Florida Power & Light Company, 6501 South Ocean Drive, Jensen Beach, FL 34957

FPL

October 17, 2001

L-2001-230
10 CFR 50.90

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

RE: St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
Proposed License Amendments
Opposite Train Requirements With Inoperable EDG

Pursuant to 10 CFR 50.90, Florida Power and Light Company (FPL) requests to amend Facility Operating Licenses DPR-67 for St. Lucie Unit 1 and NPF-16 for St. Lucie Unit 2 by incorporating the attached Technical Specifications (TS) revisions. The proposed amendments would revise actions b and c of TS 3.8.1.1 to be comparable with the actions specified in revision 2 NUREG-1432, "Standard Technical Specifications, Combustion Engineering Plant," when an emergency diesel generator (EDG) is inoperable.

Attachment 1 is an evaluation of the proposed changes. Attachment 2 is the "Determination of No Significant Hazards Consideration." Attachments 3 and 4 contain copies of the affected Technical Specifications pages marked-up to show the proposed changes.

The St. Lucie Facility Review Group and the FPL Company Nuclear Review Board have reviewed the proposed amendments. In accordance with 10 CFR 50.91(b)(1), copies of the proposed amendments are being forwarded to the State Designee for the State of Florida.

In order to minimize potential for unnecessary shutdowns, FPL requests approval of this amendment by November 30, 2001. Please issue the amendment to be effective on the date of issuance and to be implemented within 60 days of receipt by FPL.

Please contact us if there are any questions about this submittal.

Very truly yours,

Donald E. Jernigan
Vice President
St. Lucie Plant

DEJ/KWF

Attachments

cc: Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, St. Lucie Plant
Mr. W. A. Passetti, Florida Department of Health

STATE OF FLORIDA)
) ss.
COUNTY OF ST. LUCIE)

Donald E. Jernigan, being first duly sworn, deposes and says:

That he is Vice President, St. Lucie Plant, for the Nuclear Division of Florida Power and Light Company, the Licensee herein;

That he has executed the foregoing document; that the statements made in this document are true and correct to the best of his knowledge, information and belief, and that he is authorized to execute the document on behalf of said Licensee.

Donald E. Jernigan

STATE OF FLORIDA

COUNTY OF St. Lucie

Sworn to and subscribed before me

this 17 day of October, 2001

by Donald E. Jernigan, who is personally known to me.

Leslie J. Whitwell

Signature of Notary Public-State of Florida

Leslie J. Whitwell
MY COMMISSION # DD020212 EXPIRES
May 12, 2005
BONDED THRU TROY FAIN INSURANCE, INC.

Name of Notary Public (Print, Type, or Stamp)

EVALUATION OF PROPOSED TS CHANGES

EVALUATION OF PROPOSED TS CHANGES

BACKGROUND

Pursuant to 10 CFR 50.90, Florida Power and Light Company (FPL) requests to amend Facility Operating Licenses DPR-67 for St. Lucie Unit 1 and NPF-16 for St. Lucie Unit 2 by incorporating the attached Technical Specifications (TS) revisions. The proposed amendments would revise actions b and c of TS 3.8.1.1 to be comparable with the actions specified in revision 2 NUREG-1432, "Standard Technical Specifications, Combustion Engineering Plant," when an emergency diesel generator (EDG) is inoperable.

DESCRIPTION OF PROPOSED CHANGE

The proposed Unit 1 and Unit 2 Technical Specification changes are summarized below. Marked-up Technical Specification pages for this proposed change are provided as Attachments 3 and 4.

TS 3.8.1.1 action b.

With one diesel generator of 3.8.1.1.b inoperable, demonstrate the OPERABILITY of the A.C. sources by performing Surveillance Requirement 4.8.1.1.1.a within 1 hour and at least once per 8 hours thereafter; and if the EDG became inoperable due to any cause other than an inoperable support system, an independently testable component, or preplanned preventative maintenance or testing, demonstrate the OPERABILITY of the remaining OPERABLE EDG by performing Surveillance Requirement 4.8.1.1.2.a.4 within 8 hours, unless it can be confirmed that the cause of the inoperable EDG does not exist on the remaining EDG*; restore the diesel generator to OPERABLE status within 14 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours. Additionally, ~~verify within 2 hours or be in HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours that:~~

~~1. all required systems, subsystems, trains, components and devices that depend on the remaining OPERABLE diesel generator as a source of emergency power are also OPERABLE, and~~
~~2. when in MODE 1, 2 or 3, the steam-driven auxiliary feed pump is OPERABLE.~~

within 4 hours from the discovery of concurrent inoperability of required redundant feature(s) (including the steam driven auxiliary feed pump in MODE 1, 2, and 3), declare required feature(s) supported by the inoperable EDG inoperable if its redundant required feature(s) is inoperable.

* If the absence of any common-cause failure cannot be confirmed, this test shall be completed regardless of when the inoperable EDG is restored to OPERABILITY.

TS 3.8.1.1 action c.

With one offsite A.C. circuit and one diesel generator inoperable, demonstrate the OPERABILITY of the remaining A.C. sources by performing Surveillance Requirement 4.8.1.1.1.a within one hour and at least once per 8 hours thereafter; and if the EDG became inoperable due to any cause other than an inoperable support system, an independently testable component, or preplanned preventative maintenance or testing, demonstrate the OPERABILITY of the remaining OPERABLE EDG by performing Surveillance Requirement 4.8.1.1.2.a.4 within 8 hours unless it can be confirmed that the cause of the inoperable EDG does not exist on the remaining EDG*. Restore at least one of the inoperable sources to OPERABLE status within 12 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours. Restore the other A.C. power source (offsite circuit or diesel generator) to OPERABLE status in accordance with the provisions of Section 3.8.1.1 ACTION Statement a or b, as appropriate, with the time requirement of that ACTION Statement based on the time of the initial loss of the remaining inoperable A.C. power source. Additionally, ~~verify within 2 hours or be in HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours that:~~

~~3. all required systems, subsystems, trains, components and devices that depend on the remaining OPERABLE diesel generator as a source of emergency power are also OPERABLE, and~~
~~4. when in MODE 1, 2 or 3, the steam-driven auxiliary feed pump is OPERABLE.~~

within 4 hours from the discovery of concurrent inoperability of required redundant feature(s) (including the steam driven auxiliary feed pump in MODE 1, 2, and 3), declare required feature(s) supported by the inoperable EDG inoperable if its redundant required feature(s) is inoperable.

* If the absence of any common-cause failure cannot be confirmed, this test shall be completed regardless of when the inoperable EDG is restored to OPERABILITY.

The TS changes specified above are comparable to the STS and:

1. Remove the automatic unit shutdown requirement should an EDG be inoperable while required features on the opposite train are inoperable. Instead, any TS required actions are based on the inoperability of the required feature.

2. Move the steam driven auxiliary feed pump operability requirements to the required redundant feature actions to be comparable with the BASES of NUREG-1432.

JUSTIFICATION FOR THE PROPOSED CHANGE

The St. Lucie TSs are inconsistent in the actions required to be taken when a LCO is not met, depending on whether the action is entered as a result of an inoperable EDG (through actions b and c of EDG TS 3.8.1.1) or the required feature TS action statement requirements. The existing St. Lucie TS 3.8.1.1 actions b and c ultimately result in an unconditional unit shutdown should an EDG be inoperable while required features on the opposite train are inoperable.

Implementing the intent of NUREG-1432 for operating AC sources removes the inconsistency that exists in the St. Lucie TS. The proposed wording is comparable to action B.2 of STS 3.8.1. As stated in the STS BASES for STS 3.8.1 action B.2:

> *"Required Action B.2 is intended to provide assurance that a loss of offsite power, during the period that a DG is inoperable, does not result in a complete loss of safety function of critical systems..."*

All critical safety-related features are backed by EDGs and are required to be operable by the TS. Moving any possible TS action requirements from the EDG TS to the required feature TS will not prevent the initiation of a required shutdown on the loss of a critical safety-related function. As stated in the STS BASES for STS 3.8.1 action B.2:

> *"... Four hours from the discovery of these events existing concurrently, is acceptable because it minimizes risk while allowing time for restoration before subjecting the unit to transients associated with shutdown.*
>
> *In this Condition, the remaining OPERABLE DG and offsite circuits are adequate to supply electrical power to the onsite Class 1E Distribution System. Thus, on a component basis, single failure protection for the required feature's function may be lost; however, function has not been lost. The 4 hour Completion Time takes into account the OPERABILITY of the redundant counterpart to the inoperable required feature. Additionally, the 4 hour Completion Time takes into account the capacity and capability of the remaining AC sources, a reasonable time for repairs, and the low probability of a DBA occurring during this period."*

If the condition has not been remedied by the end of the four hour completion time, then the feature is declared inoperable. TS actions for loss of any critical safety-related function

would result in a required unit shutdown in the manner and timeframe supported by the existing TS actions for the inoperable feature.

However the STS wording makes allowances for continued operation without those TS required features that are backed by the EDGs, yet are not "critical safety-related" systems, such as some of the accident and radiation monitoring instrumentation. For example, the total loss of a non-critical TS required feature would not result in a TS directed unit shutdown, as long as the TS actions are complied with (e.g., continued operation without the reactor vessel water level monitoring system is allowed as long as alternate means to determine level are available). The existing St. Lucie TS make no such allowances, and TS 3.8.1.1 actions b and c would require an unconditional unit shutdown even though compliance with the required non-critical feature's TS action statement would allow continued operation of the unit.

Additionally, the existing requirement to verify operability of the turbine driven auxiliary feedwater pump is being revised and reformatted to meet the intent of the STS BASES for STS 3.8.1 action B.2:

> *"... These features are designed with redundant safety related trains. This includes motor driven auxiliary feedwater pumps. Single train systems, such as turbine driven auxiliary feedwater pumps, are not included. Redundant required feature failures consist of inoperable features with a train, redundant to the train that has an inoperable DG."*

Additionally, a reviewer's note states that:

> *"The turbine driven auxiliary feedwater pump is only required to be considered a redundant feature, and therefore, required to be determined operable by this Required Action, if the design is such that the remaining OPERABLE motor or turbine driven auxiliary feedwater pump(s) is not by itself capable (without any reliance on the motor driven auxiliary feedwater pump powered by the emergency bus associated with the inoperable diesel generator) of providing 100% of the auxiliary feedwater flow assumed in the analysis."*

The St. Lucie Chapter 15 accident analyses assume that two motor driven auxiliary feedwater pumps are equal to and redundant to the one steam driven auxiliary feedwater pump. Therefore, the TS requirements to assure that steam driven auxiliary feedwater pump operability is considered as part of the redundant features requirements should remain. The proposed format and wording for this requirements is comparable to the intent of the BASES of STS 3.8.1.

CONCLUSION

The proposed changes to Technical Specification 3.8.1.1 actions b and c are acceptable. The proposed changes remove the unconditional unit shutdown requirement should an EDG be inoperable while required feature(s) on the opposite train are inoperable. Instead any TS required actions are appropriately based on the inoperability of the required feature. Although the proposed four hour completion time is less restrictive than the current two hour verification for opposite train operability, the four hour completion time takes into account the capacity and capability of the remaining AC sources, a reasonable time for repairs, and the low probability of a DBA occurring during this period. Once the completion time expires, the timeframes for actions taken are supported by the existing St. Lucie TS. Additionally, the TS requirements to assure that steam driven auxiliary feedwater pump operability is considered as part of the redundant feature requirements remains and are comparable to the intent of the BASES of STS 3.8.1.

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

Description of amendment request: The proposed license amendments (PLAs) to Facility Operating Licenses DPR-67 for St. Lucie Unit 1 and NPF-16 for St. Lucie Unit 2 will revise actions b and c of TS 3.8.1.1 to be comparable with the actions specified in revision 2 of NUREG-1432, "Standard Technical Specifications, Combustion Engineering Plant," when an emergency diesel generator (EDG) is inoperable.

Pursuant to 10 CFR 50.92, a determination may be made that a proposed license amendment involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated; (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety. Each standard is discussed as follows.

1) Would operation of the facility in accordance with the proposed amendments involve a significant increase in the probability or consequences of an accident previously evaluated?

   Neither the steam driven auxiliary feedwater pump nor the EDGs are accident initiators, but are accident mitigators. The proposed changes to the EDG TS do not affect the operation nor availability of the EDGs, the motor or steam driven auxiliary feedwater pumps, nor TS required redundant features. For those conditions that would require a unit shutdown, once the four hour completion time had expired, the shutdown would be performed in the manner and timeframe supported by the existing redundant feature TS. Therefore, the probability or consequences of any accident previously evaluated have not been significantly increased.

2) Would operation of the facility in accordance with the proposed amendments create the possibility of a new or different kind of accident from any accident previously evaluated?

   No new failure modes are introduced by the proposed TS changes and single failure considerations are adequately addressed by following the established conventions of NUREG-1432. The proposed four hour completion time from the discovery of inoperable redundant features and an EDG takes into account the operability of the redundant counterpart to the inoperable required feature, the capacity and capability of the remaining AC sources, a reasonable time for repairs, and the low probability of a DBA occurring during this period. The TS change required reformatting and moving the steam driven auxiliary feedwater pump operability requirements to the redundant feature(s) actions to be comparable with and meet the intent of the BASES requirements contained in NUREG-1432. Without creation of a new interaction of

materials, operating configuration, or operating interfaces, there is no possibility that the proposed changes can introduce a new or different kind of accident.

3) Would operation of the facility in accordance with the proposed amendments involve a significant reduction in a margin of safety?

The margin of safety as defined in the basis for any Technical Specification or in any licensing document has not been reduced. The proposed changes remove the unconditional unit shutdown requirement should an EDG be inoperable while required features on the opposite train are inoperable. Instead, any TS required actions are appropriately based on the inoperability of the required feature. The proposed four hour completion time from the discovery of inoperable redundant features and an EDG takes into account the operability of the redundant counterpart to the inoperable required feature, the capacity and capability of the remaining AC sources, a reasonable time for repairs, and the low probability of a DBA occurring during this period. For those conditions that would require a unit shutdown, once the four hour completion time had expired, the shutdown would be performed in the manner and timeframe supported by the existing redundant feature TS. Additionally, the TS requirements to assure that steam driven auxiliary feedwater pump operability is considered as part of the redundant features requirements remains and is comparable to the intent of the BASES of STS 3.8.1. Based on the preceding discussion, FPL concludes that the margin of safety will not be significantly reduced by operation of the facility in accordance with the proposed amendments.

Based on the determination made above, it is concluded that the proposed amendments do not involve any significant hazards.

Environmental Consideration

The proposed license amendments change requirements with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The proposed amendments involve no significant increase in the amounts and no significant change in the types of any effluents that may be released offsite, and no significant increase in individual or cumulative occupational radiation exposure. FPL concluded that the proposed amendments involve no significant hazards consideration and meet the criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) and that, pursuant to 10 CFR 51.22(b), an environmental impact statement or environmental assessment need not be prepared in connection with issuance of the amendments.

Conclusion

FPL concludes, 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.

ST. LUCIE UNIT 1 MARKED UP TECHNICAL SPECIFICATION PAGES

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3/4.8 ELECTRICAL POWER SYSTEMS

3/4.8.1 A.C. SOURCES

OPERATING

LIMITING CONDITION FOR OPERATION

3.8.1.1 As a minimum, the following A.C. electrical power sources shall be OPERABLE:

a. Two physically independent circuits between the offsite transmission network and the onsite Class 1E distribution system, and

b. Two separate and independent diesel generator sets each with:

1. Engine-mounted fuel tanks containing a minimum of 152 gallons of fuel,

2. A separate fuel storage system containing a minimum of 16,450 gallons of fuel, and

3. A separate fuel transfer pump.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

a. With one offsite circuit of 3.8.1.1.a inoperable, except as provided in Action f. below, demonstrate the OPERABILITY of the remaining A.C. sources by performing Surveillance Requirement 4.8.1.1.1.a within 1 hour and at least once per 8 hours thereafter. Restore the offsite circuit to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and COLD SHUTDOWN within the following 30 hours.

b. With one diesel generator of 3.8.1.1.b inoperable, demonstrate the OPERABILITY of the A.C. sources by performing Surveillance Requirement 4.8.1.1.1.a within 1 hour and at least once per 8 hours thereafter; and if the EDG became inoperable due to any cause other than an inoperable support system, an independently testable component, or preplanned preventative maintenance or testing, demonstrate the OPERABILITY of the remaining OPERABLE EDG by performing Surveillance Requirement 4.8.1.1.2.a.4 within 8 hours, unless it can be confirmed that the cause of the inoperable EDG does not exist on the remaining EDG*; restore the diesel generator to OPERABLE status within 14 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours. Additionally, ~~verify within 2 hours or be in HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours that:~~ Insert

* If the absence of any common-cause failure cannot be confirmed, this test shall be completed regardless of when the inoperable EDG is restored to OPERABILITY.

ELECTRICAL POWER SYSTEMS

ACTION (continued)

~~1. all required systems, subsystems, trains, components and devices that depend on the remaining OPERABLE diesel generator as a source of emergency power are also OPERABLE, and~~

~~2. when in MODE 1, 2 or 3, the steam-driven auxiliary feed pump is OPERABLE.~~

c. With one offsite A.C. circuit and one diesel generator inoperable, demonstrate the OPERABILITY of the remaining A.C. sources by performing Surveillance Requirement 4.8.1.1.1.a within one hour and at least once per 8 hours thereafter; and if the EDG became inoperable due to any cause other than an inoperable support system, an independently testable component, or preplanned preventative maintenance or testing, demonstrate the OPERABILITY of the remaining OPERABLE EDG by performing Surveillance Requirement 4.8.1.1.2.a.4 within 8 hours unless it can be confirmed that the cause of the inoperable EDG does not exist on the remaining EDG*. Restore at least one of the inoperable sources to OPERABLE status within 12 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours. Restore the other A.C. power source (offsite circuit or diesel generator) to OPERABLE status in accordance with the provisions of Section 3.8.1.1 ACTION Statement a or b, as appropriate, with the time requirement of that ACTION Statement based on the time of the initial loss of the remaining inoperable A.C. power source. Additionally, ~~verify within 2 hours or be in HOT STANDBY within the next 6 hours and COLD SHUTDOWN within the following 30 hours that:~~ Insert

~~1. all required systems, subsystems, trains, components and devices that depend on the remaining OPERABLE diesel generator as a source of emergency power are also OPERABLE, and~~

~~2. When in Mode 1, 2 or 3, the steam-driven auxiliary feed pump is OPERABLE.~~

d. With two of the required offsite A.C. circuits inoperable, restore one of the inoperable offsite sources to OPERABLE status within 24 hours or be in at least HOT STANDBY within the next 6 hours. Following restoration of one offsite source, follow ACTION Statement a. with the time requirement of that ACTION Statement based on the time of the initial loss of the remaining inoperable offsite A.C. circuit.

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* If the absence of any common-cause failure cannot be confirmed, this test shall be completed regardless of when the inoperable EDG is restored to OPERABILITY.

Insert

within 4 hours from the discovery of concurrent inoperability of required redundant feature(s) (including the steam driven auxiliary feed pump in MODE 1, 2, and 3), declare required feature(s) supported by the inoperable EDG inoperable if its redundant required feature(s) is inoperable.

ST. LUCIE UNIT 2 MARKED UP TECHNICAL SPECIFICATION PAGES

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3/4.8 ELECTRICAL POWER SYSTEMS

3/4.8.1 A.C. SOURCES

OPERATING

LIMITING CONDITION FOR OPERATION

3.8.1.1 As a minimum, the following A.C. electrical power sources shall be OPERABLE:

a. Two physically independent circuits between the offsite transmission network and the onsite Class 1E distribution system, and

b. Two separate and independent diesel generators, each with:

1. Two separate engine-mounted fuel tanks containing a minimum volume of 200 gallons of fuel each,

2. A separate fuel storage system containing a minimum volume of 40,000 gallons of fuel, and

3. A separate fuel transfer pump.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

a. With one offsite circuit of 3.8.1.1.a inoperable, except as provided in Action f. below, demonstrate the OPERABILITY of the remaining A.C. sources by performing Surveillance Requirement 4.8.1.1.1.a within 1 hour and at least once per 8 hours thereafter. Restore the offsite circuit to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and COLD SHUTDOWN within the following 30 hours.

b. With one diesel generator of 3.8.1.1.b inoperable, demonstrate the OPERABILITY of the A.C. sources by performing Surveillance Requirement 4.8.1.1.1.a within 1 hour and at least once per 8 hours thereafter; and if the EDG became inoperable due to any cause other than an inoperable support system, an independently testable component, or preplanned preventative maintenance or testing, demonstrate the OPERABILITY of the remaining OPERABLE EDG by performing Surveillance Requirement 4.8.1.1.2a.4 within 8 hours, unless it can be confirmed that the cause of the inoperable EDG does not exist on the remaining EDG*; restore the diesel generator to OPERABLE status within 14 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours. Additionally, ~~verify within 2 hours or be in HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours that:~~ Insert

* If the absence of any common-cause failure cannot be confirmed, this test shall be completed regardless of when the inoperable EDG is restored to OPERABILITY.

ELECTRICAL POWER SYSTEMS

ACTION: (Continued)

~~1. All required systems, subsystems, trains, components and devices that depend on the remaining OPERABLE diesel generator as a source of emergency power are also OPERABLE, and~~

~~2. When in MODE 1, 2 or 3, the steam-driven auxiliary feed pump is OPERABLE.~~

c. With one offsite A.C. circuit and one diesel generator inoperable, demonstrate the OPERABILITY of the remaining A.C. sources by performing Surveillance Requirement 4.8.1.1.1.a within one hour and at least once per 8 hours thereafter; and if the EDG became inoperable due to any cause other than an inoperable support system, an independently testable component, or preplanned preventative maintenance or testing, demonstrate the OPERABILITY of the remaining OPERABLE EDG by performing Surveillance Requirement 4.8.1.1.2a.4 within 8 hours, unless it can be confirmed that the cause of the inoperable EDG does not exist on the remaining EDG*. Restore at least one of the inoperable sources to OPERABLE status within 12 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours. Restore the other A.C. power source (offsite circuit or diesel generator) to OPERABLE status in accordance with the provisions of Section 3.8.1.1 ACTION Statement a or b, as appropriate, with the time requirement of that ACTION Statement based on the time of the initial loss of the remaining inoperable A.C. power source. Additionally, ~~verify within 2 hours or be in HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours that:~~ Insert

~~1. All required systems, subsystems, trains, components and devices that depend on the remaining OPERABLE diesel generator as a source of emergency power are also OPERABLE, and~~

~~2. When in Mode 1, 2, or 3, the steam-driven auxiliary feed pump is OPERABLE.~~

* If the absence of any common-cause failure cannot be confirmed, this test shall be completed regardless of when the inoperable EDG is restored to OPERABILITY.

Insert

within 4 hours from the discovery of concurrent inoperability of required redundant feature(s) (including the steam driven auxiliary feed pump in MODE 1, 2, and 3), declare required feature(s) supported by the inoperable EDG inoperable if its redundant required feature(s) is inoperable.