

Industry/TSTF Standard Technical Specification Change Traveler

Increase Flexibility in MODE Restraints

Classification: 3) Improve Specifications

NUREGs Affected: 1430 1431 1432 1433 1434

Description:

Revised LCO 3.0.4 to allow entry into a MODE or specified condition in the Applicability, while relying on the associated Actions, provided that there is appropriate management review and approval. The current ITS LCO 3.0.4 allows entry into a MODE or a specified condition in the Applicability, while relying on the associated Actions, only if the Actions permit operation for an unlimited period of time. SR 3.0.4 is revised similarly.

Justification:

SHORT NEED DESCRIPTION

The startup of a unit can be held up due to the current restrictions of LCO 3.0.4. For example, a single maintenance activity that is almost complete can cause significant delays and changes in the previously well thought out plans for returning the unit to service. Allowing the unit to enter MODE of applicability for that specification would allow the work to be completed without creating error likely situations and avoid changes in other activities.

In addition, as the unit goes up in MODE the complement of systems available to mitigate certain events are increased (e.g., PWRs - availability of SGs for cooling, in addition to shutdown cooling, BWRs - availability of HPCI and RCIC). Thus in some cases, risk can be minimized by allowing entry into a MODE or specified condition in the Applicability.

DETAILED JUSTIFICATION

History of Current ITS LCO 3.0.4 and SR 3.0.4

LCO 3.0.4 states "When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall not be made except 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." Compliance with Required 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.

SR 3.0.4 states "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."

The allowances of LCO 3.0.4 are based on NRC Generic Letter 87-09 which states, "With respect to unnecessary mode changes, Specification 3.0.4 unduly restricts facility operation when conformance with Action Requirements provides an acceptable level of safety for continued operation. For an LCO that has Action Requirements permitting continued operation for an unlimited period of time, entry into an operation mode or other specified condition of operation should be permitted in accordance with the Action Requirements."

In the development of ITS, many improvements were made to LCO 3.0.4 including clarification of its applicability regarding normal shutdown and Required Action shutdowns and MODE changes during Cold Shutdown and Refueling Operations. During ITS development, almost all the LCOs with Allowed Outage Times (AOTs) greater than or equal to 30 days, and many of the LCOs with AOTs greater than or equal to 7 days, were individually developed with LCO 3.0.4 exceptions. During many plant specific ITS conversions, individual plants provided justifications for other LCO 3.0.4 exceptions.

Deterministic Justification

The proposal to allow entry into a MODE or other specified condition in the Applicability while relying on the Action

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based on appropriate management review and approval is reasonable based on the following.

- 1) The licensee is responsible for maintaining overall plant configuration and safety. Developments in the Maintenance Rule and other Industry/NRC initiatives (including the configuration risk management programs) to maintain plant configurations that support safe operation of the facility are being developed and implemented.
- 2) The established AOTs provide a limit to how long a licensee could be in a MODE of the applicability without meeting the LCO.
- 3) Entry into a MODE or specified condition in the Applicability, in many cases, will require additional equipment to be available to mitigate certain events.

The "appropriate management review and approval" may consider a variety of factors, but will focus on minimizing risk of continued safe plant operations. Consideration would be given to the probability of completing restoration such that the requirements of the LCO would be met prior to entering ACTIONS that would require exiting the Applicability. The review and approval may also establish appropriate compensatory measures to enhance safe and effective operations until restoration of compliance with the LCO. The proposed change would provide the flexibility of not restricting which LCOs, MODEs, or applicability can be entered while relying on the Actions (current LCO 3.0.4 exceptions) while providing for appropriate licensee management reviews and approval of such entries. The proposed change would also ensure an evaluation of the risks is performed prior to making the MODE change. This evaluation is not currently required.

The recent revisions to 10CFR50.65 require that licensees assess the effect equipment maintenance will have on the plant's capability to perform safety functions before beginning any maintenance activity on structures, systems, or components within the scope of the maintenance rule. The final rule clarifies that these requirements apply under all conditions of operation, including shutdown, and that the assessments are to be used so that the increase in risk that may result from the maintenance activity will be managed to ensure that the plant is not inadvertently placed in a condition of significant risk. (The change becomes effective 120 days after the issuance of RG 1.160, Rev. 3.) So effectively, there will be a requirement to evaluate the risks prior to making the MODE change.

This proposed change would provide standardization and consistency to the use and application of LCO 3.0.4. Currently there are numerous variations of LCO 3.0.4 requirements in the individual plant's Technical Specifications. Additionally, the ITS NUREGs are not totally consistent in their treatment of LCO 3.0.4.

This change in LCO 3.0.4 philosophy would require a change in SR 3.0.4. The change to SR 3.0.4 is to provide consistency with the new philosophy of LCO 3.0.4 regarding MODE changes.

Risk Discussion

A qualitative review of initiating event frequencies, considering lower MODE (2, 3, or 4 PWRs 2 or 3 BWRs) accident mitigation features and the activities associated with the lower MODEs was performed and the review indicates that this proposed change is reasonable and acceptable. Based on the review, systems/components were identified that would be more important or less important in non-MODE 1 operation based on initiating event. The review identified a small number of systems/components where, based on an increased potential for a particular initiating event in the lower MODEs, entry into a MODE of applicability would potentially have a greater impact in MODES 2-4 than they would in MODE 1.

Because of the small number of systems/components which were identified and plant variability, it is believed appropriate to allow the licensee to handle this under the appropriate management review and approval.

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Revision History

OG Revision 0 Revision Status: Closed

Revision Proposed by: RITSTF

Revision Description:
Original Issue

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 the comments of the RITSTF. The major changes include the deletion of the Tables from the Traveler and the determination that the proposed change is not an exception to SR 3.0.1, but rather a failure to meet SR 3.0.1.

Owners Group Review Information

Date Originated by OG: 06-Oct-99

Owners Group Comments
(No Comments)

Owners Group Resolution: Date:

OG Revision 2 Revision Status: Closed

Revision Proposed by: TSTF

Revision Description:

Revision 2 was created to incorporate the comments of the TSTF and the industry. The major changes include 1) changes to the Bases to make the terminology consistent with the LCO and SR requirements, and 2) other editorial changes.

TSTF Review Information

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

OG Review Completed: BWO WOG CEOG BWROG

TSTF Comments:

(No Comments)

TSTF Resolution: Date:

OG Revision 3 Revision Status: Active Next Action: NRC

Revision Proposed by: TSTF

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OG Revision 3

Revision Status: Active

Next Action: NRC

Revision Description:

Revision 3 was created to incorporate further comments of the TSTF and the Industry. The major changes include (1) deletion of SR 3.0.4 and Bases SR 3.0.4 insert regarding failure of SR 3.0.1 due to the inconsistency of interpretation of meaning of the insert and the determination that the interrelationships need no further explanation, and (2) minor wording changes for clarity.

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

LCO 3.0.4 LCO Applicability

LCO 3.0.4 Bases LCO Applicability

SR 3.0.4 SR Applicability

SR 3.0.4 Bases SR Applicability

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Bases Insert LCO 3.0.4

LCO 3.0.4 also allows changes in MODES or other specified conditions in the Applicability when an LCO is not met after appropriate management review and approval. The review and approval may consider a variety of factors and will focus on minimizing plant risk. Consideration is 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. The review and approval may also establish appropriate compensatory measures to enhance safe and effective operations until restoration is completed.

3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

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 and LCO 3.0.7.

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.

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.

LCO 3.0.4 When an LCO is not met, entry into a ^{only} MODE or other specified condition in the Applicability shall ~~not~~ be made; ~~except~~ 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, ^(N/A)

a. ↓

or,

(continued)

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b. After appropriate management review and 3.0-1 approval.

Rev 1, 04/07/95

3.0 LCO APPLICABILITY

LCO 3.0.4
(continued)

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.

~~Exceptions to this Specification are stated in the individual Specifications. These exceptions allow entry into MODES or other specified conditions in the Applicability when the associated ACTIONS to be entered allow unit operation in the MODE or other specified condition in the Applicability only for a limited period of time.~~

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.

Reviewers's Note: LCO 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, LCO 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 LCO 3.0.4 were previously applicable in all MODES. Before this version of LCO 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.

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.

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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 ^{only} specified condition in the Applicability of an LCO shall ~~not~~ be made ^{when} 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.

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, or,
b. After appropriate management review and approval.

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BASES

LCO 3.0.3
(continued)

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 3.7.16 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 3.7.16 of "Suspend movement of irradiated fuel assemblies in 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.

The requirement to be in MODE 4 in 13 hours is plant specific and depends on the ability to cool the pressurizer and degas.

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 precludes placing the unit in a MODE or other specified condition stated in that Applicability (e.g., Applicability desired to be entered) when the following exist:

- a. Unit conditions are such that the requirements of the LCO would not be met in the Applicability desired to be entered; and
- b. Continued noncompliance with the LCO requirements, if the Applicability were entered, would result in the unit being required to exit the Applicability desired to be entered to comply with the Required Actions.

BASES
INSERT
LCO 3.0.4

Compliance with Required 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 such cases, entry into a MODE or other specified condition in the Applicability may be made in accordance with the provisions of the Required Actions. 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.

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LCO 3.0.4
(continued)

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.

~~Exceptions to LCO 3.0.4 are stated in the individual Specifications. Exceptions may apply to all the ACTIONS or to a specific Required Action of a Specification.~~

LCO 3.0.4 is only applicable when entering MODE 4 from MODE 5, MODE 3 from MODE 4, MODE 2 from MODE 3, or MODE 1 from MODE 2. Furthermore, LCO 3.0.4 is applicable when entering any other specified condition in the Applicability only while operating in MODES 1, 2, 3, or 4. The requirements of LCO 3.0.4 do not apply in MODES 5 and 6, or in other specified conditions of the Applicability (unless in MODES 1, 2, 3, or 4) because the ACTIONS of individual Specifications sufficiently define the remedial measures to be taken. [In some cases (e.g., ..) these ACTIONS provide a Note that states "While this LCO is not met, entry into a MODE or other specified condition in the Applicability is not permitted, unless required to comply with ACTIONS." This Note is a requirement explicitly precluding entry into a MODE or other specified condition of the Applicability.]

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, changing MODES or other specified conditions while in an ACTIONS Condition, in compliance with LCO 3.0.4 ~~or where an exception to LCO 3.0.4 is stated~~, is not a violation of SR 3.0.1 or SR 3.0.4 for those Surveillances that do not have to be performed due to the associated 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

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SR Applicability
B 3.0

B 3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

TEST 359
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BASES

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 3.0.1 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.

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 to be not 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 special test exception (STE) are only applicable when the STE is used as an allowable exception to the requirements of a Specification.

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.

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SR Applicability
B 3.0

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RWD*

BASES

SR 3.0.1
(continued)

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 (HPSI) maintenance during shutdown that requires system functional tests at a specified pressure. Provided other appropriate testing is satisfactorily completed, startup can proceed with HPSI considered OPERABLE. This allows operation to reach the specified pressure to complete the necessary post maintenance testing.

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

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BASES

SR 3.0.3
(continued)

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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A provision is included to allow entry into a MODE or other specified condition in the Applicability:

- 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, or
- b) After appropriate management review and approval is obtained.

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SR Applicability
B 3.0

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BASES

SR 3.0.4
(continued)

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.

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 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 3.0.4 is only applicable when entering MODE 4 from MODE 5, MODE 3 from MODE 4, Mode 2 from MODE 3, or MODE 1 from MODE 2. Furthermore, SR 3.0.4 is applicable when entering any other specified condition in the Applicability only while operating in MODES 1, 2, 3, or 4. The requirements of SR 3.0.4 do not apply in MODES 5 and 6, or in other specified conditions of the Applicability (unless in MODES 1, 2, 3, or 4) because the ACTIONS of individual Specifications sufficiently define the remedial measures to be taken.

Attached is a sample of the deletion of the "LCO 3.0.4 is not applicable" Note. This change would be made for each of the appropriate Specifications and Bases. Since this part of the change is very straightforward, and in order to minimize the number of pages initially submitted with the Traveler, only a sample deletion is attached. Once the change is approved by the NRC, the remaining applicable Specifications and Bases pages will be marked up for each of the ITS NUREGs and added to the Traveler and each of the affected pages will be included in the list of affected pages on the Traveler coversheet.

BASES

LCO
(continued)

sources. In these cases, the Remote Shutdown System is OPERABLE as long as one channel of any of the alternate information or control sources for each Function is OPERABLE.

The Remote Shutdown System instrumentation and control circuits covered by this LCO do not need to be energized to be considered OPERABLE. This LCO is intended to ensure that the instrument and control circuits will be OPERABLE if plant conditions require that the Remote Shutdown System be placed in operation.

APPLICABILITY

The Remote Shutdown System LCO is applicable in MODES 1, 2, and 3. This is required so that the unit can be placed and maintained in MODE 3 for an extended period of time from a location other than the control room.

This LCO is not applicable in MODE 4, 5, or 6. In these MODES, the unit is already subcritical and in the condition of reduced RCS energy. Under these conditions, considerable time is available to restore necessary instrument control Functions if control room instruments or control become unavailable.

ACTIONS

~~A Note has been included that excludes the MODE change restrictions of LCO 3.0.4. This exception allows entry into an applicable MODE while relying on the ACTIONS, even though the ACTIONS may eventually require a plant shutdown. This is acceptable due to the low probability of an event requiring this system.~~

A Remote Shutdown System division is inoperable when each Function listed in Table 3.3.12-1 is not accomplished by at least one designated Remote Shutdown System channel that satisfies the OPERABILITY criteria for the channel's Function. These criteria are outlined in the LCO section of the Bases.

A Note **B** has been added in the ACTIONS to clarify the application of Completion Time rules. The Conditions of this Specification may be entered independently for each Function listed in Table 3.3.12-1. The Completion Time(s)

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3.3 INSTRUMENTATION

3.3.12 Remote Shutdown System (Digital)

LCO 3.3.12 The Remote Shutdown System Functions in Table 3.3.12-1 shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

NOTES

1. LCO 3.0.4 is not applicable.

2. Separate Condition entry is allowed for each Function.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more required Functions inoperable.	A.1 Restore required Functions to OPERABLE status.	30 days
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 4.	[12] hours