

Industry/TSTF Standard Technical Specification Change Traveler

Missed Surveillance Requirements

Classification: 3) Improve Specifications

NUREGs Affected: 1430 1431 1432 1433 1434

Description:

ITS SR 3.0.3 currently allows a delay period of up to 24 hours or up to the limit of the specified Frequency, whichever is less, to perform a missed Surveillance prior to having to declare the equipment inoperable. The proposed change will modify SR 3.0.3 to allow a delay period of 24 hours or up to the Surveillance frequency interval, whichever is longer. However, any missed Surveillance will be performed at the next opportunity taking into account the appropriate considerations. Any missed Surveillance requiring a change in MODE or plant conditions for performance would be performed at the first reasonable opportunity.

Justification:

NEED DESCRIPTION

ITS SR 3.0.3 currently allows a delay period of up to 24 hours or up to the limit of the specified Frequency, whichever is less, to perform a missed Surveillance prior to having to declare the equipment inoperable. However, there are Surveillances that cannot be adequately performed in 24 hours (considering the planning, personnel, in some cases procedures that may have to be written, as well as the performance of the test). Still other Surveillances, when discovered missed, may require a change in the state or MODE of the facility to perform the Surveillance. When faced with a missed Surveillance that may require a change in state or MODE, a licensee would have to either 1) declare the LCO not met and enter the Actions, which could ultimately require a plant shutdown, 2) determine a method to perform the SR in the current state or MODE, or 3) request a Notice of Enforcement Discretion - all potentially in the space of 24 hours. A survey of licensees indicates that in the 1996 to present time frame, more than 10 NOEDs regarding missed Surveillances have been processed. In some cases, the approval of the NOED was followed by a NRC request for an exigent Technical Specifications change. This is an unnecessary use of NRC and industry resources.

DETAILED JUSTIFICATION

History of Current ITS SR 3.0.3

ITS SR 3.0.3 currently allows a delay period of up to 24 hours or up to the limit of the specified Frequency, whichever is less, to perform a missed Surveillance prior to having to declare the equipment inoperable. This is based on NRC Generic Letter 87-09 which states, "It is overly conservative to assume that systems or components are inoperable when a Surveillance has not been performed. The opposite is in fact the case, the vast majority of Surveillances demonstrate that systems or components in fact are OPERABLE. When a Surveillance is missed, it is primarily a question of operability that has not been verified by the performance of the required Surveillance."

Based on consideration of plant conditions, adequate planning, availability of personnel, the time required to perform the Surveillance and the safety significance of the delay in completing the Surveillance, the NRC concluded in the Generic Letter 87-09 that 24 hours was an acceptable time limit for completing a missed Surveillance when the allowable outage times (AOT) of the ACTIONS was less than the 24 hour limit or a shutdown was required to comply with ACTIONS.

Justification

Since 1992, the NRC and Industry have been working together to establish good maintenance practices. With the issuance of the Maintenance Rule, the revisions thereto, and other NRC and Industry initiatives, there are even better Surveillance practices in place. Still, Surveillances may be missed for a variety of reasons. When this occurs, the current ITS SR 3.0.3 permits up to 24 hours or up the limit of the specified Frequency, whichever is less, to perform the Surveillance. However, there are Surveillances that cannot be adequately performed in 24 hours and still others that require a change in the state or MODE of the facility to perform the Surveillance.

The proposed change to extend the delay period allowed by SR 3.0.3 from 24 hours to 24 hours or the specified Frequency of the Surveillance, whichever is longer, is reasonable based on the following.

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- 1) As stated in the current ITS Bases, the most probable result of any particular Surveillance being performed is the verification of conformance with the requirements. This was included in Generic Letter 87-09 and was further confirmed by a limited review of Licensee Event Reports (LERs). The LER review indicated that there are very few occurrences of missed Surveillances given the number of LERs submitted and the large number of Surveillance Requirements, and when a missed Surveillance does occur, the Surveillance is subsequently passed when performed. This is also substantiated by a industry review of entries into SR 3.0.3.
- 2) If upon discovery of the missed Surveillance it is known that the Surveillance would not be passed, ITS SR 3.0.1 would require that the LCO be declared not met and the appropriate Condition(s) entered.
- 3) As currently stated in the Bases for SR 3.0.3 (and not revised in the proposal), use of the delay period established by SR 3.0.3 is a flexibility which is not intended to be used as an operational convenience to extend Surveillance intervals.
- 4) Performance of some Surveillances require the associated component to temporarily become inoperable (due to required system configuration, etc.) while other Surveillances require specific plant configurations. Having equipment not available or having to manipulate the plant configuration, carries with it a finite risk (unplanned transient, etc.). This risk, when compared with the confidence that the Surveillance would pass if performed, justifies extending the current 24 hours to up to the specified Surveillance Frequency or 24 hours whichever is longer.
- 5) When a Surveillance is missed, the licensee will take appropriate action to track the missed Surveillance and to perform the missed Surveillance at the first reasonable opportunity. Any reporting requirements associated with the missed Surveillance would be consistent with 10 CFR 50.73.

Additional Requirements/Information Included in the Proposal

The proposed change includes additional Bases words that indicate the missed Surveillance should be performed at the first reasonable opportunity and that the determination of the first reasonable opportunity should include impact on plant risk and impact on analysis assumptions, in addition to the consideration of unit conditions, planning, availability of personnel and the actual time to perform the Surveillance. The Bases also clarify that for Surveillances with a Frequency not based on time intervals that the missed Surveillance should be performed at the first reasonable opportunity. Determination of the first reasonable opportunity should consider the Code of Federal Regulations (CFR) requirements and allowances when the missed Surveillance Frequency is specified in terms of a CFR requirement. The allowance specified in SR 3.0.3 shall not be construed to supersede the CFR requirements.

In order to not unduly restrict the time to perform a missed Surveillance with a frequency less than 24 hours, the actual specification indicates up to 24 hours or the Surveillance interval whichever is longer.

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Revision History

OG Revision 0 Revision Status: Closed

Revision Proposed by: RITSTF

Revision Description:

Original Issue

11/8/99

OG Revision 0**Revision Status: Closed****Owners Group Review Information**

Date Originated by OG: 30-Aug-99

Owners Group Comments
(No Comments)

Owners Group Resolution: Date:

OG Revision 1**Revision Status: Closed**

Revision Proposed by: RITSTF

Revision Description:

Revision 1 was created to incorporate comments of the RITSTF. The major changes include (1) deletion of the Missed Surveillance Report, (2) reliance on the Bases to address informing the NRC of any missed Surveillances, and (3) the addition of a paragraph to explain that the requirements of the Code of Federal Regulations (CFR) must be considered in the determination of the first reasonable opportunity to perform the missed Surveillance, and that SR 3.0.3 does not supersede any CFR requirements.

TSTF Review Information

TSTF Received Date: 25-Oct-99 Date Distributed for Review

OG Review Completed: BWOG WOG CEOG BWROGTSTF Comments:
(No Comments)

TSTF Resolution: Date:

OG Revision 2**Revision Status: Closed**

Revision Proposed by: TSTF

Revision Description:

Revision 2 was created to incorporate comments of the TSTF and the industry. The major changes include 1) deletion of the Bases requirement to inform the NRC of the missed Surveillance and to indicate reliance upon appropriate licensee action and the reporting requirements of 10 CFR 50.73, 2) the deletion of the paragraph regarding SR 3.0.3 superceding any CFR requirements because the industry feels it is clear without making this statement, and 3) other justification enhancements and editorial changes.

TSTF Review Information

TSTF Received Date: 26-Oct-99 Date Distributed for Review 26-Oct-99

OG Review Completed: BWOG WOG CEOG BWROGTSTF Comments:
(No Comments)

TSTF Resolution: Superceded Date:

OG Revision 3**Revision Status: Active****Next Action: NRC**

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OG Revision 3

Revision Status: Active

Next Action: NRC

Revision Proposed by: TSTF

Revision Description:

Revision 3 was created to incorporate further comments of the TSTF and the Industry. The major changes include (1) consistent use of the term "first" reasonable opportunity, and (2) change of Industry contact to a TSTF Chairman.

TSTF Review Information

TSTF Received Date: 08-Nov-99

Date Distributed for Review 08-Nov-99

OG Review Completed: BWOG WOG CEOG BWROG

TSTF Comments:

(No Comments)

TSTF Resolution: Approved Date: 09-Nov-99

NRC Review Information

NRC Received Date: 10-Nov-99

NRC Comments:

(No Comments)

Final Resolution: NRC Action Pending

Final Resolution Date:

Incorporation Into the NUREGs

File to BBS/LAN Date:

TSTF Informed Date:

TSTF Approved Date:

NUREG Rev Incorporated:

Affected Technical Specifications

SR 3.0.3 SR Applicability

SR 3.0.3 Bases SR Applicability

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BASES INSERTS

Bases Insert SR 3.0.3 #1

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 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.

3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

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.

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.

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 ~~less~~. This delay period is permitted to allow performance of the Surveillance. greater.

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

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3.0 SR APPLICABILITY

SR 3.0.3 (continued) declared not met, and the applicable Condition(s) must be entered.

SR 3.0.4 Entry into a MODE or other specified condition in the Applicability of an LCO shall not be made unless the LCO's Surveillances have been met within their specified Frequency. 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.

LCO 3.0.4 is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, 3, and 4.

Reviewer's Note: SR 3.0.4 has been revised so that changes in MODES or other specified conditions in the Applicability that are part of a shutdown of the unit shall not be prevented. In addition, SR 3.0.4 has been revised so that it is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, 3, and 4. The MODE change restrictions in SR 3.0.4 were previously applicable in all MODES. Before this version of SR 3.0.4 can be implemented on a plant-specific basis, the licensee must review the existing technical specifications to determine where specific restrictions on MODE changes or Required Actions should be included in individual LCOs to justify this change; such an evaluation should be summarized in a matrix of all existing LCOs to facilitate NRC staff review of a conversion to the STS.

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**SR 3.0.2
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not be suitable for conducting the Surveillance (e.g., transient conditions or other ongoing Surveillance or maintenance activities).

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. An example of where SR 3.0.2 does not apply is a Surveillance with a Frequency of "in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions." The requirements of regulations take precedence over the TS. The TS cannot in and of themselves extend a test interval specified in the regulations. Therefore, there is a Note in the Frequency stating, "SR 3.0.2 is not applicable."

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 merely as an operational convenience 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

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greater

SR 3.0.3
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been completed within the specified Frequency. A delay period of up to 24 hours or up to the limit of the specified Frequency, whichever is ~~less~~ applies from the point in time that it is 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.

This delay period provides an adequate time to complete Surveillances that have been missed. This delay period permits the completion of a Surveillance before complying with Required Actions or other remedial measures that might preclude completion 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, or operational situations, is discovered not to have been performed when specified, SR 3.0.3 allows the full delay period of ~~24 hours~~ to perform the Surveillance.

SR 3.0.3 ~~also~~ provides a time limit for ~~completeness of~~ Surveillances that become applicable as a consequence of MODE changes imposed by Required Actions.

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 as an operational convenience to extend Surveillance intervals.

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

(e.g., Prior to entering MODE 1 after each fuel loading, or in accordance with 10CFR 50 Appendix J as modified by approved exemptions, etc.)

up to the limit of the specified Frequency

or requirements of regulations,

However, since there is no time interval specified, the missed Surveillance shall be performed at the first reasonable opportunity.

and allowances for the performance of

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**SR 3.0.3
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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.

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 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.

The provisions of SR 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability

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