

Technical Specifications Task Force Improved Standard Technical Specifications Change Traveler

Revise the Risk Informed Completion Time Backstop

NUREGs Affected: 1430 1431 1432 1433 1434 2194

Classification: 1) Technical Change

Recommended for CLIIP?: Yes

Correction or Improvement: Improvement

NRC Fee Status: Not Exempt

Benefit: Provides Longer Completion Time

Changes Marked on ISTS Rev: 5.0

PWROG RISD & PA (if applicable): PA-LSC-1996

See attached.

Revision History

OG Revision 0

Revision Status: Active

Revision Proposed by: TSTF

Revision Description:
Original Issue

Owners Group Review Information

Date Originated by OG: 21-Mar-24

Owners Group Comments
(No Comments)

Owners Group Resolution: Approved Date: 04-Apr-24

TSTF Review Information

TSTF Received Date: 04-Apr-24

Date Distributed for Review 09-Apr-24

TSTF Comments:
(No Comments)

TSTF Resolution: Approved

Date: 29-Apr-24

Affected Technical Specifications

1.3	Completion Times	
	Change Description: Example 1.3-8	
5.5.20	Risk Informed Completion Time Program	NUREG(s)- 1430 1431 1432 Only
5.5.17	Risk Informed Completion Time Program	NUREG(s)- 1433 1434 Only

30-Apr-24

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**Attachment 1: STS Required Actions Not Modified by TSTF-505, Revision 2,
due to a 30-Day Completion Time**

Model Application

1. SUMMARY DESCRIPTION

The proposed change revises the Technical Specifications (TS) Risk Informed Completion Time (RICT) Program to change the administrative limit on the duration of a RICT from 30 to 90 days. The proposed change affects the Standard Technical Specifications (STS) in NUREG-1430, NUREG-1431, NUREG-1432, NUREG-1433, and NUREG-1434¹.

2. DETAILED DESCRIPTION

2.1. Background

The Nuclear Regulatory Commission (NRC) approved Nuclear Energy Institute (NEI) Topical Report NEI 06-09, Revision 0, "Risk-Informed Technical Specifications Initiative 4b, Risk-Managed Technical Specifications (RMTS) Guidelines, Industry Guidance Document," on May 17, 2007². NEI 06-09 provides a risk-informed methodology to permit the Completion Times associated with some TS Required Actions to be extended, provided risk is assessed and managed.

TSTF-505, Revision 2, "Provide Risk-Informed Extended Completion Times - RITSTF Initiative 4b," was approved by the NRC on November 21, 2018³. TSTF-505 implements the NEI 06-09 methodology in the STS. TSTF-505 makes three types of changes: it added a RICT Program to the Administrative Controls TS, it added a new example to TS Section 1.3, "Completion Times," and it added the option to use a RICT to many TS Required Actions.

The RICT Program in the Administrative Controls describes the TS requirements for a program that permits the calculation of a RICT. It requires the program to follow NEI 06-09, and contains certain high-level controls in addition to the requirement to follow the topical report. For example, it limits the duration of a calculated RICT to 30 days (referred to as the backstop), it limits the Modes in which a RICT may be used, and it provides guidance on assessing changes to the plant configuration while using a RICT.

Example 1.3-8 in STS Section 1.3, "Completion Times," provides direction on the application of the RICTs in the TS Actions.

¹ NUREG-1430 provides the STS for Babcock & Wilcox plant designs.

NUREG-1431 provides the STS for Westinghouse plant designs.

NUREG-1432 provides the STS for Combustion Engineering plant designs.

NUREG-1433 provides the STS for BWR/4 plant designs, but is also representative of the BWR/2, BWR/3, and, in this case, of the BWR/5 plant design.

NUREG-1434 provides the STS for BWR/6 plant designs, but is also representative in some cases of the BWR/5 plant design.

² Letter from US NRC to NEI, "Final Safety Evaluation for Nuclear Energy Institute (NEI) Topical Report (TR) NEI 06-09, "Risk-Informed Technical Specifications Initiative 4b, Risk-Managed Technical Specifications (RMTS) Guidelines," dated May 17, 2007. NRC Agencywide Documents Access and Management System (ADAMS) Accession No. ML071200238.

³ Letter from US NRC to Technical Specifications Task Force, "Final Revised Model Safety Evaluation for Traveler TSTF-505, Revision 2, 'Provide Risk-Informed Extended Completion Times - RITSTF Initiative 4b'," dated November 21, 2018. ADAMS Accession No. ML18269A041.

Generally, all TS Required Actions and Completion Times are modified to provide the option to determine a RICT unless one of eighteen exclusion criteria described in Section 2.3, "Scope," of TSTF-505 applies. Some example exclusion criteria are:

- The Required Action is associated with a Condition that represents a TS loss of specified safety function condition as applied to the RICT Program.
- The Required Action directs that other structures, systems, or components (SSCs) be declared inoperable.
- The Required Action has a Completion Time of "immediately."
- The Required Action has a Completion Time of 30 days or more.

TSTF-505 was incorporated into Revision 5 of the STS, published in September 2021. While the RICT option is added to the Required Actions in the STS, the adoption of a RICT provision into any plant-specific Required Action requires justification as described in TSTF-505.

2.2. Current Technical Specifications Requirements

NUREG-1430 through NUREG-1432, Specification 5.5.20, and NUREG-1433 and NUREG-1434, Specification 5.5.17, states in part:

5.5.[20/17] Risk Informed Completion Time Program

This program provides controls to calculate a Risk Informed Completion Time (RICT) and must be implemented in accordance with NEI 06-09-A, Revision 0, "Risk-Managed Technical Specifications (RMTS) Guidelines." The program shall include the following:

- a. The RICT may not exceed 30 days;

NUREG-1430 through NUREG-1434, Example 1.3-8 states in part:

ACTIONS		
CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One subsystem inoperable.	A.1 Restore subsystem to OPERABLE status.	7 days <u>OR</u> In accordance with the Risk Informed Completion Time Program

B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3.	6 hours
	<u>AND</u>	
	B.2 Be in MODE 5.	36 hours

When a subsystem is declared inoperable, Condition A is entered. The 7 day Completion Time may be applied as discussed in Example 1.3-2. However, the licensee may elect to apply the Risk Informed Completion Time Program which permits calculation of a Risk Informed Completion Time (RICT) that may be used to complete the Required Action beyond the 7 day Completion Time. The RICT cannot exceed 30 days. After the 7 day Completion Time has expired, the subsystem must be restored to OPERABLE status within the RICT or Condition B must also be entered.

2.3. Reason for the Proposed Change

TSTF-505 has been adopted by over half of the operating plants and the industry has accumulated over 80 reactor-years of operating history with the RICT Program. South Texas Project, the lead plant for NEI 06-09, has 16 years of operating history with the program. This experience has shown that some systems have a small effect on plant risk and typically have RICTs that would exceed 30 days if not limited by the 30-day backstop administrative limit. Imposing a 30-day backstop on low-risk systems results in unnecessarily putting resources on restoring those systems to operable status over systems that pose a higher risk. Extending the backstop to 90 days focuses licensee resources on the most risk-significant systems. In addition, should additional regulatory relief be pursued by the licensee, a 90-day RICT may permit the use of the normal license amendment process in lieu of the exigent or emergency amendment process.

2.4. Description of the Proposed Change

Paragraph a of the RICT Program is revised as shown below. Added text is in italics and deleted text is struck-through.

- a. The RICT may not exceed ~~90~~30 days. *This is an exception to NEI 06-09-A;*

Note that existing paragraph c of the program also references NEI-06-09-A and does not include the revision number.

Example 1.3-8 is revised as shown below:

When a subsystem is declared inoperable, Condition A is entered. The 7 day Completion Time may be applied as discussed in Example 1.3-2. However, the licensee may elect to apply the Risk Informed Completion Time Program which permits calculation of a Risk Informed Completion Time (RICT) that may be used to complete the Required Action beyond the 7 day Completion Time. ~~The RICT cannot exceed 30 days.~~ After the 7 day

Completion Time has expired, the subsystem must be restored to OPERABLE status within the RICT or Condition B must also be entered.

A model application is attached. The model should be used by licensees desiring to adopt the traveler following NRC approval.

3. TECHNICAL EVALUATION

3.1. Extension of the Backstop Completion Time Limit

NEI 06-09, Section 3.1.2, "RMTS Risk Management Time Intervals," states:

The RICT is the time interval from discovery of a condition requiring entry into a Technical Specifications action for a SSC which has the provision to utilize a RICT and which results in a plant configuration other than the zero-maintenance state until the 10^{-5} ICDP or 10^{-6} ILERP threshold is reached, or 30 days, whichever is shorter. The maximum RICT of 30 days is referred to as the back-stop CT. The back-stop CT limit of 30 days is judged to be a prudently conservative administrative limit for configuration risk management. Similar to the 90-day limit for a temporary alteration for maintenance without performing a 10 CFR 50.59 evaluation established in NEI 96-07 "Guidelines for 10 CFR 50.59 Implementation", the 30-day back-stop CT limits the time that is in a condition that is not consistent with the design basis. The 30-day back-stop CT was established based on the fact that some conventional Technical Specification front-stop CT limits are as long as 30 days, and because many nuclear stations would require up to this time period to complete some required complex corrective maintenance and testing for system function recovery.

The NRC's Safety Evaluation for NEI 06-09 is consistent and states, "The 30-day backstop CT assures that TS equipment is not out of service for extended periods, and is a reasonable upper limit to permit repairs and restoration of equipment to an operable status."

The NRC's Safety Evaluation for TSTF-505 includes a similar statement: "The NRC staff determined that 30-day limit is appropriate because it allows sufficient time to restore SSCs to operable status while avoiding excessive out-of-service times for TS SSCs."

NEI 06-09 compared the RICT backstop to the NEI 96-07 90-day limit on temporary alterations in support of maintenance. Equipment removed from service for maintenance is similar to equipment that is inoperable for any reason. NEI 96-07, Revision 1, Section 4.1.2 states that, "Maintenance activities are activities that restore SSCs to their as-designed condition." Applying this definition, activities taken while in a TS Required Action to restore inoperable equipment to operable status is a maintenance activity. NEI 96-07 also states, "Maintenance activities also include temporary alterations to the facility or procedures that directly relate to and are necessary to support the maintenance. Examples of temporary alterations that support maintenance include jumpering terminals, lifting leads, placing temporary lead shielding on pipes and equipment, removal of barriers, and use of temporary blocks, bypasses, scaffolding and supports." When a TS system is inoperable, it is typically removed from service while being repaired (e.g., electrical power is removed, pumps are placed in pull to lock, valves are locked in position, breakers are opened, initiation signals are blocked.) In summary, the state of an inoperable system while

working to restore it to operable status is a temporary alteration of the plant design in support of maintenance.

NEI 96-07 permits a temporary alteration in support of the maintenance to be in effect for up to 90 days without considering it a change to the facility that must be reviewed under 10 CFR 50.59. The RICT Program and NEI 06-09 permit a temporary alteration in support of the maintenance (an Action) to be in effect for up to 30 days under the RICT Program without requiring a plant shutdown. Both are maintenance conditions but the time limits are different. Revising the 30-day RICT backstop to 90 days establishes a consistent approach to system maintenance and restoration.

NEI 06-09 partially supported a 30-day backstop because some Completion Times were as long as 30 days. Since NEI 06-09 was approved, the NRC approved Completion Times of 90 days in the Pressurized Water Reactor (PWR) Containment Sump Actions⁴ and the PWR and Boiling Water Reactor (BWR) control room filtration Actions⁵. In both cases, the NRC staff determined a 90-day Completion Time for these conditions is not excessive and a longer period of time to perform corrective maintenance is acceptable.

Industry experience with the RICT Program has determined that the calculated RICT for some TS systems is consistently greater than 30 days. As a result, the backstop that is intended to be a conservative administrative limit for configuration risk management instead imposes a higher risk worth to those systems than warranted. This may result in low-risk systems being given higher maintenance priority than systems that are of higher importance to plant risk.

While the proposed change to the RICT Program would permit a RICT of up to 90 days, there are a number of factors that would encourage licensees to restore the inoperable systems to operable status more quickly.

- The RICT Program and NEI 06-09 require the cumulative impact of implementation of the RICT Program to be periodically assessed, and must be shown to result in a total risk impact below 10^{-5} /year for change to CDF, and below 10^{-6} /year for change to LERF, and the total CDF and total LERF must be reasonably shown to be less than 10^{-4} /year and 10^{-5} /year, respectively. Even for low-risk systems that would qualify for a 90-day backstop, the unnecessary accumulation of risk would be avoided by licensees to minimize the potential for exceeding the cumulative limits.
- If the affected system is within the scope of 10 CFR 50.65, the Maintenance Rule, (which is the case for almost all TS systems), then an inoperable system would increase the system unavailability. If the unavailability exceeds the goals for the system, a cause determination is required and it could be determined to be a maintenance preventable functional failure, which could result in increased monitoring and maintenance. Licensees would avoid actions that could result in increased monitoring and maintenance.

⁴ Letter from NRC to TSTF, "Final Safety Evaluations of Technical Specifications Task Force Traveler TSTF-567, Revision 1, 'Add Containment Sump TS to Address GSI-191 Issues,' dated July 3, 2018 (ADAMS Accession No. ML18109A077).

⁵ Federal Register, Volume 72, No. 10, Page 2022, dated January 17, 2007, "Notice of Availability of Technical Specification Improvement To Modify Requirements Regarding Control Room Envelope Habitability Using the Consolidated Line Item Improvement Process."

- Many plants have been approved to utilize 10 CFR 50.69, "Risk-informed categorization and treatment of structures, systems and components for nuclear power reactors." The regulation requires the licensee to determine if there are any adverse changes in performance such that the SSC unreliability values approach or exceed the values used in the evaluations, and to make adjustments as necessary to the categorization or treatment processes so that the categorization process and results are maintained valid. Licensees would avoid the need to review the categorization and treatment of SSCs.
- Extended inoperability of a system could result in an adverse impact to a Reactor Oversight Process performance indicator (ROP PI), such as the Mitigating System Performance Index. An ROP PI that is "greater than green" can result in increased NRC oversight and negative public perception of station performance, which are undesirable to a licensee.
- Extended inoperability of a TS subsystem or train can prevent the performance of necessary Surveillance testing or maintenance on the redundant train, potentially resulting a plant shutdown.

For these reasons, there will be strong disincentives for a licensee to take advantage of a RICT that would utilize the 90 days available under the proposed backstop limit, and it would only be used in instances of very low-risk.

3.2. Change to Example 1.3-8

Example 1.3-8 states, "However, the licensee may elect to apply the Risk Informed Completion Time Program which permits calculation of a Risk Informed Completion Time (RICT) that may be used to complete the Required Action beyond the 7 day Completion Time. The RICT cannot exceed 30 days." The proposed change deletes the second sentence.

The first sentence in the Example discussion states that the RICT is determined in accordance with the RICT Program. The RICT Program has many requirements, such as following NEI 06-09, the applicable plant operating modes, the backstop limit, and the treatment of emergent conditions. It is misleading for the example to only include, and thereby emphasize, one of those requirements. Instead, the proposed change removes the restatement of the backstop limit and relies on the existing requirement that the RICT Program be followed.

3.3. Addition of RICT Option to Required Actions Not Included in TSTF-505, Revision 2

TSTF-505, Revision 2, revised all of the Required Actions in the STS to provide the option to justify a RICT unless the Required Action met one or more of the eighteen exclusion criteria. One of those exclusion criteria was that the Completion Time was 30 days or more. Attachment 1 contains a list of the STS Required Actions that were not modified by TSTF-505, Revision 2, to include a RICT option solely because the existing Completion Time was 30 days or more. The extension of the backstop from 30 days to 90 days could provide the opportunity for a licensee to request the addition of a RICT option to one or more of these Required Actions. Revising the TS to permit the application of a RICT to these Required Actions is outside the scope of the proposed generic traveler because it requires submittal of plant-specific justification. The references contain example license amendment requests by licensees that had previously adopted TSTF-505 to add a RICT option to additional Required Actions, and those examples

may be used by licensees to submit an amendment to add a RICT option to Required Actions that have a 30 day Completion Time.

A licensee may also submit a license amendment request to adopt TSTF-505 and propose to include the changes in this traveler as a variation.

4. REGULATORY EVALUATION

The regulation at Title 10 of the Code of Federal Regulations (10 CFR) Section 50.36(b) requires:

Each license authorizing operation of a ... utilization facility ... will include technical specifications. The technical specifications will be derived from the analyses and evaluation included in the safety analysis report, and amendments thereto, submitted pursuant to [10 CFR] 50.34 ["Contents of applications; technical information"]. The Commission may include such additional technical specifications as the Commission finds appropriate.

Regulation 10 CFR 50.36(c) states that technical specifications will include items in several categories including Paragraph (5), "Administrative controls," which states "the provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to assure operation of the facility in a safe manner." The Risk Informed Completion Time Program is in the Administrative Controls section of the TS.

Regulation 10 CFR 50.36(c), Paragraph (2), states that when a limiting condition for operation of a nuclear reactor is not met, the licensee shall shut down the reactor or follow any remedial action permitted by the technical specifications until the condition can be met. The Risk Informed Completion Time Program is used to determine the time permitted to take the remedial actions permitted by the technical specifications.

Per 10 CFR 50.90, whenever a holder of a license desires to amend the license, application for an amendment must be filed with the Commission, fully describing the changes desired, and following as far as applicable, the form prescribed for original applications.

Per 10 CFR 50.92(a), in determining whether an amendment to a license will be issued to the applicant, the Commission will be guided by the considerations which govern the issuance of initial licenses to the extent applicable and appropriate.

Section IV, "The Commission Policy," of the "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors" (58FR39132), dated July 22, 1993, states in part that improved STS have been developed and will be maintained for each NSSS owners group. The Commission Policy encourages licensees to use the improved STS as the basis for plant-specific Technical Specifications. The industry's proposal of travelers and the NRC's approval of travelers is the method used to maintain the improved STS as described in the Commission's Policy. Following NRC approval, licensees adopt travelers into their plant-specific technical specifications following the requirements of 10 CFR 50.90. Therefore, the traveler process facilitates the Commission's policy while satisfying the requirements of the applicable regulations.

The regulation at 10 CFR 50.36(a)(1) also requires the application to include a "summary statement of the bases or reasons for such specifications, other than those covering administrative controls." The proposed traveler does not revise the Bases, and therefore, is in compliance with 10 CFR 50.36(a)(1).

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the approval of the proposed change will not be inimical to the common defense and security or to the health and safety of the public.

5. REFERENCES

1. Edwin I. Hatch Nuclear Plant, Units 1 and 2, "License Amendment Request to Revise Technical Specifications to Adopt Risk Informed Completion Times for Residual Heat Removal Service Water (RHRSW) and Plant Service Water (PSW) Systems," dated December 6, 2023 (ADAMS Accession No. ML23340A223).
2. St. Lucie Nuclear Plant, Unit Nos. 1 and 2, "Issuance of Amendment Nos. 252 and 207 to Allow Risk-Informed Completion Times (RICT) for the 120-Volt Alternating Current (AC) Instrument Bus Requirements," dated January 14, 2022 (ADAMS Accession No. ML21342A209).

Attachment 1
STS Required Actions Not Modified by TSTF-505, Revision 2, due to a
30-Day Completion Time

The bracketed (i.e., plant-specific) option to request the addition of a RICT was not included in TSTF-505, Revision 2, for the following Required Actions only because the Completion Times are 30 days or more:

NUREG-1430

- 3.3.17, PAM Instrumentation, Required Action A.1
- 3.3.18, Remote Shutdown System, Required Action A.1
- 3.4.15, RCS Leakage Detection Instrumentation, Required Action A.2
- 3.4.15, RCS Leakage Detection Instrumentation, Required Action B.2
- 3.7.11, CREATCS, Required Action A.1

NUREG-1431

- 3.3.3, PAM Instrumentation, Required Action A.1
- 3.3.4, Remote Shutdown System, Required Action A.1
- 3.4.15, RCS Leakage Detection Instrumentation, Required Action A.2
- 3.4.15, RCS Leakage Detection Instrumentation, Required Action B.2.1
- 3.4.15, RCS Leakage Detection Instrumentation, Required Action B.2.2
- 3.4.15, RCS Leakage Detection Instrumentation, Required Action E.1
- 3.4.15, RCS Leakage Detection Instrumentation, Required Action E.2
- 3.6.9, Hydrogen Mixing System (HMS) (Atmospheric, Ice Condenser, and Dual), Required Action A.1
- 3.7.11, CREATCS, Required Action A.1

NUREG-1432

- 3.3.11, PAM Instrumentation (Analog), Required Action A.1
- 3.3.12, Remote Shutdown System (Analog), Required Action A.1
- 3.3.11, PAM Instrumentation (Digital), Required Action A.1
- 3.3.12, Remote Shutdown System (Digital), Required Action A.1
- 3.4.15, RCS Leakage Detection Instrumentation, Required Action A.2
- 3.4.15, RCS Leakage Detection Instrumentation, Required Action B.2.1
- 3.4.15, RCS Leakage Detection Instrumentation, Required Action B.2.2
- 3.4.15, RCS Leakage Detection Instrumentation, Required Action E.1
- 3.4.15, RCS Leakage Detection Instrumentation, Required Action E.2
- 3.6.9, Hydrogen Mixing System (HMS) (Atmospheric and Dual), Required Action A.1
- 3.7.12, CREATCS, Required Action A.1

NUREG-1433

- 3.3.3.1, Post Accident Monitoring (PAM) Instrumentation, Required Action A.1
- 3.3.3.2, Remote Shutdown System, Required Action A.1
- 3.4.6, RCS Leakage Detection Instrumentation, Required Action A.1
- 3.4.6, RCS Leakage Detection Instrumentation, Required Action B.2
- 3.4.6, RCS Leakage Detection Instrumentation, Required Action E.1
- 3.4.6, RCS Leakage Detection Instrumentation, Required Action E.2

- 3.6.1.9, Required Action Main Steam Isolation Valve (MSIV) Leakage Control System (LCS),
Required Action A.1
- 3.6.3.1, [Drywell Cooling System Fans], Required Action A.1
- 3.7.1, Residual Heat Removal Service Water (RHRSW) System, Required Action A.1
- 3.7.2, [Plant Service Water (PSW)] System and [Ultimate Heat Sink (UHS)], Required
Action A.1
- 3.7.5, [Control Room AC] System, Required Action A.1

NUREG-1434

- 3.3.3.1, Post Accident Monitoring (PAM) Instrumentation, Required Action A.1
- 3.3.3.2, Remote Shutdown System, Required Action A.1
- 3.4.7, RCS Leakage Detection Instrumentation, Required Action A.1
- 3.4.7, RCS Leakage Detection Instrumentation, Required Action B.2
- 3.4.7, RCS Leakage Detection Instrumentation, Required Action E.1
- 3.4.7, RCS Leakage Detection Instrumentation, Required Action E.2
- 3.6.1.8, Penetration Valve Leakage Control System (PVLCS), Required Action A.1
- 3.6.1.9, Main Steam Isolation Valve (MSIV) Leakage Control System (LCS), Required
Action A.1
- 3.6.3.1, Primary Containment and Drywell Hydrogen Igniters, Required Action A.1
- 3.6.3.2, Drywell Purge System, Required Action A.1
- 3.6.5.6, Drywell Vacuum Relief System, Required Action B.1
- 3.6.5.6, Drywell Vacuum Relief System, Required Action C.1
- 3.7.4, [Control Room AC] System, Required Action A.1

Model Application

[DATE]

10 CFR 50.90

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

DOCKET NO.PLANT NAME

[50]-[xxx]

SUBJECT: Application to Revise Technical Specifications to Adopt
TSTF-603, "Revise the Risk Informed Completion Time
Backstop"

Pursuant to 10 CFR 50.90, [LICENSEE] is submitting a request for an amendment to the Technical Specifications (TS) for [PLANT NAME, UNIT NOS.].

[LICENSEE] requests adoption of TSTF-603, "Revise the Risk Informed Completion Time Backstop," which is an approved change to the Standard Technical Specifications (STS), into the [PLANT NAME, UNIT NOS] TS. TSTF-603 revises the TS Risk Informed Completion Time (RICT) Program to change the administrative limit on the duration of a RICT from 30 to 90 days.

The enclosure provides a description and assessment of the proposed changes. Attachment 1 provides the existing TS pages marked to show the proposed changes. [Attachment 2 provides revised (clean) TS pages.]

[LICENSEE] requests that the amendment be reviewed under the Consolidated Line Item Improvement Process (CLIIP). Approval of the proposed amendment is requested within 6 months of completion of the NRC's acceptance review. Once approved, the amendment shall be implemented within [90] days.

There are no regulatory commitments in this letter.

[In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the designated [STATE] Official.]

[In accordance with 10 CFR 50.30(b), a license amendment request must be executed in a signed original under oath or affirmation. This can be accomplished by attaching a notarized affidavit confirming the signature authority of the signatory, or by including the following statement in the cover letter: "I declare under penalty of perjury that the foregoing is true and correct. Executed on (date)." The alternative statement is pursuant to 28 USC 1746. It does not require notarization.]

If you should have any questions regarding this submittal, please contact [NAME, TELEPHONE NUMBER].

Sincerely,

[Name, Title]

Enclosure 1: Description and Assessment

Attachments: 1. Proposed Technical Specification Changes (Mark-Up)
2. [Revised Technical Specification Pages]

[The attachments are to be provided by the licensee and are not included in the model application.]

cc: NRC Project Manager
NRC Regional Office
NRC Resident Inspector
State Contact

ENCLOSURE

DESCRIPTION AND ASSESSMENT

1.0 DESCRIPTION

[LICENSEE] requests adoption of TSTF-603, "Revise the Risk Informed Completion Time Backstop," which is an approved change to the Standard Technical Specifications (STS), into the [PLANT NAME, UNIT NOS] TS. TSTF-603 revises the TS Risk Informed Completion Time (RICT) Program to change the administrative limit on the duration of a RICT from 30 to 90 days.

2.0 ASSESSMENT

2.1 Applicability of Safety Evaluation

[LICENSEE] has reviewed the safety evaluation for TSTF-603 provided to the Technical Specifications Task Force in a letter dated [DATE]. This review included the NRC staff's evaluation, as well as the information provided in TSTF-603. [LICENSEE] has concluded that the justifications presented in TSTF-603 and the safety evaluation prepared by the NRC staff are applicable to [PLANT, UNIT NOS.] and justify this amendment for the incorporation of the changes into the [PLANT] TS.

2.2 Variations

[LICENSEE is not proposing any variations from the TS changes described in TSTF-603 or the applicable parts of the NRC staff's safety evaluation.] [LICENSEE is proposing the following variations from the TS changes described in TSTF-603 or the applicable parts of the NRC staff's safety evaluation:]

[The [PLANT] TS utilize different [numbering][and][titles] than the STS on which TSTF-603 was based. Specifically, [describe differences between the plant-specific TS numbering and/or titles and the TSTF-603 numbering and titles.] These differences are administrative and do not affect the applicability of TSTF-603 to the [PLANT] TS.]

[The [PLANT] TS contain requirements that differ from the STS on which TSTF-603 was based but are encompassed in the TSTF-603 justification. [Describe the differences and why TSTF-603 is still applicable.]]

3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Consideration Analysis

[LICENSEE] requests adoption of TSTF-603, "Revise the Risk Informed Completion Time Backstop," which is an approved change to the Standard Technical Specifications (STS), into the [PLANT NAME, UNIT NOS] TS. TSTF-603 revises the TS Risk Informed Completion Time (RICT) Program to change the administrative limit on the duration of a RICT from 30 to 90 days.

[LICENSEE] has evaluated if a significant hazards consideration is involved with the proposed amendment(s) by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

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

Response: No

The proposed change revises the administrative limit on the duration of a RICT from 30 to 90 days. The proposed change does not involve a significant increase in the probability of an accident previously evaluated because the change involves no alteration to the plant or its modes of operation. The proposed change does not increase the consequences of an accident because the design-basis mitigation function of the affected systems is not changed and the consequences of an accident during the extended Completion Time are no different from those during the existing Completion Time.

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

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

Response: No

The proposed change revises the administrative limit on the duration of a RICT from 30 to 90 days. The proposed change does not change the design, configuration, or method of operation of the plant. The proposed change does not involve a physical alteration of the plant (no new or different kind of equipment will be installed).

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 amendment involve a significant reduction in a margin of safety?

Response: No

The proposed change revises the administrative limit on the duration of a RICT from 30 to 90 days. The proposed change uses a RICT Program to assure that adequate margins of safety are maintained. Application of the extended administrative limit on the application of a RICT is based on the RICT Program that considers the cumulative effects of multiple systems or components being out of service and does so more effectively than the current technical specifications.

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

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

3.2 Conclusion

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

4.0 ENVIRONMENTAL CONSIDERATION

A review has determined that the proposed amendment would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or would change an inspection or surveillance requirement. However, the proposed amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types or a significant increase in the amounts of any effluents that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

Technical Specifications Changes

1.3 Completion Times

EXAMPLES (continued)

----- Reviewer's Note -----
 Example 1.3-8 is only applicable to plants that have adopted the Risk Informed Completion Time Program.

[EXAMPLE 1.3-8

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One subsystem inoperable.	A.1 Restore subsystem to OPERABLE status.	7 days <u>OR</u> In accordance with the Risk Informed Completion Time Program
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3. <u>AND</u> B.2 Be in MODE 5.	6 hours 36 hours

When a subsystem is declared inoperable, Condition A is entered. The 7 day Completion Time may be applied as discussed in Example 1.3-2. However, the licensee may elect to apply the Risk Informed Completion Time Program which permits calculation of a Risk Informed Completion Time (RICT) that may be used to complete the Required Action beyond the 7 day Completion Time. ~~The RICT cannot exceed 30 days.~~ After the 7 day Completion Time has expired, the subsystem must be restored to OPERABLE status within the RICT or Condition B must also be entered.

The Risk Informed Completion Time Program requires recalculation of the RICT to reflect changing plant conditions. For planned changes, the revised RICT must be determined prior to implementation of the change in configuration. For emergent conditions, the revised RICT must be determined within the time limits of the Required Action Completion Time (i.e., not the RICT) or 12 hours after the plant configuration change, whichever is less.

5.5 Programs and Manuals

5.5.18 Setpoint Control Program (continued)

3. If the as-found value of the instrument channel trip setting is less conservative than the specified AV, then the SR is not met and the instrument channel shall be immediately declared inoperable.
 4. The instrument channel setpoint shall be reset to a value that is within the as-left tolerance around the [LTSP or NTSP] at the completion of the surveillance test; otherwise, the channel is inoperable (setpoints may be more conservative than the [LTSP or NTSP] provided that the as-found and as-left tolerances apply to the actual setpoint used to confirm channel performance).
- e. The program shall be specified in [insert the facility FSAR reference or the name of any document incorporated into the facility FSAR by reference].]

[5.5.19 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 Operation 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 3.0.2 and 3.0.3 are applicable to the Frequencies established in the Surveillance Frequency Control Program.]

[5.5.20 Risk Informed Completion Time Program

This program provides controls to calculate a Risk Informed Completion Time (RICT) and must be implemented in accordance with NEI 06-09-A, Revision 0, "Risk-Managed Technical Specifications (RMTS) Guidelines." The program shall include the following:

- a. The RICT may not exceed ~~9030~~ days. **This is an exception to NEI 06-09-A;**

1.3 Completion Times

EXAMPLES (continued)

When a subsystem is declared inoperable, Condition A is entered. The 7 day Completion Time may be applied as discussed in Example 1.3-2. However, the licensee may elect to apply the Risk Informed Completion Time Program which permits calculation of a Risk Informed Completion Time (RICT) that may be used to complete the Required Action beyond the 7 day Completion Time. ~~The RICT cannot exceed 30 days.~~ After the 7 day Completion Time has expired, the subsystem must be restored to OPERABLE status within the RICT or Condition B must also be entered.

The Risk Informed Completion Time Program requires recalculation of the RICT to reflect changing plant conditions. For planned changes, the revised RICT must be determined prior to implementation of the change in configuration. For emergent conditions, the revised RICT must be determined within the time limits of the Required Action Completion Time (i.e., not the RICT) or 12 hours after the plant configuration change, whichever is less.

If the 7 day Completion Time clock of Condition A has expired and subsequent changes in plant condition result in exiting the applicability of the Risk Informed Completion Time Program without restoring the inoperable subsystem to OPERABLE status, Condition B is also entered and the Completion Time clocks for Required Actions B.1 and B.2 start.

If the RICT expires or is recalculated to be less than the elapsed time since the Condition was entered and the inoperable subsystem has not been restored to OPERABLE status, Condition B is also entered and the Completion Time clocks for Required Actions B.1 and B.2 start. If the inoperable subsystems are restored to OPERABLE status after Condition B is entered, Condition A is exited, and therefore, the Required Actions of Condition B may be terminated.]

IMMEDIATE COMPLETION TIME	When "Immediately" is used as a Completion Time, the Required Action should be pursued without delay and in a controlled manner.
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5.5 Programs and Manuals

5.5.18 Setpoint Control Program (continued)

2. If the as-found value of the instrument channel trip setting differs from the previous as-left value or the specified NTSP by more than the pre-defined test acceptance criteria band (i.e., the specified AFT), then the instrument channel shall be evaluated before declaring the SR met and returning the instrument channel to service. This condition shall be entered in the plant corrective action program.
 3. If the as-found value of the instrument channel trip setting is less conservative than the specified AV, then the SR is not met and the instrument channel shall be immediately declared inoperable.
 4. The instrument channel setpoint shall be reset to a value that is within the as-left tolerance around the NTSP at the completion of the surveillance test; otherwise, the channel is inoperable (setpoints may be more conservative than the NTSP provided that the as-found and as-left tolerances apply to the actual setpoint used to confirm channel performance).
- e. The program shall be specified in [insert the facility FSAR reference or the name of any document incorporated into the facility FSAR by reference].]

[5.5.19 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 Operation 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 3.0.2 and 3.0.3 are applicable to the Frequencies established in the Surveillance Frequency Control Program.]

[5.5.20 Risk Informed Completion Time Program

This program provides controls to calculate a Risk Informed Completion Time (RICT) and must be implemented in accordance with NEI 06-09-A, Revision 0, "Risk-Managed Technical Specifications (RMTS) Guidelines." The program shall include the following:

5.5 Programs and Manuals

5.5.20 Risk Informed Completion Time Program (continued)

- a. The RICT may not exceed ~~9030~~ days. **This is an exception to NEI 06-09-A;**

----- REVIEWER'S NOTE -----

The Risk Informed Completion Time is only applicable in MODES supported by the licensee's PRA. Licensees applying the RICT Program to MODES other than MODES 1 and 2 must demonstrate that they have the capability to calculate a RICT in those MODES or that the risk indicated by their MODE 1 and 2 PRA model is bounding with respect to the lower MODE conditions.

- b. A RICT may only be utilized in MODE 1, 2 [, and 3, and MODE 4 while relying on steam generators for heat removal];
- c. When a RICT is being used, any change to the plant configuration, as defined in NEI 06-09-A, Appendix A, must be considered for the effect on the RICT.
1. For planned changes, the revised RICT must be determined prior to implementation of the change in configuration.
 2. For emergent conditions, the revised RICT must be determined within the time limits of the Required Action Completion Time (i.e., not the RICT) or 12 hours after the plant configuration change, whichever is less.
 3. Revising the RICT is not required if the plant configuration change would lower plant risk and would result in a longer RICT.
- d. For emergent conditions, if the extent of condition evaluation for inoperable structures, systems, or components (SSCs) is not complete prior to exceeding the Completion Time, the RICT shall account for the increased possibility of common cause failure (CCF) by either:
1. Numerically accounting for the increased possibility of CCF in the RICT calculation; or
 2. Risk Management Actions (RMAs) not already credited in the RICT calculation shall be implemented that support redundant or diverse SSCs that perform the function(s) of the inoperable SSCs, and, if practicable, reduce the frequency of initiating events that challenge the function(s) performed by the inoperable SSCs.

1.3 Completion Times

EXAMPLES (continued)

When a subsystem is declared inoperable, Condition A is entered. The 7 day Completion Time may be applied as discussed in Example 1.3-2. However, the licensee may elect to apply the Risk Informed Completion Time Program which permits calculation of a Risk Informed Completion Time (RICT) that may be used to complete the Required Action beyond the 7 day Completion Time. ~~The RICT cannot exceed 30 days.~~ After the 7 day Completion Time has expired, the subsystem must be restored to OPERABLE status within the RICT or Condition B must also be entered.

The Risk Informed Completion Time Program requires recalculation of the RICT to reflect changing plant conditions. For planned changes, the revised RICT must be determined prior to implementation of the change in configuration. For emergent conditions, the revised RICT must be determined within the time limits of the Required Action Completion Time (i.e., not the RICT) or 12 hours after the plant configuration change, whichever is less.

If the 7 day Completion Time clock of Condition A has expired and subsequent changes in plant condition result in exiting the applicability of the Risk Informed Completion Time Program without restoring the inoperable subsystem to OPERABLE status, Condition B is also entered and the Completion Time clocks for Required Actions B.1 and B.2 start.

If the RICT expires or is recalculated to be less than the elapsed time since the Condition was entered and the inoperable subsystem has not been restored to OPERABLE status, Condition B is also entered and the Completion Time clocks for Required Actions B.1 and B.2 start. If the inoperable subsystems are restored to OPERABLE status after Condition B is entered, Condition A is exited, and therefore, the Required Actions of Condition B may be terminated.]

IMMEDIATE COMPLETION TIME	When "Immediately" is used as a Completion Time, the Required Action should be pursued without delay and in a controlled manner.
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5.5 Programs and Manuals

5.5.18 Setpoint Control Program (continued)

3. If the as-found value of the instrument channel trip setting is less conservative than the specified AV, then the SR is not met and the instrument channel shall be immediately declared inoperable.
 4. The instrument channel setpoint shall be reset to a value that is within the as-left tolerance around the [LTSP or NTSP] at the completion of the surveillance test; otherwise, the channel is inoperable (setpoints may be more conservative than the [LTSP or NTSP] provided that the as-found and as-left tolerances apply to the actual setpoint used to confirm channel performance).
- e. The program shall be specified in [insert the facility FSAR reference or the name of any document incorporated into the facility FSAR by reference].]

[5.5.19 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 Operation 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 3.0.2 and 3.0.3 are applicable to the Frequencies established in the Surveillance Frequency Control Program.]

[5.5.20 Risk Informed Completion Time Program

This program provides controls to calculate a Risk Informed Completion Time (RICT) and must be implemented in accordance with NEI 06-09-A, Revision 0, "Risk-Managed Technical Specifications (RMTS) Guidelines." The program shall include the following:

- a. The RICT may not exceed ~~9030~~ days. **This is an exception to NEI 06-09-A;**

1.3 Completion Times

EXAMPLES (continued)

When a subsystem is declared inoperable, Condition A is entered. The 7 day Completion Time may be applied as discussed in Example 1.3-2. However, the licensee may elect to apply the Risk Informed Completion Time Program which permits calculation of a Risk Informed Completion Time (RICT) that may be used to complete the Required Action beyond the 7 day Completion Time. ~~The RICT cannot exceed 30 days.~~ After the 7 day Completion Time has expired, the subsystem must be restored to OPERABLE status within the RICT or Condition B must also be entered.

The Risk Informed Completion Time Program requires recalculation of the RICT to reflect changing plant conditions. For planned changes, the revised RICT must be determined prior to implementation of the change in configuration. For emergent conditions, the revised RICT must be determined within the time limits of the Required Action Completion Time (i.e., not the RICT) or 12 hours after the plant configuration change, whichever is less.

If the 7 day Completion Time clock of Condition A has expired and subsequent changes in plant condition result in exiting the applicability of the Risk Informed Completion Time Program without restoring the inoperable subsystem to OPERABLE status, Condition B is also entered and the Completion Time clocks for Required Actions B.1 and B.2 start.

If the RICT expires or is recalculated to be less than the elapsed time since the Condition was entered and the inoperable subsystem has not been restored to OPERABLE status, Condition B is also entered and the Completion Time clocks for Required Actions B.1 and B.2 start. If the inoperable subsystems are restored to OPERABLE status after Condition B is entered, Condition A is exited, and therefore, the Required Actions of Condition B may be terminated.]

IMMEDIATE COMPLETION TIME	When "Immediately" is used as a Completion Time, the Required Action should be pursued without delay and in a controlled manner.
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5.5 Programs and Manuals

[5.5.17 Risk Informed Completion Time Program

This program provides controls to calculate a Risk Informed Completion Time (RICT) and must be implemented in accordance with NEI 06-09-A, Revision 0, "Risk-Managed Technical Specifications (RMTS) Guidelines." The program shall include the following:

- a. The RICT may not exceed ~~9030~~ days. **This is an exception to NEI 06-09-A;**

----- REVIEWER'S NOTE -----

The Risk Informed Completion Time is only applicable in MODES supported by the licensee's PRA. Licensees applying the RICT Program to MODES other than MODES 1 and 2 must demonstrate that they have the capability to calculate a RICT in those MODES or that the risk indicated by their MODE 1 and 2 PRA model is bounding with respect to the lower MODE conditions.

- b. A RICT may only be utilized in MODE 1, 2 [, and 3, and MODE 4 while relying on steam generators for heat removal];
- c. When a RICT is being used, any change to the plant configuration, as defined in NEI 06-09-A, Appendix A, must be considered for the effect on the RICT.
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 3. Revising the RICT is not required if the plant configuration change would lower plant risk and would result in a longer RICT.
- d. For emergent conditions, if the extent of condition evaluation for inoperable structures, systems, or components (SSCs) is not complete prior to exceeding the Completion Time, the RICT shall account for the increased possibility of common cause failure (CCF) by either:
1. Numerically accounting for the increased possibility of CCF in the RICT calculation; or
 2. Risk Management Actions (RMAs) not already credited in the RICT calculation shall be implemented that support redundant or diverse SSCs that perform the function(s) of the inoperable SSCs, and, if practicable, reduce the frequency of initiating events that challenge the function(s) performed by the inoperable SSCs.

1.3 Completion Times

EXAMPLES (continued)

Time (RICT) that may be used to complete the Required Action beyond the 7 day Completion Time. ~~The RICT cannot exceed 30 days.~~ After the 7 day Completion Time has expired, the subsystem must be restored to OPERABLE status within the RICT or Condition B must also be entered.

The Risk Informed Completion Time Program requires recalculation of the RICT to reflect changing plant conditions. For planned changes, the revised RICT must be determined prior to implementation of the change in configuration. For emergent conditions, the revised RICT must be determined within the time limits of the Required Action Completion Time (i.e., not the RICT) or 12 hours after the plant configuration change, whichever is less.

If the 7 day Completion Time clock of Condition A has expired and subsequent changes in plant condition result in exiting the applicability of the Risk Informed Completion Time Program without restoring the inoperable subsystem to OPERABLE status, Condition B is also entered and the Completion Time clocks for Required Actions B.1 and B.2 start.

If the RICT expires or is recalculated to be less than the elapsed time since the Condition was entered and the inoperable subsystem has not been restored to OPERABLE status, Condition B is also entered and the Completion Time clocks for Required Actions B.1 and B.2 start. If the inoperable subsystems are restored to OPERABLE status after Condition B is entered, Condition A is exited, and therefore, the Required Actions of Condition B may be terminated.]

IMMEDIATE COMPLETION TIME	When "Immediately" is used as a Completion Time, the Required Action should be pursued without delay and in a controlled manner.
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5.5 Programs and Manuals

5.5.15 Setpoint Control Program (continued)

- AFT), then the instrument channel shall be evaluated before declaring the SR met and returning the instrument channel to service. This condition shall be entered in the plant corrective action program.
3. If the as-found value of the instrument channel trip setting is less conservative than the specified AV, then the SR is not met and the instrument channel shall be immediately declared inoperable.
 4. The instrument channel setpoint shall be reset to a value that is within the as-left tolerance around the [LTSP or NTSP] at the completion of the surveillance test; otherwise, the channel is inoperable (setpoints may be more conservative than the [LTSP or NTSP] provided that the as-found and as-left tolerances apply to the actual setpoint used to confirm channel performance).
- e. The program shall be specified in [insert the facility FSAR reference or the name of any document incorporated into the facility FSAR by reference.]

[5.5.16 Surveillance Frequency Control Program

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- 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.
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[5.5.17 Risk Informed Completion Time Program

This program provides controls to calculate a Risk Informed Completion Time (RICT) and must be implemented in accordance with NEI 06-09-A, Revision 0, "Risk-Managed Technical Specifications (RMTS) Guidelines." The program shall include the following:

- a. The RICT may not exceed **9030** days. **This is an exception to NEI 06-09-A;**