



An Exelon/British Energy Company

Clinton Power Station

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U-603451
8E.100a
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Docket No. 50-461

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

Subject: Clinton Power Station – Follow-up Letter to Verbal Request for
Enforcement Discretion Regarding Technical Specification Limiting
Condition for Operation Related to the Division 2 Diesel Generator

Dear Madam or Sir:

This letter provides the written follow-up of the AmerGen Energy Company, LLC (AmerGen) request for enforcement discretion regarding the Technical Specification (TS) Limiting Condition for Operation (LCO) specified for the Division 2 Diesel Generator (DG). Due to the inability to complete replacement of one of the generator bearings located in the Division 2 DG unit within the TS required 72-hour completion time for restoring the inoperable DG to an Operable status, TS LCO 3.8.1, "AC Sources – Operating," Action B.4, will not be met which would require a shutdown of CPS. This follow-up letter is submitted pursuant to a verbal request that was made via a telephone conference conducted at approximately 1400 hours (CST) on January 13, 2001, between representatives of AmerGen and Exelon Generation for CPS, and NRC personnel from Headquarters and the Region III offices. The NRC verbally granted AmerGen's request for enforcement discretion for the Division 2 DG on a one-time basis at 1605 hours (CST) on January 13, 2001. As further explained below, enforcement discretion is required to support restoring the Division 2 DG to an operable status without unnecessarily placing the plant in a shutdown condition.

The Division 2 DG configuration at CPS is tandem (i.e., in-line) diesel engines, a 12-cylinder engine and a 16-cylinder engine, with the electric generator unit situated between the engines. The generator bearing on the side adjacent to the 12-cylinder diesel engine has indicated increasing wear recently when operated to fulfill periodic TS surveillance requirements. Prior to the most current DG run, the onset of generator bearing degradation was observed as indicated by bearing vibration data. On January 12, 2001, the

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Division 2 DG was started and loaded for the purposes of performing the 24-hour endurance surveillance testing per TS Surveillance Requirement (SR) 3.8.1.14.

During operation of the DG, it was confirmed that bearing degradation had progressed to the point that pre-established criteria based on industry standards were exceeded. Therefore, the DG was secured to preclude further degradation and to facilitate proactive repairs. LCO 3.8.1 Condition B for the inoperable Division 2 DG was entered at 0228 hours on January 13, 2001, upon taking the DG out of service. Hence, the required 72-hour completion time for the Required Action will expire at 0228 hours on January 16, 2001. AmerGen has been preparing during the past several weeks contingency plans for replacing the generator bearing, in the event that emergency repairs became necessary. Due to the extensive nature of the work required to replace the affected bearing (i.e., to dismantle the generator, replace the bearing, reassemble and recouple the generator to the diesel, and to perform the post-maintenance testing), it is estimated that this work will significantly extend beyond the current required Completion Time (i.e., 72 hours) to complete. Therefore, AmerGen had requested that the required Completion Time in LCO 3.8.1, Action B.4, be extended from 72 hours, the current limit, to 14 days. As discussed in the conference call conducted on January 13, 2001, AmerGen has previously prepared and submitted an application for amendment of the CPS Operating License to permanently extend the allowed outage time from the current 72 hours to 14 days for the Division 1 and Division 2 DGs (i.e., AmerGen Letter U-603416 dated December 29, 2000).

The primary focus of this amendment request is related to LCO 3.8.1, Action B.4 that would allow extending the Allowed Outage Time (AOT) (i.e., Completion Time) from 72 hours to 14 days when the Division 2 DG is inoperable. This is accomplished by simply inserting "14 days" in the Completion Time column for Required Action B.4. However, additional changes are needed to add or revise other Completion Times specified under Required Actions A.2 and B.4 to address certain scenarios involving combinations or sequences of AC source inoperabilities that could occur. These changes are needed to support or maintain consistency with the proposed extended Division 2 DG AOT, and are discussed in the aforementioned proposed application for amendment. It is also noted that the additional changes to Required Action A.2 will be required to support post-maintenance testing (PMT) of the Division 2 DG. Specifically, one of the two required offsite sources of power will be declared inoperable for a short period of time during PMT of the Division 2 DG.

Therefore, this letter follows-up our request for enforcement discretion to implement the TS LCO in the December 29, 2000, amendment request for the Division 2 DG in lieu of the current LCO. This would allow the required Completion Time to be extended from 72 hours to 14 days to implement the contingency plans in place to complete the necessary repairs. Additionally, AmerGen requests that the aforementioned proposed application for amendment be reviewed and approved on an exigent basis. In accordance with 10CFR50.91, "Notice for Public Comment; State Consultation," paragraph (a)(6)(vi), a licensee must state whether the exigency could have been avoided or whether or not the licensee has exerted its best efforts to submit a timely application for an amendment. It has been determined that this request for enforcement discretion

was unavoidable due to the emergent degradation of the affected Division 2 DG generator bearing and not created by a failure to make a timely application for a license amendment.

Based on the January 13, 2001 telephone conference, we understand that the enforcement discretion will be in effect until the Division 2 DG is returned to an operable status or until the requested 14-day AOT expires, whichever occurs first. This understanding was verified via a subsequent telephone call with the NRC CPS Senior Resident Inspector. Additionally, AmerGen will not perform surveillance testing per TS SR 3.8.1.14 on the Division 1 DG until the Division 2 DG is returned to an operable status.

Attachment 1 to this letter contains the details and information required to support AmerGen's request for enforcement discretion, consistent with Administrative Letter 95-05, "Revisions to Staff Guidance for Implementing NRC Policy of Notices of Enforcement Discretion," including 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 the CPS TS 3.8.1 are included in Attachment 2.

Sincerely yours,



J. M. Heffley
Vice President

JLP/krk/blf

Attachments

cc: NRC Clinton Licensing Project Manager
NRC Resident Office, V-690
Regional Administrator, Region III, USNRC

**CLINTON POWER STATION
FOLLOW-UP LETTER TO VERBAL
REQUEST FOR ENFORCEMENT DISCRETION
REGARDING TECHNICAL SPECIFICATION
LIMITING CONDITION FOR OPERATION
RELATED TO THE DIVISION 2 DIESEL GENERATOR**

**1. TECHNICAL SPECIFICATION (TS)/LICENSE CONDITION THAT
WOULD BE VIOLATED:**

TS Limiting Condition for Operation (LCO) 3.8.1, "AC Sources – Operating," requires the Division 1, Division 2 and Division 3 diesel generators (DGs) to be Operable during Modes 1, "Power Operation," 2, "Startup," and 3, "Hot Shutdown." With one DG inoperable, Condition B applies and Required Action B.4 requires restoring the inoperable DG to an operable status within 72 hours and 6 days from the discovery of failure to meet the LCO if contiguous failures involving other required AC sources are incurred. Otherwise, Condition F is entered such that Mode 3 is required to be entered in 12 hours per Required Action F.1, and Mode 4 is required to be entered in 36 hours per Required Action F.2.

With the Division 2 DG inoperable for greater than 72 hours, a violation of TS LCO 3.8.1 would result if no action were taken to initiate a plant shutdown. Thus, a notice of enforcement discretion (NOED) is needed to allow continued plant operation utilizing an extension of the Completion Time (i.e., allowed outage time (AOT)) specified for the Division 2 DG per Required Action B.4 of TS LCO 3.8.1.

In conjunction with the above, enforcement discretion is requested on a one-time basis for the Division 2 DG to implement the proposed TS LCO in AmerGen's amendment request in lieu of the current LCO. The amendment request to permanently extend the Completion Times for Required Actions A.2 and B.4 from the current 72 hours to 14 days for the Division 1 and Division 2 DGs was submitted by letter dated December 29, 2000 (i.e., AmerGen Letter U-603416).

**2. CIRCUMSTANCES SURROUNDING THE SITUATION, INCLUDING
APPARENT ROOT CAUSES, NEED FOR PROMPT ACTION AND
RELEVANT HISTORICAL EVENTS:**

The Division 2 DG configuration is tandem (i.e., in-line) diesel engines, a 12-cylinder engine and a 16-cylinder engine, with the electric generator situated between the engines. LCO 3.8.1, Condition B was entered at 0228 hours on January 13, 2001. During recent operation of the Division 2 DG, it was observed that the generator bearing adjacent to the 12-cylinder diesel engine has been degrading with time, as evidenced by vibration measurements. Based upon evaluation of vibration data obtained during the recent performance of the TS

required 24-hour endurance test, it was determined that the degradation has exceeded pre-established vibration acceptance criteria based on industry standards and the bearing should be replaced as a proactive measure. Although the cause of the increased degradation has not been fully determined, a failure analysis will be performed to determine the cause.

Due to the extensive nature of the maintenance required to replace the bearing, it is estimated that an additional four days, approximately, beyond the current Completion Time is necessary to complete the repairs. The scope of the work includes dismantling and de-terminating the generator, uncoupling the generator from the diesel unit, employing special rigging and lifting the generator out of its current position, replacing the bearing, reassembly and recoupling the diesel to the generator, and performing post-maintenance testing, including a 24-hour endurance run.

When it was discovered that the Division 2 DG should not be returned to service with the bearing in its present condition, CPS Management contacted the NRC to request enforcement discretion for allowing the DG to remain inoperable beyond the current TS limit. Via a telephone conference conducted on January 13, 2001, verbal approval of the requested enforcement discretion was granted by the NRC at approximately 1605 hours (CST). Therefore, at 0228 hours on January 16, 2001, CPS will implement the enforcement discretion request verbally granted by the NRC.

3. SAFETY BASIS FOR REQUEST, INCLUDING EVALUATION OF SAFETY SIGNIFICANCE AND POTENTIAL CONSEQUENCES OF THE REQUESTED ACTION.

The extension of the allowed Completion Time from 72 hours to 14 days for Required Action B.4 of LCO 3.8.1 and associated Required Action A.2 will allow the required repairs and post-maintenance testing for the Division 2 DG to be completed without subjecting the plant to an unnecessary shutdown. Although there is a certain risk associated with the increased allowed completion time, most challenges to plant systems, such as increased potential for plant transients or disturbances, occur during startup and shutdown evolutions. By preventing an unnecessary plant shutdown due to the current Action time limit, the risk associated with these events will have no affect on plant safety. Therefore, extending this completion time will have a minimal effect on the frequency of core damage risk.

A license amendment request (i.e., AmerGen Letter U-603416 dated December 29, 2000) was recently submitted to the NRC which requested a change to TS 3.8.1 that permanently extends the AOT for the Division 1 and Division 2 DGs from 72 hours to 14 days. An extensive risk evaluation and technical basis accompanied this request consistent with the guidance of NRC Regulatory Guide (RG) 1.177, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications."

As noted in the December 29, 2000, AmerGen letter, the incremental conditional core damage probability (ICCDP) and incremental conditional large early release probability (ICLERP) resulting from extending the DG AOT from 72 hours to 14 days were computed in accordance with their definitions in RG 1.177. These results were then compared with risk significance guidance from RG 1.174, "An Approach for using Probabilistic Risk Assessment in Risk-Informed Decisions On Plant-Specific Changes to the Licensing Basis," for changes in the annual average core damage frequency (CDF) and large early release frequency (LERF) and RG 1.177 for ICCDP and ICLERP. The values obtained for the ICCDP (i.e., 4.65E-07) and ICLERP (i.e., "risk neutral") demonstrate that the proposed DG Completion Time change has only a small quantitative impact on plant risk.

Based on the above, extending the AOT for an inoperable DG for up to 14 days will have a minimal effect on plant risk.

4. BASIS FOR CONCLUDING THAT NONCOMPLIANCE WILL NOT BE OF POTENTIAL DETRIMENT TO THE PUBLIC HEALTH AND SAFETY AND NO SIGNIFICANT HAZARDS CONSIDERATION IS INVOLVED.

TS LCO 3.8.1 permits continued plant operation for a limited period of time with a DG inoperable. Specifically, if the Division 2 DG is inoperable, the inoperable DG must be restored to an operable status within 72 hours, otherwise, a plant shutdown is required. With the Division 2 DG inoperable, the remaining operable DGs (i.e., Division 1 and Division 3) are sufficient for performing the required safety functions during a design basis accident.

The AOT is limited due to the inability to meet single-failure criteria during this time. The current 72-hour time limit is based on consideration of the redundant capabilities afforded by an operable Division 1 (or Division 3) DG and the low probability of a design basis accident (DBA) occurring during this period.

Given the above basis, and as supported by the results of the risk evaluation described in the discussion for Criterion 3 above, AmerGen has concluded that extending the Required Action Completion Time from 72 hours to 14 days results in no significant increase in plant risk. During the extended AOT, only a single DG (i.e., Division 2) is inoperable, and the probability of a DBA occurring during this time remains acceptably low.

Basis for No Significant Hazards Consideration

The following information was provided in support of the aforementioned TS change request. This request for enforcement discretion allows the AOT extension allowance proposed by the TS amendment request to be implemented for the Division 2 DG. Therefore, the no significant hazards consideration evaluation presented in the amendment request is applicable to this request. 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 extend the noted AOT specified in TS 3.8.1 from 72 hours to 14 days for the Division 2 DG, 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 proposed TS changes affect the Completion Time for Required Actions A.2 and B.4 associated with the Division 2 DG. The proposed changes allow a one-time extension of the current TS Completion Time from 72 hours to 14 days when the Division 2 DG is inoperable.

The proposed changes do not affect the design of the DGs, the operational characteristics or function of the DGs, the interfaces between the DGs and other plant systems, or the reliability of the DGs. Required Actions and the associated Completion Times are not initiating conditions for any accident previously evaluated, and the DGs are not initiators of any previously evaluated accidents. The DGs mitigate the consequences of previously evaluated accidents including a loss of offsite power. The consequences of a previously analyzed event will not be significantly affected by the extended DG Completion Time since the DGs will continue to be capable of performing their accident mitigation function as assumed in the accident analysis. Thus the consequences of accidents previously analyzed are unchanged in going from the existing TS requirements to the proposed changes. The consequences of an accident are independent of the time the DGs are out of service as long as adequate DG availability is assumed. The proposed changes will not result in a significant decrease in DG availability so that the assumptions regarding DG availability are not impacted.

To fully evaluate the effect of the proposed EDG Completion Time extension, Probabilistic Risk Assessment (PRA) methods and a deterministic analysis were utilized. The results of the analysis show no significant increase in Core Damage Frequency (CDF) and Large Early Release Frequency (LERF). Therefore, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously analyzed.

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

The proposed changes do not involve a change in the design, configuration, or method of operation of the plant. The proposed changes will not alter the manner in which equipment operation is initiated, nor will the function demands on credited equipment be changed. The changes do not alter assumptions made in the safety analysis. No alteration in the procedures, which ensure that the plant remains within analyzed limits, is being proposed, and no changes are being made to the procedures relied upon to respond to an off-normal event. As such, no new failure modes are being introduced. Therefore, these proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

Since there are no changes to the plant design and safety analysis, and no changes to the DG design, including any instrument setpoints, no margin of safety assumed in the safety analysis is affected. If a margin of safety is ascribed to DG availability and plant risk, it has also been determined that such a margin of safety is not significantly reduced, as the proposed changes have been evaluated both deterministically and using a risk-informed approach. The evaluation concluded the following with respect to the proposed changes.

Applicable regulatory requirements will continue to be met, adequate defense-in-depth will be maintained, sufficient safety margins will be maintained, and any increases in CDF and LERF are small and consistent with the NRC Safety Goal Policy Statement (Federal Register, Vol.51, p. 30028 (51 FR 30028), August 4, 1986, as interpreted by NRC Regulatory Guides 1.174, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis," and 1.177, "An Approach for Plant-Specific Risk-Informed Decisionmaking: Technical Specifications"). Furthermore, increases in risk posed by potential combinations of equipment out of service during the proposed DG extended Completion Time will be managed under a configuration risk management program consistent with 10CFR50.65, "Requirements for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," paragraph (a)(4).

The availability of offsite power coupled with the availability of the other DGs and the use of on-line risk assessment tools provide adequate compensation for the potential small incremental increase in plant risk of the extended DG Completion Time. The proposed extended DG Completion Times in conjunction with the availability of the other DGs

continues to provide adequate assurance of the capability to provide power to the engineered safety features (ESFs) buses. Therefore, implementation of the proposed changes will not involve a significant reduction in the margin of safety.

Based upon the above analysis, the proposed changes will not increase the probability or consequences of any accident previously evaluated, create the possibility of a new or different kind of accident from any accident previously evaluated, or involve a significant reduction in the margin of safety. Therefore, the proposed changes meet the criteria of 10CFR 50.92(c) and involve no significant hazard consideration.

5. BASIS FOR CONCLUDING THAT THE NONCOMPLIANCE WILL NOT INVOLVE ADVERSE CONSEQUENCES TO THE ENVIRONMENT.

The proposed request would serve only to allow an extension of the AOT for the Division 2 DG. This does not constitute any change to any of the plant process limits or the manner in which plant systems are operated. Other than the extended AOT for the inoperable DG, no other the changes are involved, and the plant will continue to be required to operate within the limits, condition and provisions of the current Operating License. On that basis, the proposed request will have no impact on the plant's current licensing basis with respect to environmental impact. Thus, the proposed request involves no adverse consequences to the environment.

6. PROPOSED COMPENSATORY MEASURES

In accordance with CPS procedure 1151.12, "On-Line Risk Assessment," a contingency plan for high-risk evolutions has been established. As such, the plant is currently in an "Yellow" risk status, and the following equipment has been placed in a "Protected" status until the Division 2 DG is restored to an operable status.

Division 1 DG
High Pressure Core Spray system
Reactor Core Isolation Cooling system
Automatic Depressurization System
Reserve Auxiliary Transformer
Emergency Reserve Auxiliary Transformer
Switchyard system
Static VAR Compensator system
Divisions 1, 2, and 3 DC power
Standby Liquid Control system
Division 1 Nuclear System Protection System
Division 1 and 3 Shutdown Service Water system
Emergency Core Cooling System Ventilation (VY) subsystem C

Increases in risks posed by potential combinations of equipment out-of-service will be managed as follows:

- While in the extended DG Completion Time, additional elective equipment maintenance or testing or equipment failure will be evaluated. Activities that yield unacceptable results will be avoided.
- The condition of the offsite power supply, including potential weather-related affects, and switchyard will be evaluated.
- Activities have been identified that can mitigate any increase in risk. Procedures are in place for the minimizing risk associated with the following activities.

No elective maintenance will be scheduled within the switchyard that would challenge the offsite power connection or offsite power availability during the extended Division 2 DG Completion Time.

No elective work will be performed on protected equipment or opposite train emergency core cooling system (ECCS) equipment during the extended Division 2 DG Completion Time.

In addition, the TS required 24-hour surveillance test for the Division 1 DG, will not be conducted until the Division 2 DG is returned to an operable status.

7. JUSTIFICATION FOR THE DURATION OF THE NONCOMPLIANCE

It is requested that the AOT for Division 2 DG be extended 11 days. This will allow time for the continuation and completion of replacement of the Division 2 DG generator bearings. The extension of the completion time to a total of 14 days is sufficient to complete all the necessary repairs and post-maintenance testing prior to returning the Division 2 DG to an operable status.

8. FACILITY REVIEW GROUP REVIEW

The CPS Facility Review Group reviewed this request for enforcement discretion and subsequently approved the request at 0756 hours on January 13, 2001.

9. NOED CRITERIA SATISFIED FOR THE CURRENT PLANT CONDITIONS

At the time the enforcement discretion was verbally requested (approximately 1400 hours CST on January 13, 2001), the plant was in Mode 1, "Power Operations," at 100 percent power. As of the date of this letter, the plant continues to operate at or near full power. Approval of the request was appropriate and needed to avoid undesirable transients as a result of forcing compliance with the Actions for a Limiting Condition for Operation, thus, minimizing potential adverse safety consequences and operational risks.

10. IF A FOLLOW-UP LICENSE AMENDMENT IS REQUESTED, 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 was prepared and submitted on December 29, 2000, to permanently change the AOT for an inoperable Division 1 or Division 2 DG from the current 72-hour limit to 14 days. Because this amendment request was previously submitted, the action to provide a follow-up amendment request (including marked up TS pages) to this NOED request within 48 hours has already been met.

11. FOR NOED'S 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.

**Clinton Power Station - Request for Enforcement Discretion
Regarding Technical Specification Limiting Condition for
Operation Related to the Division 2 Diesel Generator**

Relevant Portions of CPS Technical Specification 3.8.1, “AC Sources – Operating”

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)

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)

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)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
G. Three or more required AC sources inoperable.	G.1 Enter LCO 3.0.3.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.8.1.1 Verify correct breaker alignment and indicated power availability for each offsite circuit.	7 days
<p>SR 3.8.1.2 -----NOTES-----</p> <ol style="list-style-type: none"> 1. Performance of SR 3.8.1.7 satisfies this SR. 2. All DG starts may be preceded by an engine prelube period and followed by a warmup period prior to loading. 3. A modified DG start involving idling and gradual acceleration to synchronous speed may be used for this SR as recommended by the manufacturer. When modified start procedures are not used, the time, voltage, and frequency tolerances of SR 3.8.1.7 must be met. <p>-----</p> <p>Verify each DG starts from standby conditions and achieves steady state voltage ≥ 4084 V and ≤ 4580 V and frequency ≥ 58.8 Hz and ≤ 61.2 Hz.</p>	As specified in Table 3.8.1-1

(continued)

SURVEILLANCE REQUIREMENTS (continued)	
SURVEILLANCE	FREQUENCY
<p>SR 3.8.1.14 -----NOTES-----</p> <ol style="list-style-type: none"> 1. Momentary transients outside the load and power factor ranges do not invalidate this test. 2. Credit may be taken for unplanned events that satisfy this SR. <p>-----</p> <p>Verify each DG operating at a power factor ≤ 0.9 operates for ≥ 24 hours:</p> <ol style="list-style-type: none"> a. For ≥ 2 hours loaded ≥ 4062 kW for DG 1A, ≥ 4069 kW for DG 1B, and ≥ 2310 kW for DG 1C; and b. For the remaining hours of the test loaded ≥ 3482 kW for DG 1A, ≥ 3488 kW for DG 1B, and ≥ 1980 kW for DG 1C. 	18 months
	(continued)