

Michael T. Coyle  
Vice President

# AmerGen

A PECO Energy/British Energy Company

---

## Clinton Power Station

P.O. Box 678  
Clinton, IL 61727  
Phone: 217 935-8881 Ext. 4161

U-603414  
8E.100a  
September 18, 2000

Docket No. 50-461

Mr. Samuel J. Collins, Director  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Subject: Request for Enforcement Discretion Regarding  
Technical Specification Limiting Condition for Operation  
Related to the Static VAR Compensator (SVC) Protection Systems

Dear Mr. Collins:

Events have occurred at Clinton Power Station (CPS) which require your prompt attention as AmerGen requests enforcement discretion regarding the Limiting Condition for Operation (LCO) requirements of Technical Specification (TS) 3.8.11, "Static VAR Compensator (SVC) Protection Systems." This written request for enforcement discretion is submitted pursuant to a verbal request that was made via a telephone conference conducted at approximately 1430 hours (CDT) on September 15, 2000 between representatives of AmerGen Energy Company, (LLC) (AmerGen) for CPS, and NRC staff personnel from the Office of Nuclear Reactor Regulation (NRR) and Region III. Immediate resolution of the issue requiring the enforcement discretion was obtained when the NRC verbally granted AmerGen's request during a followup telephone conference conducted at 1635 hours (CDT) on September 15, 2000. As explained further below, enforcement discretion was required to support returning to service one of the offsite power sources to CPS with its associated SVC having only one protection subsystem Operable.

Each of the two required offsite power sources for CPS has an associated auxiliary transformer that is supported with an SVC. (The 345-kV transmission system is connected to the CPS auxiliary power system via the reserve auxiliary transformer (RAT) which is supported by the RAT SVC, and the 138-kV system is connected to CPS via the emergency reserve auxiliary transformer (ERAT) which is supported by the ERAT SVC.) The SVCs provide dynamic reactive power support and are capable of quickly responding to changes in voltage to ensure that adequate voltage to plant loads is maintained under normal and accident conditions. Due to this support function, CPS procedurally requires the associated offsite source to be declared inoperable whenever its associated SVC is not in service.

*Rec'd  
DCD  
1/2/01*

*Aool  
1/1*

*Add:  
Bill Long  
Paper  
copy  
0869*

At 0300 on September 13, 2000, a planned outage of the ERAT was begun to perform scheduled routine maintenance. Removal of the ERAT from service required entry into Required Action A.1 of CPS TS 3.8.1, "AC Sources - Operating," which requires the inoperable offsite source to be restored to operable status within 72 hours, otherwise a plant shutdown is required. The ERAT was thus required to be restored to Operable status by 0300 on September 16. While the ERAT was removed from service, planned testing of the ERAT SVC protection system was begun.

Each SVC is provided with a protection scheme to protect the Class 1E onsite power distribution system from malfunctions of the SVC. The protection system consists of two redundant subsystems, each of which can initiate a trip of both in-series SVC output breakers for the associated SVC in the event of an abnormal overvoltage, undervoltage, phase unbalance, harmonic, or overcurrent condition. TS LCO 3.8.11 requires that an SVC Protection System consisting of two redundant protection subsystems be Operable for each inservice SVC during SVC operation. When one subsystem of an SVC Protection System becomes inoperable, Required Action A.1 requires that the SVC protection subsystem be restored to Operable status within 30 days. If this Completion Time is not met, Required Action C.1 requires removing the SVC from service by opening the SVC output breaker within one hour.

Difficulties were encountered during testing of the ERAT SVC "A" protection subsystem. In particular, restoration from testing of the "A" protective subsystem necessitated restoring the ERAT SVC to service with only the "B" protective subsystem Operable. However, as explained further below, the requirements of LCO 3.0.4 in the CPS TS prevent placing the ERAT SVC in service with less than both required protection subsystems operable. The ERAT is not considered Operable without an Operable SVC. This restriction prevented restoring the ERAT to Operable status within the Completion Time limits of LCO 3.8.1 which, as noted above, was due to expire at 0300 on September 16, 2000.

LCO 3.0.4 states, "when an LCO is not met, entry into a MODE or other specified condition in the Applicability shall not be made except when the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time." With the ERAT SVC removed from service, and with one of the required ERAT SVC protection subsystems inoperable, LCO 3.0.4 prohibits placing the ERAT SVC into service. This is because placing the SVC back into service constitutes re-entry into a condition specified in the Applicability of the LCO (i.e., "during SVC operation"), and the ACTIONS of TS 3.8.11 do not permit continued operation for an unlimited period of time in this condition. (The ACTIONS of TS 3.8.11 do not permit continued operation in the condition specified in the Applicability for an unlimited period of time because Required Action C.1 requires removing the SVC from service within one hour if one subsystem is not restored to an Operable status within 30 days.)

The enforcement discretion that was verbally requested on September 15 allowed a "3.0.4 exception" to be applied to Required Action A.1, thus permitting the SVC to be restored to service with the "A" protection subsystem inoperable. This exception allowed the ERAT SVC to be placed back into service with an ACTION in effect, thus precluding the immediate noncompliance with LCO 3.0.4. (This provision is reflected via a note preceding TS 3.8.11 Required Action A.1, as shown on the marked-up page from the CPS TS provided

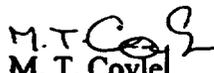
provided in Attachment 3.) As noted in the telephone conferences conducted on September 15, AmerGen proposes that this provision be effective only during a 30-day period that begins on September 15, 2000, and expires on October 15, 2000. The intent is to limit the total out-of-service time for the inoperable ERAT SVC protection subsystem to 30 days in keeping with the intent of the current TS 3.8.11 ACTION requirements.

SVC operation for a limited period of time with only one protection subsystem Operable is acceptable on the basis that the subsystems are fully redundant such that one subsystem provides sufficient protection capability for plant loads in the event of a malfunction of the associated SVC. Further, the risk associated with this operating condition would be equivalent to that allowed under TS 3.8.11 Required Action A.1 which was supported by the original amendment application that added TS 3.8.11 to the TS.<sup>1</sup> At the same time, continued SVC operation is important for ensuring adequate voltage to Class 1E, 4160 volt plant loads during normal plant operation as well as in the event of an accident. Thus, there was a safety incentive to restoring the ERAT SVC to service as soon as possible, even with only one protection subsystem Operable. For this reason, the ERAT SVC (and the ERAT) was restored to service and declared Operable at 2054 hours on September 15, thus implementing the enforcement discretion that was verbally approved on September 15.

Attachment 2 to this letter contains the details and information required to support AmerGen's request for enforcement discretion, consistent with the NRC's Technical Guidance, Part 9900, "Operations - Notices of Enforcement Discretion." Attachment 2 includes a discussion as to why this request does not involve a significant hazards consideration and does not involve adverse consequences to the environment. Copies of the relevant portions of TS 3.8.11 (and TS 3.8.1 for reference) are included in Attachment 3. In addition, an affidavit supporting the facts set forth in this letter and its attachments is provided as Attachment 1.

As discussed in the conference calls conducted on September 15, 2000, AmerGen will submit an application for amendment of the CPS Operating License to preclude any future recurrence of the identified LCO 3.0.4 compliance problem associated with TS 3.8.11. This permanent change is expected to involve changing TS 3.8.11 to permanently insert a "3.0.4 exception" into Required Action A.1. The license amendment application for revising TS 3.8.11 will be submitted on or by Wednesday, September 20, 2000.

Sincerely yours,

  
M. T. Coyle  
Vice President

---

<sup>1</sup> License Amendment application letter (U-602972) dated May 4, 1998, and subsequent letter (U-603084) dated September 23, 1998, associated with Facility Operating License - NPF-62 amendment 117 dated October 9, 1998.

JLP/blf

**Attachments**

**cc: NRC Clinton Licensing Project Manager  
NRC Regional Administrator  
NRC Resident Office, V-690  
Illinois Department of Nuclear Safety**

AFFIRMATION

Michael T. Coyle, being first duly sworn, deposes and says: That he is Vice President for Clinton Power Station; that this request for enforcement discretion has been prepared under his supervision and direction; that he knows the contents thereof; and that the letter and the statements made and the facts contained therein are true and correct to the best of his knowledge and belief.

Date: This 18<sup>th</sup> day of September, 2000.

Signed: M. T. Coyle  
M. T. Coyle  
Vice President

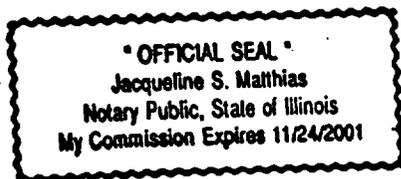
STATE OF ILLINOIS

DeWitt COUNTY

}

SS.

Subscribed and sworn to before me this 18<sup>th</sup> day of September, 2000.



Jacqueline S. Matthias  
(Notary Public)

**Request for Enforcement Discretion Regarding  
Technical Specification Limiting Condition for Operation 3.8.11  
Related to the Static VAR Compensator (SVC) Protection System**

1. Technical Specification (TS)/License Condition that would be violated:

TS Limiting Condition for Operation (LCO) 3.8.11, "Static VAR Compensator (SVC) Protection Systems," requires that an SVC Protection System consisting of two redundant protection subsystems be Operable for each inservice SVC during SVC operation. With one of the redundant protection subsystems inoperable, Required Action A.1 requires restoring the SVC protection subsystem to Operable status within 30 days. If this Required Action and associated Completion Time cannot be met, Required Action C.1 requires the SVC output breaker(s) be opened within one hour; thus, removing the SVC from service.

LCO 3.0.4 states, "(w)hen an LCO is not met, entry into a MODE or other specified condition in the Applicability shall not be made except when the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time." With the Emergency Reserve Auxiliary Transformer (ERAT) SVC removed from service, and with one of the required protection subsystems inoperable, LCO 3.0.4 prohibits placing the ERAT SVC into service. Placing the SVC back into service constitutes re-entry into a condition specified in the Applicability of the LCO, and since the ACTIONS of TS 3.8.11 do not permit continued operation for an unlimited period of time in this condition, re-entry is prohibited by LCO 3.0.4. (The ACTIONS of TS 3.8.11 do not permit continued operation in the condition specified in the Applicability for an unlimited period of because Required Action C.1 requires removing the SVC from service within one hour if one subsystem is not restored to an Operable status within 30 days.)

Thus, the Technical Specification/License Condition that would be violated would be the requirements of LCO 3.8.11 and LCO 3.0.4.

2. The circumstances surrounding the situation, including apparent root causes, the need for prompt action and identification of any relevant historical events.

At 0300 on Wednesday, September 13, 2000, a planned outage of the ERAT was begun to perform scheduled maintenance. (The ERAT is the offsite source connection for the 138-kV transmission system, one of the two required offsite electric power sources for Clinton Power Station (CPS).) When the ERAT was removed from service, Required Actions A.1 and A.2 of TS 3.8.1 were entered that required restoration of the offsite source to an OPERABLE status by 0300 on Saturday, September 16 (i.e., within 72 hours). In parallel with the above activity, at 0505, September 13, 2000, a functional test of the ERAT SVC protection subsystem was started to satisfy Surveillance Requirement (SR) 3.8.11.2. [Performance of this surveillance requires the SVC to be removed from service. In addition, to support continuous assurance of adequate onsite voltage during normal plant operation, as

well as in the event of an accident, CPS procedurally requires the associated offsite source to be declared inoperable whenever the SVC is not in service. Therefore, the ERAT outage provided an appropriate opportunity to perform this TS required surveillance.]

During performance of the steps to check the trip function of the harmonic distortion relay trip, the initial attempt resulted in a satisfactory trip actuation, but the specified time frame to trip was unacceptably short. The time frame was approximately 10 seconds instead of the specified range of 41 to 45 seconds. Following reset of the circuitry, subsequent attempts to execute the steps resulted in the alarm function without the trip function. The surveillance procedure was exited and troubleshooting was initiated.

Investigation into the cause of the trip actuation failure determined that during the initial attempt to perform the steps to check the harmonic distortion trip function, the input signal from the test equipment was either too high [10% Total Harmonic Distortion (THD) vice the specified 5% THD], or was ramped up too quickly, or both. This resulted in a successful trip actuation, but because the trip has an inverse time characteristic, the trip was received in an unacceptably short time frame. In resetting the circuitry to re-perform the steps, personnel actions potentially resulted in inadvertent disabling of the trip function. Later investigation efforts to test the relay and trip functions included restoration of the firmware configuration. This activity would have corrected an inadvertent disabling of the trip function, if it had occurred, and also precluded determination of whether a configuration change had actually occurred. These troubleshooting efforts did conclude that the relay and trip functions were operating as expected, but did not have the capability to test the setpoint and time duration.

Also during the investigation efforts, a connector was found to be loose. Movement of the connector caused an alarm actuation. The connector was firmly seated and the alarm was cleared. Reseating of the connector precluded the ability to re-create the test with the connector in both the "loose" condition and seated condition to determine if this was the cause of the failure to achieve the trip function. This is a possible cause. When and how the connector became dislodged is indeterminate.

The current surveillance procedure was also compared to the initial testing after installation. The only significant difference was in the input signal type. In the original test, voltage and current inputs were used, that corresponded to the desired harmonic distortion value. In the current test, an actual harmonic distortion signal was used. There was no indication, however, that the current test methodology is invalid.

The interim conclusions surrounding this test is that the initial portion of this testing was not performed correctly and that resetting of the circuitry potentially resulted in a firmware configuration that prevented the trip actuation. Subsequent investigation efforts preclude conclusive determination, but the configuration has been verified to now be correct. No information was identified that invalidated the surveillance procedure methodology.

Performance of the test was recommenced. Additional difficulties were experienced regarding tripping of the ERAT SVC output breakers. The root cause of the testing difficulties is still being investigated, however, it is suspected that the current surveillance test procedure is deficient. This is the first periodic test of the ERAT SVC protective subsystems since they were installed during Refueling Outage No. 6.

Due to the difficulties being experienced with restoration of the SVC from testing, AmerGen contacted the NRC to request enforcement discretion for allowing the SVC to be restored to service (thus allowing the ERAT to be restored to service) with one protection subsystem inoperable. Via the noted telephone conferences conducted on September 15, 2000, verbal NRC approval of the requested enforcement discretion was granted at approximately 1635 on that day. Subsequently, at 2054 on September 15, 2000, Clinton Power Station returned the ERAT SVC to service with only one operable SVC protection subsystem, thus implementing the NOED request verbally granted by the NRC at approximately 1635 on September 15, 2000.

3. The safety basis for the request, including an evaluation of the safety significance and potential consequences of the proposed course of action.

The requested enforcement discretion regarding the requirements of TS 3.8.11 allows the ERAT SVC to be placed back into service (i.e., re-entering the Applicability of LCO 3.8.11) without violation of LCO 3.0.4. This is accomplished by permitting an exception to LCO 3.0.4 to be applied to Required Action A.1.

Although there is some risk associated with placing the SVC into service with less than two fully redundant protection subsystems Operable, the overall plant risk levels are considered to be lower with an SVC in service (to maintain the 138 kV offsite source Operable), than with continued plant operation with no ERAT SVC in service.

In addition, this proposed change will allow continued plant operation with the ERAT SVC in service rather than requiring a plant shutdown. The risk associated with continued plant operation with less than two fully redundant SVC protection subsystems is also low compared to the risk of performing an unnecessary plant shutdown without the SVC in service. These risk levels are consistent with the risk levels previously evaluated in establishing the 30-day Completion Time of LCO 3.8.11 Required Action A.1. The basis for the Completion Times and the associated plant risk considerations were presented in the License Amendment application letter (U-602972) dated May 4, 1998, and subsequent letter (U-603084) dated September 23, 1998, associated with Facility Operating License – NPF-62 amendment 117 dated October 9, 1998.

A risk evaluation of ERAT SVC operation with only one Operable protective subsystem while supporting the ERAT offsite electrical circuit was performed. The results of the evaluation indicated no appreciable change in core damage frequency (CDF) due to operation of the SVC with one protective subsystem vice two

protective subsystems. Regardless of whether one or two SVC protective subsystems were in operation, the risk evaluation yielded a CDF of  $1.842E-05$  /yr. These CDF results are reasonable based on the fact that 1) a required loss of the RAT must first occur causing safety-related loads to be transferred to the ERAT, 2) a fault must occur on the ERAT SVC such that unacceptable operation is induced, 3) the remaining ERAT SVC protective subsystem must fail such that the SVC induced fault is transmitted to the 4160 V bus, and 4) the equipment supplied by the 4160 V bus must fail as a result of the induced SVC failure mode.

Based on the above, placing the ERAT SVC into service with only one Operable SVC protection subsystem will have a minimal effect on plant safety.

4. The basis for the licensee's conclusion that the noncompliance will not be of potential detriment to the public health and safety and that no significant hazard consideration is involved.

LCO 3.8.11 and LCO 3.0.4 do not permit placing an SVC into operation with only one Operable ERAT SVC protection subsystem. Based on the above discussion, the requested enforcement discretion regarding these TS requirements has been evaluated to not pose a potential detriment to the public health and safety. Further, AmerGen has determined that no significant hazards consideration is involved for the following reasons:

#### Basis for No Significant Hazards Consideration

In accordance with 10 CFR 50.92, a proposed change to the operating license involves no significant hazards consideration if operation of the facility in accordance with the proposed change would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident than previously evaluated; or (3) involve a significant reduction in a margin of safety. The proposed change, i.e., the request for enforcement discretion to revise the requirements of TS 3.8.11, is evaluated against each of these criteria as follows:

- (1) The proposed change does not involve a significant increase in the probability or consequences of any accident previously evaluated.

The accident analyses assume that the offsite AC electrical power sources have sufficient capacity, capability, redundancy and reliability to ensure the availability of necessary power to safety-related systems so that the fuel, reactor coolant system, and containment design limits are not exceeded and that the postulated transients and accidents are effectively mitigated such that offsite radiation exposure criteria are not exceeded. The SVCs provide voltage support, when required, for the associated offsite AC power circuits to the safety-related buses and equipment supplied by those circuits. The SVC protection systems described in LCO 3.8.11 protect safety-related equipment from potential SVC failure modes that could damage or degrade Class 1E electrical equipment.

The proposed request to add an LCO 3.0.4 exception to TS 3.8.11 Required Action A.1 would result in the ability to place the ERAT SVC back into service with only one protection subsystem Operable for up to 30 days. This request would allow the ERAT SVC to provide voltage support for onsite loads, as necessary, and thus assist in ensuring an adequate power source to safety-related electrical equipment. Restoring the ERAT SVC to service provides automatic voltage support, when required, rather than relying on manual means to monitor offsite grid conditions to ensure adequate onsite power voltage. This request continues to limit the duration of inoperability of the SVC protective subsystem to 30 days as required by LCO 3.8.11 Required Action A.1.

SVC failure, with or without an Operable protective subsystem, is a plausible initiator for those accidents evaluated in the Updated Safety Analysis Report (USAR) Chapters 6 and 15 that result from an interruption of an offsite power source; for example, a loss of RHR during shutdown conditions when supplied by an offsite power circuit. However, no facility design changes are associated with the SVCs or their associated offsite circuits which would cause a change in component failure probability; hence reliability of the SVCs is maintained at their previous levels. Therefore, no change in plausible initiation mechanisms or frequencies has occurred. In addition, following approval of this request, the remaining protective subsystem would continue to be required Operable. When combined with the proposed 30-day limitation on the proposed request, the assumed conditions and failure probabilities used to derive the basis for the Required Action and associated Completion Times for Conditions B and C of TS 3.8.11 are preserved. Thus, no significant increase in the probability of any accident previously evaluated results from this change.

For those accidents that rely on the availability of the offsite power circuit for successful mitigation, no change has been introduced to alter the assumed failure modes or effects. One ERAT SVC protective subsystem will continue to provide a level of protection consistent with the analyses provided for the basis for the Required Actions and associated Completion Times for Conditions B and C of TS 3.8.11. Thus, the assumed failure of the SVC would not alter the assumptions of the accident analyses nor consequences resulting from the accident analyses. Therefore, no significant increase in consequences of any accident evaluated previously results from this change.

Based on the above, the proposed change (request) does not involve a significant increase in the probability or consequences of any accident previously evaluated.

- (2) The proposed change would not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed change to the ERAT SVC protection subsystem minimum requirements will not introduce any new or different accident. No changes have been introduced into the design or operation of the SVC or the associated offsite circuit that would result in a new or different failure mode or effect. No failures previously considered incredible would be made credible as a result of the allowance to place the ERAT SVC in service with only one protective subsystem Operable. Therefore, sufficient protection against SVC malfunctions will continue to exist for the duration of this change and, thus, the proposed change does not create the possibility of a new or different kind of accident than previously evaluated.

- (3) The proposed change will not involve a significant reduction in the margin of safety.

Although the minimum requirements for the ERAT SVC Protection Subsystem are proposed to be changed, the SVC will continue to be protected from all of its postulated failures. Because of the reliable design of the protective subsystems and the demonstrated reliability and predictable behavior of the SVC during its previous service, requiring both redundant protective subsystems to be Operable provides a negligible increase in the margin of safety associated with the overall protection system. Thus, the request to allow SVC operation with only one protective subsystem Operable does not involve a significant reduction in the margin of safety. Further, the benefit of having the SVC in service to support offsite circuit OPERABILITY, as needed, provides a greater margin of safety than the margin lost due to the reduction in protective system redundancy.

Based on the above, it is concluded that the proposed change does not involve a significant reduction in a margin of safety.

5. The basis for the licensee's conclusion that the noncompliance will not involve adverse consequences to the environment.

AmerGen has evaluated this requested enforcement discretion against the criteria for identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.21. AmerGen has determined that this requested action meets the criteria for a categorical exclusion set forth in 10 CFR 51.22(c)(9) and as such, has determined that no irreversible consequences exist in accordance with 10 CFR 50.92(b). This determination is based on the fact the proposed to a license issued pursuant to 10 CFR 50 that reflects a requirement with respect to the use of a facility component located within the restricted area, as defined in 10 CFR 20, and the action meets the following specific criteria:

- A. The proposed action involves no significant hazards consideration. As demonstrated in Section 4 of this submittal, this proposed action does not involve any significant hazards consideration.
- B. There is no significant change in the types or significant increase in the amounts of any effluent that may be released offsite. The proposed action does not affect the generation of any radioactive effluent, nor does it affect the operation of any system or component used to control the release of such effluents. With regard to plant operation and the availability of equipment, the resulting overall increase in risk during the additional 30-day period is minimal. It is expected that plant equipment would operate as expected in the event of an accident to minimize the potential for any leakage of radioactive effluents.
- C. There is no significant increase in individual or cumulative occupational radiation exposure. The proposed action will not change the level of controls or methodology used for processing of radioactive effluents or handling of solid radioactive waste, nor will the proposed action result in any change in the normal radiation levels within the plant. Therefore, there will be no increase in individual or cumulative occupational radiation exposure resulting from this change.

6. Proposed compensatory measure(s).

No additional compensatory measures would be involved with this proposed request. However, the potential for failure of the SVC that would result in a demand for protective system action concurrent with a failure of the remaining Operable protection subsystem is low. As a result, the ERAT and its loads will continue to have sufficient protection from potential SVC failures.

7. The justification for the duration of the noncompliance.

It is proposed that this request remain in effect only during a 30-day period that begins on September 15, 2000, and expires on October 15, 2000, until a License Amendment request is submitted and approved that will permit placing an SVC into service with one inoperable protection subsystem without violating LCO 3.0.4. AmerGen will track inoperability of the inoperable SVC protection subsystem in accordance with LCO 3.8.11 Required Action A.1 from the time that the ERAT SVC is placed in service. This will ensure that the total out-of-service time is limited to 30 days in keeping with the intent of the current TS 3.8.11 ACTION requirements.

8. A statement that the request has been approved by the facility organization that normally reviews safety issues (Plant On-site Review Committee, or its equivalent).

The CPS Facility Review Group reviewed this request and subsequently approved this request at 1630 hours on September 15, 2000.

9. The request must specifically address which of the NOED criteria for appropriate plant conditions specified in Section B is satisfied and how it is satisfied.

At the time when the enforcement discretion was verbally requested, the plant was in MODE 1, 100 percent power. Approval of the request was appropriate and needed in order to avoid undesirable transients as a result of forcing compliance with the ACTIONS for a Limiting Condition for Operation and, thus, minimize potential adverse safety consequences and operational risks.

This request would permit continued operation with a single SVC protection subsystem for the ERAT SVC until the refueling outage, since it permits required Action A.1 to be in effect upon placing the ERAT SVC into service. The total allowed out-of-service time will be limited to 30 days consistent with the intent of Required Action A.1. Allowing the ERAT SVC to be placed in service allows the SVC to automatically respond to changes in offsite grid conditions, rather than relying on manual actions to monitor offsite grid conditions to ensure adequate onsite power voltage remains available.

10. If a follow-up license amendment is required, the NOED request must include marked-up TS pages showing the proposed TS changes and a commitment to submit the actual license amendment request within 48 hours.

A License Amendment request will be submitted on or by September 20, 2000, as committed to during a conference call conducted at approximately 1430 hours on September 15, 2000. The amendment is expected to request that an LCO 3.0.4 exception be added to TS 3.8.11 Required Action A.1. The LCO 3.0.4 exception to Required Action A.1 would allow an SVC to be placed into service with less than two Operable redundant SVC protection subsystems. A markup of the proposed changes to TS 3.8.11 are included with this request in Attachment 3.

11. For NOEDs involving severe weather or other natural events, the licensee's request must be sufficiently detailed for the staff to evaluate the likelihood that the event could affect the plant, the capability of the ultimate heat sink, on-site and off-site emergency preparedness status, access to and from the plant, acceptability of any increased radiological risk to the public and the overall public benefit.

This criterion is not applicable to this request.

**Marked-Up Pages of the CPS Technical Specifications**

## 3.8 ELECTRICAL POWER SYSTEMS

## 3.8.11 Static VAR Compensator (SVC) Protection Systems

LCO 3.8.11 An SVC Protection System consisting of two redundant protection subsystems shall be OPERABLE for each inservice SVC.

APPLICABILITY: During SVC operation

Insert NOTE  
(attached)

## ACTIONS

-----NOTE-----  
Separate Condition entry is allowed for each SVC Protection System.  
-----

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One subsystem of an SVC Protection System inoperable.	A.1 Restore SVC protection subsystem to OPERABLE status.	30 days
B. Both subsystems of an SVC Protection System inoperable.	B.1 Restore one SVC protection subsystem to OPERABLE status.	24 hours
C. Required Action and associated Completion Time not met.	C.1 Open SVC output breaker(s) to remove SVC from service.	1 hour

No changes to this page.

**SURVEILLANCE REQUIREMENTS**

<b>SURVEILLANCE</b>		<b>FREQUENCY</b>
SR 3.8.11.1	For each required SVC Protection System, perform a local, visual check of the SVC system control and status panel to confirm satisfactory operation.	24 hours
SR 3.8.11.2	Perform a system functional test of each SVC protection subsystem, including breaker actuation.	18 months

No changes to this page.

## 3.8 ELECTRICAL POWER SYSTEMS

## 3.8.1 AC Sources—Operating

LCO 3.8.1 The following AC electrical power sources shall be OPERABLE:

- a. Two qualified circuits between the offsite transmission network and the onsite Class 1E AC Electric Power Distribution System; and
- b. Three diesel generators (DGs).

APPLICABILITY: MODES 1, 2, and 3.

-----NOTE-----  
Division 3 AC electrical power sources are not required to be OPERABLE when High Pressure Core Spray System is inoperable.  
-----

## ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One offsite circuit inoperable.	A.1 Perform SR 3.8.1.1 for OPERABLE offsite circuit.	1 hour <u>AND</u> Once per 8 hours thereafter
	<u>AND</u> A.2 Restore offsite circuit to OPERABLE status.	72 hours <u>AND</u> 6 days from discovery of failure to meet LCO

(continued)

No changes to this page.

## ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. One required DG inoperable.	B.1 Perform SR 3.8.1.1 for OPERABLE offsite circuit(s).	1 hour <u>AND</u> Once per 8 hours thereafter
	<u>AND</u> B.2 Declare required feature(s), supported by the inoperable DG, inoperable when the redundant required feature(s) are inoperable.	4 hours from discovery of Condition B concurrent with inoperability of redundant required feature(s)
	<u>AND</u> B.3.1 Determine OPERABLE DG(s) are not inoperable due to common cause failure.	24 hours
	<u>OR</u> B.3.2 Perform SR 3.8.1.2 for OPERABLE DG(s).	24 hours
	<u>AND</u> B.4 Restore required DG to OPERABLE status.	72 hours <u>AND</u> 6 days from discovery of failure to meet LCO

(continued)

No changes to this page.

## ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. Two offsite circuits inoperable.	C.1 Declare required feature(s) inoperable when the redundant required feature(s) are inoperable.	12 hours from discovery of Condition C concurrent with inoperability of redundant required feature(s)
	<u>AND</u> C.2 Restore one offsite circuit to OPERABLE status.	24 hours
D. One offsite circuit inoperable.  <u>AND</u> One required DG inoperable.	D.1 Restore offsite circuit to OPERABLE status.	12 hours
	<u>OR</u> D.2 Restore required DG to OPERABLE status.	12 hours
E. Two required DGs inoperable.	E.1 Restore one required DG to OPERABLE status.	2 hours  <u>OR</u> 24 hours if Division 3 DG is inoperable
F. Required Action and Associated Completion Time of Condition A, B, C, D, or E not met.	F.1 Be in MODE 3.	12 hours
	<u>AND</u> F.2 Be in MODE 4.	36 hours

(continued)

Insert to TS 3.8.11, Required Action A.1

----- NOTE -----

From September 15,  
2000, to October 15,  
2000, LCO 3.0.4 is  
not applicable.

-----