Docket Filo



UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

March 25, 1993

Docket Nos. 50-277 and 50-278

> Mr. George A. Hunger, Jr. Director-Licensing, MC 52A-5 Philadelphia Electric Company Nuclear Group Headquarters Correspondence Control Desk P.O. Box No. 195 Wayne, Pennsylvania 19087-0195

Dear Mr. Hunger:

SUBJECT: EMERGENCY DIESEL GENERATOR SURVEILLANCE REQUIREMENTS, PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3 (TAC NOS. M82778 AND M82779)

The Commission has issued the enclosed Amendments Nos. 173 and 176 to Facility Operating License Nos. DPR-44 and DPR-56 for the Peach Bottom Atomic Power Station, Units 2 and 3. These amendments consist of changes to the Technical Specifications (TS) in response to your application dated January 31, 1992, as supplemented by your letters dated April 28, 1992, June 22, 1992, November 9, 1992, and January 8, 1993.

These amendments change existing surveillance requirements and add additional surveillance requirements for the Emergency Diesel Generators (EDG). The changes establish 1) a more rigorous and comprehensive surveillance test program for the EDGs, 2) modified EDG test methodologies and schedules, 3) requirements consistent with NUREG-0123 for operability and for demonstrating operability of redundant components and systems when an Alternating Current (AC) source is not operable, and 4) more specific requirements for minimum inventories of diesel fuel oil.

Your letter of June 22, 1992, requested that the staff review and evaluate a provision of the proposed TS which eliminated immediate and daily testing requirements for EDGs when one EDG is out of service for planned preventative maintenance. The staff considered that request and issued Amendments 168 and 172 to the TS which incorporated that single change on July 6, 1992.

Your letters of April 28, November 9, 1992 and January 8, 1993, provided additional information but did not change the intent of your original application.

Please inform the staff when you have implemented the provisions of this amendment.

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Mr. George A. Hunger, Jr.

- 2 -

March 25, 1993

A copy of the Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's Bi-Weekly <u>Federal</u> <u>Register</u> Notice. You are requested to notify the staff when you have implemented this amendment.

Sincerely,

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Joseph W. Shea, Project Manager Project Directorate I-2 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

Enclosures:

- 1. Amendment No. 173 to DPR-44 2. Amendment No. 176 to DPR-56
- 3. Safety Evaluation

cc w/enclosures: See next page

**DISTRIBUTION:** 

Docket File	MO'Brien(2)	CGrimes, 11E21	CAnderson, RGN-I
NRC & Local PDRs	JShea/APelletier	CBerlinger	CThomas
PDI-2 Reading	OGC	ACRS(10)	GHubbard
SVarga	DHagan, 3206	OPA	
JCalvo	GHill(8), P1-22	OC/LFMB	
CMiller	Wanda Jones, P-370	EWenzinger, RGN-I	
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\*Previously Concurred .

OFC	: POT ZAA	:PDI-2/PM	:EELB/C*	:0GC*	:PDI-2/D	•
NAME	: MO Brilen	:JSkea:rb	:CBerlinge	r:CBarth	:CMitten	:
DATE	: 2 (93	: 3/22/93	:02/25/93	:03/16/93	:3 17/93	•

Mr. George A. Hunger, Jr.

- 2 -

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NAME : NO: Brien : JSkea: rb : CBerlinger: CBarth : CMielen :         DATE :	/D :	:PDI-2/D	:OGC*	:EELB/C*	:PDI-2/PM	: POT ZAA	OFC
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	/93 :	:3 11/93	:03/16/93	:02/25/93	: 3/24/93	: 2 93	DATE

Mr. George A. Hunger, Jr.

March 25, 1993

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- 2 -

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Joseph W. Shea, Project Manager Project Directorate I-2 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

Enclosures:

- 1. Amendment No. 173 to DPR-44 2. Amendment No. 176 to DPR-56
- 3. Safety Evaluation

cc w/enclosures: See next page

Mr. George A. Hunger, Jr. Philadelphia Electric Company

cc:

J. W. Durham, Sr., Esquire Sr. V.P. & General Counsel Philadelphia Electric Company 2301 Market Street, S26-1 Philadelphia, Pennsylvania 19101

Philadelphia Electric Company ATTN: Mr. D. B. Miller, Vice President Peach Bottom Atomic Power Station Route 1, Box 208 Delta, Pennsylvania 17314

Philadelphia Electric Company ATTN: Regulatory Engineer, A1-2S Peach Bottom Atomic Power Station Route 1, Box 208 Delta, Pennsylvania 17314

Resident Inspector U.S. Nuclear Regulatory Commission Peach Bottom Atomic Power Station P.O. Box 399 Delta, Pennsylvania 17314

Regional Administrator, Region I U.S. Nuclear Regulatory Commission 475 Allendale Road King of Prussia, Pennsylvania 19406

Mr. Roland Fletcher Department of Environment 201 West Preston Street Baltimore, Maryland 21201

Carl D. Schaefer External Operations - Nuclear Delmarva Power & Light Company P.O. Box 231 Wilmington, DE 19899 Peach Bottom Atomic Power Station, Units 2 and 3

Mr. William P. Dornsife, Director
Bureau of Radiation Protection
Pennsylvania Department of
Environmental Resources
P. O. Box 2063
Harrisburg, Pennsylvania 17120

Board of Supervisors Peach Bottom Township R. D. #1 Delta, Pennsylvania 17314

Public Service Commission of Maryland Engineering Division ATTN: Chief Engineer 231 E. Baltimore Street Baltimore, MD 21202-3486

Mr. Richard McLean Power Plant and Environmental Review Division Department of Natural Resources B-3, Tawes States Office Building Annapolis, Maryland 21401



UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D.C. 20555

# PHILADELPHIA ELECTRIC COMPANY

# PUBLIC SERVICE ELECTRIC AND GAS COMPANY

# DELMARVA POWER AND LIGHT COMPANY

# ATLANTIC CITY ELECTRIC COMPANY

# DOCKET NO. 50-277

# PEACH BOTTOM ATOMIC POWER STATION, UNIT NO. 2

### AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 173 License No. DPR-44

- 1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Philadelphia Electric Company, et. al. (the licensee) dated January 31, 1992, as supplemented by letters dated April 28, 1992, June 22, 1992, November 9, 1992, and January 8, 1993, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I.
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health or safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
- Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C(2) of Facility Operating License No. DPR-44 is hereby amended to read as follows:

9304080016 930325 PDR ADDCK 05000277 P PDR (2) <u>Technical Specifications</u>

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 173, are hereby incorporated in the license. PECO shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance and shall be implemented within 30 days of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Charles J. Miller

Charles L. Miller, Director Project Directorate I-2 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications

Date of Issuance: March 25, 1993

# ATTACHMENT TO LICENSE AMENDMENT NO. 173

# FACILITY OPERATING LICENSE NO. DPR-44

# DOCKET NO. 50-277

Replace the following pages of the Appendix A Technical Specifications with the enclosed pages. The revised areas are indicated by marginal lines.

<u>Remove</u>	<u>Insert</u>
67	67
72	72
132	132
132a	-
217	217
218	218
218a	218a
218b	218b
218c	218c
-	218d
-	218e
-	218f
-	218g
-	218h
-	218i
-	218j
219	219
220	220
220a	220a
-	220b
222	222
223	223
224	224

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TABLE 3.2.B INSTRUMENTATION THAT INITIATES OR CONTROLS THE CORE AND CONTAINMENT COOLING SYSTEMS

Minimum No. of Operable Instrument Channels Per Irip System (1)		Trip Function	Trip Level Setting	Number of Instru- ment Channels Pro- vided by Design	Remarks
	2	Core Spray Pump	6 +/-1 sec.	4 timers	All pumps-loss of offsite power only
		Start Timer	13 sec. +/-7% of setting	2 timers	A&C pumps-offsite power available
			23 sec. +/-7% of setting	2 timers	B&D pumps-offsite power available
	l per 4kV bus (7)	480V Emergency Load Center Timer	3 +/-0.5 sec.	4 timers	All timers - loss of offsite power only
	2	LPCI Pump Start Timer (Four Pumps)	2 sec. +/-7% of setting 8 sec. +/-7% of setting	4 timers 4 timers	LPCI pumps A&B LPCI pumps C&D
Ĺ	1	ADS Actuation Timer	90 =t </=120<br seconds	2 timers	In conjunction with Low Reactor Water Level, High Drywell Pressure and LPCI or Core Spray Pump running interlock, initiates ADS.
	2	ADS Bypass Timer*	8 =t </=10<br minutes	4 timers	In conjunction with low reactor water level, bypass high drywell pressure initiation of ADS.
No 47	2	RHR (LPCI) Pump Discharge Pressure Interlock	50 +/- 10 psig	4 channels	Defers ADS actuation pending confirmation of Low Pressure Core Cooling system operation (LPCI Pump running interlock).
96. 106.	2	Core Spray Pump Discharge Pressure Interlock	185 +/- 10 psig	4 channels	Defers ADS actuation pending confirmation of Lo Pressure Core cooling system operation (Core Spra Pump running interlock).

\*Effective when modification associated with this amendment is complete.

#### NOTES FOR TABLE 3.2.B

- 1. Whenever any CSCS subsystem is required by Section 3.5 to be operable, there shall be two operable trip systems. If the first column cannot be met for one of the trip systems, that trip system shall be placed in the tripped condition or the reactor shall be placed in the Cold Shutdown Condition within 24 hours.
- 2. Close isolation valves in RCIC subsystem.
- 3. Close isolation valves in HPCI subsystem.
- 4. Instrument set point corresponds to 378 inches above vessel zero.
- 5. HPCI has only one trip system for these sensors.
- 6. With the number of OPERABLE channels less than required by the Minimum OPERABLE Channels per Trip System requirement, place at least one inoperable channel in the tripped condition within one hour or declare the RCIC system inoperable.
- 7. The failure of a 480V Emergency Load Center timer could result in the failure of a 480V Emergency Load Center to re-energize following the loss of one or both offsite sources. Therefore, Technical Specification 3.9.8.7 will apply when a 480V Emergency Load Center timer is not operable.

- 3.5.F <u>Minimum Low Pressure Cooling</u> Availability
- 1. Deleted
- Any combination of inoperable components in the core and containment cooling systems shall not defeat the capability of the remaining operable components to fulfill the cooling functions.
- 3. When irradiated fuel is in the reactor vessel and the reactor is in the Cold Shutdown Condition, both core spray systems, the LPCI and containment cooling systems may be inoperable, provided no work is being done which has the potential for draining the reactor vessel.
- 4. During a refueling outage, fuel and LPRM removal and replacement may be performed provided at least one of the following conditions below is satisfied:
  - a. Both core spray systems and the LPCI system shall be operable except that one core spray system or the LPCI system may be inoperable for a period of thirty days, or
  - b. The reactor vessel head is removed, the cavity is flooded, the spent fuel pool gates are removed, and the water level is maintained at least 21 feet over the top of irradiated fuel assemblies seated in the spent fuel storage pool racks and no work is being performed which has the potential for draining the reactor vessel.

#### SURVEILLANCE REQUIREMENTS

### 4.5.F <u>Minimum Low Pressure</u> Cooling Availability

### 1. Deleted

-132-

# PBAPS

### SURVEILLANCE REQUIREMENTS

### 3.9 AUXILIARY ELECTRICAL SYSTEM

### Applicability:

Applies to the auxiliary electrical power system.

### Objective:

To assure an adequate supply of electrical power for operation of those systems required for safety.

### Specification:

A. <u>Auxiliary Electrical</u> Equipment

> The reactor shall not be made critical unless all of the following conditions are satisfied:

- Two physically independent circuits between the offsite transmission network and the onsite Class 1E distribution system are operable.
- The four diesel generators shall be operable and there shall be a mimimum of 108,000 gallons of diesel fuel on site. Each operable diesel generator shall have:
  - A separate day tank containing a minimum of 200 gallons of fuel,
  - A separate fuel storage tank with a minimum of 28,000 gallons of fuel, and
  - c. A separate fuel transfer pump.
- 3. The unit 4kV emergency buses and the 480V emergency load centers are energized.
- The four unit 125V batteries and their chargers shall be operable.

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# 4.9 AUXILIARY ELECTRICAL SYSTEM

### Applicability

Applies to the periodic testing requirements of the auxiliary electrical systems.

### **Objective:**

Verify the operability of the auxiliary electrical system.

### Specification:

- A. <u>Auxiliary Electrical</u> Equipment
- Diesel Generators and Offsite Circuits
  - Each of the required independent circuits between the offsite transmission network and the onsite Class 1E distribution system shall be:
  - a. Verified OPERABLE
     at least once per
     7 days by verifying
     correct breaker
     alignments and
     indicated power
     availability.
  - b. Demonstrated OPERABLE at least once per 18 months by transferring, manually and automatically, the start-up source from the normal circuit to the alternate circuit.

4.9.A.1 (Continued)

- Each of the required diesel generators shall be demonstrated OPERABLE:
  - a. In accordance with the frequency specified in 4.9.A.1.2.k by:
    - Verifying the fuel level in the fuel storage tank, and the volume of fuel onsite.
    - Verifying the fuel transfer pump starts and transfers fuel from the storage system to the day fuel tank.
    - 3. Verifying that the diesel can start<sup>a</sup> and gradually accelerate to synchronous speed with generator voltage and frequency at 4160 + 410 volts and 60 + 1.2 HZ.
    - Verifying that the diesel can be synchronized, gradually loaded<sup>a</sup> to an indicated 2400-2600<sup>D</sup> kw and can operate with this load for at least 60 minutes.
    - Verifying the diesel generator is aligned to provide standby power to the associated emergency busses.

<sup>a</sup>This test shall be conducted in accordance with the manufacturer's recommendations regarding engine pre-lube and warmup and, as applicable, loading and shutdown.

<sup>&</sup>lt;sup>b</sup>This load band is meant as guidance to avoid routine overloading of the engine. Loads in excess of this band for special testing, under direct monitoring by the manufacturer or system engineer, or momentary variations due to changing bus loads shall not invalidate the test.

# SURVEILLANCE REQUIREMENTS

4.9.A.1.2 (Continued)

- Verifying the pressure in all diesel generator air start receivers to be greater than or equal to 225 psig.
- b. At least once per 184 days the diesel generator shall be started<sup>a</sup> and verified to accelerate to synchronous speed in less than or equal to 10 seconds. The generator voltage and frequency shall reach 4160 + 410 volts and  $60 + 1.\overline{2}$  Hz within 10 seconds after the start signal. The generator shall be manually synchronized to its appropriate emergency bus, loaded to an indicated 2400-2600 kw<sup>D</sup> in less than or equal to 60 seconds, and operated for at least 60 minutes. This test, if it is performed so it coincides with the testing required by Surveillance Requirement 4.9.A.1.2.a.3 and 4.9.A.1.2.a.4, may also serve to concurrently meet those requirements as well.

<sup>&</sup>lt;sup>a</sup>This test shall be conducted in accordance with the manufacturer's recommendations regarding engine prelube and warmup and, as applicable, loading and shutdown.

<sup>&</sup>lt;sup>b</sup>This band is meant as guidance to avoid routine overloading of the engine. Loads in excess of this band for special testing, under direct monitoring by the manufacturer or system engineer, or momentary variations due to changing bus loads shall not invalidate the test.

### SURVEILLANCE REQUIREMENTS

# 4.9.A.1.2 (Continued)

- c. By removing accumulated water:
  - From the day tanks least once per 31 days and after each occasion when the diesel is operated for greater than 1 hour, and
  - 2. From the main storage tanks at least once per 31 days.
- d. By sampling new fuel oil in accordance with ASTM D4057-81 prior to addition to the storage tanks and:
  - By verifying in accordance with the tests specified in ASTM D975-81 prior to addition to the storage tanks that the sample has:
    - a) An API Gravity of within 0.3 degrees at 60 degrees F or a specific gravity of within 0.0016 at 60/60 degrees F when compared to the supplier's certificate; or an absolute specific gravity at 60/60 degrees F of greater than or equal to 0.83 but less than or equal to 0.89; or an API Gravity at 60 degrees F of greater than or equal to 27 degrees but less than or equal to 39 degrees.

### SURVEILLANCE REQUIREMENTS

4.9.A.1.2.d.1 (Con	tinued)
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PBAPS

- b) A kinematic viscosity at 40 degrees C of greater than or equal to 1.9 centistokes but less than or equal to 4.1 centistokes, if gravity was not determined by comparison with the supplier's certification.
- c) A flash point equal to or greater than 125 degrees F, and
- d) A clear and bright appearance with proper color when tested in accordance with ASTM D4176-82.
- 2. By verifying within 31 days of obtaining the sample that the other properties specified in Table 1 of ASTM D975-81 are met when tested in accordance with ASTM D975-81 except that the analysis for sulfur may be performed in accordance with ASTM D1552-79 or ASTM D2622-82.

LIMITING CONDITION FOR OPERATION

SURVEILLANCE REQUIREMENTS 4.9.A.1.2 (Continued)

- e. At least once every 31 days by obtaining a sample of fuel oil from the storage tank in accordance with ASTM D2276-78, and verifying that total particulate contamination is less than 10mg/liter when checked in accordance with ASTM D2276-78, Method A, except that the filters specified in ASTM D2276-78, Sections 5.1.6 and 5.1.7, may have a nominal pore size of up to three (3) microns.
- f. At least once per 18 months by:
- Subjecting the diesel to an inspection in accordance with procedures prepared in conjunction with its manufacturer's recommendations for this class of standby service.
- 2. Verifying the diesel generator capability to reject a load of greater than or equal to that of the RHR Pump Motor for each diesel generator while maintaining voltage within 4160 ± 410 volts and frequency at 60 ± 1.2hz.
- 3. Verifying the diesel generator capability to reject an indicated load of 2400 kW-2600 kW without tripping. The generator voltage shall not exceed the initial value (4160 + 410 volts) by more than 660 volts during and following the load rejection.

### SURVEILLANCE REQUIREMENTS

# 4.9.A.1.2.f (Continued)

- 4. Verifying that all automatic diesel generator trips except engine overspeed, generator differential over-current, generator ground overcurrent and manual cardox initiation are automatically bypassed upon an ECCS actuation signal.
- 5. Verifying the diesel generator operates<sup>a</sup> for at least 24 hours. During the first 2 hours of this test, the diesel generator shall be loaded to an indicated 2800-3000 kW<sup>D</sup> and during the remaining 22 hours of this test, the diesel generator shall be loaded to an indicated 2400-2600 kW<sup>D</sup>.
- 6. Verifying diesel generator capability at full load temperature within 5 minutes after completing the 24 hour test<sup>C</sup> by starting and loading the diesel as described in Surveillance Requirement 4.9.A.1.2.b and operating for greater than 5 minutes<sup>d</sup>.

<sup>a</sup>This test shall be conducted in accordance with the manufacturer's recommendations regarding engine prelube and warm-up and, as applicable, loading and shutdown.

<sup>D</sup>This band is meant as guidance to avoid routine overloading of the engine. Loads in excess of this band for special testing, under direct monitoring by the manufacturer or system engineer, or momentary variations due to changing bus loads shall not invalidate the test.

<sup>C</sup>If Surveillance Requirement 4.9.A.1.2.f.6 is not satisfactorily completed, it is not necessary to repeat the preceding 24-hour test. Instead, the diesel generator may be operated at 2400-2600 kW for 1 hour or until operating temperature has stabilized prior 1 performing Surveillance Requirement 4.9.A.1.2.f.6.

<sup>d</sup>Performance of Surveillance Requirement 4.9.A.1.2.f.6 will not be used to satisfy the requirements of Surveillance Requirement 4.9.A.1.2.b.

Unit<sup>2</sup>

### 4.9.A.1.2 (Continued)

- Verifying that the fuel transfer pump transfers fuel from each fuel storage tank to the day tank of each diesel via the installed cross connection lines.
- g. At least once each operating
   cycle by:
  - 1. Simulating a loss-of-offsite
     power by itself, and:
    - a) Verifying deenergization of the emergency busses and load shedding from the emergency busses.
    - b) Verifying the diesel generator starts<sup>a</sup> on the auto-start signal, energizes the emergency busses within 10 seconds, energizes the permanent and auto-connected loads through the individual load timers and operates for greater than or equal to 5 minutes.

After energization, the steady-state voltage and frequency of the emergency busses shall be maintained at  $4160 \pm 410$  volts and  $60 \pm 1.2$  Hz during this test.

<sup>a</sup>This test shall be conducted in accordance with the manufacturer's recommendations regarding engine prelube and warm-up and, as applicable, loading and shutdown.

#### SURVEILLANCE REQUIREMENTS

# 4.9.A.1.2 (Continued)

- 2. Verifying that on an ECCS actuation test signal, without loss-of-offsite power, the diesel generator starts<sup>a</sup> on the auto-start signal and operates for greater than or equal 5 minutes. The generator voltage and frequency shall reach 4160 ± 410 volts and 60 ± 1.2 Hz within 10 seconds after the auto-start signal; the steady state generator voltage and frequency shall be maintained within these limits during this test.
- Simulating a loss-of-offsite power in conjunction with an ECCS actuation test signal, and:
  - a) Verifying deenergization of the emergency busses and load shedding from the emergency busses.
  - b) Verifying the diesel generator starts<sup>a</sup> on the auto-start signal, energizes the emergency busses within 10 seconds, energizes the permanent and auto-connected loads through the individual load timers and operates for greater than or equal to 5 minutes.

After energization, the steady-state voltage and frequency of the emergency busses shall be maintained at  $4160 \pm 410$  volts and 60 + 1.2 Hz during this test.

<sup>&</sup>lt;sup>a</sup>This test shall be conducted in accordance with the manufacturer's recommendations regarding engine prelube and warmup and, as applicable, loading and shutdown.

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4.9.A.1.2 (Continued)

- Verifying the diesel generator's capability to:
  - a) Sychronize with the offsite power source while the generator is loaded with its emergency loads upon a simulated restoration of offsite power.
  - b) Transfer its loads to the offsite power source, and
  - c) Be restored to its standby status.
- h. At least once per 10 years or after any modifications which could affect diesel generator interdependence by starting<sup>a</sup> all four diesel generators simultaneously and verifying that all four diesel generators accelerate to at least 855 rpm in less than or equal to 10 seconds.
- i. At least once per 10 years by draining each fuel oil tank, removing the accumulated sediment and cleaning the tank using a sodium hypochlorite or equivalent solution.
- j. The fuel oil storage tank cathodic protection system shall be checked as follows:
  - At least once every twelve months perform a test to determine whether the cathodic protection is adequate, and

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<sup>&</sup>lt;sup>a</sup>This test shall be conducted in accordance with the manufacturer's recommendations regarding engine prelube and warmup and, as applicable, loading and shutdown.

SURVEILLANCE REQUIREMENTS

4.9.A.1.2 (Continued)

PBAPS

- At least once every two months inspect the cathodic protection rectifiers.
- k. If the number of failures during the last 20 valid demands<sup>d</sup> is less than or equal to 1, the test frequency shall be at least once per 31 days.

If the number of failures during the last 20 valid demands is greater than or equal to 2, the test frequency shall be at least once per 7 days<sup>e</sup>.

 All diesel generator failures, valid or non-valid, shall be reported to the Commission in a Special Report within 30 days. Reports of the diesel generator failures shall include the information recommended in Regulatory Position C.3.b of Regulatory Guide 1.108, Revision 1, August 1977.

<sup>e</sup>The associated test frequency shall be maintained until seven consecutive failure free demands have been performed <u>and</u> the number of failures in the last 20 demands have been reduced to one. For the purposes of determining the required frequency, the previous test failure count may be reduced to zero if a complete diesel overhaul to like-new condition is completed. This diesel overhaul, including appropriate post-maintenance operation and testing, shall be specifically approved by the manufacturer and acceptable diesel reliability must be demonstrated. The reliability criterion shall be the successful completion of 14 consecutive tests. Ten of these tests may be slow starts in accordance with Surveillance Requirements 4.9.A.1.2.a.3 and 4.9.A.1.2.a.4 and four tests shall be fast starts in accordance with the Surveillance Requirement 4.9.A.1.2.b. If this criterion is not satisfied during the first series of tests, any alternate criterion to be used to reset the valid failure count to zero requires NRC approval.

<sup>&</sup>lt;sup>d</sup>Criteria for determining the number of failures and number of valid demands shall be in accordance with Regulatory Position C.2.e of Regulatory Guide 1.108, but determined on a per diesel generator basis.

SURVEILLANCE REQUIREMENTS

# 4.9.A.2 Unit Batteries

PBAPS

- a. Every week the specific gravity, the voltage and temperature of the pilot cell and overall battery voltage shall be measured and logged.
  - b. Every three months the measurements shall be made of voltage of each cell to nearest 0.1 Volt, specific gravity of each cell, and temperature of every fifth cell. These measurements shall be logged.
  - c. The station batteries shall be subjected to a performance test every third refueling outage and a service test during the other refueling outage. In lieu of the performance test every third refueling outage, any battery that shows "signs of degradation or has reached 85% of its service life" shall be subjected to an annual performance test. The service test need not be performed on the refueling outage during which the performance test was conducted. The specific gravity and voltage of each cell shall be determined after the discharge and logged.

4.9.A.3 Swing Buses

a. Every two months the swing buses supplying power to the Low Pressure Coolant Injection System (LPCIS) valves shall be tested to assure that the transfer circuits operate as designed.

Unit 2

# PBAPS

# LIMITING CONDITIONS FOR OPERATION

# 3.9.B Operation with Inoperable Equipment

Whenever the reactor is in Run Mode or Startup Mode with the reactor not in a Cold Condition, the availability of electric power shall be as specified in 3.9.A, except as follows:

 With one offsite circuit required by Specification 3.9.A.1 inoperable, restore at least two offsite circuits to OPERABLE status within 7 days or be in least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours. 4.9.B. <u>Operation with Inoperable</u> Equipment

SURVEILLANCE REQUIREMENTS

 When it is determined that one offsite circuit required by Specification 3.9.A.1 is inoperable, verify the OPERABILITY of the remaining A.C. sources by performing Surveillance Requirement 4.9.A.1.1.a within 1 hour and once per 8 hours thereafter.

> If any of the diesel generators have not been successfully tested within the preceding 24 hours, demonstrate OPERABILITY of these diesel generators by performing Surveillance Requirement 4.9.A.1.2.a.3 for one diesel at a time within 24 hours and once per 72 hours thereafter.

- 2. With two independent off-site circuits required by Specification 3.9.A.1 inoperable, continued operation is permissible, provided the four diesel generators and associated emergency busses are operable, all core and containment cooling systems are operable and reactor power level is reduced to 25% of the design.
- 2. None

### SURVEILLANCE REQUIREMENTS

### 3.9.B (Continued)

3. With one diesel generator inoperable, restore the inoperable diesel generator and associated emergency bus to OPERABLE status within 7 days or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours. 3. When it is determined that one diesel generator is inoperable, verify the OPERABILITY of the remaining A.C. sources by performing Surveillance Requirement 4.9.A.1.1.a within 1 hour and once per 8 hours thereafter. Verify within 2 hours that required systems, subsystems, trains, components, and devices that depend on the remaining diesel generators as a source of emergency power are OPERABLE.

If the diesel generator became inoperable for any reason other than preplanned preventative maintenance, or testing, demonstrate the OPERABILITY of the remaining operable diesel generators by performing Surveillance Requirement 4.9A.1.2.a.3 for one diesel at a time, within 24 hours\* and at least once per 72 hours thereafter.

<sup>\*</sup>This test is required to be completed regardless of when the inoperable diesel generator is restored to OPERABILITY for failures that are potentially generic to the remaining diesel generators and for which appropriate alternative testing cannot be designed.

### PBAPS

### SURVEILLANCE REQUIREMENTS

### 3.9.B (Continued)

- 4. With one diesel generator and one offsite circuit required by Specification 3.9.A.1 inoperable, restore at least two offsite circuits or four diesel generators to OPERABLE status within 72 hours from the time of initial loss or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.
- 4. When it is determined that one diesel generator and one offsite circuit required by Specification 3.9.A.1 are inoperable, verify the OPERABILITY of the remaining A.C. sources by performing Surveillance Requirement 4.9.A.1.1.a within 1 hour and once per 8 hours thereafter. Verify within 2 hours, that required systems, subsystems, trains, components, and devices that depend on the remaining diesel generators as a source of emergency power are OPERABLE.

If the diesel generator became inoperable for any reason other than preplanned preventative maintenance, or testing, demonstrate the OPERABILITY of the remaining diesel generators by performing Surveillance Requirement 4.9.A.1.2.a.3 for one diesel generator at a time, within 8 hours\*.

- 5. From and after the date that one of the 125 volt battery systems is made or found to be inoperable for any reason, continued reactor operation is permissible during the succeeding three days within electrical safety considerations, provided repair work is initiated in the most expeditious manner to return the failed component to an operable state, and Specifications 3.5.F and 3.9.B.3 are satisifed.
- 5. None

<sup>\*</sup>This test is required to be completed regardless of when the inoperable diesel generator is restored to OPERABILITY for failures that are potentially generic to the remaining diesel generators and for which appropriate alternative testing cannot be designed.

### SURVEILLANCE REQUIREMENTS

### LIMITING CONDITIONS FOR OPERATION

### 3.9.B (Continued)

- With fuel oil in one of the diesel 6. generator main storage tanks not available or not in conformance with Surveillance Requirement 4.9.A.1.2.e, implement the following:
  - Isolate the main storage tank from a. the system, with the associated diesel generator being supplied from one of the remaining storage tanks within 8 hours, and
  - Establish and maintain a minimum of b. 108,000 gallons of diesel fuel oil in the other three main storage tanks within 72 hours, and
  - Sample the fuel oil in the other с. three main storage tanks and confirm conformance with specification 4.9.A.1.2.e within 24 hours, and
  - Replace the unacceptable fuel oil d. with acceptable fuel and return the storage tank to service within 7 days, or place the reactor in Cold Shutdown within 24 hours.

Accelerated testing of the diesel generators is not required.

With one of the 4kV emergency busses 7. or 480V emergency load centers required by 3.9.A.3 not energized, declare the associated equipment inoperable and take the appropriate action for that system.

> Reenergize the bus within 24 hours or be in COLD SHUTDOWN within the following 24 hours.

6. None

7. None

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### 3.9 BASES

The general objective of this Specification is to assure an adequate source of electrical power to operate the auxiliaries during plant operation, to operate facilities to cool and lubricate the plant during shutdown, and to operate the engineered safeguards following the accident. Two independent power sources from the off-site transmission network and the diesel generators are available. One off-site source is provided through the 13.2 kV startup regulating transformer switchgear No. 3 supplied from either the No. 343 startup transformer or the startup and emergency auxiliary regulating transformer No. 3. The other off-site source is provided through the 13.2 kV startup transformer switchgear No. 2 supplied from the startup and emergency auxiliary transformer No. 2. The two off-site sources are connected to the on-site Class 1E distribution system (which begins with the 4kV emergency buses) by physically independent circuits. The dc supply is required for switchgear and engineered safety feature systems. Specification 3.9.A states the required availability of ac and dc power; i.e., active off-site ac sources and the required amount of on-site ac and dc sources. The requirement for a minimum onsite inventory of diesel fuel is based upon an analysis of the time dependent electrical loads on the diesels following an accident. A battery charger is supplied with each of the 125-Volt batteries.

The No. 2, No. 3 and No. 343 startup transformers and unit auxiliary transformers are each sized to carry 100% of the auxiliary load. If one of the off-site power circuits becomes inoperable, the unit can continue to operate since the unit auxiliary transformer is in service, the other off-site power circuit is available, and the required number of diesel generators is operational.

If both off-site power circuits are inoperable, the reactor power level must be reduced to a value whereby the units can safely reject the load and continue to supply auxiliary electric power to the station.

In the normal mode of operation, the No. 2 startup transformer and either the No. 3 or No. 343 startup transformer are energized and four diesel generators are operable. One diesel generator may be allowed out-ofservice based on the availability of power from the startup transformer and the fact that three diesel generators carry sufficient engineered safequards equipment to cover all breaks. With one off-site power circuit and one diesel generator out-of-service, the off-site transmission line corresponding to the operable off-site power circuit must be available. Upon the loss of one on-site and one off-site power source, power would be available from the other immediate off-site power source and the three operable on-site diesels to carry sufficient engineered safeguards equipment to cover all breaks. In addition to these two power sources, removal of the Isolated Phase Bus "quick" disconnect links would allow backfeed of power through the main transformer to the unit auxiliary transformer and provide power to carry the full station auxiliary load. The time required to perform this operation is comparable to the time the reactor could remain on RCIC operation before controlled depressurization need be initiated.

Amendment No. 149, 173

### 3.9 BASES (Cont'd.)

The 125-Volt battery system shall have a minimum of 105 Volts at the battery terminals to be considered operable. The 250-Volt portion of the 125/250-Volt battery system shall have a minimum of 210 Volts at the battery terminals to be considered operable.

The ACTION requirements specified for the degradation of the **power** sources provide restrictions upon continued facility operation commensurate with the level of degradation. The OPERABILITY of the power sources are consistent with the initial condition assumptions of the safety analyses.

When a diesel generator is inoperable, there is an ACTION requirement to verify that all required systems, subsystems, trains, components and devices, that depend on the remaining OPERABLE diesel generators as a source of emergency power, are also OPERABLE. This requirement is intended to provide assurance that a loss-ofoffsite power event will not result in a complete loss of safety function of critical systems during the period one of the diesel generators is inoperable. The term verify as used in this context means to administratively check by examining logs or other information to determine if certain components are out-ofservice for maintenance or other reasons. It does not mean to perform the surveillance requirements needed to demonstrate the OPERABILITY of the component.

Demonstrations of diesel generator operability required by Section 4.9.B may include paralleling with the offsite source and operating the diesel generator under load.

A standby heating system is used to maintain engine jacket cooling water and engine lube oil temperature at optimum standby starting conditions. An EDG will be declared inoperable if the required temperatures cannot be maintained. The EDGs will not be operated for the sole purpose of maintaining engine temperatures.

Following an EDG failure, the redundant EDG will be inspected prior to a test start to detect any external conditions that indicate starting the EDG might cause similar degradation or damage.

The ESWS has two 100 percent cooling capacity pumps, each powered from a separate standby power supply. A third pump equivalent to the two ESW pumpes the Emergency Cooling Water pump, is located at the Emergency Cooling Tower. This latter pump requires the operability of one of the two ESW booster pumps and two of the three Emergency Cooling Tower fans to function adequately. In the event the 2 pumps are inoperable, the allowable repair period is conservative in view of the 3-month test interval for the system.

### 4.9 Bases

The surveillance requirements for demonstrating the OPERABILITY of the diesel generators follow the recommendations of Regulatory Guide 1.9, "Selection of Diesel Generator Set Capacity for Standby Power Supplies," March 10, 1971, Regulatory Guide 1.137 "Fuel-Oil Systems for Standby Diesel Generators," Revision 1, October 1979 and Regulatory Guide 1.108, "Periodic Testing of Diesel Generator Units Used as Onsite Electric Power Systems at Nuclear Power Flants," Revision 1, August 1977 except for paragraphs C.2.A(3), C.2.C(1), C.2.C(2), C.2.D(2), C.2.D(3) and C.2.D(4). The exceptions to Regulatory Guide 1.108 allow for gradual loading of diesel generators during testing and decreased surveillance test frequencies (in response to Generic Letter 84-15). Test procedures minimize the period of time that a diesel generator would not be capable of providing emergency power and contain direction for the prompt restoration of the diesel, if necessary, during testing.

### 4.9 BASES (Cont'd)

The diesel generator voltage may decrease to 59% of nominal when the 2000 HP RHR pump motor is started. The load rejection test of the largest single load will be conducted with the EDG governor in isochronous mode using the Residual Heat Removal Pump in full flow test as the rejected load. The load rejection test of 2400-2600 kW may be conducted with the EDG governor and voltage regulator in droop mode parallel to the offsite grid. The EDG voltage will be matched to the bus voltage (4160  $\pm$  410 volts) and the overshoot upon load removal will be limited to 660 volts which is 15% of this nominal value.

The term permanent and auto-connected loads means those loads which the diesel would normally be expected to supply in the scenario being tested. Verification of load shedding from the emergency busses will include only those normally powered from the emergency bus during plant operations. The loads described by the term emergency loads are a Residual Heat Removal Pump, a High Pressure Service Water Pump and the 480 Volt emergency bus load center.

The diesel fuel oil quality must be checked to ensure proper operation of the diesel generators. Water content should be minimized because water in the fuel could contribute to excessive damage to the diesel engine. Amendment No. <u>131</u> centralized commitments related to Position C.2 of Regulatory Guide 1.137, Revision 1 (October, 1979) "Fuel Oil Systems for Standby Diesel Generators."

Although station batteries will deteriorate with time, utility experience indicates there is almost no possibility of precipitous failure. The type of surveillance described in this specification is that which has been demonstrated over the years to provide an indication of a cell becoming irregular or unserviceable long before it becomes a failure. In addition, the checks described also provide adequate indication that the batteries have the specified ampere hour capability.

The station batteries shall be subjected to a performance test every third refueling outage and a service test during the other refueling outages. This testing frequency complies with the testing requirements of the Institute of Electrical and Electronics Engineers (IEEE) Standard 450 (1975), "Recommended Practice for Maintenance, Testing and Replacement of Large Lead Storage Batteries," and Regulatory Guide 1.129, Revision 1 (February 1978), "Maintenance, Testing and Replacement of Large Lead Storage Batteries for Nuclear Power Plants."

A performance test determines the ability of the battery to meet a specified discharge rate and duration based on the manufacturer's rating. A service test proves the capability of the battery to deliver the design requirements of the dc systems; i.e., supply and maintain in operable status all of the actual emergency loads for the design basis accident. A performance test is the most severe test because the cycling on the battery at manufacturer's rating shortens the service life of the battery. A service test is performed at design load instead of manufacturer's ratings.

The test interval for the Emergency Service Water system, and pump room fans associated with the ESW pumps is deemed adequate to provide assurance that the equipment will be operable based on good engineering judgment and system redundancy, plus the additional testing accomplished when the diesel generators are tested. Pump flow tests during normal operation will be performed by measuring the head and flow in the system using suitable flow equipment and pressure instrumentation.

Amendment No. 131, 165, 170,173



UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D.C. 20555

# PHILADELPHIA ELECTRIC COMPANY

# PUBLIC SERVICE ELECTRIC AND GAS COMPANY

### DELMARVA POWER AND LIGHT COMPANY

### ATLANTIC CITY ELECTRIC COMPANY

### DOCKET NO. 50-278

### PEACH BOTTOM ATOMIC POWER STATION, UNIT NO. 3

### AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 176 License No. DPR-56

- 1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Philadelphia Electric Company, et. al. (the licensee) dated January 31, 1992, as supplemented by letters dated April 28, 1992, June 22, 1992, November 9, 1992, and January 8, 1993, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I.
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health or safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
- Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C(2) of Facility Operating License No. DPR-56 is hereby amended to read as follows:

(2) <u>Technical Specifications</u>

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 176, are hereby incorporated in the license. PECO shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance and shall be implemented within 30 days of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Charles J. Miller

Charles L. Miller, Director Project Directorate I-2 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications

Date of Issuance: March 25, 1993

# ATTACHMENT TO LICENSE AMENDMENT NO. 176

# FACILITY OPERATING LICENSE NO. DPR-56

# DOCKET NO. 50-278

Replace the following pages of the Appendix A Technical Specifications with the enclosed pages. The revised areas are indicated by marginal lines.

<u>Remove</u>	<u>Insert</u>
67	67
72 132	72 132
132a	-
217	217 218
218 218a	218 218a
218b	218b
218c	218c
-	218d 218e
-	218e 218f
-	218g
-	218h
-	218i 218j
219	219
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TABLE 3.2.BINSTRUMENTATION THAT INITIATES OR CONTROLS THE CORE AND<br/>CONTAINMENT COOLING SYSTEMS

of 1ns Cha	imum No. Operable trument nnels Per p System (1)	Trip Function	Trip Level Setting	Number of Instru- ment Channels Pro- vided by Design	Remarks
	2	Core Spray Pump	6 +/-1 sec.	4 timers	All pumps-loss of offsite power only
		Start Timer	13 sec. +/-7% of setting	2 timers	A&C pumps-offsite power available
			23 sec. +/-7% of setting	2 timers	B&D pumps-offsite power available
	1 per 4kV bus (7)	480V Emergency Load Center Timer	3 +/-0.5 sec.	4 timers	All timers - loss of offsite power only
	2	LPCI Pump Start Timer (Four Pumps)	2 sec. +/-7% of setting 8 sec. +/-7% of setting	4 timers 4 timers	LPCI pumps A&B LPCI pumps C&D
- 67 -	1	ADS Actuation Timer	90 =t </=12()<br seconds	2 timers	In conjunction with Low Reactor Water Level, High Drywell Pressure and LPCI or Core Spray Pump running interlock, initiates ADS.
Amendment No.	2	ADS Bypass Timer	8 < /=t < /=10 minutes	4 timers	In conjunction with low reactor water level, bypasses high drywell pressure initiation of ADS.
	2	RHR (LPCI) Pump Discharge Pressure Interlock	50 +/- 10 psig	4 channels	Defers ADS actuation pending confirmation of Low Pressure Core Cooling system operation (LPCI Pump running interlock).
47, 96, 110, 145,	2	Core Spray Pump Discharge Pressure Interlock	185 +/- 10 psig	4 channels	Defers ADS actuation pending confirmation of Low Pressure Core cooling system operation (Core Spray Pump running interlock)

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### NOTES FOR TABLE 3.2.B

- 1. Whenever any CSCS subsystem is required by Section 3.5 to be operable, there shall be two operable trip systems. If the first column cannot be met for one of the trip systems, that trip system shall be placed in the tripped condition or the reactor shall be placed in the Cold Shutdown Condition within 24 hours.
- 2. Close isolation valves in RCIC subsystem.
- 3. Close isolation valves in HPCI subsystem.
- 4. Instrument set point corresponds to 378 inches above vessel zero.
- 5. HPCI has only one trip system for these sensors.
- 6. With the number of OPERABLE channels less than required by the Minimum OPERABLE Channels per Trip System requirement, place at least one inoperable channel in the tripped condition within one hour or declare the RCIC system inoperable.
- 7. The failure of a 480V Emergency Load Center timer could result in the failure of a 480V Emergency Load Center to re-energize following the loss of one or both offsite sources. Therefore, Technical Specification 3.9.8.7 will apply when a 480V Emergency Load Center timer is not operable.

### LIMITING CONDITIONS FOR OPERATION

- 3.5.F <u>Minimum Low Pressure Cooling</u> Availability
- 1. Deleted
- Any combination of inoperable components in the core and containment cooling systems shall not defeat the capability of the remaining operable components to fulfill the cooling functions.
- 3. When irradiated fuel is in the reactor vessel and the reactor is in the Cold Shutdown Condition, both core spray systems, the LPCI and containment cooling systems may be inoperable, provided no work is being done which has the potential for draining the reactor vessel.
- 4. During a refueling outage, fuel and LPRM removal and replacement may be performed provided at least one of the following conditions below is satisfied:
  - a. Both core spray systems and the LPCI system shall be operable except that one core spray system or the LPCI system may be inoperable for a period of thirty days, or
  - b. The reactor vessel head is removed, the cavity is flooded, the spent fuel pool gates are removed, and the water level is maintained at least 21 feet over the top of irradiated fuel assemblies seated in the spent fuel storage pool racks and no work is being performed which has the potential for draining the reactor vessel.

SURVEILLANCE REQUIREMENTS

- 4.5.F <u>Minimum Low Pressure</u> <u>Cooling Availability</u>
- 1. Deleted

#### 3.9 AUXILIARY ELECTRICAL SYSTEM

#### Applicability:

Applies to the auxiliary electrical power system.

#### Objective:

To assure an adequate supply of electrical power for operation of those systems required for safety.

#### Specification:

A. <u>Auxiliary Electrical</u> Equipment

> The reactor shall not be made critical unless all of the following conditions are satisfied:

- Two physically independent circuits between the offsite transmission network and the onsite Class 1E distribution system are operable.
- The four diesel generators shall be operable and there shall be a mimimum of 108,000 gallons of diesel fuel on site. Each operable diesel generator shall have:
  - A separate day tank containing a minimum of 200 gallons of fuel,
  - A separate fuel storage tank with a minimum of 28,000 gallons of fuel, and
  - c. A separate fuel transfer pump.
- The unit 4kV emergency buses and the 480V emergency load centers are energized.
- The four unit 125V batteries and their chargers shall be operable.

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#### SURVEILLANCE REQUIREMENTS

### 4.9 AUXILIARY ELECTRICAL SYSTEM

### Applicability

Applies to the periodic testing requirements of the auxiliary electrical systems.

### Objective:

Verify the operability of the auxiliary electrical system.

#### Specification:

- A. <u>Auxiliary Electrical</u> Equipment
- 1. Diesel Generators and Offsite Circuits
  - Each of the required independent circuits between the offsite transmission network and the onsite Class 1E distribution system shall be:
  - a. Verified OPERABLE at least once per 7 days by verifying correct breaker alignments and indicated power availability.
  - b. Demonstrated OPERABLE at least once per 18 months by transferring, manually and automatically, the start-up source from the normal circuit to the alternate circuit.

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#### 4.9.A.1 (Continued)

- Each of the required diesel generators shall be demonstrated OPERABLE:
  - a. In accordance with the frequency specified in 4.9.A.1.2.k by:
    - Verifying the fuel level in the fuel storage tank, and the volume of fuel onsite.
    - Verifying the fuel transfer pump starts and transfers fuel from the storage system to the day fuel tank.
    - 3. Verifying that the diesel can start<sup>a</sup> and gradually accelerate to synchronous speed with generator voltage and frequency at 4160 + 410 volts and 60 + 1.2 HZ.
    - Verifying that the diesel can be synchronized, gradually loaded<sup>a</sup> to an indicated 2400-2600<sup>b</sup> kw and can operate with this load for at least 60 minutes.
    - 5. Verifying the diesel generator is aligned to provide standby power to the associated emergency busses.

<sup>a</sup>This test shall be conducted in accordance with the manufacturer's recommendations regarding engine pre-lube and warmup and, as applicable, loading and shutdown.

<sup>&</sup>lt;sup>D</sup>This load band is meant as guidance to avoid routine overloading of the engine. Loads in excess of this band for special testing, under direct monitoring by the manufacturer or system engineer, or momentary variations due to changing bus loads shall not invalidate the test.

4.9.A.1.2 (Continued)

- Verifying the pressure in all diesel generator air start receivers to be greater than or equal to 225 psig.
- b. At least once per 184 days the diesel generator shall be started<sup>a</sup> and verified to accelerate to synchronous speed in less than or equal to 10 seconds. The generator voltage and frequency shall reach 4160 + 410volts and  $60 + 1.\overline{2}$  Hz within 10 seconds after the start signal. The generator shall be manually synchronized to its appropriate emergency bus, loaded to an indicated 2400-2600 kw<sup>D</sup> in less than or equal to 60 seconds, and operated for at least 60 minutes. This test, if it is performed so it coincides with the testing required by Surveillance Requirement 4.9.A.1.2.a.3 and 4.9.A.1.2.a.4, may also serve to concurr', tly meet those requirements as well.

<sup>&</sup>lt;sup>a</sup>This test shall be conducted in accordance with the manufacturer's recommendations regarding engine prelube and warmup and, as applicable, loading and shutdown.

<sup>&</sup>lt;sup>b</sup>This band is meant as guidance to avoid routine overloading of the engine. Loads in excess of this band for special testing, under direct monitoring by the manufacturer or system engineer, or momentary variations due to changing bus loads shall not invalidate the test.

# SURVEILLANCE REQUIREMENTS

4.9.A.1.2 (Continued)

- c. By removing accumulated
   water:
  - From the day tanks at least once per 31 days and after each occasion when the diesel is operated for greater than 1 hour, and
  - 2. From the main storage tanks at least once per 31 days.
- d. By sampling new fuel oil in accordance with ASTM D4057-81 prior to addition to the storage tanks and:
  - By verifying in accordance with the tests specified in ASTM D975-81 prior to addition to the storage tanks that the sample has:
    - a) An API Gravity of within 0.3 degrees at 60 degrees F or a specific gravity of within 0.0016 at 60/60 degrees F when compared to the supplier's certificate; or an absolute specific gravity at 60/60 degrees F of greater than or equal to 0.83 but less than or equal to 0.89; or an API Gravity at 60 degrees F greater than or equal to 27 degrees but less than or equal to 39 degrees.

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LIMITING CONDITIONS FOR OPERATION	SURVEILLANCE REQUIREMENTS
	4.9.A.1.2.d.1 (Continued)
	<ul> <li>b) A kinematic viscosity at 40 degrees C of greater than or equal to 1.9 centistokes but less than or equal to 4.1 centistokes, if gravity was not determined by comparison with the supplier's certification.</li> </ul>
	c) A flash point equal to or greater than 125 degrees F, and
	d) A clear and bright appearance with proper color when tested in accordance with ASTM D4176-82.
	2. By verifying within 31 days of obtaining the sample that the other properties specified in Table 1 of ASTM D975-81 are met when tested in accordance with ASTM D975-81 except that the analysis for sulfur may be performed in accordance with ASTM D1552-79 or ASTM D2622-82.

Unit 3

PBAPS

# LIMITING CONDITION FOR OPERATION

#### SURVEILLANCE REQUIREMENTS

- 4.9.A.1.2 (Continued)
  - e. At least once every 31 days by obtaining a sample of fuel oil from the storage tank in accordance with ASTM D2276-78, and verifying that total particulate contamination is less than 10mg/liter when checked in accordance with ASTM D2276-78, Method A, except that the filters specified in ASTM D2276-78, Sections 5.1.6 and 5.1.7, may have a nominal pore size of up to three (3) microns.
  - f. At least once per 18 months by:
  - Subjecting the diesel to an inspection in accordance with procedures prepared in conjunction with its manufacturer's recommendations for this class of standby service.
  - Verifying the diesel generator capability to reject a load of greater than or equal to that of the RHR Pump Motor for each diesel generator while maintaining voltage within 4160 ± 410 volts and frequency at 60 ± 1.2hz.
  - 3. Verifying the diesel generator capability to reject an indicated load of 2400 kW-2600 kW without tripping. The generator voltage shall not exceed the initial value (4160 + 410 volts) by more than 660 volts during and following the load rejection.

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4.9.A.1.2.f (Continued)

- 4. Verifying that all automatic diesel generator trips except engine overspeed, generator differential over-current, generator ground overcurrent and manual cardox initiation are automatically bypassed upon an ECCS actuation signal.
- 5. Verifying the diesel generator operates<sup>a</sup> for at least 24 hours. During the first 2 hours of this test, the diesel generator shall be loaded to an indicated 2800-3000 kW<sup>D</sup> and during the remaining 22 hours of this test, the diesel generator shall be loaded to an indicated 2400-2600 kW<sup>L</sup>.
- 6. Verifying diesel generator capability at full load temperature within 5 minutes after completing the 24 hour test<sup>C</sup> by starting and loading the diesel as described in Surveillance Requirement 4.9.A.1.2.b and operating for greater than 5 minutes<sup>d</sup>.

<sup>a</sup>This test shall be conducted in accordance with the manufacturer's recommendations regarding engine prelube and warm-up and, as applicable, loading and shutdown.

<sup>b</sup>This band is meant as guidance to avoid routine overloading of the engine. Loads in excess of this band for special testing, under direct monitoring by the manufacturer or system engineer, or momentary variations due to changing bus loads shall not invalidate the test.

<sup>C</sup>If Surveillance Requirement 4.9.A.1.2.f.6 is not satisfactorily completed, it is not necessary to repeat the preceding 24-hour test. Instead, the diesel generator may be operated at 2400-2600 kW for 1 hour or until operating temperature has stabilized prior to performing Surveillance Requirement 4.9.A.1.2.f.6.

<sup>d</sup>Performance of Surveillance Requirement 4.9.A.1.2.f.6 will not be used to satisfy the requirements of Surveillance Requirement 4.9.A.1.2.b.

#### 4.9.A.1.2 (Continued)

- 7. Verifying that the fuel transfer pump transfers fuel from each fuel storage tank to the day tank of each diesel via the installed cross connection lines.
- g. At least once each operating
   cycle by:
  - Simulating a loss-of-offsite power by itself, and:
    - a) Verifying deenergization of the emergency busses and load shedding from the emergency busses.
    - b) Verifying the diesel generator starts<sup>a</sup> on the auto-start signal, energizes the emergency busses within 10 seconds, energizes the permanent and auto-connected loads through the individual load timers and operates for greater than or equal to 5 minutes.

After energization, the steady-state voltage and frequency of the emergency busses shall be maintained at  $4160 \pm 410$  volts and  $60 \pm 1.2$  Hz during this test.

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<sup>&</sup>lt;sup>a</sup>This test shall be conducted in accordance with the manufacturer's recommendations regarding engine prelube and warm-up and, as applicable, loading and shutdown.

#### SURVEILLANCE REQUIREMENTS

# 4.9.A.1.2 (Continued)

- 2. Verifying that on an ECCS actuation test signal. without loss-of-offsite power, the diesel generator starts<sup>a</sup> on the auto-start signal and operates for greater than or equal 5 minutes. The generator voltage and frequency shall reach 4160 + 410 volts and 60 + 1.2 Hz within 10 seconds after the auto-start signal: the steady state generator voltage and frequency shall be maintained within these limits during this test.
- Simulating a loss-of-offsite power in conjunction with an ECCS actuation test signal, and:
  - a) Verifying deenergization of the emergency busses and load shedding from the emergency busses.
  - b) Verifying the diesel generator starts<sup>a</sup> on the auto-start signal, energizes the emergency busses within 10 seconds, energizes the permanent and auto-connected loads through the individual load timers and operates for greater than or equal to 5 minutes.

After energization, the steady-state voltage and frequency of the emergency busses shall be maintained at  $4160 \pm 410$  volts and  $60 \pm 1.2$  Hz during this test.

<sup>&</sup>lt;sup>a</sup>This test shall be conducted in accordance with the manufacturer's recommendations regarding engine prelube and warmup and, as applicable, loading and shutdown.

#### SURVEILLANCE REQUIREMENTS

4.9.A.1.2 (Continued)

- Verifying the diesel generator's capability to:
  - a) Sychronize with the offsite power source while the generator is loaded with its emergency loads upon a simulated restoration of offsite power.
  - b) Transfer its loads to the offsite power source, and
  - c) Be restored to its standby status.
- h. At least once per 10 years or after any modifications which could affect diesel generator interdependence by starting<sup>a</sup> all four diesel generators simultaneously and verifying that all four diesel generators accelerate to at least 855 rpm in less than or equal to 10 seconds.
- i. At least once per 10 years by draining each fuel oil tank, removing the accumulated sediment and cleaning the tank using a sodium hypochlorite or equivalent solution.
- j. The fuel oil storage tank cathodic protection system shall be checked as follows:
  - At least once every twelve months perform a test to determine whether the cathodic protection is adequate, and

<sup>a</sup>This test shall be conducted in accordance with the manufacturer's recommendations regarding engine prelube and warmup and, as applicable, loading and shutdown.

#### SURVEILLANCE REQUIREMENTS

4.9.A.1.2 (Continued)

- At least once every two months inspect the cathodic protection rectifiers.
- k. If the number of failures during the last 20 valid demands<sup>d</sup> is less than or equal to 1, the test frequency shall be at least once per 31 days.

If the number of failures during the last 20 valid demands is greater than or equal to 2, the test frequency shall be at least once per 7 days<sup>e</sup>.

 All diesel generator failures, valid or non-valid, shall be reported to the Commission in a Special Report within 30 days. Reports of the diesel generator failures shall include the information recommended in Regulatory Position C.3.b of Regulatory Guide 1.108, Revision 1, August 1977.

<sup>d</sup>Criteria for determining the number of failures and number of valid demands shall be in accordance with Regulatory Position C.2.e of Regulatory Guide 1.108, but determined on a per diesel generator basis.

<sup>e</sup>The associated test frequency shall be maintained until seven consecutive failure free demands have been performed <u>and</u> the number of failures in the last 20 demands have been reduced to one. For the purposes of determining the required frequency, the previous test failure count may be reduced to zero if a complete diesel overhaul to like-new condition is completed. This diesel overhaul, including appropriate post-maintenance operation and testing, shall be specifically approved by the manufacturer and acceptable diesel reliability must be demonstrated. The reliability criterion shall be the successful completion of 14 consecutive tests. Ten of these tests may be slow starts in accordance with Surveillance Requirements 4.9.A.1.2.a.3 and 4.9.A.1.2.a.4 and four tests shall be fast starts in accordance with the Surveillance Requirement 4.9.A.1.2.b. If this criterion is not satisfied during the first series of tests, any alternate criterion to be used to reset the valid failure count to zero requires NRC approval.

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PBAPS

### 4.9.A.2 Unit Batteries

- a. Every week the specific gravity, the voltage and temperature of the pilot cell and overall battery voltage shall be measured and logged.
  - b. Every three months the measurements shall be made of voltage of each cell to nearest 0.1 Volt, specific gravity of each cell, and temperature of every fifth cell. These measurements shall be logged.
  - c. The station batteries shall be subjected to a performance test every third refueling outage and a service test during the other refueling outage. In lieu of the performance test every third refueling outage, any battery that shows "signs of degradation or has reached 85% of its service life" shall be subjected to an annual performance test. The service test need not be performed on the refueling outage during which the performance test was conducted. The specific gravity and voltage of each cell shall be determined after the discharge and logged.

4.9.A.3 Swing Buses

a. Every two months the swing buses supplying power to the Low Pressure Coolant Injection System (LPCIS) valves shall be tested to assure that the transfer circuits operate as designed.

#### 3.9.8 Operation with Inoperable Equipment

Whenever the reactor is in Run Mode or Startup Mode with the reactor not in a Cold Condition, the availability of electric power shall be as specified in 3.9.A, except as follows:

 With one offsite circuit required by Specification 3.9.A.1 inoperable, restore at least two offsite circuits to OPERABLE status within 7 days or be in least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours. SURVEILLANCE REQUIREMENTS

4.9.B. Operation with Inoperable Equipment

 When it is determined that one offsite circuit required by Specification 3.9.A.1 is inoperable, verify the OPERABILITY of the remaining A.C. sources by performing Surveillance Requirement 4.9.A.1.1.a within 1 hour and once per 8 hours thereafter.

If any of the diesel generators have not been successfully tested within the preceding 24 hours, demonstrate OPERABILITY of these diesel generators by performing Surveillance Requirement 4.9.A.1.2.a.3 for one diesel at a time within 24 hours and once per 72 hours thereafter.

- 2. With two independent off-site circuits required by Specification 3.9.A.1 inoperable, continued operation is permissible, provided the four diesel generators and associated emergency busses are operable, all core and containment cooling systems are operable and reactor power level is reduced to 25% of the design.
- 2. None

PBAPS

SURVEILLANCE REQUIREMENTS

### 3.9.8 (Continued)

- 3. With one diesel generator inoperable, restore the inoperable diesel generator and associated emergency bus to OPERABLE status within 7 days or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.
- 3. When it is determined that one diesel generator is inoperable, verify the OPERABILITY of the remaining A.C. sources by performing Surveillance Requirement 4.9.A.1.1.a within 1 hour and once per 8 hours thereafter. Verify within 2 hours that required systems. subsystems, trains, components, and devices that depend on the remaining diesel generators as a source of emergency power are OPERABLE.
  - If the diesel generator became inoperable for any reason other than preplanned preventative maintenance, or testing, demonstrate the OPERABILITY of the remaining operable diesel generators by performing Surveillance Requirement 4.9A.1.2.a.3 for one diesel at a time, within 24 hours\* and at least once per 72 hours thereafter.

<sup>\*</sup>This test is required to be completed regardless of when the inoperable diesel generator is restored to OPERABILITY for failures that are potentially generic to the remaining diesel generators and for which appropriate alternative testing cannot be designed.

# PBAPS

# LIMITING CONDITIONS FOR OPERATION

#### SURVEILLANCE REQUIREMENTS

#### 3.9.B (Continued)

4. With one diesel generator and one offsite circuit required by Specification 3.9.A.1 inoperable, restore at least two offsite circuits or four diesel generators to OPERABLE status within 72 hours from the time of initial loss or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours. 4. When it is determined that one diesel generator and one offsite circuit required by Specification 3.9.A.1 are inoperable, verify the OPERABILITY of the remaining A.C. sources by performing Surveillance Requirement 4.9.A.1.1.a within 1 hour and once per 8 hours thereafter. Verify within 2 hours. that required systems, subsystems, trains, components, and devices that depend on the remaining diesel generators as a source of emergency power are OPERABLE.

> If the diesel generator became inoperable for any reason other than preplanned preventative maintenance, or testing, demonstrate the OPERABILITY of the remaining diesel generators by performing Surveillance Requirement 4.9.A.1.2.a.3 for one diesel generator at a time, within 8 hours\*.

- 5. From and after the date that one of the 125 volt battery systems is made or found to be inoperable for any reason, continued reactor operation is permissible during the succeeding three days within electrical safety considerations, provided repair work is initiated in the most expeditious manner to return the failed component to an operable state, and Specifications 3.5.F and 3.9.B.3 are satisifed.
- 5. None

<sup>\*</sup>This test is required to be completed regardless of when the inoperable diesel generator is restored to OPERABILITY for failures that are potentially generic to the remaining diesel generators and for which appropriate alternative testing cannot be designed.

SURVEILLANCE REQUIREMENTS

#### 3.9.B (Continued)

- 6. With fuel oil in one of the diesel generator main storage tanks not available or not in conformance with Surveillance Requirement 4.9.A.1.2.e, implement the following:
  - Isolate the main storage tank from a. the system, with the associated diesel generator being supplied from one of the remaining storage tanks within 8 hours, and
  - Establish and maintain a minimum of b. 108,000 gallons of diesel fuel oil in the other three main storage tanks within 72 hours, and
  - Sample the fuel oil in the other c. three main storage tanks and confirm conformance with specification 4.9.A.1.2.e within 24 hours, and
  - d. Replace the unacceptable fuel oil with acceptable fuel and return the storage tank to service within 7 days, or place the reactor in Cold Shutdown within 24 hours.

Accelerated testing of the diesel generators is not required.

7. With one of the 4kV emergency busses or 480V emergency load centers required by 3.9.A.3 not energized, declare the associated equipment inoperable and take the appropriate action for that system.

> Reenergize the bus within 24 hours or be in COLD SHUTDOWN within the following 24 hours.

6. None

PBAPS

7. None

PBAPS

#### 3.9 BASES

The general objective of this Specification is to assure an adequate source of electrical power to operate the auxiliaries during plant operation. to operate facilities to cool and lubricate the plant during shutdown, and to operate the engineered safeguards following the accident. Two independent power sources from the off-site transmission network and the diesel generators are available. One off-site source is provided through the 13.2 kV startup regulating transformer switchgear No. 3 supplied from either the No. 343 startup transformer or the startup and emergency auxiliary regulating transformer No. 3. The other off-site source is provided through the 13.2 kV startup transformer switchgear No. 2 supplied from the startup and emergency auxiliary transformer No. 2. The two off-site sources are connected to the on-site Class 1E distribution system (which begins with the 4kV emergency buses) by physically independent circuits. The dc supply is required for switchgear and engineered safety feature systems. Specification 3.9.A states the required availability of ac and dc power; i.e., active off-site ac sources and the required amount of on-site ac and dc sources. The requirement for a minimum onsite inventory of diesel fuel is based upon an analysis of the time dependent electrical loads on the diesels following an accident. A battery charger is supplied with each of the 125-Volt batteries.

The No. 2, No. 3 and No. 343 startup transformers and unit auxiliary transformers are each sized to carry 100% of the auxiliary load. If one of the off-site power circuits becomes inoperable, the unit can continue to operate since the unit auxiliary transformer is in service, the other off-site power circuit is available, and the required number of diesel generators is operational.

If both off-site power circuits are inoperable, the reactor power level must be reduced to a value whereby the units can safely reject the load and continue to supply auxiliary electric power to the station.

In the normal mode of operation, the No. 2 startup transformer and either the No. 3 or No. 343 startup transformer are energized and four diesel generators are operable. One diesel generator may be allowed out-ofservice based on the availability of power from the startup transformer and the fact that three diesel generators carry sufficient engineered safequards equipment to cover all breaks. With one off-site power circuit and one diesel generator out-of-service, the off-site transmission line corresponding to the operable off-site power circuit must be available. Upon the loss of one on-site and one off-site power source, power would be available from the other immediate off-site power source and the three operable on-site diesels to carry sufficient engineered safeguards equipment to cover all breaks. In addition to these two power sources, removal of the Isolated Phase Bus "quick" disconnect links would allow backfeed of power through the main transformer to the unit auxiliary transformer and provide power to carry the full station auxiliary load. The time required to perform this operation is comparable to the time the reactor could remain on RCIC operation before controlled depressurization need be initiated.

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## 3.9 BASES (Cont'd.)

The 125-Volt battery system shall have a minimum of 105 Volts at the battery terminals to be considered operable. The 250-Volt portion of the 125/250-Volt battery system shall have a minimum of 210 Volts at the battery terminals to be considered operable.

The ACTION requirements specified for the degradation of the power sources provide restrictions upon continued facility operation commensurate with the level of degradation. The OPERABILITY of the power sources are consistent with the initial condition assumptions of the safety analyses.

When a diesel generator is inoperable, there is an ACTION requirement to verify that all required systems, subsystems, trains, components and devices, that depend on the remaining OPERABLE diesel generators as a source of emergency power, are also OPERABLE. This requirement is intended to provide assurance that a loss-ofoffsite power event will not result in a complete loss of safety function of critical systems during the period one of the diesel generators is inoperable. The term verify as used in this context means to administratively check by examining logs or other information to determine if certain components are out-ofservice for maintenance or other reasons. It does not mean to perform the surveillance requirements needed to demonstrate the OPERABILITY of the component.

Demonstrations of diesel generator operability required by Section 4.9.B may include paralleling with the offsite source and operating the diesel generator under load.

A standby heating system is used to maintain engine jacket cooling water and engine lube oil temperature at optimum standby starting conditions. An EDG will be declared inoperable if the required temperatures cannot be maintained. The EDGs will not be operated for the sole purpose of maintaining engine temperatures.

Following an EDG failure, the redundant EDG will be inspected prior to a test start to detect any external conditions that indicate starting the EDG might cause similar degradation or damage.

The ESWS has two 100 percent cooling capacity pumps, each powered from a separate standby power supply. A third pump equivalent to the two ESW pumps, the Emergency Cooling Water pump, is located at the Emergency Cooling Tower. This latter pump requires the operability of one of the two ESW booster pumps and two of the three Emergency Cooling Tower fans to function adequately. In the event the 2 pumps are inoperable, the allowable repair period is conservative in view of the 3-month test interval for the system.

#### 4.9 Bases

The surveillance requirements for demonstrating the OPERABILITY of the diesel generators follow the recommendations of Regulatory Guide 1.9, "Selection of Diesel Generator Set Capacity for Standby Power Supplies," March 10, 1971, Regulatory Guide 1.137 "Fuel-Oil Systems for Standby Diesel Generators," Revision 1, October 1979 and Regulatory Guide 1.108, "Periodic Testing of Diesel Generator Units Used as Onsite Electric Power Systems at Nuclear Power Plants," Revision 1, August 1977 except for paragraphs C.2.A(3), C.2.C(1), C.2.C(2), C.2.D(2), C.2.D(3) and C.2.D(4). The exceptions to Regulatory Guide 1.108 allow for gradual loading of diesel generators during testing and decreased surveillance test frequencies (in response to Generic Letter 84-15). Test procedures minimize the period of time that a diesel generator would not be capable of providing emergency power and contain direction for the prompt restoration of the diesel, if necessary, during testing.

#### PBAPS

# 4.9 BASES (Cont'd)

The diesel generator voltage may decrease to 59% of nominal when the 2000 HP RHR pump motor is started. The load rejection test of the largest single load will be conducted with the EDG governor in isochronous mode using the Residual Heat Removal Pump in full flow test as the rejected load. The load rejection test of 2400-2600 kW may be conducted with the EDG governor and voltage regulator in droop mode parallel to the offsite grid. The EDG voltage will be matched to the bus voltage (4160  $\pm$  410 volts) and the overshoot upon load removal will be limited to 660 volts which is 15% of this nominal value.

The term permanent and auto-connected loads means those loads which the diesel would normally be expected to supply in the scenario being tested. Verification of load shedding from the emergency busses will include only those normally powered from the emergency bus during plant operations. The loads described by the term emergency loads are a Residual Heat Removal Pump, a High Pressure Service Water Pump and the 480 Volt emergency bus load center.

The diesel fuel oil quality must be checked to ensure proper operation of the diesel generators. Water content should be minimized because water in the fuel could contribute to excessive damage to the diesel engine. Amendment No. <u>134</u> centralized commitments related to Position C.2 of Regulatory Guide 1.137, Revision 1 (October, 1979) "Fuel Oil Systems for Standby Diesel Generators."

Although station batteries will deteriorate with time, utility experience indicates there is almost no possibility of precipitous failure. The type of surveillance described in this specification is that which has been demonstrated over the years to provide an indication of a cell becoming irregular or unserviceable long before it becomes a failure. In addition, the checks described also provide adequate indication that the batteries have the specified ampere hour capability.

The station batteries shall be subjected to a performance test every third refueling outage and a service test during the other refueling outages. This testing frequency complies with the testing requirements of the Institute of Electrical and Electronics Engineers (IEEE) Standard 450 (1975), "Recommended Practice for Maintenance, Testing and Replacement of Large Lead Storage Batteries," and Regulatory Guide 1.129, Revision 1 (February 1978), "Maintenance, Testing and Replacement of Large Lead Storage Batteries for Nuclear Power Plants."

A performance test determines the ability of the battery to meet a specified discharge rate and duration based on the manufacturer's rating. A service test proves the capability of the battery to deliver the design requirements of the dc systems; i.e., supply and maintain in operable status all of the actual emergency loads for the design basis accident. A performance test is the most severe test because the cycling on the battery at manufacturer's rating shortens the service life of the battery. A service test is performed at design load instead of manufacturer's ratings.

The test interval for the Emergency Service Water system, and pump room fans associated with the ESW pumps is deemed adequate to provide assurance that the equipment will be operable based on good engineering judgment and system redundancy, plus the additional testing accomplished when the diesel generators are tested. Pump flow tests during normal operation will be performed by measuring the head and flow in the system using suitable flow equipment and pressure instrumentation.



UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D.C. 20555

# SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NOS. 173 AND 176 TO FACILITY OPERATING

# LICENSE NOS. DPR-44 and DPR-56

PHILADELPHIA ELECTRIC COMPANY PUBLIC SERVICE ELECTRIC AND GAS COMPANY DELMARVA POWER AND LIGHT COMPANY ATLANTIC CITY ELECTRIC COMPANY

PEACH BOTTOM ATOMIC POWER STATION, UNIT NOS. 2 AND 3

DOCKET NOS. 50-277 AND 50-278

### 1.0 INTRODUCTION

By letter dated January 31, 1992, as supplemented by letters dated April 28, 1992, June 22, 1992, November 9, 1992, and January 8, 1993, the Philadelphia Electric Company, Public Service Electric and Gas Company, Delmarva Power and Light and Atlantic City Electric Company (the licensee) proposed various changes to the Peach Bottom Atomic Power Station, Units 2 and 3 Technical Specifications (TS). Specifically, the licensee proposed changes to Technical Specification 3.9/4.9, "Auxiliary Electric Systems," for Units 2 and 3 regarding testing of emergency diesel generators (EDGs) and Offsite AC Sources. These proposed changes are intended to incorporate enhanced testing requirements in the plants' Technical Specifications by implementing the quidance contained in Regulatory Guide 1.108, "Periodic Testing of Diesel Generator Units Used as Onsite Electrical Power Systems at Nuclear Power Plants;" NUREG-0123, "Standard Technical Specifications for General Electric Boiling Water Reactors, Revision 3;" and Generic Letter 84-15, "Proposed Staff Action to Improve and Maintain Diesel Generator Reliability." These changes are intended to improve the availability and reliability of the Emergency Diesel Generator, and Offsite AC Sources for Peach Bottom Units 2 and 3. The proposed Technical Specification (TS) changes and our evaluation of these changes are described in Section 2.0.

The April 28, 1992, November 9, 1992, and January 8, 1993, letters provided clarifying information that did not increase the scope of the original amendment request or change the initial proposed no significant hazards determination which was based on the January 31, 1992, letter. An administrative change to TS 4.9.A.1.2.c.2 was made by the NRC staff, and agreed upon by the licensee, as a result of our telephone discussion on January 12, 1993. The staff corrected typographical errors on page 132 of the TS as agreed to by the licensee in a telephone discussion dated February 10, 1993. These administrative changes were for clarity and also did not change the original proposed no significant hazards determination.

9304080021 930325 PDR ADDCK 05000277 P PDR The supplemental letter of June 22, 1992, requested that the staff review and evaluate a provision of the proposed TS which eliminated immediate and daily testing requirements for EDGs when one EDG is out of service for planned preventive maintenance. The staff considered that request and issued Amendments 168 and 172 to the TS which incorporated that single change on July 6, 1992.

#### 2.0 EVALUATION

The licensee has proposed various TS changes for Peach Bottom Units 2 and 3 diesel generator surveillance requirements. The proposed changes constitute a comprehensive and rigorous test program to ensure reliability for the EDGs and associated equipment. This test program is modeled on the test program recommended in NUREG-0123, Revision 3 of the Standard Technical Specifications (STS) and Generic Letter 84-15. The staff's evaluation of these changes are as follows:

# 2.1 New Surveillances to be added to the current T/S

### Table 3.2.B

The licensee has proposed the 480 Volt Emergency Load Center Timers to the list of required operable Core and Containment Cooling System Instrumentation and Control equipment in Table 3.2.B. The Table includes a timer setting of  $3.0 \pm 0.5$  seconds and requires four channels to be operable. The surveillance of these timers would be captured under the existing TS Table 4.2.B requirement to test Auto Sequencing Timers once per operating cycle (i.e., 18 months).

The licensee's proposed change is a new requirement which follows the guidelines contained in NUREG-0123, Revision 3 of the STS and is acceptable.

#### T/S Section 4.9.A.1.1.a

This surveillance requires that each diesel generator and offsite circuit be verified operable at least once per 7 days by verifying correct breaker alignments and indicated power availability.

The licensee's proposed change is a new requirement which follows the guidelines contained in NUREG-0123, Revision 3 of the STS and is acceptable.

# T/S Section 4.9.A.1.1.b

This surveillance pertains to demonstrating the operability of the diesel generators and offsite circuits at least once per operating cycle (i.e., 18 months) by transferring, manually and automatically, the start-up source from the normal circuit to the alternate circuit.

The licensee's proposed change is a new requirement which follows the guidelines contained in NUREG-0123, Revision 3 of the STS and is acceptable.

### T/S Section 4.9.A.1.2.a.3

This surveillance requires that each diesel generator be demonstrated operable at least once every 31 days by verifying that the diesel can start and gradually accelerate to synchronous speed with generator voltage and frequency at 4160  $\pm$  410 volts and 60  $\pm$  1.2 Hz, respectively.

The licensee's proposed change is a new requirement which follows the guidelines contained in Generic Letter 84-15 and is acceptable.

# T/S Section 4.9.A.1.2.a.4

This surveillance requires verifying that the diesel generator can be synchronized, gradually loaded to an indicated 2400-2600 kW and can operate with this load for at least 60 minutes.

The licensee's proposed change is a new requirement which follows the guidelines contained in Generic Letter 84-15 and is acceptable.

#### T/S Section 4.9.A.1.2.a.5

This surveillance requires verifying that the diesel generator is aligned to provide standby power to the associated emergency buses. It also requires that each diesel generator shall be demonstrated operable in accordance with the frequency specified in 4.9.A.1.2.K below.

The licensee's proposed change is a new requirement which follows the quidelines contained in NUREG-0123, Revision 3 of the STS and is acceptable.

### T/S Section 4.9.A.1.2.b

This surveillance requires that at least once per 184 days the diesel generator shall be started and verified to accelerate to synchronous speed in less than or equal to 10 seconds. The generator voltage and frequency shall reach 4160  $\pm$  410 volts and 60  $\pm$  1.2 Hz, respectively, within 10 seconds after the start signal. The generator shall be manually synchronized to its appropriate emergency bus, loaded to an indicated 2400-2600 kW in less than or equal to 60 seconds, and operated for at least 60 minutes. This test, if it is performed so it coincides with the testing required by Surveillance Requirement 4.9.A.1.2.a.3 and 4.9.A.1.2.a.4, may also serve to concurrently meet those requirements as well.

The licensee's proposed change is a new requirement which follows the guidelines contained in NUREG-0123, Revision 3 of the STS and is acceptable.

# T/S Section 4.9.A.1.2.f.2

This surveillance requires that each diesel generator be demonstrated operable at least once per operating cycle (i.e., 18 months) by verifying the diesel generator capability to reject a load of greater than or equal to that of the RHR pump motor for each diesel generator while maintaining voltage and frequency at 4160  $\pm$  410 volts and 60  $\pm$  1.2 Hz, respectively.

The licensee's proposed change is a new requirement which follows the guidelines contained in NUREG-0123, Revision 3 of the STS and is acceptable.

### T/S Section 4.9.A.1.2.f.3

This surveillance requires that each diesel generator be demonstrated operable at least once per operating cycle (i.e., 18 months) by verifying the diesel generator capability to reject a load of 2400 to 2600 kW without tripping. The generator voltage during this test shall not exceed an initial value (4160  $\pm$  410 volts) by more than 660 volts during and following the load rejection test.

The licensee's proposed change is a new requirement which meets the intent of NUREG-0123, Revision 3 of the STS and is acceptable.

#### T/S Section 4.9.A.1.2.f.4

This surveillance requires that each diesel generator be demonstrated operable at least once per operating cycle (i.e., 18 months) by verifying that all automatic diesel generator trips except engine overspeed, generator differential over-current, generator ground over-current and manual cardox initiation are automatically bypassed upon an ECCS actuation signal.

The current staff position stipulated in RG-1.9 for bypassing EDG protective trips during emergency conditions recommends that the diesel generator units be automatically tripped on engine overspeed and generator differential current under accident conditions. Any other automatic protective trips should either be bypassed or be implemented with two or more measurements for each trip parameter with coincident logic for trip actuation. The licensee's design also allows the EDGs to be automatically tripped on generator ground over-current and manual cardox initiation. The licensee has provided a coincident logic of 2 out of 16 for manual cardox initiation (CO2 fire extinguishing system discharge). However, no coincident logic is provided for generator ground over-current. The licensee informed the staff that this was the original plant design and that there have been no instances where this over-current trip signal spuriously actuated. Based on the above, we find the corresponding TS change to be acceptable.

# T/S Section 4.9.A.1.2.f.5

This surveillance requires that each diesel generator be demonstrated operable at least once per operating cycle (i.e., 18 months) by verifying the diesel generator operates for at least 24 hours. During the first 2 hours of this test, the diesel generator shall be loaded to an indicated 2800-3000 kW and during the remaining 22 hours of this test the diesel generator shall be loaded to an indicated 2400-2600 kW.

The licensee's proposed change is a new requirement which follows the guidelines contained in NUREG-0123, Revision 3 of the STS and is acceptable.

# T/S Section 4.9.A.1.2.f.6

This surveillance requires that each diesel generator be demonstrated operable at least once per operating cycle (i.e., 18 months) by verifying diesel generator capability at full load temperature within 5 minutes after completing the 24-hour test by starting and loading the diesel as described in Surveillance Requirement 4.9.A.1.2.b and operating for greater than 5 minutes.

The licensee's proposed change is a new requirement which follows the guidelines contained in NUREG-0123, Revision 3 of the STS and is acceptable.

# T/S Section 4.9.A.1.2.f.7

This surveillance requires verification that the fuel transfer pump transfers fuel from each fuel storage tank to the day tank of each diesel via the installed cross connection lines.

The licensee has proposed to add the above surveillance requirement to ensure that the transfer pump and crosstie are functioning properly. Because the licensee has proposed an action statement (T/S Section 3.9.B.6) to eliminate the requirement to declare an EDG inoperable when the fuel oil in its associated fuel oil storage tank is not available, the licensee has added the surveillance requirement to ensure that fuel oil can be delivered from one of the remaining storage tanks through the crosstie. This proposed change is a new requirement which demonstrates the adequacy of a diverse flow path of fuel oil to the EDGs and is acceptable.

# T/S Section 4.9.A.1.2.g.1

This surveillance requires that each diesel generator be demonstrated operable at least once per operating cycle (i.e., 18 months) by simulating a loss-of-offsite power (LOOP), verifying deenergization of the emergency buses and load shedding from the emergency buses and verifying that the diesel generator starts on the auto-start signal, energizes the emergency buses with the permanently connected loads within 10 seconds, energizes the auto-connected loads through the individual load timers and operates for greater than or equal to 5 minutes. After energization, the steady-state voltage and frequency of the emergency buses shall be maintained at 4160  $\pm$  410 volts and 60  $\pm$  1.2 Hz, respectively, during this test.

The licensee's proposed change is a new requirement which follows the guidelines contained in NUREG-0123, Revision 3 of the STS and is acceptable.

### T/S Section 4.9.A.1.2.q.2

This surveillance requires that each diesel generator be demonstrated operable at least once per operating cycle (i.e., 18 months) by verifying that on an ECCS actuation test signal, without loss-of-offsite power, the diesel generator starts on the auto-start signal and operates for greater than or equal to 5 minutes. The generator voltage and frequency shall reach 4160  $\pm$ 410 volts and 60  $\pm$  1.2 Hz, respectively, within 10 seconds after the autostart signal; the steady state generator voltage and frequency shall be maintained within these limits during this test.

The licensee's proposed change is a new requirement which follows the guidelines contained in NUREG-0123, Revision 3 of the STS and is acceptable.

# T/S Section 4.9.A.1.2.g.3

This surveillance requires that each diesel generator be demonstrated operable at least once per operating cycle (i.e., 18 months) by simulating a loss-of-offsite power in conjunction with an ECCS actuation test signal, verifying deenergization of the emergency buses and load shedding from the emergency buses, and verifying that the diesel generator starts on the auto-start signal, energizes the emergency buses with permanently connected loads within 10 seconds, energizes the auto-connected loads through the individual load timers and operates for greater than or equal to 5 minutes. After energization, the steady-state voltage and frequency of the emergency buses shall be maintained at 4160  $\pm$  410 volts and 60  $\pm$  1.2 Hz, respectively, during this test.

The licensee's proposed revision follows the guidelines contained in NUREG-0123, Revision 3 of the STS and is acceptable.

# T/S Section 4.9.A.1.2.g.4

This surveillance requires that at least once per operating cycle (i.e., 18 months) each diesel generator be demonstrated operable by (1) synchronizing with the offsite power source while the generator is loaded with its emergency loads, (2) transferring this load to the offsite power, and (3) restoring the diesel generator to its standby condition.

The licensee's proposed change is a new requirement which follows the guidelines contained in NUREG-0123, Revision 3 of the STS and is acceptable.

### T/S Section 4.9.A.1.2.h

This surveillance requires that each diesel generator be demonstrated operable at least once per 10 years or after any modifications which could affect diesel generator interdependence by starting all four diesel generators simultaneously and verifying that all four diesel generators accelerate to at least 855 rpm in less than or equal to 10 seconds.

The licensee's proposed change is a new requirement which follows the guidelines contained in NUREG-0123, Revision 3 of the STS and is acceptable.

### T/S Section 4.9.A.1.2.k

This surveillance incorporates requirements for EDGs which vary the surveillance testing frequency based on the number of failures. If the number of failures during the last 20 valid demands is less than or equal to one, the test frequency shall be at least once per 31 days. If the number of failures during the last 20 valid demands is greater than or equal to two, the test frequency shall be at least once per 7 days.

The licensee's proposed change is a new requirement which follows the guidelines contained in Generic Letter 84-15 and is acceptable.

### T/S Section 4.9.A.1.2.1

This surveillance requires that all diesel generator failures, valid or nonvalid, shall be reported to the Commission in a Special Report within 30 days. Reports of the diesel generator failures shall include the information in Regulatory Position C.3.b of Regulatory Guide 1.108, Revision 1, August 1977.

The licensee's above requirement to directly incorporate the reporting requirements of paragraph C.3.b of Regulatory Guide 1.108, Revision 1, is acceptable.

#### T/S Section 4.9.B.1

This surveillance requires that when it is determined that one offsite circuit required by Specification 3.9.A.1 is inoperable, verify the operability of the remaining AC sources by performing Surveillance Requirement 4.9.A.1.1.a. within 1 hour and once per 8 hours thereafter.

In addition, it requires that if any diesel generator has not been successfully tested within the preceding 24 hours, demonstrate operability of these diesel generators by performing Surveillance Requirement 4.9.A.1.2.a.3 for one diesel at a time within 24 hours and once per 72 hours thereafter.

The licensee's proposed change is a new requirement which follows the guidelines contained in NUREG-0123, Revision 3 of the STS and is acceptable.

### T/S Section 4.9.B.3

This surveillance requires that when one diesel generator is inoperable, the operability of the remaining AC sources shall be verified by performing Surveillance Requirement 4.9.A.1.1.a. within 1 hour and once per 8 hours, thereafter. Verification is required within 2 hours that all systems,

subsystems, trains, components, and devices that depend on the remaining diesel generators as a source of emergency power are operable.

In addition, it requires that if the diesel generator becomes inoperable for any reason other than preplanned preventive maintenance, or testing; demonstrate the operability of the remaining operable diesel generators by performing Surveillance Requirement 4.9.A.1.2.a.3 for one diesel at a time, within 24 hours and at least once per 72 hours thereafter.

The licensee's proposed change follows the guidelines contained in Generic Letter 84-15 and is acceptable.

#### T/S Section 4.9.B.4

This surveillance requires that when it is determined that one diesel and one offsite circuit required by Specification 3.9.A.1 are inoperable, verify the operability of the remaining AC sources by performing Surveillance Requirement 4.9.A.1.1.a. within 1 hour and once per 8 hours thereafter. Verification is required within 2 hours that all required systems, subsystems, trains, components, and devices that depend on the remaining diesel generators as a source of emergency power are operable.

In addition, it requires that if the diesel generator becomes inoperable for any reason other than preplanned preventive maintenance, or testing, demonstrate the operability of the remaining diesel generators by performing Surveillance Requirement 4.9.A.1.2.a.3 for one diesel at a time, within 8 hours.

The licensee's proposed change follows the guidelines contained in Generic Letter 84-15 and is acceptable.

# 2.2 <u>Revisions to Existing T/S Sections</u>

### T/S Section 3.9.A.2, 3.9.A.2.a, 3.9.A.2.b and 3.9.A.2.c

The above action statement establishes a minimum fuel oil availability requirement for each operable EDG (28,000 gallons) and increase the existing requirement for the cumulative minimum volume of fuel on site from 104,000 to 108,000 gallons.

The licensee has proposed to add the above action statement to increase EDG reliability and availability by establishment of minimum diesel fuel oil availability requirements for each EDG and increasing the existing requirements for the cumulative minimum volume of diesel fuel oil on site. Previously no specific fuel oil inventory requirements were designated for each of the diesel generator fuel oil storage tanks. The only TS requirement was to maintain a specific minimum fuel oil quantity onsite (104,000 gallons) which did not necessarily make available fuel oil to the operable diesel generators. This proposed change adds conservatism to the TSs and is acceptable.

# <u>T/S Section 3.9.B.1</u>

This action statement currently states that if one of the two independent offsite circuits required by Specification 3.9.A.1 is inoperable, continued reactor operation is permissible for 7 days provided the 4 diesel generators and associated emergency buses are demonstrated to be operable. The Licensee has proposed to add the following to this action statement: "restore at least two offsite circuits to operable status within 7 days or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours."

The staff finds this proposed revision to be more conservative than the current TS and is acceptable.

# T/S Sections 3.9.B.3

This action statement currently states that if one diesel generator or associated emergency bus is made or found to be inoperable for any reason, continued reactor operation is permissible if other provisions of the existing TS is satisfied. The licensee has proposed to add the following to this action statement: "restore the inoperable diesel generator and associated emergency bus to operable status within 7 days or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours."

The staff finds this proposed revision to be more conservative than the current TS and is acceptable.

#### T/S Section 3.9.B.4

This action statement currently states that if one of the diesel generators or associated emergency buses and either the emergency or startup transformer power source are made or found to be inoperable for any reason, continued reactor operation is permissible if the existing TS is satisfied, and if the other offsite source, startup transformer and emergency transformer are available and capable of automatically supplying power to the 4 kV emergency buses. The licensee has proposed to add the following to this action statement: "restore at least two offsite circuits or four diesel generators to operable status within 72 hours from the time of initial loss or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours."

The staff finds this proposed revision to be more conservative than the current TS and is acceptable.

### <u>T/S Section 3.9.B.6, 3.9.B.6.a, 3.9.B.6.b, 3.9.B.6.c and 3.9.B.6.d</u>

The above action statement eliminates an option allowing an EDG to be declared inoperable when the fuel oil in one of the diesel fuel storage tanks is not available by requiring that the EDG be supplied from one of the remaining storage tanks but increasing the time from 24 to 72 hours to establish the required inventory of 108,000 gallons of fuel in the other three storage tanks.

The licensee has proposed to change the above action statement which increases EDG reliability and availability by elimination of an option allowing an EDG to be declared inoperable when the fuel oil in one of the diesel fuel storage tanks is not available by requiring the EDG be supplied fuel from one of the remaining storage tanks within 8 hours. The NRC evaluated and accepted the operation of an EDG with its associated fuel oil storage tank isolated and the sharing of safety-system components in a safety evaluation report, dated May 31, 1988, supporting Amendments Nos. 131 and 134 to Peach Bottom's operating license. The NRC determined in the safety evaluation that there is reasonable assurance that the common mode failure due to the sharing of a crosstie rendering two EDGs inoperable will not occur considering that the crosstie provision will only be utilized during a 7-day period. Amendments Nos. 131 and 134 consisted of changes to the TSs which require the unacceptable fuel oil in the isolated storage tank to be replaced and returned to service within 7 days or place the reactor in COLD SHUTDOWN within 24 The proposed action statement also increases the time from 24 to 72 hours. hours to establish the required inventory of 108,000 gallons of fuel on site which increases the time that the EDGs do not have sufficient fuel to meet the design basis requirement of 7 days of post LOOP/LOCA operation. However, considering the short duration in which this condition will exist, combined with having a minimum of 84,000 gallons of fuel in the other three tanks provides sufficient time, 5.6 days of operating time with 4 EDGs and 3 fuel oil storage tanks, to obtain additional diesel fuel from offsite sources. If the licensee does not obtain the minimum 108,000 gallons of fuel oil inventory requirement on site within the 72 hours proposed, the TSs require them to place the reactor in COLD SHUTDOWN within 24 hours. This proposed change ensures that sufficient inventory of fuel oil is available within a specified time and is therefore; acceptable.

### T/S Section 3.9.B.7

This action statement pertains to operation with inoperable equipment and requires that if one of the 4 kV emergency buses or 480 volt emergency load centers required by TS 3.9.A.3 are not energized, declare the associated equipment inoperable and take the appropriate action for that system. In addition, it requires that the bus be re-energize within 24 hours or be in COLD SHUTDOWN within the following 24 hours.

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The licensee's proposed revision follows the guidelines contained in NUREG-0123, Revision 3 of the STS and is acceptable.

# T/S Sections 4.9.A.1.d and 4.9.A.1.2.c

This surveillance deletes the prescriptive corrective maintenance requirements if water is suspected between the day tank and the EDG fuel injectors.

The licensee eliminated these maintenance requirements because they may be counterproductive. Adherence to the existing TS requirements for operability and testing are sufficient to assure that water in the fuel will be detected and appropriate corrective actions taken in a timely manner. TS 4.9.A.1.d was deleted in part and the remaining requirements were incorporated into proposed TS 4.9.A.1.2.c. The staff finds these proposed changes acceptable.

#### T/S Section 4.9.A.1.2.a.6

This surveillance requires that each diesel generator be demonstrated operable by verifying the pressure in all diesel generator air start receivers to be greater than or equal to 225 psig.

The licensee's proposed revision follows the guidelines contained in NUREG-0123, Revision 3 of the STS and is acceptable.

# <u>T/S Sections 4.9.A.1.2.a.3, 4.9.A.1.2.b, 4.9.A.1.2.f.5, 4.9.A.1.2.g.1.b,</u> 4.9.A.1.2.g.2 and 4.9.A.1.2.g.3.b.

The licensee has added footnote "a" to the above technical specifications. This footnote requires explicit recognition that all planned EDG starts shall be performed in accordance with the manufacturer's recommendations for prelubrication, warm-up, and, as applicable, loading and shutdown.

The licensee's proposed change is a new requirement which follows the guidelines contained in Generic Letter 84-15 and is acceptable.

# T/S Bases Section 4.9.

The bases discussing EDG surveillance requirements have been modified to reflect the review EDG testing program.

### 2.3 Editorial Changes:

In proposing revised EDG TS requirements, the licensee made numerous editorial and labeling changes to the TSs. The changes that are strictly editorial are captured below.

1. Existing TS requirement 4.9.A.1.h on fuel oil storage tank cathodic protection is relabeled as 4.9.A.1.2.j.

- 2. Existing TS requirement 4.9.A.1.g on draining and cleaning fuel oil storage tanks has been slightly reworded with no change in requirements and relabeled as TS 4.9.A.1.2.i.
- 3. Existing TS requirement 4.9.A.l.e on sample requirements for new fuel oil have been incorporated with minor editorial revisions into new TS 4.9.A.l.2.d.
- 4. Existing TS requirement 4.9.A.1.f on periodic sample requirements for fuel oil in the main storage tanks has been incorporated with minor editorial revisions into new TS 4.9.A.1.2.e.
- 5. Existing TS requirement 4.9.A.1.i specified that once per operating cycle (i.e., 18 months) diesel inspection requirements in accordance with procedures prepared in conjunction with manufacturer's recommendations was incorporated with minor editorial changes into new TS 4.9.A.1.2.f.1.
- 6. Existing TS requirement 4.9.A.1.c on logging quantity of diesel fuel available has been modified to specify that fuel levels in the fuel storage tank and onsite be verified in accordance with the schedule determined in 4.9.A.1.2.k and has been incorporated in new TS requirement 4.9.A.1.2.a.1.
- 7. Existing TS requirement 4.9.A.1.a specified that, among other things, during the monthly diesel generator test, the operation of the diesel fuel oil transfer pumps shall be demonstrated. This requirement has been moved and clarified to new TS 4.9.A.1.2.a.2.
- 8. Revised TS requirement 3.9.B.6 was modified to delete a reference to accelerated testing of ECCS as specified in 4.5.F.1 as not required. TS 4.5.F.1 was deleted and reference to it is subsequently not required.

### 2.4 <u>Conclusion</u>

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We have reviewed the licensee's submittals and have concluded that these changes as described and evaluated individually above are acceptable.

#### 3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Pennsylvania State official was notified of the proposed issuance of the amendments. The State official had no comments.

### 4.0 ENVIRONMENTAL CONSIDERATION

The amendments change surveillance requirements. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released

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offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding (57 FR 20515). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

#### 5.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

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Date: March 25, 1993