICABILITY

MORE RESTRICTIVE CHANGES

- M01 CTS 3.7.6 Action provides the actions for inoperable snubbers, and requires that with one or more snubbers inoperable on any system, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status and determine the impact on the attached component by evaluation in accordance with Specification 4.7.6, or declare the attached system inoperable and follow the appropriate ACTION statement for that system. In the ITS, the actions for inoperable snubbers are incorporated into ITS LCO 3.0.8. When one or more required snubbers are unable to perform the associated support function(s), any affected supported LCO(s) is not required to be declared not met if risk is assessed and managed, and either: a) the snubbers not able to perform the support function(s) are associated with only one train or subsystem of a multiple train or subsystem supported system or are associated with a single train or subsystem supported system and are able to perform the support function within 72 hours; or b) the snubbers not able to perform their associated support function(s) are associated with more than one train or subsystem of a multiple train or subsystem supported system and are able to perform their associated support function within 12 hours. At the end of the specified period (i.e., 12 hours or 72 hours) snubbers must be able to perform their associated function(s), or the affected system LCO(s) shall be declared not met. This changes the CTS by requiring the risk associated with inoperable snubbers to be assessed and managed and requires the snubbers to be restored to OPERABLE status in all cases, and in certain cases within a more restrictive Completion Time.

The purpose of CTS 3.7.6 Action is to provide a short time (72 hours) prior to requiring the affected systems to be declared inoperable, to replace or restore the inoperable snubber(s) to OPERABLE status and determine the impact on the attached component by evaluation in accordance with Specification 4.7.6, or declare the attached system inoperable and follow the appropriate ACTION statement for that system. ITS LCO 3.0.8 requires the risk associated with inoperable required snubbers to be assessed and managed in all instances of snubber inoperability. ITS LCO 3.0.8 also requires all "required" inoperable snubbers to be restored to OPERABLE status within the specified Completion Times. It does not provide a requirement to determine the impact on the attached component by evaluation in accordance with the Snubber Testing Program. However, the wording of ITS LCO 3.0.8 (i.e., one or more "required" snubbers) continues to allow this evaluation to be performed. ITS LCO 3.0.8.a applies when one or more snubbers are not capable of providing their associated support function(s) to a single subsystem of a multiple subsystem supported system or to a single subsystem supported system. ITS LCO 3.0.8.a allows 72 hours to restore the snubber(s) before declaring the supported system inoperable, provided only a single subsystem is affected. This 72-hour time is consistent with the CTS. However, ITS LCO 3.0.8.b applies when one or more snubbers are not capable of providing their associated support function(s) to more than one subsystem of a multiple subsystem supported system, and allows 12 hours to restore the snubber(s) before declaring the supported system inoperable. This 12-hour time is more restrictive than the CTS. The 12-hour Completion Time is acceptable based on the low probability of a seismic event concurrent with an event that would require operation of the supported system

DISCUSSION OF CHANGES ITS 3.0, LCO AND SR APPLICABILITY

while the snubber(s) is not capable of performing the associated support function. Furthermore, ITS LCO 3.0.8 requires that risk be assessed and managed. This risk assessment is not required in the CTS. The Bases for ITS LCO 3.0.8 provides guidance on how the risk must be assessed. Industry and NRC guidance on the implementation of 10 CFR 50.65(a)(4) (the Maintenance Rule) does not address seismic risk. However, use of ITS LCO 3.0.8 should be considered with respect to other plant maintenance activities, and integrated into the existing Maintenance Rule process to the extent possible so that maintenance on any unaffected train or subsystem is properly controlled, and emergent issues are properly addressed. The risk assessment need not be quantified but may be a qualitative awareness of the vulnerability of systems and components when one or more snubbers are not able to perform the associated support function. Furthermore, Florida Power & Light (FPL) has reviewed the additional provisions discussed in the NRC's consolidated line item improvement process (CLIP) Model Safety Evaluation (in Federal Register Notice 70 FR 23252, May 4, 2005), Section 3.2, and will ensure appropriate plant procedures and administrative controls will be used to implement the applicable Tier 2 Restrictions. Specifically: a) at least one Auxiliary Feedwater (AFW) train (including a minimum set of supporting features required for its successful operation) not associated with the inoperable snubber(s) must be available when LCO 3.0.8.a is used; b) at least one AFW train (including a minimum set of supporting features required for its successful operation) not associated with the inoperable snubber(s), or some alternative means of core cooling must be available when LCO 3.0.8.b is used; and c) every time the provisions of LCO 3.0.8 are used, FPL will confirm that at least one train of systems supported by the inoperable snubber(s) would remain capable of performing the required safety or support function(s) for postulated design loads other than seismic loads. In addition, a record of the design function of the inoperable snubber (i.e., seismic vs. non-seismic), implementation of any applicable Tier 2 restriction, and the associated plant configuration shall be available on a recoverable basis for NRC staff inspection. These Tier 2 restrictions are also more restrictive than what is currently required by the Turkey Point Units 3 and 4 CTS. This change is designated as more restrictive because inoperable snubbers must be restored to OPERABLE status under certain conditions within a more restrictive Completion Time and the risk associated with inoperable snubbers must always be assessed and managed.

- M02 CTS 4.0.2 states, "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." ITS SR 3.0.2 states, "The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met. For Frequencies specified as "once," the above interval extension does not apply. If a Completion Time requires periodic performance on a "once per . . ." basis, the above Frequency extension applies to each performance after the initial performance. Exceptions to this Specification are stated in the individual Specifications." This changes the CTS by adding "For Frequencies specified as "once," the above interval extension does not apply." The remaining changes to CTS 4.0.2 are discussed in DOC A10.

DISCUSSION OF CHANGES ITS 3.0, LCO AND SR APPLICABILITY

The purpose of the 1.25 extension allowance to Surveillance Frequencies is to allow for flexibility in scheduling tests. This change is acceptable because Frequencies specified as "once" are typically condition-based Surveillances in which the first performance demonstrates the acceptability of the current condition. Such demonstrations should be accomplished within the specified Frequency without extension in order to avoid operation in unacceptable conditions. This change is designated as more restrictive because an allowance to extend Frequencies by 25 percent is eliminated for some Surveillances.

RELOCATED SPECIFICATIONS

None

REMOVED DETAIL CHANGES

LA01 (*Type 4 – Removal of LCO, SR, or other TS requirement to the TRM, UFSAR, ODCM, QAPM, IST Program, or IIP*) CTS 3.7.6 provides the requirements for all snubbers, excluding those installed on nonsafety-related systems and then only if the of a snubber failure or failure of the system on which the snubber(s) is installed would have no adverse effect on any safety-related system. CTS 6.8.4.m requires a program that conforms to the examination, testing and service life monitoring for dynamic restraints (snubbers) in accordance with 10 CFR 50.55a inservice inspection (ISI) requirements for supports. These specifications with the exception of the Action in CTS 3.7.6 are not included in the ITS. This changes the CTS by moving the explicit snubber requirements from the Technical Specifications to the Technical Requirements Manual (TRM).

The removal of these details from the Technical Specification is acceptable because this type of information is not necessary to provide adequate protection of public health and safety. The purpose of the Action of CTS 3.7.6 is to ensure that the structural integrity of the reactor coolant system and all other safety related systems is maintained during and following a seismic or other event initiating dynamic loads. This change is acceptable because LCO 3.0.8 requirements continue to ensure that the structures, systems, and components (SSCs) are maintained consistent with the safety analyses and licensing basis. The requirement to perform snubber inspections is specified in 10 CFR 50.55a and the requirement to perform snubber inspections and testing is specified in ASME Section XI, as modified by approved relief requests. Therefore, both commitments for Turkey Point Units 3 and 4, and NRC Regulations or generic guidance will contain the necessary programmatic requirements for the inspection and testing of safety-related snubbers without repeating the requirements in the ITS. Also, this change is acceptable because the removed information will be adequately controlled in the TRM. Changes to the TRM are made under 10 CFR 50.59, which ensures changes are properly evaluated. This change is designated as a less restrictive removal of detail change because a requirement is being removed from the Technical Specifications.

DISCUSSION OF CHANGES ITS 3.0, LCO AND SR APPLICABILITY

LESS RESTRICTIVE CHANGES

- L01 CTS Section 3.0 does not contain an allowance when barriers cannot perform the associated support function. The proposed change to CTS 3.0, "LCO Applicability" adds a new LCO 3.0.9. The addition of LCO 3.0.9 to the CTS is to address barriers which cannot perform the related support function for Technical Specification systems. ITS LCO 3.0.9 allows barriers to be able to not perform the associated safety function for up to 30 days before declaring the supported system inoperable. Furthermore, due to this addition, an allowance is also needed in LCO 3.0.1. This allowance has been added.

Barriers are defined as doors, walls, floor plugs, curbs, hatches, installed SSCs, or other devices, not explicitly described in Technical Specifications, which are designed to provide for the performance of the specified safety function for the Technical Specification system after the occurrence of one or more initiating events.

The barrier which cannot perform its related support function will be evaluated and managed under the Maintenance Rule plant configuration control requirement, 10 CFR 50.65(a)(4), and the associated industry guidance (NUMARC 93-01, Revision 4F) as described in NEI 04-08, "Allowance for Non-Technical Specification Barrier Degradation on Supported System OPERABILITY (TSTF-427) Industry Implementation Guidance'," March 2006. This provision is applicable whether the barrier is affected due to planned maintenance or due to a discovered condition. Should the risk assessment and risk management actions for a specific plant configuration or emergent condition not support the 30-day allowed time, the Maintenance Rule risk management determined allowed time and actions must be implemented or the supported system's LCO be considered not met.

Application of LCO 3.0.9 is dependent on the OPERABILITY of at least one train or subsystem of the supported Technical Specification system and the system's ability to mitigate the consequences of the specified initiating events. However, during the 30-day period allowed by LCO 3.0.9, there exists the possibility that the train or subsystem required to be OPERABLE will unexpectedly become inoperable. Absent any further consideration, this would likely result in both trains of a Technical Specification required system being declared inoperable (i.e., the train supported by the barriers to which LCO 3.0.9 was being applied and the emergent condition of the inoperable train). This would likely result in entering LCO 3.0.3 and a rapid plant shutdown. While this scenario is of low likelihood, it is of very high consequence due to the potential required shutdown of the unit and subsequent unnecessary challenge placed on plant systems; therefore, entry into LCO 3.0.3 should be avoided unless necessary to avoid an unacceptable plant risk configuration. As a result, LCO 3.0.9 contains a provision which addresses the emergent condition of the required OPERABLE train or subsystem becoming inoperable while LCO 3.0.9 is being used. LCO 3.0.9 provides 24 hours to either restore the inoperable train or subsystem or to cease relying on the provisions of LCO 3.0.9 to consider the train or subsystem supported by the affected barrier(s) OPERABLE. This 24-hour period

DISCUSSION OF CHANGES ITS 3.0, LCO AND SR APPLICABILITY

is not based on a generic risk evaluation, as it would be difficult to perform such an analysis in a generic fashion. Rather, plant risk during this 24-hour allowance is managed using the contemporaneous risk assessment and management required by 10 CFR 50.65(a)(4) and recognizes the unquantified advantage to plant safety of avoiding a plant shutdown with the associated transition risk.

A risk impact of the 30-day allowance for barriers was performed. All PTN initiating events are located on the table depicted in TSTF-427 or PTN has evaluated the use of LCO 3.0.9 for a barrier protecting against an initiating event not on the table located in TSTF-427 and calculated the frequency ranges within the ranges in the table so that the above analysis is applicable for those initiators. Therefore, LCO 3.0.9 can be used when inoperable barriers affect SSCs.

- L02 CTS 4.0.3 states, in part, "If it is discovered that a Surveillance was not performed within its specified frequency, then compliance with the requirement to declare the Limiting Condition of Operation not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified frequency, whichever is greater. This delay period is permitted to allow performance of the Surveillance." ITS SR 3.0.3 states, in part, "If it is discovered that a Surveillance was not performed within its specified frequency, then compliance with the requirement to declare the Limiting Condition of Operation not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified frequency, whichever is greater. This delay period is permitted to allow performance of the Surveillance. The delay period is only applicable when there is a reasonable expectation the surveillance will be met when performed." This changes the CTS by adding, "The delay period is only applicable when there is a reasonable expectation the surveillance will be met when performed."

The purpose of CTS TS 4.0.3 is to establish flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a Surveillance has not been performed within the specified Frequency. One premise for this flexibility was that the SR was satisfactorily met in the past and the most probable result of performing the SR is the verification of conformance with the requirements. Therefore, there was a reasonable expectation the SR will be met when performed. However, there are instances in which an SR may not have been performed in the past, but there is still a reasonable expectation the SR will be met when performed. This change is acceptable because it supports the premise that there is a reasonable expectation that the SR will be met when performed. This change has been approved by the NRC in TSTF-529, "Clarify Use and Application Rules," (ML16060A455). The NRC staff determined the application of the delay period provided by ISTS SR 3.0.3 was acceptable for use on SRs that have never been performed as long as licensees can provide an adequate determination of reasonable expectation the SR will be met when performed. This change is designated as less restrictive because an allowance to defer declaring affected equipment inoperable is extended to SRs that have not been performed if a reasonable expectation the surveillance will be met when performed can be shown.

**Improved Standard Technical Specifications (ISTS) Markup
and Justification for Deviations (JFDs)**

3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

3.0.1 LCO 3.0.1 LCOs shall be met during the MODES or other specified conditions in the Applicability, except as provided in LCO 3.0.2, LCO 3.0.7, LCO 3.0.8, and LCO 3.0.9.

3.0.2 LCO 3.0.2 Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5 and LCO 3.0.6.

If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required unless otherwise stated.

3.0.3 LCO 3.0.3 When an LCO is not met and the associated ACTIONS are not met, an associated ACTION is not provided, or if directed by the associated ACTIONS, the unit shall be placed in a MODE or other specified condition in which the LCO is not applicable. Action shall be initiated within 1 hour to place the unit, as applicable, in:

- a. MODE 3 within 7 hours,
- b. MODE 4 within 13 hours, and
- c. MODE 5 within 37 hours.

Exceptions to this Specification are stated in the individual Specifications.

Where corrective measures are completed that permit operation in accordance with the LCO or ACTIONS, completion of the actions required by LCO 3.0.3 is not required.

LCO 3.0.3 is only applicable in MODES 1, 2, 3, and 4.

3.0.4 LCO 3.0.4 When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall only be made:

- a. When the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time;
- b. After performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate (exceptions to this Specification are stated in the individual Specifications); or

3.0 LCO Applicability

LCO 3.0.4 (continued)

- c. When an allowance is stated in the individual value, parameter, or other Specification.

This Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.

3.0.6

LCO 3.0.5

Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to LCO 3.0.2 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY.

3.0.7

LCO 3.0.6

When a supported system LCO is not met solely due to a support system LCO not being met, the Conditions and Required Actions associated with this supported system are not required to be entered. Only the support system LCO ACTIONS are required to be entered. This is an exception to LCO 3.0.2 for the supported system. In this event, an evaluation shall be performed in accordance with Specification 5.5.14, "Safety Function Determination Program (SFDP)." If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

When a support system's Required Action directs a supported system to be declared inoperable or directs entry into Conditions and Required Actions for a supported system, the applicable Conditions and Required Actions shall be entered in accordance with LCO 3.0.2.

DOC A09

LCO 3.0.7

Test Exception LCOs ~~[3.1.8 and 3.4.19]~~ allow specified Technical Specification (TS) requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. Compliance with Test Exception LCOs is optional. When a Test Exception LCO is desired to be met but is not met, the ACTIONS of the Test Exception LCO shall be met. When a Test Exception LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall be made in accordance with the other applicable Specifications.

S

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3.0 LCO Applicability

3.7.6 Action

LCO 3.0.8

When one or more required snubbers are unable to perform their associated support function(s), any affected supported LCO(s) are not required to be declared not met solely for this reason if risk is assessed and managed, and:

- a. the snubbers not able to perform their associated support function(s) are associated with only one train or subsystem of a multiple train or subsystem supported system or are associated with a single train or subsystem supported system and are able to perform their associated support function within 72 hours; or
- b. the snubbers not able to perform their associated support function(s) are associated with more than one train or subsystem of a multiple train or subsystem supported system and are able to perform their associated support function within 12 hours.

At the end of the specified period the required snubbers must be able to perform their associated support function(s), or the affected supported system LCO(s) shall be declared not met.

DOC L01

LCO 3.0.9

When one or more required barriers are unable to perform their related support function(s), any supported system LCO(s) are not required to be declared not met solely for this reason for up to 30 days provided that at least one train or subsystem of the supported system is OPERABLE and supported by barriers capable of providing their related support function(s), and risk is assessed and managed. This specification may be concurrently applied to more than one train or subsystem of a multiple train or subsystem supported system provided at least one train or subsystem of the supported system is OPERABLE and the barriers supporting each of these trains or subsystems provide their related support function(s) for different categories of initiating events.

If the required OPERABLE train or subsystem becomes inoperable while this specification is in use, it must be restored to OPERABLE status within 24 hours or the provisions of this specification cannot be applied to the trains or subsystems supported by the barriers that cannot perform their related support function(s).

At the end of the specified period, the required barriers must be able to perform their related support function(s) or the supported system LCO(s) shall be declared not met.

INSERT 1

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3.0.5

3 **INSERT 1**

- LCO 3.0.10 LCO Conditions and the associated Required Actions shall apply to each unit individually unless otherwise indicated as follows:
- a. Whenever the LCO refers to systems or components which are shared by both units, the Conditions and Required Actions will apply to both units simultaneously;
 - b. Whenever the LCO applies to only one unit, this will be identified in the Applicability section of the Specification; and
 - c. Whenever certain portions of a specification contain operating parameters, setpoints, etc., which are different for each unit, this will be identified in parentheses, notes, or body of the requirement.

3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

- 4.0.1 SR 3.0.1 SRs shall be met during the MODES or other specified conditions in the Applicability for individual LCOs, unless otherwise stated in the SR. Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO. Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO except as provided in SR 3.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.
-
- 4.0.2 SR 3.0.2 The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met.
- For Frequencies specified as "once," the above interval extension does not apply.
- If a Completion Time requires periodic performance on a "once per . . ." basis, the above Frequency extension applies to each performance after the initial performance.
- Exceptions to this Specification are stated in the individual Specifications.
-
- 4.0.3 SR 3.0.3 If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is greater. This delay period is permitted to allow performance of the Surveillance. The delay period is only applicable when there is a reasonable expectation the Surveillance will be met when performed. A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.
- If the Surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.
- When the Surveillance is performed within the delay period and the Surveillance is not met, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.
-
- 4.0.4 SR 3.0.4 Entry into a MODE or other specified condition in the Applicability of an LCO shall only be made when the LCO's Surveillances have been met within their specified Frequency, except as provided by SR 3.0.3. When an LCO is not met due to Surveillances not having been met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with LCO 3.0.4.

3.0 SR Applicability

SR 3.0.4 (continued)

This provision shall not prevent entry into MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit. INSERT 2

4.0.6

3

3 INSERT 2

SR 3.0.5 Surveillance Requirements shall apply to each unit individually unless otherwise indicated as stated in LCO 3.0.10 for individual Specifications or whenever certain portions of a Specification contain Surveillance parameters different for each unit, which will be identified in parentheses, notes, or body of the requirement.

**JUSTIFICATION FOR DEVIATIONS
ITS 3.0, LCO AND SR APPLICABILITY**

1. Changes are made (additions, deletions, and/or changes) to the Improved Standard Technical Specifications (ISTS) which reflect the plant specific nomenclature, number, reference, system description, analysis, or licensing basis description.
2. The ISTS contains bracketed information and/or values that are generic to all Westinghouse vintage plants. The brackets are removed and the proper plant specific information/value is changed to reflect the current licensing basis.
3. Changes were made to reflect inclusion of specific Turkey Point Nuclear Generating Station (PTN) Units 3 and 4 Current Technical Specifications (CTS) not included in ISTS. CTS Limiting Condition for Operation (LCO) 3.0.5 and Surveillance Requirement (SR) 4.0.6 provide guidance with respect to when a requirement is applicable to an individual or both PTN units. This is necessary because the Technical Specifications are shared between the units. This guidance is maintained as Improved Technical Specification (ITS) LCO 3.0.10 and SR 3.0.5. Maintenance of this guidance is considered administrative in nature as no technical changes are involved.

**Improved Standard Technical Specifications (ISTS) Bases
Markup and Bases Justification for Deviations (JFDs)**

B 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

BASES

10

1

LCOs LCO 3.0.1 through LCO 3.0.2 establish the general requirements applicable to all Specifications and apply at all times, unless otherwise stated.

LCO 3.0.1 LCO 3.0.1 establishes the Applicability statement within each individual Specification as the requirement for when the LCO is required to be met (i.e., when the unit is in the MODES or other specified conditions of the Applicability statement of each Specification).

LCO 3.0.2 LCO 3.0.2 establishes that upon discovery of a failure to meet an LCO, the associated ACTIONS shall be met. The Completion Time of each Required Action for an ACTIONS Condition is applicable from the point in time that an ACTIONS Condition is entered, unless otherwise specified. The Required Actions establish those remedial measures that must be taken within specified Completion Times when the requirements of an LCO are not met. This Specification establishes that:

- a. Completion of the Required Actions within the specified Completion Times constitutes compliance with a Specification and
- b. Completion of the Required Actions is not required when an LCO is met within the specified Completion Time, unless otherwise specified.

There are two basic types of Required Actions. The first type of Required Action specifies a time limit in which the LCO must be met. This time limit is the Completion Time to restore an inoperable system or component to OPERABLE status or to restore variables to within specified limits. If this type of Required Action is not completed within the specified Completion Time, a shutdown may be required to place the unit in a MODE or condition in which the Specification is not applicable. (Whether stated as a Required Action or not, correction of the entered Condition is an action that may always be considered upon entering ACTIONS.) The second type of Required Action specifies the remedial measures that permit continued operation of the unit that is not further restricted by the Completion Time. In this case, compliance with the Required Actions provides an acceptable level of safety for continued operation.

Completing the Required Actions is not required when an LCO is met or is no longer applicable, unless otherwise stated in the individual Specifications.

2

BASES

LCO 3.0.2 (continued)

The nature of some Required Actions of some Conditions necessitates that, once the Condition is entered, the Required Actions must be completed even though the associated Conditions no longer exist. The individual LCO's ACTIONS specify the Required Actions where this is the case. An example of this is in LCO 3.4.3, "RCS Pressure and Temperature (P/T) Limits."

The Completion Times of the Required Actions are also applicable when a system or component is removed from service intentionally. The ACTIONS for not meeting a single LCO adequately manage any increase in plant risk, provided any unusual external conditions (e.g., severe weather, offsite power instability) are considered. In addition, the increased risk associated with simultaneous removal of multiple structures, systems, trains or components from service is assessed and managed in accordance with 10 CFR 50.65(a)(4). Individual Specifications may specify a time limit for performing an SR when equipment is removed from service or bypassed for testing. In this case, the Completion Times of the Required Actions are applicable when this time limit expires, if the equipment remains removed from service or bypassed.

When a change in MODE or other specified condition is required to comply with Required Actions, the unit may enter a MODE or other specified condition in which another Specification becomes applicable. In this case, the Completion Times of the associated Required Actions would apply from the point in time that the new Specification becomes applicable, and the ACTIONS Condition(s) are entered.

LCO 3.0.3

LCO 3.0.3 establishes the actions that must be implemented when an LCO is not met and:

- a. An associated Required Action and Completion Time is not met and no other Condition applies or
- b. The condition of the unit is not specifically addressed by the associated ACTIONS. This means that no combination of Conditions stated in the ACTIONS can be made that exactly corresponds to the actual condition of the unit. Sometimes, possible combinations of Conditions are such that entering LCO 3.0.3 is warranted; in such cases, the ACTIONS specifically state a Condition corresponding to such combinations and also that LCO 3.0.3 be entered immediately.

BASES

LCO 3.0.3 (continued)

This Specification delineates the time limits for placing the unit in a safe MODE or other specified condition when operation cannot be maintained within the limits for safe operation as defined by the LCO and its ACTIONS. Planned entry into LCO 3.0.3 should be avoided. If it is not practicable to avoid planned entry into LCO 3.0.3, plant risk should be assessed and managed in accordance with 10 CFR 50.65(a)(4), and the planned entry into LCO 3.0.3 should have less effect on plant safety than other practicable alternatives.

Upon entering LCO 3.0.3, 1 hour is allowed to prepare for an orderly shutdown before initiating a change in unit operation. This includes time to permit 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 enter 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 capabilities of the unit, assuming that only the minimum required equipment is OPERABLE. This reduces thermal stresses on components of the Reactor Coolant System and the potential for a plant upset that could challenge safety systems under conditions to which this Specification applies. The use and interpretation of specified times to complete the actions of LCO 3.0.3 are consistent with the discussion of Section 1.3, Completion Times.

A unit shutdown required in accordance with LCO 3.0.3 may be terminated and LCO 3.0.3 exited if any of the following occurs:

- a. The LCO is now met,
- b. The LCO is no longer applicable,
- c. A Condition exists for which the Required Actions have now been performed, or
- d. ACTIONS exist that do not have expired Completion Times. These Completion Times are applicable from the point in time that the Condition is initially entered and not from the time LCO 3.0.3 is exited.

The time limits of LCO 3.0.3 allow 37 hours for the unit to be in MODE 5 when a shutdown is required during MODE 1 operation. If the unit is in a lower MODE of operation when a shutdown is required, the time limit for entering the next lower MODE applies. If a lower MODE is entered in less time than allowed, however, the total allowable time to enter MODE 5, or other applicable MODE, is not reduced. For example, if MODE 3 is entered in 2 hours, then the time allowed for entering MODE 4

BASES

LCO 3.0.3 (continued)

is the next 11 hours, because the total time for entering MODE 4 is not reduced from the allowable limit of 13 hours. Therefore, if remedial measures are completed that would permit a return to MODE 1, a penalty is not incurred by having to enter a lower MODE of operation in less than the total time allowed.

In MODES 1, 2, 3, and 4, LCO 3.0.3 provides actions for Conditions not covered in other Specifications. The requirements of LCO 3.0.3 do not apply in MODES 5 and 6 because the unit is already in the most restrictive Condition required by LCO 3.0.3. The requirements of LCO 3.0.3 do not apply in other specified conditions of the Applicability (unless in MODE 1, 2, 3, or 4) because the ACTIONS of individual Specifications sufficiently define the remedial measures to be taken.

Exceptions to LCO 3.0.3 are provided in instances where requiring a unit shutdown, in accordance with LCO 3.0.3, would not provide appropriate remedial measures for the associated condition of the unit. An example of this is in LCO 3.7.12, "Fuel Storage Pool Water Level." LCO 3.7.12 has an Applicability of "During movement of irradiated fuel assemblies in the fuel storage pool." Therefore, this LCO can be applicable in any or all MODES. If the LCO and the Required Actions of LCO 3.7.12 are not met while in MODE 1, 2, or 3, there is no safety benefit to be gained by placing the unit in a shutdown condition. The Required Action of LCO 3.7.12 of "Suspend movement of irradiated fuel assemblies in the fuel storage pool" is the appropriate Required Action to complete in lieu of the actions of LCO 3.0.3. These exceptions are addressed in the individual Specifications.

LCO 3.0.4

LCO 3.0.4 establishes limitations on changes in MODES or other specified conditions in the Applicability when an LCO is not met. It allows placing the unit in a MODE or other specified condition stated in that Applicability (e.g., the Applicability desired to be entered) when unit conditions are such that the requirements of the LCO would not be met, in accordance with either LCO 3.0.4.a, LCO 3.0.4.b, or LCO 3.0.4.c.

LCO 3.0.4.a allows entry into a MODE or other specified condition in the Applicability with the LCO not met when the associated ACTIONS to be entered following entry into the MODE or other specified condition in the Applicability will permit continued operation within the MODE or other specified condition for an unlimited period of time. Compliance with ACTIONS that permit continued operation of the unit for an unlimited period of time in a MODE or other specified condition provides an acceptable level of safety for continued operation. This is without regard to the status of the unit before or after the MODE change. Therefore, in

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BASES

LCO 3.0.4 (continued)

such cases, entry into a MODE or other specified condition in the Applicability may be made and the Required Actions followed after entry into the Applicability.

For example, LCO 3.0.4.a may be used when the Required Action to be entered states that an inoperable instrument channel must be placed in the trip condition within the Completion Time. Transition into a MODE or other specified condition in the Applicability may be made in accordance with LCO 3.0.4 and the channel is subsequently placed in the tripped condition within the Completion Time, which begins when the Applicability is entered. If the instrument channel cannot be placed in the tripped condition and the subsequent default ACTION ("Required Action and associated Completion Time not met") allows the OPERABLE train to be placed in operation, use of LCO 3.0.4.a is acceptable because the subsequent ACTIONS to be entered following entry into the MODE include ACTIONS (place the OPERABLE train in operation) that permit safe plant operation for an unlimited period of time in the MODE or other specified condition to be entered.

LCO 3.0.4.b allows entry into a MODE or other specified condition in the Applicability with the LCO not met after performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate.

The risk assessment may use quantitative, qualitative, or blended approaches, and the risk assessment will be conducted using the plant program, procedures, and criteria in place to implement 10 CFR 50.65(a)(4), which requires that risk impacts of maintenance activities to be assessed and managed. The risk assessment, for the purposes of LCO 3.0.4.b, must take into account all inoperable Technical Specification equipment regardless of whether the equipment is included in the normal 10 CFR 50.65(a)(4) risk assessment scope. The risk assessments will be conducted using the procedures and guidance endorsed by Regulatory Guide 1.160, "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." Regulatory Guide 1.160 endorses the guidance in Section 11 of NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." These documents address general guidance for conduct of the risk assessment, quantitative and qualitative guidelines for establishing risk management actions, and example risk management actions. These include actions to plan and conduct other activities in a manner that controls overall risk, increased risk awareness by shift and

BASES

LCO 3.0.4 (continued)

management personnel, actions to reduce the duration of the condition, actions to minimize the magnitude of risk increases (establishment of backup success paths or compensatory measures), and determination that the proposed MODE change is acceptable. Consideration should also be given to the probability of completing restoration such that the requirements of the LCO would be met prior to the expiration of ACTIONS Completion Times that would require exiting the Applicability.

LCO 3.0.4.b may be used with single, or multiple systems and components unavailable. NUMARC 93-01 provides guidance relative to consideration of simultaneous unavailability of multiple systems and components.

The results of the risk assessment shall be considered in determining the acceptability of entering the MODE or other specified condition in the Applicability, and any corresponding risk management actions. The LCO 3.0.4.b risk assessments do not have to be documented.

The Technical Specifications allow continued operation with equipment unavailable in MODE 1 for the duration of the Completion Time. Since this is allowable, and since in general the risk impact in that particular MODE bounds the risk of transitioning into and through the applicable MODES or other specified conditions in the Applicability of the LCO, the use of the LCO 3.0.4.b allowance should be generally acceptable, as long as the risk is assessed and managed as stated above. However, there is a small subset of systems and components that have been determined to be more important to risk and use of the LCO 3.0.4.b allowance is prohibited. The LCOs governing these systems and components contain Notes prohibiting the use of LCO 3.0.4.b by stating that LCO 3.0.4.b is not applicable.

LCO 3.0.4.c allows entry into a MODE or other specified condition in the Applicability with the LCO not met based on a Note in the Specification which states LCO 3.0.4.c is applicable. These specific allowances permit entry into MODES or other specified conditions in the Applicability when the associated ACTIONS to be entered do not provide for continued operation for an unlimited period of time and a risk assessment has not been performed. This allowance may apply to all the ACTIONS or to a specific Required Action of a Specification. The risk assessments performed to justify the use of LCO 3.0.4.b usually only consider systems and components. For this reason, LCO 3.0.4.c is typically applied to Specifications which describe values and parameters (e.g., RCS Specific Activity), and may be applied to other Specifications based on NRC plant specific approval.

BASES

LCO 3.0.4 (continued)

The provisions of this Specification should not be interpreted as endorsing the failure to exercise the good practice of restoring systems or components to OPERABLE status before entering an associated MODE or other specified condition in the Applicability.

The provisions of LCO 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS. In addition, the provisions of LCO 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that result from any unit shutdown. In this context, a unit shutdown is defined as a change in MODE or other specified condition in the Applicability associated with transitioning from MODE 1 to MODE 2, MODE 2 to MODE 3, MODE 3 to MODE 4, and MODE 4 to MODE 5.

Upon entry into a MODE or other specified condition in the Applicability with the LCO not met, LCO 3.0.1 and LCO 3.0.2 require entry into the applicable Conditions and Required Actions until the Condition is resolved, until the LCO is met, or until the unit is not within the Applicability of the Technical Specification.

Surveillances do not have to be performed on the associated inoperable equipment (or on variables outside the specified limits), as permitted by SR 3.0.1. Therefore, utilizing LCO 3.0.4 is not a violation of SR 3.0.1 or SR 3.0.4 for any Surveillances that have not been performed on inoperable equipment. However, SRs must be met to ensure OPERABILITY prior to declaring the associated equipment OPERABLE (or variable within limits) and restoring compliance with the affected LCO.

LCO 3.0.5

LCO 3.0.5 establishes the allowance for restoring equipment to service under administrative controls when it has been removed from service or declared inoperable to comply with ACTIONS. The sole purpose of this Specification is to provide an exception to LCO 3.0.2 (e.g., to not comply with the applicable Required Action(s)) to allow the performance of required testing to demonstrate:

- a. The OPERABILITY of the equipment being returned to service or
- b. The OPERABILITY of other equipment.

The administrative controls ensure the time the equipment is returned to service in conflict with the requirements of the ACTIONS is limited to the time absolutely necessary to perform the required testing to demonstrate OPERABILITY. This Specification does not provide time to perform any other preventive or corrective maintenance. LCO 3.0.5 should not be

BASES

LCO 3.0.5 (continued)

used in lieu of other practicable alternatives that comply with Required Actions and that do not require changing the MODE or other specified conditions in the Applicability in order to demonstrate equipment is OPERABLE. LCO 3.0.5 is not intended to be used repeatedly.

An example of demonstrating equipment is OPERABLE with the Required Actions not met is opening a manual valve that was closed to comply with Required Actions to isolate a flowpath with excessive Reactor Coolant System (RCS) Pressure Isolation Valve (PIV) leakage in order to perform testing to demonstrate that RCS PIV leakage is now within limit.

Examples of demonstrating equipment OPERABILITY include instances in which it is necessary to take an inoperable channel or trip system out of a tripped condition that was directed by a Required Action, if there is no Required Action Note for this purpose. An example of verifying OPERABILITY of equipment removed from service is taking a tripped channel out of the tripped condition to permit the logic to function and indicate the appropriate response during performance of required testing on the inoperable channel. Examples of demonstrating the OPERABILITY of other equipment are taking an inoperable channel or trip system out of the tripped condition 1) to prevent the trip function from occurring during the performance of required testing on another channel in the other trip system, or 2) to permit the logic to function and indicate the appropriate response during the performance of required testing on another channel in the same trip system.

The administrative controls in LCO 3.0.5 apply in all cases to systems or components in Chapter 3 of the Technical Specifications, as long as the testing could not be conducted while complying with the Required Actions. This includes the realignment or repositioning of redundant or alternate equipment or trains previously manipulated to comply with ACTIONS, as well as equipment removed from service or declared inoperable to comply with ACTIONS.

LCO 3.0.6

LCO 3.0.6 establishes an exception to LCO 3.0.2 for supported systems that have a support system LCO specified in the Technical Specifications (TS). This exception is provided because LCO 3.0.2 would require that the Conditions and Required Actions of the associated inoperable supported system LCO be entered solely due to the inoperability of the support system. This exception is justified because the actions that are required to ensure the unit is maintained in a safe condition are specified in the support system LCO's Required Actions. These Required Actions may include entering the supported system's Conditions and Required Actions or may specify other Required Actions.

BASES

LCO 3.0.6 (continued)

When a support system is inoperable and there is an LCO specified for it in the TS, the supported system(s) are required to be declared inoperable if determined to be inoperable as a result of the support system inoperability. However, it is not necessary to enter into the supported systems' Conditions and Required Actions unless directed to do so by the support system's Required Actions. The potential confusion and inconsistency of requirements related to the entry into multiple support and supported systems' LCOs' Conditions and Required Actions are eliminated by providing all the actions that are necessary to ensure the unit is maintained in a safe condition in the support system's Required Actions.

However, there are instances where a support system's Required Action may either direct a supported system to be declared inoperable or direct entry into Conditions and Required Actions for the supported system. This may occur immediately or after some specified delay to perform some other Required Action. Regardless of whether it is immediate or after some delay, when a support system's Required Action directs a supported system to be declared inoperable or directs entry into Conditions and Required Actions for a supported system, the applicable Conditions and Required Actions shall be entered in accordance with LCO 3.0.2.

Specification 5.5.12, "Safety Function Determination Program (SFDP)," ensures loss of safety function is detected and appropriate actions are taken. Upon entry into LCO 3.0.6, an evaluation shall be made to determine if loss of safety function exists. Additionally, other limitations, remedial actions, or compensatory actions may be identified as a result of the support system inoperability and corresponding exception to entering supported system Conditions and Required Actions. The SFDP implements the requirements of LCO 3.0.6.

The following examples use Figure B 3.0-1 to illustrate loss of safety function conditions that may result when a TS support system is inoperable. In this figure, the fifteen systems that comprise Train A are independent and redundant to the fifteen systems that comprise Train B. To correctly use the figure to illustrate the SFDP provisions for a cross train check, the figure establishes a relationship between support and supported systems as follows: the figure shows System 1 as a support system for System 2 and System 3; System 2 as a support system for System 4 and System 5; and System 4 as a support system for System 8 and System 9. Specifically, a loss of safety function may exist when a support system is inoperable and:

BASES

LCO 3.0.6 (continued)

- a. A system redundant to system(s) supported by the inoperable support system is also inoperable (EXAMPLE B 3.0.6-1),
- b. A system redundant to system(s) in turn supported by the inoperable supported system is also inoperable (EXAMPLE B 3.0.6-2), or
- c. A system redundant to support system(s) for the supported systems (a) and (b) above is also inoperable (EXAMPLE B 3.0.6-3).

For the following examples, refer to Figure B 3.0-1.

EXAMPLE B 3.0.6-1

If System 2 of Train A is inoperable and System 5 of Train B is inoperable, a loss of safety function exists in Systems 5, 10, and 11.

EXAMPLE B 3.0.6-2

If System 2 of Train A is inoperable, and System 11 of Train B is inoperable, a loss of safety function exists in System 11.

EXAMPLE B 3.0.6-3

If System 2 of Train A is inoperable, and System 1 of Train B is inoperable, a loss of safety function exists in Systems 2, 4, 5, 8, 9, 10 and 11.

If an evaluation determines that a loss of safety function exists, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

BASES

LCO 3.0.6 (continued)

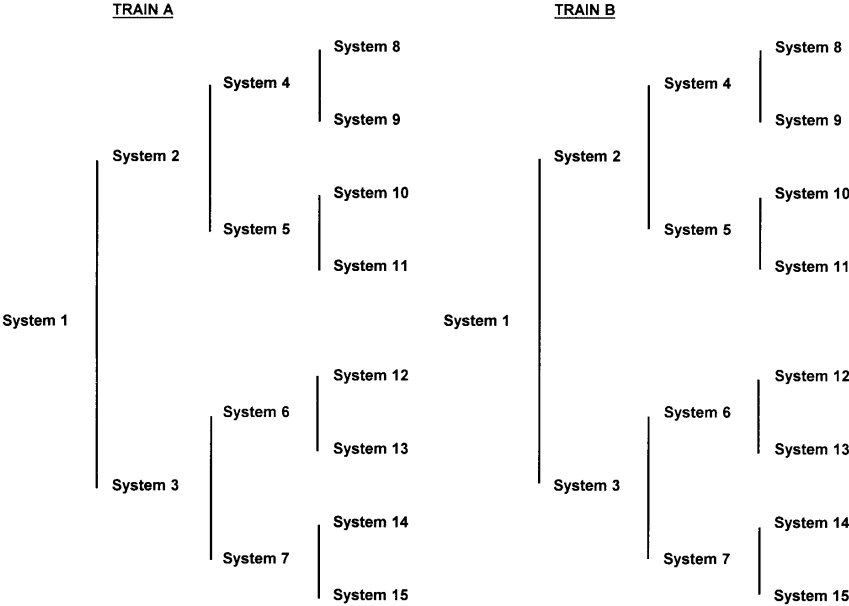


Figure B 3.0-1
Configuration of Trains and Systems

This loss of safety function does not require the assumption of additional single failures or loss of offsite power. Since operations are being restricted in accordance with the ACTIONS of the support system, any resulting temporary loss of redundancy or single failure protection is taken into account. Similarly, the ACTIONS for inoperable offsite circuit(s) and inoperable diesel generator(s) provide the necessary restriction for cross train inoperabilities. This explicit cross train verification for inoperable AC electrical power sources also acknowledges that supported system(s) are not declared inoperable solely as a result of inoperability of a normal or emergency electrical power source (refer to the definition of OPERABILITY).

When loss of safety function is determined to exist, and the SFDP requires entry into the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists, consideration must be given to the specific type of function affected. Where a loss of function is solely due to a single Technical Specification support system (e.g., loss of automatic start due to inoperable instrumentation, or loss of pump suction

BASES

LCO 3.0.6 (continued)

source due to low tank level) the appropriate LCO is the LCO for the support system. The ACTIONS for a support system LCO adequately address the inoperabilities of that system without reliance on entering its supported system LCO. When the loss of function is the result of multiple support systems, the appropriate LCO is the LCO for the supported system.

LCO 3.0.7

There are certain special tests and operations required to be performed at various times over the life of the unit. These special tests and operations are necessary to demonstrate select unit performance characteristics, to perform special maintenance activities, and to perform special evolutions. Test Exception LCOs [3.1.8 and 3.4.19] allow specified Technical Specification (TS) requirements to be changed to permit performances of these special tests and operations, which otherwise could not be performed if required to comply with the requirements of these TS. Unless otherwise specified, all the other TS requirements remain unchanged. This will ensure all appropriate requirements of the MODE or other specified condition not directly associated with or required to be changed to perform the special test or operation will remain in effect.

The Applicability of a Test Exception LCO represents a condition not necessarily in compliance with the normal requirements of the TS. Compliance with Test Exception LCOs is optional. A special operation may be performed either under the provisions of the appropriate Test Exception LCO or under the other applicable TS requirements. If it is desired to perform the special operation under the provisions of the Test Exception LCO, the requirements of the Test Exception LCO shall be followed.

LCO 3.0.8

LCO 3.0.8 establishes conditions under which systems are considered to remain capable of performing their intended safety function when associated snubbers are not capable of providing their associated support function(s). This LCO states that the supported system is not considered to be inoperable solely due to one or more snubbers not capable of performing their associated support function(s). This is appropriate because a limited length of time is allowed for maintenance, testing, or repair of one or more snubbers not capable of performing their associated support function(s) and appropriate compensatory measures are specified in the snubber requirements, which are located outside of the Technical Specifications (TS) under licensee control. The snubber requirements do not meet the criteria in 10 CFR 50.36(c)(2)(ii), and, as such, are appropriate for control by the licensee.

BASES

LCO 3.0.8 (continued)

If the allowed time expires and the snubber(s) are unable to perform their associated support function(s), the affected supported system's LCO(s) must be declared not met and the Conditions and Required Actions entered in accordance with LCO 3.0.2.

LCO 3.0.8.a applies when one or more snubbers are not capable of providing their associated support function(s) to a single train or subsystem of a multiple train or subsystem supported system or to a single train or subsystem supported system. LCO 3.0.8.a allows 72 hours to restore the snubber(s) before declaring the supported system inoperable. The 72-hour Completion Time is reasonable based on the low probability of a seismic event concurrent with an event that would require operation of the supported system occurring while the snubber(s) are not capable of performing their associated support function and due to the availability of the redundant train of the supported system.

LCO 3.0.8.b applies when one or more snubbers are not capable of providing their associated support function(s) to more than one train or subsystem of a multiple train or subsystem supported system. LCO 3.0.8.b allows 12 hours to restore the snubber(s) before declaring the supported system inoperable. The 12-hour Completion Time is reasonable based on the low probability of a seismic event concurrent with an event that would require operation of the supported system occurring while the snubber(s) are not capable of performing their associated support function.

LCO 3.0.8 requires that risk be assessed and managed. Industry and NRC guidance on the implementation of 10 CFR 50.65(a)(4) (the Maintenance Rule) does not address seismic risk. However, use of LCO 3.0.8 should be considered with respect to other plant maintenance activities, and integrated into the existing Maintenance Rule process to the extent possible so that maintenance on any unaffected train or subsystem is properly controlled, and emergent issues are properly addressed. The risk assessment need not be quantified, but may be a qualitative awareness of the vulnerability of systems and components when one or more snubbers are not able to perform their associated support function.

BASES

LCO 3.0.9

~~REVIEWER'S NOTE~~

~~Adoption of LCO 3.0.9 requires the licensee to make the following commitments:~~

- ~~1. [LICENSEE] commits to the guidance of NUMARC 93-01, Revision [4F], Section 11, which provides guidance and details on the assessment and management of risk during maintenance.~~
- ~~2. [LICENSEE] commits to the guidance of NEI 04-08, "Allowance for Non Technical Specification Barrier Degradation on Supported System OPERABILITY (TSTF-427) Industry Implementation Guidance," March 2006.~~

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LCO 3.0.9 establishes conditions under which systems described in the Technical Specifications are considered to remain OPERABLE when required barriers are not capable of providing their related support function(s).

Barriers are doors, walls, floor plugs, curbs, hatches, installed structures or components, or other devices, not explicitly described in Technical Specifications, that support the performance of the safety function of systems described in the Technical Specifications. This LCO states that the supported system is not considered to be inoperable solely due to required barriers not capable of performing their related support function(s) under the described conditions. LCO 3.0.9 allows 30 days before declaring the supported system(s) inoperable and the LCO(s) associated with the supported system(s) not met. A maximum time is placed on each use of this allowance to ensure that as required barriers are found or are otherwise made unavailable, they are restored. However, the allowable duration may be less than the specified maximum time based on the risk assessment.

If the allowed time expires and the barriers are unable to perform their related support function(s), the supported system's LCO(s) must be declared not met and the Conditions and Required Actions entered in accordance with LCO 3.0.2.

This provision does not apply to barriers which support ventilation systems or to fire barriers. The Technical Specifications for ventilation systems provide specific Conditions for inoperable barriers. Fire barriers are addressed by other regulatory requirements and associated plant programs. This provision does not apply to barriers which are not required to support system OPERABILITY (see NRC Regulatory Issue Summary 2001-09, "Control of Hazard Barriers," dated April 2, 2001).

BASES

LCO 3.0.9 (continued)

The provisions of LCO 3.0.9 are justified because of the low risk associated with required barriers not being capable of performing their related support function. This provision is based on consideration of the following initiating event categories:

~~REVIEWER'S NOTE~~

~~LCO 3.0.9 may be expanded to other initiating event categories provided plant-specific analysis demonstrates that the frequency of the additional initiating events is bounded by the generic analysis or if plant specific approval is obtained from the NRC.~~

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- Loss of coolant accidents;
- High energy line breaks;
- Feedwater line breaks;
- Internal flooding;
- External flooding;
- Turbine missile ejection; and
- Tornado or high wind.

The risk impact of the barriers which cannot perform their related support function(s) must be addressed pursuant to the risk assessment and management provision of the Maintenance Rule, 10 CFR 50.65 (a)(4), and the associated implementation guidance, Regulatory Guide 1.160, "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." Regulatory Guide 1.160 endorses the guidance in Section 11 of NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." This guidance provides for the consideration of dynamic plant configuration issues, emergent conditions, and other aspects pertinent to plant operation with the barriers unable to perform their related support function(s). These considerations may result in risk management and other compensatory actions being required during the period that barriers are unable to perform their related support function(s).

LCO 3.0.9 may be applied to one or more trains or subsystems of a system supported by barriers that cannot provide their related support function(s), provided that risk is assessed and managed (including consideration of the effects on Large Early Release and from external events). If applied concurrently to more than one train or subsystem of a multiple train or subsystem supported system, the barriers supporting each of these trains or subsystems must provide their related support function(s) for different categories of initiating events. For example, LCO 3.0.9 may be applied for up to 30 days for more than one train of a multiple train supported system if the affected barrier for one train

BASES

LCO 3.0.9 (continued)

protects against internal flooding and the affected barrier for the other train protects against tornado missiles. In this example, the affected barrier may be the same physical barrier but serve different protection functions for each train.

If during the time that LCO 3.0.9 is being used, the required OPERABLE train or subsystem becomes inoperable, it must be restored to OPERABLE status within 24 hours. Otherwise, the train(s) or subsystem(s) supported by barriers that cannot perform their related support function(s) must be declared inoperable and the associated LCOs declared not met. This 24-hour period provides time to respond to emergent conditions that would otherwise likely lead to entry into LCO 3.0.3 and a rapid plant shutdown, which is not justified given the low probability of an initiating event which would require the barrier(s) not capable of performing their related support function(s). During this 24-hour period, the plant risk associated with the existing conditions is assessed and managed in accordance with 10 CFR 50.65(a)(4).

LCO 3.0.10 LCO 3.0.10 delineates the applicability of each specification to Unit 3 and Unit 4 operation. LCO 3.0.10 states that LCOs, including the associated Required Actions, shall apply to each unit individually unless otherwise indicated as follows: a. Whenever the LCO refers to systems or components which are shared by both units, the Required Actions will apply to both units simultaneously; b. Whenever the LCO applies to only one unit, this will be identified in the APPLICABILITY section of the specification; and c. Whenever certain portions of a specification contain operating parameters, Setpoints, etc., which are different for each unit, this will be identified in parentheses, footnotes or body of the requirement. Examples of Required Actions applicable to both units simultaneously are found in Section 3.8. There are no examples of a TS applying to only one unit. An example of when certain portions of a Specification have operating parameters, Setpoints, etc., which are different for each unit is found in Table 3.3.1-1 Notes.

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B 3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

BASES

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SRs SR 3.0.1 through SR 3.0.4 establish the general requirements applicable to all Specifications and apply at all times, unless otherwise stated. SR 3.0.2 and SR 3.0.3 apply in Chapter 5 only when invoked by a Chapter 5 Specification.

SR 3.0.1 SR 3.0.1 establishes the requirement that SRs must be met during the MODES or other specified conditions in the Applicability for which the requirements of the LCO apply, unless otherwise specified in the individual SRs. This Specification is to ensure that Surveillances are performed to verify the OPERABILITY of systems and components, and that variables are within specified limits. Failure to meet a Surveillance within the specified Frequency, in accordance with SR 3.0.2, constitutes a failure to meet an LCO. Surveillances may be performed by means of any series of sequential, overlapping, or total steps provided the entire Surveillance is performed within the specified Frequency. Additionally, the definitions related to instrument testing (e.g., CHANNEL CALIBRATION) specify that these tests are performed by means of any series of sequential, overlapping, or total steps.

Systems and components are assumed to be OPERABLE when the associated SRs have been met. Nothing in this Specification, however, is to be construed as implying that systems or components are OPERABLE when:

- a. The systems or components are known to be inoperable, although still meeting the SRs; or
- b. The requirements of the Surveillance(s) are known not to be met between required Surveillance performances.

Surveillances do not have to be performed when the unit is in a MODE or other specified condition for which the requirements of the associated LCO are not applicable, unless otherwise specified. The SRs associated with a test exception are only applicable when the test exception is used as an allowable exception to the requirements of a Specification.

Unplanned events may satisfy the requirements (including applicable acceptance criteria) for a given SR. In this case, the unplanned event may be credited as fulfilling the performance of the SR. This allowance includes those SRs whose performance is normally precluded in a given MODE or other specified condition.

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BASES

SR 3.0.1 (continued)

Surveillances, including Surveillances invoked by Required Actions, do not have to be performed on inoperable equipment because the ACTIONS define the remedial measures that apply. Surveillances have to be met and performed in accordance with SR 3.0.2, prior to returning equipment to OPERABLE status.

Upon completion of maintenance, appropriate post maintenance testing is required to declare equipment OPERABLE. This includes ensuring applicable Surveillances are not failed and their most recent performance is in accordance with SR 3.0.2. Post maintenance testing may not be possible in the current MODE or other specified conditions in the Applicability due to the necessary unit parameters not having been established. In these situations, the equipment may be considered OPERABLE provided testing has been satisfactorily completed to the extent possible and the equipment is not otherwise believed to be incapable of performing its function. This will allow operation to proceed to a MODE or other specified condition where other necessary post maintenance tests can be completed.

Some examples of this process are:

- a. Auxiliary feedwater (AFW) pump turbine maintenance during refueling that requires testing at steam pressures > 800 psi. However, if other appropriate testing is satisfactorily completed, the AFW System can be considered OPERABLE. This allows startup and other necessary testing to proceed until the plant reaches the steam pressure required to perform the testing.

- b. High pressure safety injection (~~HPI~~^{HPSI}) maintenance during shutdown that requires system functional tests at a specified pressure. Provided other appropriate testing is satisfactorily completed, startup can proceed with ~~HPI~~^{HPSI} considered OPERABLE. This allows operation to reach the specified pressure to complete the necessary post maintenance testing.

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SR 3.0.2

SR 3.0.2 establishes the requirements for meeting the specified Frequency for Surveillances and any Required Action with a Completion Time that requires the periodic performance of the Required Action on a "once per . . ." interval.

SR 3.0.2 permits a 25% extension of the interval specified in the Frequency. This extension facilitates Surveillance scheduling and considers plant operating conditions that may not be suitable for conducting the Surveillance (e.g., transient conditions or other ongoing Surveillance or maintenance activities).

BASES

SR 3.0.2 (continued)

When a Section 5.5, "Programs and Manuals," specification states that the provisions of SR 3.0.2 are applicable, a 25% extension of the testing interval, whether stated in the specification or incorporated by reference, is permitted.

The 25% extension does not significantly degrade the reliability that results from performing the Surveillance at its specified Frequency. This is based on the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the SRs.

The exceptions to SR 3.0.2 are those Surveillances for which the 25% extension of the interval specified in the Frequency does not apply. These exceptions are stated in the individual Specifications. The requirements of regulations take precedence over the TS. Examples of where SR 3.0.2 does not apply are the Containment Leakage Rate Testing Program required by 10 CFR 50, Appendix J, and the inservice testing of pumps and valves in accordance with applicable American Society of Mechanical Engineers Operation and Maintenance Code, as required by 10 CFR 50.55a. These programs establish testing requirements and Frequencies in accordance with the requirements of regulations. The TS cannot in and of themselves extend a test interval specified in the regulations directly or by reference.

As stated in SR 3.0.2, the 25% extension also does not apply to the initial portion of a periodic Completion Time that requires performance on a "once per ..." basis. The 25% extension applies to each performance after the initial performance. The initial performance of the Required Action, whether it is a particular Surveillance or some other remedial action, is considered a single action with a single Completion Time. One reason for not allowing the 25% extension to this Completion Time is that such an action usually verifies that no loss of function has occurred by checking the status of redundant or diverse components or accomplishes the function of the inoperable equipment in an alternative manner.

The provisions of SR 3.0.2 are not intended to be used repeatedly to extend Surveillance intervals (other than those consistent with refueling intervals) or periodic Completion Time intervals beyond those specified.

SR 3.0.3

SR 3.0.3 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a Surveillance has not been performed within the specified Frequency. A delay period of up to 24 hours or up to the limit of the specified Frequency, whichever is greater, applies from the point in time that it is

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SR 3.0.3 (continued)

discovered that the Surveillance has not been performed in accordance with SR 3.0.2, and not at the time that the specified Frequency was not met.

When a Section 5.5, "Programs and Manuals," specification states that the provisions of SR 3.0.3 are applicable, it permits the flexibility to defer declaring the testing requirement not met in accordance with SR 3.0.3 when the testing has not been completed within the testing interval (including the allowance of SR 3.0.2 if invoked by the Section 5.5 specification).

This delay period provides adequate time to perform Surveillances that have been missed. This delay period permits the performance of a Surveillance before complying with Required Actions or other remedial measures that might preclude performance of the Surveillance.

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the Surveillance, the safety significance of the delay in completing the required Surveillance, and the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the requirements.

When a Surveillance with a Frequency based not on time intervals, but upon specified unit conditions, operating situations, or requirements of regulations (e.g., prior to entering MODE 1 after each fuel loading, or in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions, etc.) is discovered to not have been performed when specified, SR 3.0.3 allows for the full delay period of up to the specified Frequency to perform the Surveillance. However, since there is not a time interval specified, the missed Surveillance should be performed at the first reasonable opportunity.

SR 3.0.3 provides a time limit for, and allowances for the performance of, Surveillances that become applicable as a consequence of MODE changes imposed by Required Actions.

SR 3.0.3 is only applicable if there is a reasonable expectation the associated equipment is OPERABLE or that variables are within limits, and it is expected that the Surveillance will be met when performed. Many factors should be considered, such as the period of time since the Surveillance was last performed, or whether the Surveillance, or a portion thereof, has ever been performed, and any other indications, tests, or activities that might support the expectation that the Surveillance will be

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SR 3.0.3 (continued)

met when performed. An example of the use of SR 3.0.3 would be a relay contact that was not tested as required in accordance with a particular SR, but previous successful performances of the SR included the relay contact; the adjacent, physically connected relay contacts were tested during the SR performance; the subject relay contact has been tested by another SR; or historical operation of the subject relay contact has been successful. It is not sufficient to infer the behavior of the associated equipment from the performance of similar equipment. The rigor of determining whether there is a reasonable expectation a Surveillance will be met when performed should increase based on the length of time since the last performance of the Surveillance. If the Surveillance has been performed recently, a review of the Surveillance history and equipment performance may be sufficient to support a reasonable expectation that the Surveillance will be met when performed. For Surveillances that have not been performed for a long period or that have never been performed, a rigorous evaluation based on objective evidence should provide a high degree of confidence that the equipment is OPERABLE. The evaluation should be documented in sufficient detail to allow a knowledgeable individual to understand the basis for the determination.

Failure to comply with specified Frequencies for SRs is expected to be an infrequent occurrence. Use of the delay period established by SR 3.0.3 is a flexibility which is not intended to be used repeatedly to extend Surveillance intervals. While up to 24 hours or the limit of the specified Frequency is provided to perform the missed Surveillance, it is expected that the missed Surveillance will be performed at the first reasonable opportunity. The determination of the first reasonable opportunity should include consideration of the impact on plant risk (from delaying the Surveillance as well as any plant configuration changes required or shutting the plant down to perform the Surveillance) and impact on any analysis assumptions, in addition to unit conditions, planning, availability of personnel, and the time required to perform the Surveillance. This risk impact should be managed through the program in place to implement 10 CFR 50.65(a)(4) and its implementation guidance, NRC Regulatory Guide 1.160, "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." This Regulatory Guide addresses consideration of temporary and aggregate risk impacts, determination of risk management action thresholds, and risk management action up to and including plant shutdown. The missed Surveillance should be treated as an emergent condition as discussed in the Regulatory Guide. The risk evaluation may use quantitative, qualitative, or blended methods. The

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SR 3.0.3 (continued)

degree of depth and rigor of the evaluation should be commensurate with the importance of the component. Missed Surveillances for important components should be analyzed quantitatively. If the results of the risk evaluation determine the risk increase is significant, this evaluation should be used to determine the safest course of action. All missed Surveillances will be placed in the licensee's Corrective Action Program.

If a Surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable is considered outside the specified limits and the Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon expiration of the delay period. If a Surveillance is failed within the delay period, then the equipment is inoperable, or the variable is outside the specified limits and the Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon the failure of the Surveillance.

Completion of the Surveillance within the delay period allowed by this Specification, or within the Completion Time of the ACTIONS, restores compliance with SR 3.0.1.

SR 3.0.4

SR 3.0.4 establishes the requirement that all applicable SRs must be met before entry into a MODE or other specified condition in the Applicability.

This Specification ensures that system and component OPERABILITY requirements and variable limits are met before entry into MODES or other specified conditions in the Applicability for which these systems and components ensure safe operation of the unit. The provisions of this Specification should not be interpreted as endorsing the failure to exercise the good practice of restoring systems or components to OPERABLE status before entering an associated MODE or other specified condition in the Applicability.

A provision is included to allow entry into a MODE or other specified condition in the Applicability when an LCO is not met due to a Surveillance not being met in accordance with LCO 3.0.4.

However, in certain circumstances, failing to meet an SR will not result in SR 3.0.4 restricting a MODE change or other specified condition change. When a system, subsystem, division, component, device, or variable is inoperable or outside its specified limits, the associated SR(s) are not required to be performed, per SR 3.0.1, which states that surveillances do

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SR 3.0.4 (continued)

not have to be performed on inoperable equipment. When equipment is inoperable, SR 3.0.4 does not apply to the associated SR(s) since the requirement for the SR(s) to be performed is removed. Therefore, failing to perform the Surveillance(s) within the specified Frequency does not result in an SR 3.0.4 restriction to changing MODES or other specified conditions of the Applicability. However, since the LCO is not met in this instance, LCO 3.0.4 will govern any restrictions that may (or may not) apply to MODE or other specified condition changes. SR 3.0.4 does not restrict changing MODES or other specified conditions of the Applicability when a Surveillance has not been performed within the specified Frequency, provided the requirement to declare the LCO not met has been delayed in accordance with SR 3.0.3.

The provisions of SR 3.0.4 shall not prevent entry into MODES or other specified conditions in the Applicability that are required to comply with ACTIONS. In addition, the provisions of SR 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that result from any unit shutdown. In this context, a unit shutdown is defined as a change in MODE or other specified condition in the Applicability associated with transitioning from MODE 1 to MODE 2, MODE 2 to MODE 3, MODE 3 to MODE 4, and MODE 4 to MODE 5.

The precise requirements for performance of SRs are specified such that exceptions to SR 3.0.4 are not necessary. The specific time frames and conditions necessary for meeting the SRs are specified in the Frequency, in the Surveillance, or both. This allows performance of Surveillances when the prerequisite condition(s) specified in a Surveillance procedure require entry into the MODE or other specified condition in the Applicability of the associated LCO prior to the performance or completion of a Surveillance. A Surveillance that could not be performed until after entering the LCO's Applicability, would have its Frequency specified such that it is not "due" until the specific conditions needed are met. Alternately, the Surveillance may be stated in the form of a Note, as not required (to be met or performed) until a particular event, condition, or time has been reached. Further discussion of the specific formats of SRs' annotation is found in Section 1.4, Frequency.

SR 3.0.5 SR 3.0.5 delineates the applicability of the Surveillance activities to Unit 3 and Unit 4 operations. SR 3.0.5 states that SRs shall apply to each unit individually unless otherwise indicated as stated in LCO 3.0.10 for individual specifications or whenever certain portions of a specification contain surveillance parameters different for each unit, which will be identified in parentheses, footnotes or body of the requirement. Examples of different parameters for each unit can be found in the SRs for LCO 3.8.1.

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**JUSTIFICATION FOR DEVIATIONS
ITS 3.0 BASES, LCO AND SR APPLICABILITY**

1. Changes have been made to reflect changes made to the Specification.
2. Changes are made (additions, deletions, and/or changes) to the Improved Standard Technical Specifications (ISTS) Bases which reflect the plant specific nomenclature, number, reference, system description, analysis, or licensing basis description.
3. The ISTS contains bracketed information and/or values that are generic to all Westinghouse vintage plants. The brackets are removed and the proper plant specific information/value is changed to reflect the current licensing basis.
4. The Reviewer's Note has been deleted. This information is for the NRC reviewer to be keyed into what is needed to meet this requirement. This Note is not meant to be retained in the final version of the plant specific submittal.
5. Editorial/grammatical changes made.

Specific No Significant Hazards Considerations (NSHCs)

**DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS
ITS 3.0, LCO AND SR APPLICABILITY**

10 CFR 50.92 EVALUATION
FOR
LESS RESTRICTIVE CHANGE L01

Florida Power & Light (FPL) is converting Turkey Point Nuclear Generating Station (PTN) Units 3 and 4 to the Improved Technical Specifications (ITS) as outlined in NUREG-1431, Rev. 5, "Standard Technical Specifications, Westinghouse Plants." The proposed change involves making the Current Technical Specifications (CTS) less restrictive. Below is the description of this less restrictive change and the determination of No Significant Hazards Considerations for conversion to NUREG-1431.

A change is proposed to PTN current Technical Specifications to allow a delay time for entering a supported system Technical Specification (TS) when the inoperability is due solely to an unavailable barrier if risk is assessed and managed consistent with the program in place for following the requirements of 10 CFR 50.65(a)(4). Limiting Condition for Operation (LCO) 3.0.9 will be added to the PTN ITS providing this allowance. This change was generically approved by the NRC published in a Notice of Availability in the Federal Register (71 FR 58444, dated October 3, 2006).

FPL has evaluated whether a significant hazards consideration is involved with the proposed generic change by focusing on the three standards in 10 CFR 50.92, "Issuance of Amendment," as discussed below:

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

Response: No.

Barriers are not an initiator to any accident previously evaluated. The probability of an accident previously evaluated is not significantly increased. Barriers support the operation of equipment assumed to mitigate the effects of accidents previously evaluated. The proposed relaxation may only be applied to a single train or subsystem of a multiple train or subsystem TS system at a given time for a given category of initiating event, or to multiple trains or subsystems of a multiple train or subsystem TS system provided the affected barriers protect against different categories of initiating events. Therefore, for any given category of initiating event, the ability to perform the assumed safety function is preserved. The consequences of an accident occurring during the time allowed when barriers are not capable of performing the associated support function are no different from the consequences of the same accident while relying on the Actions of the supported TS systems.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

**DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS
ITS 3.0, LCO AND SR APPLICABILITY**

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

Response: No.

No new or different accidents result from using the proposed change. The changes do not involve a physical alteration of the plant (i.e., no new or different type of equipment will be installed) or a change in the methods governing normal plant operation. In addition, the changes do not impose any new or different requirements or eliminate any existing requirements. The changes do not alter assumptions made in the safety analysis. The proposed changes are consistent with the safety analysis assumptions and current plant operating practice.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

Response: No.

The proposed change allows for a limited period in which barriers may be unable to perform the associated support function without declaring the supported systems inoperable. A risk analysis has shown that this provision will not have a significant effect on plant risk. In addition, regulatory requirements in 10 CFR 50.65(a)(4) require risk assessment and risk management, which will ensure that plant risk is not significantly increased.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, FPL concludes that the proposed change does not involve a significant hazards consideration under the standards in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

**DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS
ITS 3.0, LCO AND SR APPLICABILITY**

10 CFR 50.92 EVALUATION
FOR
LESS RESTRICTIVE CHANGE L02

Florida Power & Light (FPL) is converting Turkey Point Nuclear Generating Station (PTN) Units 3 and 4 current Technical Specifications (CTS) to the Improved Technical Specifications (ITS) as outlined in NUREG-1431, Rev. 5, "Standard Technical Specifications, Westinghouse Plants." The proposed change involves making the CTS less restrictive. Below is the description of this less restrictive change and the determination of No Significant Hazards Considerations for conversion to NUREG-1431.

The proposed change revises Sections 3.0, "LCO Applicability" and "SR Applicability" of the Technical Specifications (TS) to clarify the use and application of the TS usage rules and revise the application of Surveillance Requirement (SR) 3.0.3. CTS TS 4.0.3 is revised to allow application of ITS SR 3.0.3 when an SR has not been previously performed.

FPL has evaluated whether a significant hazards consideration is involved with the proposed generic change by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

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

Response: No.

The proposed change to SR 3.0.3 states that the allowance may only be used when there is a reasonable expectation the surveillance will be met when performed. Since the proposed changes does not significantly affect system Operability, the proposed change will have no significant effect on the initiating events for accidents previously evaluated and will have no significant effect on the ability of the systems to mitigate accidents previously evaluated.

Therefore, it is concluded that this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

Response: No.

The proposed change to the TS usage rules does not affect the design or function of any plant systems. The proposed change does not change the Operability requirements for plant systems, or the actions taken when plant systems are not operable.

Therefore, it is concluded that this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

**DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS
ITS 3.0, LCO AND SR APPLICABILITY**

3. Does the proposed change involve a significant reduction in a margin of safety?

Response: No.

The proposed change revised CTS TS 4.0.3 to allow application of ITS SR 3.0.3 when an SR has not been previously performed if there is reasonable expectation that the SR will be met when performed. This expands the use of SR 3.0.3 while ensuring the affected system can perform its safety function. As a result, plant safety is either improved or unaffected.

Therefore, it is concluded that this change does not involve a significant reduction in a margin of safety.

Based on the above, FPL concludes that the proposed change presents no significant hazards considerations under the standards in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.