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SERIAL: BSEP 00-0050
TSC 00TSC04

10 CFR 50.90

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

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324/LICENSE NOS. DPR-71 AND DPR-62
REQUEST FOR LICENSE AMENDMENTS
ULTIMATE HEAT SINK TEMPERATURE

Gentlemen:

In accordance with the Code of Federal Regulations, Title 10, Parts 50.90 and 2.101, Carolina Power & Light (CP&L) Company is requesting a revision to the Technical Specifications (TSs) for the Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2.

The proposed license amendments revise the maximum 24 hour average Ultimate Heat Sink (UHS) temperature allowed by TS 3.7.2, "Service Water (SW) System and Ultimate Heat Sink (UHS)," for BSEP, Unit Nos. 1 and 2. Specifically, Condition H of TS 3.7.2 provides a UHS water temperature range of $> 89^{\circ}\text{F}$ and $\leq 92^{\circ}\text{F}$. The Required Action for UHS water temperature within this range is to verify, once per hour, that the water temperature of the UHS is $\leq 89^{\circ}\text{F}$ when averaged over the previous 24 hours. Should the UHS water temperature exceed 92°F or the 24 hour average UHS water temperature exceed 89°F , Condition I of TS 3.7.2 would require the affected unit to be in Mode 3 in 12 hours and Mode 4 in 36 hours. The requested amendments increase the maximum 24 hour average UHS temperature from 89°F to 90.5°F .

Revised Unit 1 Bases pages associated with the proposed amendments are included in Enclosure 9. These pages are provided for information only and do not require issuance by the NRC.

In accordance with 10 CFR 50.91(b), CP&L is providing Mr. Mel Fry of the State of North Carolina a copy of the proposed license amendments.

A001

To allow time for procedure revision and orderly incorporation into copies of the TSs, CP&L requests that the proposed license amendments, once approved by the NRC, be issued with an effective date of within 30 days of issuance of the amendments.

Please refer any questions regarding this submittal to Mr. Warren J. Dorman, Manager - Regulatory Affairs, at (910) 457-2068.

Sincerely,

John S. Keenan
For John S. Keenan

MAT/mat

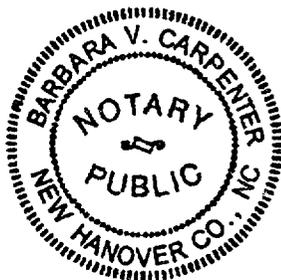
Enclosures:

1. Basis for Change Request
2. 10 CFR 50.92 Evaluation
3. Environmental Considerations
4. Page Change Instructions
5. Typed Technical Specification Page - Unit No. 1
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Jeffrey J. Lyash, having been first duly sworn, did depose and say that the information contained herein is true and correct to the best of his information, knowledge and belief; and the sources of his information are officers, employees, and agents of Carolina Power & Light Company.

Barbara V. Carpenter
Notary (Seal)

My commission expires: 2-16-03



cc (with enclosures):

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ENCLOSURE 1

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2 DOCKET NOS. 50-325 AND 50-324/LICENSE NOS. DPR-71 AND DPR-62 REQUEST FOR LICENSE AMENDMENTS ULTIMATE HEAT SINK TEMPERATURE

BASIS FOR CHANGE REQUEST

Proposed Change

The proposed license amendments revise the maximum 24 hour average Ultimate Heat Sink (UHS) temperature allowed by Technical Specification (TS) 3.7.2, "Service Water (SW) System and Ultimate Heat Sink (UHS)," for the Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2. Specifically, Condition H of TS 3.7.2 provides a UHS water temperature range of $> 89^{\circ}\text{F}$ and $\leq 92^{\circ}\text{F}$. The Required Action for UHS water temperature within this range is to verify, once per hour, that the water temperature of the UHS is $\leq 89^{\circ}\text{F}$ when averaged over the previous 24 hours. Should the UHS water temperature exceed 92°F or the 24 hour average UHS water temperature exceed 89°F , Condition I of TS 3.7.2 would require the affected unit to be in Mode 3 in 12 hours and Mode 4 in 36 hours. The requested amendments increase the maximum 24 hour average UHS temperature from 89°F to 90.5°F .

Current Requirement

TS 3.7.2, Required Action H.1 states:

- H.1 Verify water temperature of the UHS is $\leq 89^{\circ}\text{F}$ averaged over previous 24 hour period.

Proposed Change

- H.1 Verify water temperature of the UHS is $\leq 90.5^{\circ}\text{F}$ averaged over previous 24 hour period.

Basis For Proposed Change

The BSEP SW system is designed to provide cooling water for the removal of heat from equipment required for a safe reactor shutdown following a Design Basis Accident (DBA) or transient. This equipment includes the Diesel Generators (DGs), Residual Heat Removal (RHR) pump seal coolers, room cooling units for Emergency Core Cooling System (ECCS) equipment, and Residual Heat Removal Service Water (RHRSW) heat exchangers. The SW system also provides cooling to other components, as required, during normal operation. The safety related components associated with SW cooling have been analyzed for a maximum UHS temperature of

92°F. The proposed license amendments maintain this maximum UHS temperature. As such, the qualification of safety related components is not affected.

The proposed amendments allow the maximum 24 hour average UHS water temperature to be as high as 90.5°F. The existing 89°F limit was based on Engineering analysis that demonstrated sufficient heat removal capability based on a 24 hour "worst case" temperature profile. This profile; however, contained significant conservatism. For example, the maximum allowed UHS temperature of 92°F was assumed to exist for 8 hours coincident with minimum intake canal level conditions (i.e., a minimum water level in the pump well of the intake structure of -8.63 feet mean sea level), which could only be experienced during a hurricane.

The revised maximum 24 hour average UHS water temperature limit of 90.5°F was established by revising the overly conservative assumed intake canal water level from -8.63 feet mean sea level to -6.0 feet mean sea level. As stated above, this minimum design low canal water level of -8.63 feet would occur only during a hurricane. At such times, rain and cloud cover would reduce the canal temperature well below the maximum limits. Instead, a more realistic minimum intake canal water level of -6.0 feet mean sea level was assumed. The assumed -6.0 feet intake canal water level is the operability limit for the intake canal (i.e., UHS) and is currently reflected in the TS Bases for LCO 3.7.2, which states:

The OPERABILITY of the UHS is based on having a minimum water level in the pump well of the intake structure of -6 ft mean sea level . . .

Raising the minimum assumed intake canal level provides higher water head pressure, which in turn provides higher minimum SW flow rates. The higher SW flow rates allow the maximum 24 hour average UHS water temperature limit to be raised from 89°F to 90.5°F while maintaining equivalent SW system heat removal capability.

Based on the above, CP&L has determined that the proposed amendments do not present a safety concern. The existing maximum UHS temperature of 92°F is not affected. As such, the qualification of safety related components is not affected. The new maximum 24 hour average UHS water temperature limit of 90.5°F has been evaluated; and it was determined that the SW system will maintain sufficient heat removal capability, given the more realistic assumptions. Existing TS operability requirements for the UHS ensure that these assumptions will be met, or the UHS will be declared inoperable.

ENCLOSURE 2

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2 DOCKET NOS. 50-325 AND 50-324/LICENSE NOS. DPR-71 AND DPR-62 REQUEST FOR LICENSE AMENDMENTS ULTIMATE HEAT SINK TEMPERATURE

10 CFR 50.92 EVALUATION

Carolina Power & Light (CP&L) Company has concluded that the proposed change to the Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2 Technical Specifications (TS) does not involve a Significant Hazards Consideration. The proposed license amendments revise the maximum 24 hour average Ultimate Heat Sink (UHS) temperature allowed by TS 3.7.2, "Service Water (SW) System and Ultimate Heat Sink (UHS)," for the BSEP, Unit Nos. 1 and 2. Specifically, Condition H of TS 3.7.2 provides a UHS water temperature range of $> 89^{\circ}\text{F}$ and $\leq 92^{\circ}\text{F}$. The Required Action for UHS water temperature within this range is to verify, once per hour, that the water temperature of the UHS is $\leq 89^{\circ}\text{F}$ when averaged over the previous 24 hours. Should the UHS water temperature exceed 92°F or the 24 hour average UHS water temperature exceed 89°F , Condition I of TS 3.7.2 would require the affected unit to be in Mode 3 in 12 hours and Mode 4 in 36 hours. The requested amendments increase the maximum 24 hour average UHS temperature from 89°F to 90.5°F .

In support of this determination, an evaluation of each of the three (3) standards set forth in 10 CFR 50.92 is provided below.

1. Operation with the maximum 24 hour average UHS water temperature as high as 90.5°F does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The BSEP SW system is designed to provide cooling water for the removal of heat from equipment required for a safe reactor shutdown following a Design Basis Accident (DBA) or transient. This equipment includes the Diesel Generators (DGs), Residual Heat Removal (RHR) pump seal coolers, room cooling units for Emergency Core Cooling System (ECCS) equipment, and Residual Heat Removal Service Water (RHRSW) heat exchangers. The SW system also provides cooling to other components, as required, during normal operation. The SW system is not an initiator of any previously evaluated accident. The safety related components associated with SW cooling have been analyzed for a maximum UHS temperature of 92°F . The proposed change maintains this maximum UHS temperature. As such, the qualification of safety related components is not affected. Therefore, the probability of occurrence of a previously evaluated accident is not increased.

The new maximum 24 hour average UHS water temperature limit of 90.5°F has been evaluated and it was determined that the SW system will maintain sufficient heat removal capability. Existing TS operability requirements for the UHS ensure that conservatively bounding assumptions used in the analysis of the SW system's heat removal capability will be met, or the UHS will be declared inoperable. As such, the consequences of previously analyzed accidents are not affected

2. Operation with the maximum 24 hour average UHS water temperature as high as 90.5°F will not create the possibility of a new or different kind of accident from any accident previously evaluated.

Increasing the maximum 24 hour average UHS water temperature does not create the possibility of an accident of a different type than any evaluated previously in the safety analysis report. UHS water temperature does not represent an accident initiator. There is no physical change to any plant structure, system, or components. Therefore, there is no possibility of an accident of a different type.

Increasing the maximum 24 hour average UHS water temperature does not create the possibility of a malfunction of a different type than any evaluated previously. The safety related components associated with SW cooling have been analyzed for a maximum UHS temperature of 92°F. This maximum UHS temperature is maintained by the proposed change. As such, this condition does not introduce the possibility of a malfunction of a different type than any evaluated.

3. Operation with the maximum 24 hour average UHS water temperature as high as 90.5°F does not involve a significant reduction in a margin of safety.

UHS temperature limits are established to ensure that the SW system is able to provide sufficient cooling water for the removal of heat from equipment, such as the DGs, RHR pump seal coolers, ECCS room cooling units, and RHRSW heat exchangers, required for a safe reactor shutdown following a DBA or transient. CP&L has performed an analysis which demonstrates that this capability is not reduced with the increased maximum 24 hour average UHS water temperature limit. Existing TS operability requirements for the UHS ensure that conservatively bounding assumptions used in the analysis of the SW system's heat removal capability will be met, or the UHS will be declared inoperable. As such, the ability of the SW system to perform its intended safety function is not affected and the margin of safety is not reduced.

ENCLOSURE 3

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324/LICENSE NOS. DPR-71 AND DPR-62
REQUEST FOR LICENSE AMENDMENTS
ULTIMATE HEAT SINK TEMPERATURE

ENVIRONMENTAL CONSIDERATIONS

Carolina Power & Light (CP&L) Company has concluded that the proposed change to the Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2 Technical Specifications (TS) is eligible for categorical exclusion from performing an environmental assessment. The proposed license amendments revise the maximum 24 hour average Ultimate Heat Sink (UHS) temperature allowed by TS 3.7.2, "Service Water (SW) System and Ultimate Heat Sink (UHS)," for the BSEP, Unit Nos. 1 and 2. Specifically, Condition H of TS 3.7.2 provides a UHS water temperature range of $> 89^{\circ}\text{F}$ and $\leq 92^{\circ}\text{F}$. The Required Action for UHS water temperature within this range is to verify, once per hour, that the water temperature of the UHS is $\leq 89^{\circ}\text{F}$ when averaged over the previous 24 hours. Should the UHS water temperature exceed 92°F or the 24 hour average UHS water temperature exceed 89°F , Condition I of TS 3.7.2 would require the affected unit to be in Mode 3 in 12 hours and Mode 4 in 36 hours. The requested amendments increase the maximum 24 hour average UHS temperature from 89°F to 90.5°F . In support of this determination, an evaluation of each of the three (3) criteria set forth in 10 CFR 51.22(c)(9) is provided below.

1. As demonstrated in Enclosure 2, allowing the 24 hour average UHS water temperature to be raised from 89°F to 90.5°F does not involve a significant hazards consideration.
2. Increasing the 24 hour average UHS water temperature limit from 89°F to 90.5°F does not result in a significant change in the types or a significant increase in the amounts of any effluent that may be released offsite. The proposed amendments do not introduce any new equipment nor require any existing equipment or systems to perform a different type of function than they are presently designed to perform. The proposed amendments do not alter the function of existing equipment and will ensure that the consequences of any previously evaluated accident do not increase. Therefore, CP&L has concluded that there will not be a significant increase in the types or amounts of any effluent that may be released offsite and, as such, the proposed amendments do not involve irreversible environmental consequences beyond those already associated with normal operation.
3. Increasing the 24 hour average UHS water temperature limit from 89°F to 90.5°F does not result in an increase in individual or cumulative occupational radiation exposure.

ENCLOSURE 4

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
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PAGE CHANGE INSTRUCTIONS

<u>UNIT NO. 1</u>	
Remove page	Insert page
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<u>UNIT NO. 2</u>	
Remove page	Insert page
3.7-7	3.7-7

ENCLOSURE 5

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324/LICENSE NOS. DPR-71 AND DPR-62
REQUEST FOR LICENSE AMENDMENTS
ULTIMATE HEAT SINK TEMPERATURE

TYPED TECHNICAL SPECIFICATION PAGE - UNIT NO. 1

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>G. One required NSW pump inoperable.</p> <p><u>AND</u></p> <p>Two required CSW pumps inoperable.</p>	<p>G.1 Verify by administrative means that two Unit 1 NSW pumps are OPERABLE.</p> <p><u>AND</u></p> <p>G.2.1 Restore required NSW pump to OPERABLE status.</p> <p><u>OR</u></p> <p>G.2.2 Restore one required CSW pump to OPERABLE status.</p>	<p>Immediately</p> <p>72 hours</p> <p>72 hours</p>
<p>H. Water temperature of the UHS > 89°F and ≤ 92°F.</p>	<p>H.1 Verify water temperature of the UHS is ≤ 90.5°F averaged over previous 24 hour period.</p>	<p>Once per hour</p>

(continued)

ENCLOSURE 6

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324/LICENSE NOS. DPR-71 AND DPR-62
REQUEST FOR LICENSE AMENDMENTS
ULTIMATE HEAT SINK TEMPERATURE

TYPED TECHNICAL SPECIFICATION PAGE - UNIT NO. 2

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>G. One required NSW pump inoperable.</p> <p><u>AND</u></p> <p>Two required CSW pumps inoperable.</p>	<p>G.1 Verify by administrative means that two Unit 2 NSW pumps are OPERABLE.</p> <p><u>AND</u></p> <p>G.2.1 Restore required NSW pump to OPERABLE status.</p> <p><u>OR</u></p> <p>G.2.2 Restore one required CSW pump to OPERABLE status.</p>	<p>Immediately</p> <p>72 hours</p> <p>72 hours</p>
<p>H. Water temperature of the UHS > 89°F and ≤ 92°F.</p>	<p>H.1 Verify water temperature of the UHS is ≤ 90.5°F averaged over previous 24 hour period.</p>	<p>Once per hour</p>

(continued)

ENCLOSURE 7

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324/LICENSE NOS. DPR-71 AND DPR-62
REQUEST FOR LICENSE AMENDMENTS
ULTIMATE HEAT SINK TEMPERATURE

MARKED-UP TECHNICAL SPECIFICATION PAGE - UNIT NO. 1

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>G. One required NSW pump inoperable.</p> <p><u>AND</u></p> <p>Two required CSW pumps inoperable.</p>	<p>G.1 Verify by administrative means that two Unit 1 NSW pumps are OPERABLE.</p> <p><u>AND</u></p> <p>G.2.1 Restore required NSW pump to OPERABLE status.</p> <p><u>OR</u></p> <p>G.2.2 Restore one required CSW pump to OPERABLE status.</p>	<p>Immediately</p> <p>72 hours</p> <p>72 hours</p>
<p>H. Water temperature of the UHS > 89°F and ≤ 92°F.</p>	<p>H.1 Verify water temperature of the UHS is ≤ 92°F averaged over previous 24 hour period.</p>	<p>Once per hour</p>

(continued)

90.5

ENCLOSURE 8

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324/LICENSE NOS. DPR-71 AND DPR-62
REQUEST FOR LICENSE AMENDMENTS
ULTIMATE HEAT SINK TEMPERATURE

MARKED-UP TECHNICAL SPECIFICATION PAGE - UNIT NO. 2

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>G. One required NSW pump inoperable.</p> <p><u>AND</u></p> <p>Two required CSW pumps inoperable.</p>	<p>G.1 Verify by administrative means that two Unit 2 NSW pumps are OPERABLE.</p> <p><u>AND</u></p> <p>G.2.1 Restore required NSW pump to OPERABLE status.</p> <p><u>OR</u></p> <p>G.2.2 Restore one required CSW pump to OPERABLE status.</p>	<p>Immediately</p> <p>72 hours</p> <p>72 hours</p>
<p>H. Water temperature of the UHS > 89°F and ≤ 92°F.</p>	<p>H.1 Verify water temperature of the UHS is ≤ 92°F averaged over previous 24 hour period.</p>	<p>Once per hour</p>

(continued)

90.5

ENCLOSURE 7

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324/LICENSE NOS. DPR-71 AND DPR-62
REQUEST FOR LICENSE AMENDMENTS
ULTIMATE HEAT SINK TEMPERATURE

MARKED-UP BASES PAGES - UNIT NO. 1

(FOR INFORMATION ONLY)

BASES

APPLICABLE
SAFETY ANALYSES
(continued)

evaluation of the long term primary containment response after a design basis LOCA.

The ability of the SW System to provide adequate cooling to the identified safety equipment is an implicit assumption for the safety analyses evaluated in References 1 and 2. During the first 10 minutes of a design basis LOCA, the ability to provide onsite emergency AC power is dependent on the ability of the SW System to cool the DGs. Ten minutes following a LOCA, the long term cooling capability of the RHR, core spray, and RHRSW subsystems is dependent on the cooling provided by the SW System.

The SW System, together with the UHS, satisfy Criterion 3 of 10 CFR 50.36(c)(2)(ii) (Ref. 4).

LCO

In the event of a DBA, the NSW header and associated components are adequate to provide the minimum heat removal capability assumed in the safety analysis for the systems to which it supplies cooling water. However, the CSW header and associated components are required to ensure maximum reliability in the event of a single failure. To ensure this requirement is met, the appropriate equipment to supply the unit NSW and CSW headers must be OPERABLE. In addition, at least three site NSW pumps are required to ensure adequate NSW pump redundancy is available to ensure cooling to the DGs in the event of an active single failure.

The SW System is considered OPERABLE when it has two OPERABLE CSW pumps, three site NSW pumps (any combination of Unit 1 and Unit 2 NSW pumps), and an OPERABLE flow path capable of taking suction from the intake structure and transferring the water to the ECCS equipment and the DGs. In addition, for a site NSW pump to be considered OPERABLE, it must be capable of supplying its associated unit NSW header. For a CSW pump to be considered OPERABLE, it must be capable of supplying the CSW header and the NSW header.

The OPERABILITY of the UHS is based on having a minimum water level in the pump well of the intake structure of -6 ft mean sea level and a maximum water temperature of

90.5 → ~~90.5~~ F.

The isolation of the SW System to components or systems may render those components or systems inoperable, but does not affect the OPERABILITY of the SW System.

(continued)

BASES

ACTIONS G.1, G.2.1, and G.2.2 (continued)

remaining OPERABLE SW pumps. However, the overall SW System reliability is significantly reduced because of the reduction in SW pump redundancy and operational diversity such that the SW System may not be able to perform its required support function. Therefore, a more restrictive Completion Time of 72 hours is required to restore at least one required CSW pump or the required NSW pump to OPERABLE status.

H.1

With water temperature of the UHS $> 89^{\circ}\text{F}$ and $\leq 92^{\circ}\text{F}$, the design basis assumption associated with initial UHS temperature are bounded provided the temperature of the UHS averaged over the previous 24 hour period is $\leq 90.5^{\circ}\text{F}$. With the water temperature of the UHS $> 89^{\circ}\text{F}$, long term cooling capability of the ECCS loads and DGs may be affected. Therefore, to ensure long term cooling capability is provided to the ECCS loads when water temperature of the UHS is $> 89^{\circ}\text{F}$, Required Action H.1 is provided to more frequently monitor the water temperature of the UHS and verify the temperature is $\leq 90.5^{\circ}\text{F}$ when averaged over the previous 24 hour period. The once per hour Completion Time takes into consideration UHS temperature variations and the increased monitoring frequency needed to ensure design basis assumptions are not exceeded in this condition. If the water temperature of the UHS exceeds 90.5°F when averaged over the previous 24 hour period or the water temperature of the UHS exceeds 92°F , Condition I must be entered immediately.

I.1 and I.2

If Required Actions cannot be completed within the associated Completion Time of Condition A, B, D, E, F, G, and H; Required Action C.2 cannot be completed within the associated Completion Time; two or more required NSW pumps are inoperable; the SW System is inoperable for reasons other than Conditions A, B, C, D, E, F, and G; or the UHS is inoperable for reasons other than Condition H (e.g., low water level); the unit must be placed in a MODE in which the LCO does not apply. To achieve this status, the unit must

(continued)