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16.0 TECHNICAL SPECIFICATIONS

16.1 TECHNICAL SPECIFICATIONS

The Technical Specifications are located in the OPERATING LICENSE MANUAL.

16.1.1 Technical Specification Task Force (TSTF) Required Implementation Commitments

TSTF-423, Technical Specification End States

Commitment	Implementation
Entry into the shutdown modes approved in this SE shall be for the primary purpose of accomplishing short-duration repairs which necessitated exiting the original operating mode. In response to the staffs questions, the BWROG stated that "The BWRs are most likely to stay in hot shutdown for no more than 2 to 3 days and definitely, not more than a week." The staff expects that the licensees will follow this guidance.	The Bases for each modified Required Action which allows remaining in MODE 3 is modified to include the following statement, "Remaining in the Applicability of the LCO is acceptable because the plant risk in MODE 3 is similar to or lower than the risk in MODE 4 and because the time spent in MODE 3 to perform the necessary repairs to restore the system to OPERABLE status will be short." Regarding the specific time limits, a BWR in MODE 3 only generates sufficient decay heat to remain in MODE 3 for 2 to 3 days, and for not more than a week. Therefore, this is not an administrative limitation, but a physical limitation. As a result, there is no need for a licensee to incorporate these specific times in the Technical Specifications or Bases.

Appropriate plant procedures and administrative controls will be used when the plant is operated in the proposed end states.	Licensees will implement appropriate plant procedures and administrative controls to be used when the plant is operated in the proposed end states as required by Technical Specification 5.4, "Procedures," and 10 CFR 50, Appendix B. Appropriate plant procedures and administrative controls must be used when the plant is operated in any plant operating MODE. The MODE 3 end states are not unique in this regard. Therefore, this stipulation is not appropriate for inclusion in the Technical Specifications or Bases as it is does not provide guidance to the operator that is unique to the conditions to be entered.

Entry into and use of the proposed end states shall be in accordance with the requirements of 10 CFR 50.65(b)(4). The licensee should do a risk assessment with respect to performance of the key shutdown safety functions, as described in Section 4 of this SE.	Use of the new MODE 3 end states will be accompanied by the performance of maintenance to restore the inoperable system or component. When performing maintenance, licensees are required to perform a risk assessment by 10 CFR 50.65(a)(4). This risk assessment is in accordance with the plant procedures in place to implement 10 CFR 50.65(a)(4) and envelopes the situation where entering a MODE or other specified condition in the applicability is contemplated with plant equipment inoperable. Those plant procedures will follow the guidance in NUMARC 93-01, "Assessment of Resulting from Performance of Maintenance Activities," Section 11, as revised in February 2000 and as endorsed by NRC Regulatory Guide 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants." The risk evaluations performed in accordance with these documents consider the key shutdown safety functions. Therefore, implementation of these end state changes imposes no new requirements with regard to implementation of 10 CFR 50.65(a)(4). As a result, this stipulation is not appropriate for inclusion in the Technical Specifications or Bases as it is contrary to the content and format of the Improved Standard Technical Specifications to repeat regulatory requirements in the Technical Specifications.

The purpose of the BWROG request is to allow corrective maintenance in a safe operating mode after an CT has been exceeded and minimize the corrective action time so that the plant can be restored to power operation. Ordinarily the failures result in a degraded plant condition. Consequently, with respect to additional licensee outage activities that could affect the safe conduct of operations and that are not directly required for correction of the failure or failures that caused the CT to be exceeded, a licensee must make two commitments:

a. The licensee will perform a safety assessment in accordance with the maintenance rule prior to undertaking such additional activities.

b. If conditions change so that the safety assessment is no longer valid, the licensee will suspend all such additional activities via a process consistent with safety until the assessment has been revalidated. The staff expects the licensee to make a contingency plan to address this situation. The contingency plan may require such actions as (1) suspending the activity until conditions are again appropriate, (2) terminating the activity and starting over when conditions are again appropriate, and (3) continuing the activity if safety is best

Use of the new MODE 3 end states will be accompanied by the performance of maintenance to restore the inoperable system or component. When performing maintenance licensees are required to perform a risk assessment by 10 CFR 50.65(a)(4). This risk assessment must consider all maintenance being performed, regardless of whether the maintenance is related to restoring the inoperable equipment which lead to the use of the new MODE 3 end state. Therefore, the inclusion of stipulation 4.a in the Technical Specifications or Bases is not needed as it is unnecessary for a licensee to commit to follow the requirements in 10 CFR 50.65(a)(4). The requirements of 10 CFR 50 are imposed by regulation.

If plant conditions change during performance of maintenance, 10 CFR 50.65(a)(4) requires the new condition to evaluated, and if necessary, risk management actions to be taken. The actions may include stopping the maintenance activity, taking other risk management actions, or completing the activity. These actions are implemented in plant procedures. Therefore, inclusion of stipulation 4.b in the Technical Specifications or Bases is not needed as it is unnecessary for a licensee to commit to having a contingency plan to follow the requirements in 10 CFR 50.65(a)(4). The requirements

~~ensured by completing the~~ activity. The staff recognizes that such decisions may have to be made on the basis of engineering judgment should an unforeseen situation arise.	~~of 10 CFR 50 are already~~ imposed by regulation. In addition, it is contrary to the content and format of the Improved Standard Technical Specifications to repeat regulatory requirements in the Technical Specifications.
The requested end state changes do not prohibit licensees from entering cold shutdown if they wish to do so for operational reasons or maintenance requirements. In such cases, the specific requirements associated with the requested end state changes do not apply.	The Bases for each modified Required Action which allows remaining in MODE 3 is modified to include the following statement, "Voluntary entry into MODE 4 may be made as it is also an acceptable low-risk state." As stated above, the specific requirements associated with the MODE 3 end states are not unique to implementation of this change. Therefore, it not necessary to implement the qualification that these requirements do not apply if cold shutdown is entered. Once MODE 4 is entered, the subject Technical Specifications do not apply. Therefore, any requirements associated with the modified Required Actions are not applicable. As a result, it is not necessary to implement this stipulation in the Technical Specifications or Bases.

16.2 RELOCATED TECHNICAL SPECIFICATION REQUIREMENTS

The relocated Technical Specifications are located in either the Technical Requirements Manual (TRM) or the Offsite Dose Calculation Manual (ODCM) of the OPERATING LICENSE MANUAL.