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May 4, 2018

AEP-NRC-2018-26
10 CFR 50.90

Docket Nos.: 50-315
50-316

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

Donald C. Cook Nuclear Plant, Units 1 and 2
APPLICATION TO REVISE TECHNICAL SPECIFICATIONS TO
ADOPT TSTF-529, REVISION 4, "CLARIFY USE AND APPLICATION RULES"

Pursuant to 10 CFR 50.90, Indiana Michigan Power Company (I&M), the licensee for Donald C. Cook Nuclear Plant (CNP), is submitting a request for an amendment to the Technical Specifications (TS) for CNP Units 1 and 2. The proposed amendment would modify TS requirements in Section 1.3 and Section 3.0 regarding Limiting Condition for Operation (LCO) and Surveillance Requirement (SR) usage. These changes are consistent with U.S. Nuclear Regulatory Commission (NRC)-approved Technical Specification Task Force (TSTF) Traveler TSTF-529, Revision 4, "Clarify Use and Application Rules."

Enclosure 1 provides an affirmation statement pertaining to the information contained herein. Enclosure 2 provides a description and assessment of the proposed changes. Enclosures 3 and 4 provide Unit 1 and Unit 2 TS pages marked to show the proposed changes. Enclosures 5 and 6 provide Unit 1 and Unit 2 TS Bases pages marked to show the proposed changes. Bases changes are included for information only. New clean Unit 1 and Unit 2 TS pages with proposed changes incorporated will be provided to the NRC Licensing Project Manager when requested.

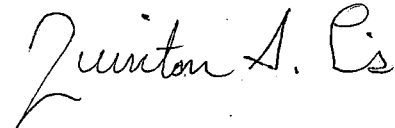
I&M would like to request NRC review and approval of the proposed changes commensurate with the NRC's normal review schedule. Once approved, the amendment shall be implemented within 60 days.

In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the designated Michigan state officials.

ADD1
NRR

There are no new regulatory commitments made in this letter. Should you have any questions, please contact Mr. Michael K. Scarpello, Regulatory Affairs Director, at (269) 466-2649.

Sincerely,



Q. Shane Lies
Site Vice President
Indiana Michigan Power Company

BMC/ml

Enclosures:

1. Affirmation
2. Description and Assessment of the Technical Specification Changes
3. Donald C. Cook Nuclear Plant Unit 1 Technical Specification Pages Marked To Show Proposed Changes
4. Donald C. Cook Nuclear Plant Unit 2 Technical Specification Pages Marked To Show Proposed Changes
5. Donald C. Cook Nuclear Plant Unit 1 Technical Specification Bases Pages Marked To Show Proposed Changes (For Information Only)
6. Donald C. Cook Nuclear Plant Unit 2 Technical Specification Bases Pages Marked To Show Proposed Changes (For Information Only)

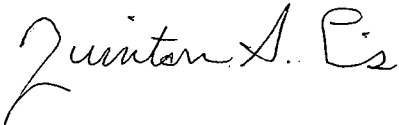
c: R. J. Ancona – MPSC
A. W. Dietrich – Washington, D.C.
MDEQ – RMD/RPS
NRC Resident Inspector
K. S. – West, NRC, Region III
A. J. Williamson – AEP Ft. Wayne, w/o enclosures

Enclosure 1 to AEP-NRC-2018-26

AFFIRMATION

I, Quinton S. Lies, being duly sworn, state that I am the Site Vice President of Indiana Michigan Power Company (I&M), that I am authorized to sign and file this request with the U. S. Nuclear Regulatory Commission on behalf of I&M, and that the statements made and the matters set forth herein pertaining to I&M are true and correct to the best of my knowledge, information, and belief.


Indiana Michigan Power Company



Q. Shane Lies
Site Vice President

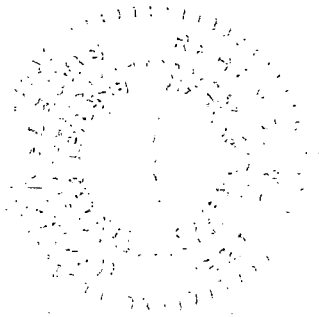
SWORN TO AND SUBSCRIBED BEFORE ME

THIS 4 DAY OF May 2018



Notary Public

My Commission Expires 01/21/2025



Enclosure 2 to AEP-NRC-2018-26

Description and Assessment of Technical Specification Changes

This letter is a request to amend Operating License Numbers DPR-58 and DPR-74 for Donald C. Cook Nuclear Plant (CNP) Unit 1 and Unit 2, respectively. In this request, Indiana Michigan Power Company (I&M), the licensee for CNP, proposes to implement Technical Specification Task Force (TSTF) change traveler TSTF-529, Revision 4, "Clarify Use and Application Rules," dated February 29, 2016, at CNP.

1.0 DESCRIPTION

The proposed change revises Section 1.3, "Completion Times," and Section 3.0, "LCO Applicability" of the Technical Specifications (TS) to clarify the use and application of the TS usage rules, as described below:

- Section 1.3 is revised to clarify "discovery."
- Section 1.3 is revised to discuss exceptions to starting the Completion Time at condition entry.
- Limiting Condition for Operation (LCO) 3.0.4.b is revised to clarify that LCO 3.0.4.a, LCO 3.0.4.b, and LCO 3.0.4.c are independent options.
- Surveillance Requirement (SR) 3.0.3 is revised to allow application of SR 3.0.3 when an SR has not been previously performed and to clarify the application of SR 3.0.3.

2.0 ASSESSMENT

2.1 Applicability of Safety Evaluation

I&M has reviewed the safety evaluation for TSTF-529 provided to the TSTF in a letter dated April 21, 2016, (Nuclear Regulatory Commission (NRC) Agencywide Documents Access and Management System, Accession No. ML16060A441). This review included a review of the NRC staff's evaluation, as well as the information provided in TSTF-529. As described in the subsequent paragraphs, I&M has concluded that the justifications presented in the TSTF-529 proposal and the safety evaluation prepared by the NRC staff are applicable to CNP Units 1 and 2 and justify this amendment for the incorporation of the changes to the CNP TS.

2.2 Variations

I&M is proposing the following variations from the TS or TS Bases changes described in TSTF-529. These variations do not affect the applicability of TSTF-529 or the NRC staff's safety evaluation to the proposed license amendment.

The changes to TS 1.3 in TSTF-529 refer to LCO 3.8.1, "AC Sources – Operating," Required Action B.2. The corresponding Required Action in the CNP Units 1 and 2 TS is LCO 3.8.1, Required Action B.3.

In addition to including the proposed TS Bases LCO 3.0.5 examples provided as part of TSTF-529, Revision 4, I&M has elected to maintain the original containment isolation valve example as supplement to discussion provided in the Bases Section. The proposed TS Bases are provided as information only in Enclosures 5 and 6 to this letter.

3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Consideration Analysis

Indiana Michigan Power Company (I&M), the licensee for Donald C. Cook Nuclear Plant Units 1 and 2, requests adoption of the Technical Specifications (TS) changes described in Technical Specification Task Force-529, "Clarify Use and Application Rules," which is an approved change to the Standard Technical Specifications, into the CNP Unit 1 and Unit 2 TS. The proposed change revises Section 1.3, "Completion Times," and Sections 3.0, "LCO Applicability" and "SR Applicability" of the TS to clarify the use and application of the TS usage rules and revise the application of Surveillance Requirement (SR) 3.0.3. Section 1.3 is modified to clarify the concept of "discovery" that a Limiting Condition for Operation (LCO) is not met and to describe existing exceptions to the start of Completion Times in the TS. An editorial change is made to LCO 3.0.4.b to clarify that LCO 3.0.4.a, LCO 3.0.4.b, and LCO 3.0.4.c are independent options. SR 3.0.3 is revised to allow application of SR 3.0.3 when an SR has not been previously performed.

I&M has evaluated whether or not a significant hazards consideration is involved with the proposed amendments 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 changes to Section 1.3 and LCO 3.0.4 have no effect on the requirement for systems to be Operable and have no effect on the application of TS actions. The proposed change to SR 3.0.3 states that the allowance may only be used when there is a reasonable expectation the surveillance will be met when performed. Since the proposed change does not significantly affect system Operability, the proposed change will have no effect on the initiating events for accidents previously evaluated and will have no significant effect on the ability of the systems to mitigate accidents previously evaluated.

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

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

Response: No.

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

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

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

Response: No.

The proposed change clarifies the application of Section 1.3 and LCO 3.0.4 and does not result in changes in plant operation. SR 3.0.3 is revised to allow application of SR 3.0.3 when an SR has not been previously performed if there is reasonable expectation that the SR will be met when performed. This expands the use of SR 3.0.3 while ensuring the affected system is capable of performing its safety function. As a result, plant safety is either improved or unaffected.

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

Based on the above, I&M 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.

4.0 ENVIRONMENTAL EVALUATION

The proposed change 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 change does not involve (i) a significant hazards consideration, (ii) a significant change in the types or 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 change 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 change.

Enclosure 3 to AEP-NRC-2018-26

**Donald C. Cook Nuclear Plant Unit 1 Technical Specification Pages Marked to Show
Proposed Changes**

1.0 USE AND APPLICATION

1.3 Completion Times

PURPOSE	The purpose of this section is to establish the Completion Time convention and to provide guidance for its use.
BACKGROUND	Limiting Conditions for Operation (LCOs) specify minimum requirements for ensuring safe operation of the unit. The ACTIONS associated with an LCO state Conditions that typically describe the ways in which the requirements of the LCO can fail to be met. Specified with each stated Condition are Required Action(s) and Completion Time(s).
DESCRIPTION	The Completion Time is the amount of time allowed for completing a Required Action. It is referenced to the time of discovery of a situation (e.g., inoperable equipment or variable not within limits) that requires entering an ACTIONS Condition unless otherwise specified, providing the unit is in a MODE or specified condition stated in the Applicability of the LCO.

Unless otherwise specified, the Completion Time begins when a senior licensed operator on the operating shift crew with responsibility for plant operations makes the determination that an LCO is not met and an ACTIONS Condition is entered. The "otherwise specified" exceptions are varied, such as a Required Action Note or Surveillance Requirement Note that provides an alternative time to perform specific tasks, such as testing, without starting the Completion Time. While utilizing the Note, should a Condition be applicable for any reason not addressed by the Note, the Completion Time begins. Should the time allowance in the Note be exceeded, the Completion Time begins at that point. The exceptions may also be incorporated into the Completion Time. For example, LCO 3.8.1, "AC Sources - Operating," Required Action B.3, requires declaring required feature(s) supported by an inoperable diesel generator, inoperable when the redundant required feature(s) are inoperable. The Completion Time states, "4 hours from discovery of Condition B concurrent with inoperability of redundant required feature(s)." In this case the Completion Time does not begin until the conditions in the Completion Time are satisfied.

Required Actions must be completed prior to the expiration of the specified Completion Time. An ACTIONS Condition remains in effect and the Required Actions apply until the Condition no longer exists or the unit is not within the LCO Applicability.

If situations are discovered that require entry into more than one Condition at a time within a single LCO (multiple Conditions), the Required Actions for each Condition must be performed within the associated Completion Time. When in multiple Conditions, separate Completion Times are tracked for each Condition starting from the ~~time of~~

1.3 Completion Times

DESCRIPTION (continued)

discovery of the situation that required entry into the Condition, unless otherwise specified.

Once a Condition has been entered, subsequent trains, subsystems, components, or variables expressed in the Condition, discovered to be inoperable or not within limits, will not result in separate entry into the Condition, unless specifically stated. The Required Actions of the Condition continue to apply to each additional failure, with Completion Times based on initial entry into the Condition, unless otherwise specified.

However, when a subsequent train, subsystem, component, or variable expressed in the Condition is discovered to be inoperable or not within limits, the Completion Time(s) may be extended. To apply this Completion Time extension, two criteria must first be met. The subsequent inoperability:

- a. Must exist concurrent with the first inoperability; and
- b. Must remain inoperable or not within limits after the first inoperability is resolved.

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, LCO 3.0.7, and LCO 3.0.8.

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 MODE or other specified condition in the Applicability shall only be made:

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

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 greater. This delay period is permitted to allow performance of the Surveillance. The delay period is only applicable when there is a reasonable expectation the surveillance will be met when performed. A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.

If the Surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

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

SR 3.0.4 Entry into a MODE or other specified condition in the Applicability of an LCO shall only be made when the LCO's Surveillances have been met within their specified Frequency, except as provided by SR 3.0.3. When an LCO is not met due to Surveillances not having been met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with LCO 3.0.4.

Enclosure 4 to AEP-NRC-2018-26

**Donald C. Cook Nuclear Plant Unit 2 Technical Specification Pages Marked to Show
Proposed Changes**

1.0 USE AND APPLICATION

1.3 Completion Times

PURPOSE	The purpose of this section is to establish the Completion Time convention and to provide guidance for its use.
BACKGROUND	Limiting Conditions for Operation (LCOs) specify minimum requirements for ensuring safe operation of the unit. The ACTIONS associated with an LCO state Conditions that typically describe the ways in which the requirements of the LCO can fail to be met. Specified with each stated Condition are Required Action(s) and Completion Time(s).
DESCRIPTION	The Completion Time is the amount of time allowed for completing a Required Action. It is referenced to the time of discovery of a situation (e.g., inoperable equipment or variable not within limits) that requires entering an ACTIONS Condition unless otherwise specified, providing the unit is in a MODE or specified condition stated in the Applicability of the LCO.

Unless otherwise specified, the Completion Time begins when a senior licensed operator on the operating shift crew with responsibility for plant operations makes the determination that an LCO is not met and an ACTIONS Condition is entered. The "otherwise specified" exceptions are varied, such as a Required Action Note or Surveillance Requirement Note that provides an alternative time to perform specific tasks, such as testing, without starting the Completion Time. While utilizing the Note, should a Condition be applicable for any reason not addressed by the Note, the Completion Time begins. Should the time allowance in the Note be exceeded, the Completion Time begins at that point. The exceptions may also be incorporated into the Completion Time. For example, LCO 3.8.1, "AC Sources - Operating," Required Action B.3, requires declaring required feature(s) supported by an inoperable diesel generator, inoperable when the redundant required feature(s) are inoperable. The Completion Time states, "4 hours from discovery of Condition B concurrent with inoperability of redundant required feature(s)." In this case the Completion Time does not begin until the conditions in the Completion Time are satisfied.

Required Actions must be completed prior to the expiration of the specified Completion Time. An ACTIONS Condition remains in effect and the Required Actions apply until the Condition no longer exists or the unit is not within the LCO Applicability.

If situations are discovered that require entry into more than one Condition at a time within a single LCO (multiple Conditions), the Required Actions for each Condition must be performed within the associated Completion Time. When in multiple Conditions, separate Completion Times are tracked for each Condition starting from the ~~time of~~

1.3 Completion Times

DESCRIPTION (continued)

discovery of the situation that required entry into the Condition, unless otherwise specified.

Once a Condition has been entered, subsequent trains, subsystems, components, or variables expressed in the Condition, discovered to be inoperable or not within limits, will not result in separate entry into the Condition, unless specifically stated. The Required Actions of the Condition continue to apply to each additional failure, with Completion Times based on initial entry into the Condition, unless otherwise specified.

However, when a subsequent train, subsystem, component, or variable expressed in the Condition is discovered to be inoperable or not within limits, the Completion Time(s) may be extended. To apply this Completion Time extension, two criteria must first be met. The subsequent inoperability:

- a. Must exist concurrent with the first inoperability; and
- b. Must remain inoperable or not within limits after the first inoperability is resolved.

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, LCO 3.0.7, and LCO 3.0.8.

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 MODE or other specified condition in the Applicability shall only be made:

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

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 greater. This delay period is permitted to allow performance of the Surveillance. The delay period is only applicable when there is a reasonable expectation the surveillance will be met when performed. A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.

If the Surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

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

SR 3.0.4 Entry into a MODE or other specified condition in the Applicability of an LCO shall only be made when the LCO's Surveillances have been met within their specified Frequency, except as provided by SR 3.0.3. When an LCO is not met due to Surveillances not having been met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with LCO 3.0.4.

Enclosure 5 to AEP-NRC-2018-26

**Donald C. Cook Nuclear Plant Unit 1 Technical Specification Bases Pages Marked to
Show Proposed Changes**

(For Information Only)

B 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

BASES

LCOs	LCO 3.0.1 through LCO 3.0.8 establish the general requirements applicable to all Specifications in Sections 3.1 through 3.9 and apply at all times, unless otherwise stated.
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LCO 3.0.1	LCO 3.0.1 establishes the Applicability statement within each individual Specification as the requirement for when the LCO is required to be met (i.e., when the unit is in the MODES or other specified conditions of the Applicability statement of each Specification).
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LCO 3.0.2	LCO 3.0.2 establishes that upon discovery of a failure to meet an LCO, the associated ACTIONS shall be met. The Completion Time of each Required Action for an ACTIONS Condition is applicable from the point in time that an ACTIONS Condition is entered, unless otherwise specified. The Required Actions establish those remedial measures that must be taken within specified Completion Times when the requirements of an LCO are not met. This Specification establishes that:
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- a. Completion of the Required Actions within the specified Completion Times constitutes compliance with a Specification; and
- b. Completion of the Required Actions is not required when an LCO is met within the specified Completion Time, unless otherwise specified.

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

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

The nature of some Required Actions of some Conditions necessitates that, once the Condition is entered, the Required Actions must be

BASES

LCO 3.0.3 (continued)

This Specification delineates the time limits for placing the unit in a safe MODE or other specified condition when operation cannot be maintained within the limits for safe operation as defined by the LCO and its ACTIONS. It is not intended to be used as an operational convenience that permits routine voluntary removal of redundant systems or components from service in lieu of other alternatives that would not result in redundant systems or components being inoperable.

Upon entering LCO 3.0.3, 1 hour is allowed to prepare for an orderly shutdown before initiating a change in unit operation. This includes time to permit the operator to coordinate the reduction in electrical generation with the load dispatcher to ensure the stability and availability of the electrical grid. The time limits specified to ~~enter~~ ~~reach~~ lower MODES of operation permit the shutdown to proceed in a controlled and orderly manner that is well within the specified maximum cooldown rate and within the capabilities of the unit, assuming that only the minimum required equipment is OPERABLE. This reduces thermal stresses on components of the Reactor Coolant System and the potential for a unit upset that could challenge safety systems under conditions to which this Specification applies. The use and interpretation of specified times to complete the actions of LCO 3.0.3 are consistent with the discussion of Section 1.3, Completion Times.

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

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

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

BASES

LCO 3.0.3 (continued)

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

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

Exceptions to LCO 3.0.3 are provided in instances where requiring a unit shutdown, in accordance with LCO 3.0.3, would not provide appropriate remedial measures for the associated condition of the unit. An example of this is in LCO 3.7.14, "Fuel Storage Pool Water Level." LCO 3.7.14 has an Applicability of "During movement of irradiated fuel assemblies in the fuel storage pool." Therefore, this LCO can be applicable in any or all MODES. If the LCO and the Required Actions of LCO 3.7.14 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 3.7.14 to "Suspend movement of irradiated fuel assemblies in the fuel storage pool" is the appropriate Required Action to complete in lieu of the actions of LCO 3.0.3. These exceptions are addressed in the individual Specifications.

LCO 3.0.4

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

LCO 3.0.4.a allows entry into a MODE or other specified condition in the Applicability with the LCO not met when the associated ACTIONS to be entered ~~following entry into~~ ~~permit continued operation in the MODE or other specified condition in the Applicability~~ ~~will permit continued operation within the MODE or other specified condition~~ for an unlimited period of time. Compliance with ~~ACTIONS~~ ~~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.

BASES

LCO 3.0.4 (continued)

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

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

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

The risk assessment may use quantitative, qualitative, or blended approaches, and the risk assessment will be conducted using the plant program, procedures, and criteria in place to implement 10 CFR 50.65(a)(4), which requires that risk impacts of maintenance activities to be assessed and managed. The risk assessment, for the purposes of LCO 3.0.4.b, must take into account all inoperable Technical Specification equipment regardless of whether the equipment is included in the normal 10 CFR 50.65(a)(4) risk assessment scope. The risk assessments will be conducted using the procedures and guidance endorsed by Regulatory Guide 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants." Regulatory Guide 1.182 endorses the guidance in Section 11 of NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." These documents address general guidance for conduct of the risk assessment, quantitative and qualitative guidelines for establishing risk management actions, and example risk management actions. These include actions to plan and conduct other activities in a manner that controls overall risk, increased risk awareness by shift and management personnel, actions to reduce the duration of the condition,

BASES

LCO 3.0.4 (continued)

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

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

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

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

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

BASES

LCO 3.0.4 (continued)

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

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

LCO 3.0.5

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

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

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

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

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

An example of demonstrating the OPERABILITY of the equipment being returned to service is reopening a containment isolation valve that has been closed to comply with Required Actions and must be reopened to perform the required testing.

BASES

LCO 3.0.5 (continued)

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

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

BASES

SR 3.0.2 (continued)

testing of pumps and valves in accordance with applicable American Society of Mechanical Engineers Operation and Maintenance Code, as required by 10 CFR 50.55a. These programs establish testing requirements and Frequencies in accordance with the requirements of regulations. The TS cannot, in and of themselves, extend a test interval specified in the regulations directly or by reference.

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

The provisions of SR 3.0.2 are not intended to be used repeatedly ~~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 been ~~performed~~ ~~completed~~ within the specified Frequency. A delay period of up to 24 hours or up to the limit of the specified Frequency, whichever is greater, applies from the point in time that it is discovered that the Surveillance has not been performed in accordance with SR 3.0.2, and not at the time that the specified Frequency was not met.

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

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

BASES

SR 3.0.3 (continued)

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the Surveillance, the safety significance of the delay in completing the required Surveillance, and the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the requirements. When a Surveillance with a Frequency based not on time intervals, but upon specified unit conditions, operating situations, or requirements of regulations (e.g., prior to entering MODE 1 after each fuel loading, or in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions, etc.) is discovered to not have been performed when specified, SR 3.0.3 allows for the full delay period of up to the specified Frequency to perform the Surveillance. However, since there is not a time interval specified, the missed Surveillance should be performed at the first reasonable opportunity

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

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

BASES

SR 3.0.3 (continued)

Failure to comply with specified Frequencies for SRs is expected to be an infrequent occurrence. Use of the delay period established by SR 3.0.3 is a flexibility which is not intended to be used ~~repeatedly as an operational convenience~~ to extend Surveillance intervals. While up to 24 hours or the limit of the specified Frequency is provided to perform the missed Surveillance, it is expected that the missed Surveillance will be performed at the first reasonable opportunity. The determination of the first reasonable opportunity should include consideration of the impact on unit risk (from delaying the Surveillance as well as any unit configuration changes required or shutting the unit down to perform the Surveillance) and impact on any analysis assumptions, in addition to unit conditions, planning, availability of personnel, and the time required to perform the Surveillance. This risk impact should be managed through the program in place to implement 10 CFR 50.65(a)(4) and its implementation guidance, Regulatory Guide 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants." This Regulatory Guide addresses consideration of temporary and aggregate risk impacts, determination of risk management action thresholds, and risk management action up to and including unit shutdown. The missed Surveillance should be treated as an emergent condition as discussed in the Regulatory Guide. The risk evaluation may use quantitative, qualitative, or blended methods. The degree of depth and rigor of the evaluation should be commensurate with the importance of the component. Missed Surveillances for important components should be analyzed quantitatively. If the results of the risk evaluation determine the risk increase is significant, this evaluation should be used to determine the safest course of action. All missed Surveillances will be placed in the licensee's Corrective Action Program.

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

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

Enclosure 6 to AEP-NRC-2018-26

**Donald C. Cook Nuclear Plant Unit 2 Technical Specification Bases Pages Marked to
Show Proposed Changes**

(For Information Only)

B 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

BASES

LCOs	LCO 3.0.1 through LCO 3.0.8 establish the general requirements applicable to all Specifications in Sections 3.1 through 3.9 and apply at all times, unless otherwise stated.
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LCO 3.0.1	LCO 3.0.1 establishes the Applicability statement within each individual Specification as the requirement for when the LCO is required to be met (i.e., when the unit is in the MODES or other specified conditions of the Applicability statement of each Specification).
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LCO 3.0.2	LCO 3.0.2 establishes that upon discovery of a failure to meet an LCO, the associated ACTIONS shall be met. The Completion Time of each Required Action for an ACTIONS Condition is applicable from the point in time that an ACTIONS Condition is entered, unless otherwise specified. The Required Actions establish those remedial measures that must be taken within specified Completion Times when the requirements of an LCO are not met. This Specification establishes that:
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- a. Completion of the Required Actions within the specified Completion Times constitutes compliance with a Specification; and
- b. Completion of the Required Actions is not required when an LCO is met within the specified Completion Time, unless otherwise specified.

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

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

The nature of some Required Actions of some Conditions necessitates that, once the Condition is entered, the Required Actions must be

BASES

LCO 3.0.3 (continued)

This Specification delineates the time limits for placing the unit in a safe MODE or other specified condition when operation cannot be maintained within the limits for safe operation as defined by the LCO and its ACTIONS. It is not intended to be used as an operational convenience that permits routine voluntary removal of redundant systems or components from service in lieu of other alternatives that would not result in redundant systems or components being inoperable.

Upon entering LCO 3.0.3, 1 hour is allowed to prepare for an orderly shutdown before initiating a change in unit operation. This includes time to permit the operator to coordinate the reduction in electrical generation with the load dispatcher to ensure the stability and availability of the electrical grid. The time limits specified to ~~enter~~ reach lower MODES of operation permit the shutdown to proceed in a controlled and orderly manner that is well within the specified maximum cooldown rate and within the capabilities of the unit, assuming that only the minimum required equipment is OPERABLE. This reduces thermal stresses on components of the Reactor Coolant System and the potential for a unit upset that could challenge safety systems under conditions to which this Specification applies. The use and interpretation of specified times to complete the actions of LCO 3.0.3 are consistent with the discussion of Section 1.3, Completion Times.

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

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

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

BASES

LCO 3.0.3 (continued)

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

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

Exceptions to LCO 3.0.3 are provided in instances where requiring a unit shutdown, in accordance with LCO 3.0.3, would not provide appropriate remedial measures for the associated condition of the unit. An example of this is in LCO 3.7.14, "Fuel Storage Pool Water Level." LCO 3.7.14 has an Applicability of "During movement of irradiated fuel assemblies in the fuel storage pool." Therefore, this LCO can be applicable in any or all MODES. If the LCO and the Required Actions of LCO 3.7.14 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 3.7.14 to "Suspend movement of irradiated fuel assemblies in the fuel storage pool" is the appropriate Required Action to complete in lieu of the actions of LCO 3.0.3. These exceptions are addressed in the individual Specifications.

LCO 3.0.4

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

LCO 3.0.4.a allows entry into a MODE or other specified condition in the Applicability with the LCO not met when the associated ACTIONS to be entered ~~following entry into~~ ~~permit continued operation in~~ the MODE or other specified condition in the Applicability ~~will permit continued operation within the MODE or other specified condition~~ for an unlimited period of time. Compliance with ~~ACTIONS~~ 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.

BASES

LCO 3.0.4 (continued)

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

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

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

The risk assessment may use quantitative, qualitative, or blended approaches, and the risk assessment will be conducted using the plant program, procedures, and criteria in place to implement 10 CFR 50.65(a)(4), which requires that risk impacts of maintenance activities to be assessed and managed. The risk assessment, for the purposes of LCO 3.0.4.b, must take into account all inoperable Technical Specification equipment regardless of whether the equipment is included in the normal 10 CFR 50.65(a)(4) risk assessment scope. The risk assessments will be conducted using the procedures and guidance endorsed by Regulatory Guide 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants." Regulatory Guide 1.182 endorses the guidance in Section 11 of NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." These documents address general guidance for conduct of the risk assessment, quantitative and qualitative guidelines for establishing risk management actions, and example risk management actions. These include actions to plan and conduct other activities in a manner that controls overall risk, increased risk awareness by shift and management personnel, actions to reduce the duration of the condition,

BASES

LCO 3.0.4 (continued)

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

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

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

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

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

BASES

LCO 3.0.4 (continued)

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

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

LCO 3.0.5

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

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

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

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

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

An example of demonstrating the OPERABILITY of the equipment being returned to service is reopening a containment isolation valve that has been closed to comply with Required Actions and must be reopened to perform the required testing.

BASES

LCO 3.0.5 (continued)

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

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

BASES

SR 3.0.2 (continued)

testing of pumps and valves in accordance with applicable American Society of Mechanical Engineers Operation and Maintenance Codes, as required by 10 CFR 50.55a. These programs establish testing requirements and Frequencies in accordance with the requirements of regulations. The TS cannot, in and of themselves, extend a test interval specified in the regulations directly or by reference.

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

The provisions of SR 3.0.2 are not intended to be used repeatedly 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 been ~~performed~~ ~~completed~~ within the specified Frequency. A delay period of up to 24 hours or up to the limit of the specified Frequency, whichever is greater, applies from the point in time that it is discovered that the Surveillance has not been performed in accordance with SR 3.0.2, and not at the time that the specified Frequency was not met.

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

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

BASES

SR 3.0.3 (continued)

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the Surveillance, the safety significance of the delay in completing the required Surveillance, and the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the requirements. When a Surveillance with a Frequency based not on time intervals, but upon specified unit conditions, operating situations, or requirements of regulations (e.g., prior to entering MODE 1 after each fuel loading, or in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions, etc.) is discovered to not have been performed when specified, SR 3.0.3 allows for the full delay period of up to the specified Frequency to perform the Surveillance. However, since there is not a time interval specified, the missed Surveillance should be performed at the first reasonable opportunity.

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

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

BASES

SR 3.0.3 (continued)

Failure to comply with specified Frequencies for SRs is expected to be an infrequent occurrence. Use of the delay period established by SR 3.0.3 is a flexibility which is not intended to be used ~~repeatedly as an operational convenience~~ to extend Surveillance intervals. While up to 24 hours or the limit of the specified Frequency is provided to perform the missed Surveillance, it is expected that the missed Surveillance will be performed at the first reasonable opportunity. The determination of the first reasonable opportunity should include consideration of the impact on unit risk (from delaying the Surveillance as well as any unit configuration changes required or shutting the unit down to perform the Surveillance) and impact on any analysis assumptions, in addition to unit conditions, planning, availability of personnel, and the time required to perform the Surveillance. This risk impact should be managed through the program in place to implement 10 CFR 50.65(a)(4) and its implementation guidance, Regulatory Guide 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants." This Regulatory Guide addresses consideration of temporary and aggregate risk impacts, determination of risk management action thresholds, and risk management action up to and including unit shutdown. The missed Surveillance should be treated as an emergent condition as discussed in the Regulatory Guide. The risk evaluation may use quantitative, qualitative, or blended methods. The degree of depth and rigor of the evaluation should be commensurate with the importance of the component. Missed Surveillances for important components should be analyzed quantitatively. If the results of the risk evaluation determine the risk increase is significant, this evaluation should be used to determine the safest course of action. All missed Surveillances will be placed in the licensee's Corrective Action Program.

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

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