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February 12, 2002

United States Nuclear Regulatory Commission
ATTENTION: Document Control Desk
Washington, DC 20555-0001

SUBJECT: Duke Energy Corporation
McGuire Nuclear Station Units 1 and 2
Docket Nos. 50-369 and 50-370
Technical Specification Bases Revision

Attached is a revision to McGuire Technical Specification (TS) 3.8.9 Bases, Distribution Systems - Operating. This revision clarifies that the safety related motor control centers (MCCs) listed in Table B 3.8.9-1 also include all associated safety related sub-MCCs. This revision has been processed consistent with the requirements of TS 5.5.14, TS Bases Control Program.

Attachment 1 contains the revised TS Bases List of Effective Sections. Attachment 2 contains revised TS Bases 3.8.9.

Please contact P.T. Vu at (704) 875-4302 if you have any questions.

Very truly yours,

H. B. Barron

HBB/PTV/s

Attachments

A001

U. S. Nuclear Regulatory Commission
February 12, 2002
Page 2

Xc w/attachments:

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L. Nicholson (ON03RC)

ATTACHMENT 1

REVISED TS BASES LIST OF EFFECTIVE SECTIONS

McGuire Nuclear Station Technical Specifications
List of Effective Pages and Bases List of Effective Sections

Page Number	Amendment	Revision Date
i	184/166	9/30/98
ii	184/166	9/30/98
iii	184/166	9/30/98
iv	184/166	9/30/98
1.1-1	184/166	9/30/98
1.1-2	184/166	9/30/98
1.1-3	184/166	9/30/98
1.1-4	194/175	9/18/00
1.1-5	194/175	9/18/00
1.1-6	194/175	9/18/00
1.1-7	194/175	9/18/00
1.2-1	184/166	9/30/98
1.2-2	184/166	9/30/98
1.2-3	184/166	9/30/98
1.3-1	184/166	9/30/98
1.3-2	184/166	9/30/98
1.3-3	184/166	9/30/98
1.3-4	184/166	9/30/98
1.3-5	184/166	9/30/98
1.3-6	184/166	9/30/98
1.3-7	184/166	9/30/98
1.3-8	184/166	9/30/98
1.3-9	184/166	9/30/98
1.3-10	184/166	9/30/98
1.3-11	184/166	9/30/98
1.3-12	184/166	9/30/98
1.3-13	184/166	9/30/98
1.4-1	184/166	9/30/98
1.4-2	184/166	9/30/98
1.4-3	184/166	9/30/98
1.4-4	184/166	9/30/98

Page Number	Amendment	Revision Date
2.0-1	184/166	9/30/98
2.0-2	191/172	3/20/00
3.0-1	184/166	9/30/98
3.0-2	184/166	9/30/98
3.0-3	184/166	9/30/98
3.0-4	184/166	9/30/98
3.0-5	184/166	9/30/98
3.1.1-1	184/166	9/30/98
3.1.2-1	184/166	9/30/98
3.1.2-2	184/166	9/30/98
3.1.3-1	184/166	9/30/98
3.1.3-2	184/166	9/30/98
3.1.3-3	184/166	9/30/98
3.1.4-1	184/166	9/30/98
3.1.4-2	184/166	9/30/98
3.1.4-3	184/166	9/30/98
3.1.4-4	186/167	9/8/99
3.1.5-1	184/166	9/30/98
3.1.5-2	184/166	9/30/98
3.1.6-1	184/166	9/30/98
3.1.6-2	184/166	9/30/98
3.1.6-3	184/166	9/30/98
3.1.7-1	184/166	9/30/98
3.1.7-2	184/166	9/30/98
3.1.8-1	184/166	9/30/98
3.1.8-2	184/166	9/30/98
3.2.1-1	184/166	9/30/98
3.2.1-2	184/166	9/30/98
3.2.1-3	184/166	9/30/98
3.2.1-4	188/169	9/22/99
3.2.1-5	188/169	9/22/99
3.2.2-1	184/166	9/30/98
3.2.2-2	184/166	9/30/98

Page Number	Amendment	Revision Date
3.2.2-3	184/166	9/30/98
3.2.2-4	188/169	9/22/99
3.2.3-1	184/166	9/30/98
3.2.4-1	184/166	9/30/98
3.2.4-2	184/166	9/30/98
3.2.4-3	184/166	9/30/98
3.2.4-4	184/166	9/30/98
3.3.1-1	184/166	9/30/98
3.3.1-2	184/166	9/30/98
3.3.1-3	184/166	9/30/98
3.3.1-4	184/166	9/30/98
3.3.1-5	184/166	9/30/98
3.3.1-6	184/166	9/30/98
3.3.1-7	184/166	9/30/98
3.3.1-8	184/166	9/30/98
3.3.1-9	184/166	9/30/98
3.3.1-10	184/166	9/30/98
3.3.1-11	184/166	9/30/98
3.3.1-12	184/166	9/30/98
3.3.1-13	184/166	9/30/98
3.3.1-14	194/175	9/18/00
3.3.1-15	194/175	9/18/00
3.3.1-16	194/175	9/18/00
3.3.1-17	194/175	9/18/00
3.3.1-18	194/175	9/18/00
3.3.1-19	194/175	9/18/00
3.3.1-20	184/166	9/30/98
3.3.2-1	184/166	9/30/98
3.3.2-2	184/166	9/30/98
3.3.2-3	184/166	9/30/98
3.3.2-4	184/166	9/30/98
3.3.2-5	184/166	9/30/98
3.3.2-6	198/179	4/12/01

Page Number	Amendment	Revision Date
3.3.2-7	198/179	4/12/01
3.3.2-8	184/166	9/30/98
3.3.2-9	184/166	9/30/98
3.3.2-10	194/175	9/18/00
3.3.2-11	194/175	9/18/00
3.3.2-12	194/175	9/18/00
3.3.2-13	198/179	4/12/01
3.3.2-14	194/175	9/18/00
3.3.2-15	184/166	9/30/98
3.3.3-1	184/166	9/30/98
3.3.3-2	184/166	9/30/98
3.3.3-3	184/166	9/30/98
3.3.3-4	184/166	9/30/98
3.3.4-1	184/166	9/30/98
3.3.4-2	184/166	9/30/98
3.3.4-3	184/166	9/30/98
3.3.5-1	184/166	9/30/98
3.3.5-2	194/175	9/18/00
3.3.6-1	184/166	9/30/98
3.3.6-2	184/166	9/30/98
3.3.6-3	194/175	9/18/00
3.4.1-1	191/172	3/20/00
3.4.1-2	191/175	3/20/00
3.4.1-3	184/166	9/30/98
3.4.1-4	191/172	3/20/00
3.4.2-1	184/166	9/30/98
3.4.3-1	184/166	9/30/98
3.4.3-2	184/166	9/30/98
3.4.3-3	184/166	9/30/98
3.4.3-4	184/166	9/30/98
3.4.3-5	184/166	9/30/98
3.4.3-6	184/166	9/30/98
3.4.4-1	184/166	9/30/98

Page Number	Amendment	Revision Date
3.4.5-1	184/166	9/30/98
3.4.5-2	184/166	9/30/98
3.4.5-3	184/166	9/30/98
3.4.6-1	184/166	9/30/98
3.4.6-2	184/166	9/30/98
3.4.7-1	184/166	9/30/98
3.4.7-2	184/166	9/30/98
3.4.8-1	184/166	9/30/98
3.4.8-2	184/166	9/30/98
3.4.9-1	184/166	9/30/98
3.4.9-2	184/166	9/30/98
3.4.10-1	184/166	9/30/98
3.4.10-2	184/166	9/30/98
3.4.11-1	184/166	9/30/98
3.4.11-2	184/166	9/30/98
3.4.11-3	184/166	9/30/98
3.4.11-4	184/166	9/30/98
3.4.12-1	184/166	9/30/98
3.4.12-2	184/166	9/30/98
3.4.12-3	184/166	9/30/98
3.4.12-4	184/166	9/30/98
3.4.12-5	184/166	9/30/98
3.4.12-6	184/166	9/30/98
3.4.13-1	184/166	9/30/98
3.4.13-2	184/166	9/30/98
3.4.14-1	184/166	9/30/98
3.4.14-2	184/166	9/30/98
3.4.14-3	184/166	9/30/98
3.4.14-4	184/166	9/30/98
3.4.15-1	184/166	9/30/98
3.4.15-2	184/166	9/30/98
3.4.15-3	184/166	9/30/98
3.4.16-1	184/166	9/30/98

Page Number	Amendment	Revision Date
3.4.16-2	184/166	9/30/98
3.4.16-3	184/166	9/30/98
3.4.16-4	184/166	9/30/98
3.4.17-1	184/166	9/30/98
3.5.1-1	184/166	9/30/98
3.5.1-2	184/166	9/30/98
3.5.2-1	184/166	9/30/98
3.5.2-2	184/166	9/30/98
3.5.2-3	184/166	9/30/98
3.5.3-1	184/166	9/30/98
3.5.3-2	184/166	9/30/98
3.5.4-1	184/166	9/30/98
3.5.4-2	184/166	9/30/98
3.5.5-1	184/166	9/30/98
3.5.5-2	184/166	9/30/98
3.6.1-1	184/166	9/30/98
3.6.1-2	184/166	9/30/98
3.6.2-1	184/166	9/30/98
3.6.2-2	184/166	9/30/98
3.6.2-3	184/166	9/30/98
3.6.2-4	184/166	9/30/98
3.6.2-5	184/166	9/30/98
3.6.3-1	184/166	9/30/98
3.6.3-2	184/166	9/30/98
3.6.3-3	184/166	9/30/98
3.6.3-4	184/166	9/30/98
3.6.3-5	184/166	9/30/98
3.6.3-6	184/166	9/30/98
3.6.3-7	184/166	9/30/98
3.6.4-1	184/166	9/30/98
3.6.5-1	184/166	9/30/98
3.6.5-2	184/166	9/30/98
3.6.6-1	184/166	9/30/98

Page Number	Amendment	Revision Date
3.6.6-2	184/166	9/30/98
3.6.7-1	184/166	9/30/98
3.6.7-2	184/166	9/30/98
3.6.8-1	184/166	9/30/98
3.6.8-2	184/166	9/30/98
3.6.9-1	184/166	9/30/98
3.6.9-2	184/166	9/30/98
3.6.10-1	184/166	9/30/98
3.6.10-2	184/166	9/30/98
3.6.11-1	184/166	9/30/98
3.6.11-2	184/166	9/30/98
3.6.12-1	184/166	9/30/98
3.6.12-2	184/166	9/30/98
3.6.12-3	184/166	9/30/98
3.6.13-1	184/166	9/30/98
3.6.13-2	184/166	9/30/98
3.6.13-3	184/166	9/30/98
3.6.14-1	184/166	9/30/98
3.6.14-2	184/166	9/30/98
3.6.14-3	184/166	9/30/98
3.6.15-1	184/166	9/30/98
3.6.15-2	184/166	9/30/98
3.6.16-1	184/166	9/30/98
3.6.16-2	184/166	9/30/98
3.7.1-1	184/166	9/30/98
3.7.1-2	184/166	9/30/98
3.7.1-3	184/166	9/30/98
3.7.2-1	184/166	9/30/98
3.7.2-2	184/166	9/30/98
3.7.3-1	184/166	9/30/98
3.7.3-2	184/166	9/30/98
3.7.4-1	184/166	9/30/98
3.7.4-2	184/166	9/30/98

Page Number	Amendment	Revision Date
3.7.5-1	184/166	9/30/98
3.7.5-2	184/166	9/30/98
3.7.5-3	184/166	9/30/98
3.7.5-4	184/166	9/30/98
3.7.6-1	184/166	9/30/98
3.7.6-2	184/166	9/30/98
3.7.7-1	184/166	9/30/98
3.7.7-2	184/166	9/30/98
3.7.8-1	184/166	9/30/98
3.7.8-2	184/166	9/30/98
3.7.9-1	187/168	9/22/99
3.7.9-2	187/168	9/22/99
3.7.9-3	184/166	9/30/98
3.7.10-1	184/166	9/30/98
3.7.10-2	184/166	9/30/98
3.7.11-1	184/166	9/30/98
3.7.11-2	184/166	9/30/98
3.7.12-1	184/166	9/30/98
3.7.12-2	184/166	9/30/98
3.7.13-1	184/166	9/30/98
3.7.14-1	184/166	9/30/98
3.7.15-1	197/178	11/27/00
3.7.15-2	197/178	11/27/00
3.7.15-3	197/178	11/27/00
3.7.15-4	197/178	11/27/00
3.7.15-5	197/178	11/27/00
3.7.15-6	197/178	11/27/00
3.7.15-7	197/178	11/27/00
3.7.15-8	197/178	11/27/00
3.7.15-9	197/178	11/27/00
3.7.15-10	197/178	11/27/00
3.7.15-11	197/178	11/27/00
3.7.15-12	197/178	11/27/00

Page Number	Amendment	Revision Date
3.7.15-13	197/178	11/27/00
3.7.15-14	197/178	11/27/00
3.7.15-15	197/178	11/27/00
3.7.15-16	197/178	11/27/00
3.7.15-17	197/178	11/27/00
3.7.15-18	197/178	11/27/00
3.7.15-19	197/178	11/27/00
3.7.15-20	197/178	11/27/00
3.7.15-21	197/178	11/27/00
3.7.16-1	184/166	9/30/98
3.8.1-1	184/166	9/30/98
3.8.1-2	184/166	9/30/98
3.8.1-3	184/166	9/30/98
3.8.1-4	184/166	9/30/98
3.8.1-5	184/166	9/30/98
3.8.1-6	184/166	9/30/98
3.8.1-7	184/166	9/30/98
3.8.1-8	192/173	3/15/00
3.8.1-9	184/166	9/30/98
3.8.1-10	184/166	9/30/98
3.8.1-11	192/173	3/15/00
3.8.1-12	184/166	9/30/98
3.8.1-13	184/166	9/30/98
3.8.1-14	184/166	9/30/98
3.8.1-15	184/166	9/30/98
3.8.2-1	184/166	9/30/98
3.8.2-2	184/166	9/30/98
3.8.2-3	184/166	9/30/98
3.8.3-1	184/166	9/30/98
3.8.3-2	184/166	9/30/98
3.8.3-3	184/166	9/30/98
3.8.4-1	184/166	9/30/98
3.8.4-2	184/166	9/30/98

Page Number	Amendment	Revision Date
3.8.4-3	184/166	9/30/98
3.8.5-1	184/166	9/30/98
3.8.5-2	184/166	9/30/98
3.8.6-1	184/166	9/30/98
3.8.6-2	184/166	9/30/98
3.8.6-3	184/166	9/30/98
3.8.6-4	184/166	9/30/98
3.8.7-1	184/166	9/30/98
3.8.8-1	184/166	9/30/98
3.8.8-2	184/166	9/30/98
3.8.9-1	184/166	9/30/98
3.8.9-2	184/166	9/30/98
3.8.10-1	184/166	9/30/98
3.8.10-2	184/166	9/30/98
3.9.1-1	184/166	9/30/98
3.9.2-1	184/166	9/30/98
3.9.3-1	184/166	9/30/98
3.9.3-2	184/166	9/30/98
3.9.4-1	184/166	9/30/98
3.9.4-2	184/166	9/30/98
3.9.5-1	184/166	9/30/98
3.9.5-2	184/166	9/30/98
3.9.6-1	184/166	9/30/98
3.9.6-2	184/166	9/30/98
3.9.7-1	184/166	9/30/98
4.0.1	197/178	11/27/00
4.0.2	197/178	11/27/00
5.1-1	184/166	9/30/98
5.2-1	184/166	9/30/98
5.2-2	184/166	9/30/98
5.2-3	184/166	9/30/98
5.3-1	184/166	9/30/98
5.4-1	184/166	9/30/98

Page Number	Amendment	Revision Date
5.5-1	184/166	9/30/98
5.5-2	184/166	9/30/98
5.5-3	184/166	9/30/98
5.5-4	184/166	9/30/98
5.5-5	190/171	12/21/99
5.5-6	184/166	9/30/98
5.5-7	184/166	9/30/98
5.5-8	184/166	9/30/98
5.5-9	184/166	9/30/98
5.5-10	184/166	9/30/98
5.5-11	184/166	9/30/98
5.5-12	184/166	9/30/98
5.5-13	184/166	9/30/98
5.5-14	196/177	11/2/00
5.5-15	184/166	9/30/98
5.5-16	184/166	9/30/98
5.5-17	184/166	9/30/98
5.5-18	184/166	9/30/98
5.6-1	184/166	9/30/98
5.6-2	184/166	9/30/98
5.6-3	188/169	9/22/99
5.6-4	195/176	9/22/00
5.6-5	184/166	9/30/98
5.7-1	184/166	9/30/98
5.7-2	184/166	9/30/98

BASES

(Revised per section)

i	Revision 0	9/30/98
ii	Revision 0	9/30/98
iii	Revision 0	9/30/98
B 2.1.1	Revision 0	9/30/98
B 2.1.2	Revision 0	9/30/98

Page Number	Amendment	Revision Date
B 3.0	Revision 0	9/30/98
B 3.1.1	Revision 0	9/30/98
B 3.1.2	Revision 10	9/22/00
B 3.1.3	Revision 10	9/22/00
B 3.1.4	Revision 0	9/30/98
B 3.1.5	Revision 19	1/10/02
B 3.1.6	Revision 0	9/30/98
B 3.1.7	Revision 15	01/04/01
B 3.1.8	Revision 0	9/30/98
B 3.2.1	Revision 10	9/22/00
B 3.2.2	Revision 10	9/22/00
B 3.2.3	Revision 0	9/30/98
B 3.2.4	Revision 10	9/22/00
B 3.3.1	Revision 23	1/15/02
B 3.3.2	Revision 16	10/9/01
B 3.3.3	Revision 23	1/15/02
B 3.3.4	Revision 0	9/30/98
B 3.3.5	Revision 11	9/18/00
B 3.3.6	Revision 0	9/30/98
B 3.4.1	Revision 8	3/20/00
B 3.4.2	Revision 0	9/30/98
B 3.4.3	Revision 0	9/30/98
B 3.4.4	Revision 0	9/30/98
B 3.4.5	Revision 0	9/30/98
B 3.4.6	Revision 0	9/30/98
B 3.4.7	Revision 0	9/30/98
B 3.4.8	Revision 0	9/30/98
B 3.4.9	Revision 0	9/30/98
B 3.4.10	Revision 0	9/30/98
B 3.4.11	Revision 0	9/30/98
B 3.4.12	Revision 12	8/23/00
B 3.4.13	Revision 0	9/30/98
B 3.4.14	Revision 0	9/30/98

Page Number	Amendment	Revision Date
B 3.4.15	Revision 0	9/30/98
B 3.4.16	Revision 0	9/30/98
B 3.4.17	Revision 0	9/30/98
B 3.5.1	Revision 10	9/22/00
B 3.5.2	Revision 10	9/22/00
B 3.5.3	Revision 0	9/30/98
B 3.5.4	Revision 0	9/30/98
B 3.5.5	Revision 0	9/30/98
B 3.6.1	Revision 0	9/30/98
B 3.6.2	Revision 17	10/08/01
B 3.6.3	Revision 18	10/23/01
B 3.6.4	Revision 0	9/30/98
B 3.6.5	Revision 0	9/30/98
B 3.6.6	Revision 0	9/30/98
B 3.6.7	Revision 0	9/30/98
B 3.6.8	Revision 0	9/30/98
B 3.6.9	Revision 0	9/30/98
B 3.6.10	Revision 0	9/30/98
B 3.6.11	Revision 0	9/30/98
B 3.6.12	Revision 0	9/30/98
B 3.6.13	Revision 0	9/30/98
B 3.6.14	Revision 0	9/30/98
B 3.6.15	Revision 0	9/30/98
B 3.6.16	Revision 0	9/30/98
B 3.7.1	Revision 0	9/30/98
B 3.7.2	Revision 0	9/30/98
B 3.7.3	Revision 0	9/30/98
B 3.7.4	Revision 0	9/30/98
B 3.7.5	Revision 0	9/30/98
B 3.7.6	Revision 0	9/30/98
B 3.7.7	Revision 0	9/30/98
B 3.7.8	Revision 0	9/30/98
B 3.7.9	Revision 0	9/30/98

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B 3.7.10	Revision 0	9/30/98
B 3.7.11	Revision 0	9/30/98
B 3.7.12	Revision 6	10/6/99
B 3.7.13	Revision 0	9/30/98
B 3.7.14	Revision 14	11/27/00
B 3.7.15	Revision 14	11/27/00
B 3.7.16	Revision 0	9/30/98
B 3.8.1	Revision 13	1/18/01
B 3.8.2	Revision 21	1/8/02
B 3.8.3	Revision 0	9/30/98
B 3.8.4	Revision 22	1/10/02
B 3.8.5	Revision 0	9/30/98
B 3.8.6	Revision 0	9/30/98
B 3.8.7	Revision 20	1/10/02
B 3.8.8	Revision 0	9/30/98
B 3.8.9	Revision 24	2/4/02
B 3.8.10	Revision 0	9/30/98
B 3.9.1	Revision 0	9/30/98
B 3.9.2	Revision 0	9/30/98
B 3.9.3	Revision 23	1/15/02
B 3.9.4	Revision 0	9/30/98
B 3.9.5	Revision 0	9/30/98
B 3.9.6	Revision 0	9/30/98
B 3.9.7	Revision 0	9/30/98

McGuire Nuclear Station Technical Specifications
List of Effective Pages and Bases List of Effective Sections

Rev to Bases	Rev to LOEF	Bases Affected	Person Responsible
23	23	3.3.1, 3.3.3, 3.9.3	John Weber

ATTACHMENT 2

REVISED TS BASES 3.8.9

B 3.8 ELECTRICAL POWER SYSTEMS

B 3.8.9 Distribution Systems—Operating

BASES

BACKGROUND The onsite Class 1E AC, DC, and AC vital bus electrical power distribution systems are divided by train into two redundant and independent AC, four independent channels (two per train) of DC, and four AC vital buses electrical power distribution subsystems.

The AC electrical power subsystem for each train consists of a primary Engineered Safety Feature (ESF) 4.16 kV bus and secondary 600 V buses, distribution panels, motor control centers and load centers. Each 4.16 kV ESF bus has at least one separate and independent offsite source of power from a 6.9 kV non safety related bus, as well as a dedicated onsite diesel generator (DG) source. Each 6.9 kV bus is normally connected to an offsite source. After a loss of the normal offsite power source to a 6.9 kV bus, an automatic transfer scheme automatically transfers the bus to the alternate offsite source if it is available. A fast transfer occurs if normal and alternate sources are synchronous, otherwise this transfer is done as a slow transfer (time delayed). If the normal and alternate offsite sources are unavailable, the onsite emergency DG supplies power to the 4.16 kV ESF bus. Control power for the 4.16 kV breakers is supplied from the Class 1E batteries. Additional description of this system may be found in the Bases for LCO 3.8.1, "AC Sources—Operating," and the Bases for LCO 3.8.4, "DC Sources—Operating."

The secondary AC electrical power distribution system for each train includes the safety related load centers, motor control centers, and distribution panels shown in Table B 3.8.9-1. Motor control centers shown in Table B 3.8.9-1 also include all submotor control centers such as EMXA1, EMXA2, EMXB1, EMXB2, 1EMXH1, etc.

The 120 VAC vital buses are arranged in two load groups per train and are normally powered from the inverters. The alternate power supply for the vital buses is from the regulated voltage transformers and their use is governed by LCO 3.8.7, "Inverters—Operating." The regulated voltage transformer is powered from a non-Class 1E AC bus.

The list of all required distribution buses is presented in Table B 3.8.9-1.

APPLICABLE SAFETY ANALYSES The initial conditions of Design Basis Accident (DBA) and transient analyses in the UFSAR, Chapter 6 (Ref. 1), and in the UFSAR, Chapter 15 (Ref. 2), assume ESF systems are OPERABLE. The AC, DC,

BASES

APPLICABLE SAFETY ANALYSES (continued)

and AC vital bus electrical power distribution systems are designed to provide sufficient capacity, capability, redundancy, and reliability to ensure the availability of necessary power to ESF systems so that the fuel, Reactor Coolant System, and containment design limits are not exceeded. These limits are discussed in more detail in the Bases for Section 3.2, Power Distribution Limits; Section 3.4, Reactor Coolant System (RCS); and Section 3.6, Containment Systems.

The OPERABILITY of the AC, DC, and AC vital bus electrical power distribution systems is consistent with the initial assumptions of the accident analyses and is based upon meeting the design basis of the unit. This includes maintaining power distribution systems OPERABLE during accident conditions in the event of:

- a. An assumed loss of all offsite power or all onsite AC electrical power; and
- b. A worst case single failure.

The distribution systems satisfy Criterion 3 of 10 CFR 50.36 (c)(2)(ii).

LCO

The required power distribution subsystems listed in Table B 3.8.9-1 ensure the availability of AC, DC, and AC vital bus electrical power for the systems required to shut down the reactor and maintain it in a safe condition after an anticipated operational occurrence (AOO) or a postulated DBA. The AC, DC, and AC vital bus electrical power distribution subsystems are required to be OPERABLE.

Maintaining the Train A and Train B AC, channels of DC, and AC vital buses OPERABLE ensures that the redundancy incorporated into the design of ESF is not defeated. Therefore, a single failure within any system or within the electrical power distribution subsystems will not prevent safe shutdown of the reactor.

OPERABLE AC electrical power distribution subsystems require the associated buses, load centers, motor control centers, and distribution panels to be energized to their proper voltages. OPERABLE DC electrical power distribution subsystems require the associated buses to be energized to their proper voltage from either the associated battery or charger. OPERABLE AC vital bus electrical power distribution subsystems require the associated buses to be energized to their proper voltage from the associated inverter via inverted DC voltage or regulated voltage transformer.

BASES

APPLICABILITY The electrical power distribution subsystems are required to be OPERABLE in MODES 1, 2, 3, and 4 to ensure that:

- a. Acceptable fuel design limits and reactor coolant pressure boundary limits are not exceeded as a result of AOOs or abnormal transients; and
- b. Adequate core cooling is provided, and containment OPERABILITY and other vital functions are maintained in the event of a postulated DBA.

Electrical power distribution subsystem requirements for MODES 5 and 6 are covered in the Bases for LCO 3.8.10, "Distribution Systems—Shutdown."

ACTIONS

A.1

With one or more required AC buses, load centers, motor control centers, or distribution panels, except AC vital buses, in one train inoperable, the remaining AC electrical power distribution subsystem in the other train is capable of supporting the minimum safety functions necessary to shut down the reactor and maintain it in a safe shutdown condition, assuming no single failure. The overall reliability is reduced, however, because a single failure in the remaining power distribution subsystems could result in the minimum required ESF functions not being supported. Therefore, the required AC buses, load centers, motor control centers, and distribution panels must be restored to OPERABLE status within 8 hours.

Condition A worst scenario is one train without AC power (i.e., no offsite power to the train and the associated DG inoperable). In this Condition, the unit is more vulnerable to a complete loss of AC power. It is, therefore, imperative that the unit operator's attention be focused on minimizing the potential for loss of power to the remaining train by stabilizing the unit, and on restoring power to the affected train. The 8 hour time limit before requiring a unit shutdown in this Condition is acceptable because of:

- a. The potential for decreased safety if the unit operator's attention is diverted from the evaluations and actions necessary to restore power to the affected train, to the actions associated with taking the unit to shutdown within this time limit; and
 - b. The potential for an event in conjunction with a single failure of a redundant component in the train with AC power.
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BASES

ACTIONS (continued)

The second Completion Time for Required Action A.1 establishes a limit on the maximum time allowed for any combination of required distribution subsystems to be inoperable during any single contiguous occurrence of failing to meet the LCO. If Condition A is entered while, for instance, a DC bus is inoperable and subsequently restored OPERABLE, the LCO may already have been not met for up to 2 hours. This could lead to a total of 10 hours, since initial failure of the LCO, to restore the AC distribution system. At this time, a DC circuit could again become inoperable, and AC distribution restored OPERABLE. This could continue indefinitely.

The Completion Time allows for an exception to the normal "time zero" for beginning the allowed outage time "clock." This will result in establishing the "time zero" at the time the LCO was initially not met, instead of the time Condition A was entered. The 16 hour Completion Time is an acceptable limitation on this potential to fail to meet the LCO indefinitely.

B.1

With one AC vital bus inoperable, the remaining OPERABLE AC vital buses are capable of supporting the minimum safety functions necessary to shut down the unit and maintain it in the safe shutdown condition. Overall reliability is reduced, however, since an additional single failure could result in the minimum ESF functions not being supported. Therefore, the required AC vital bus must be restored to OPERABLE status within 2 hours by powering the bus from the associated inverter via inverted DC or regulated voltage transformer.

Condition B represents one AC vital bus without power; potentially both the DC source and the associated AC source are nonfunctioning. In this situation, the unit is significantly more vulnerable to a complete loss of all noninterruptible power. It is, therefore, imperative that the operator's attention focus on stabilizing the unit, minimizing the potential for loss of power to the remaining vital buses and restoring power to the affected vital bus.

This 2 hour limit is more conservative than Completion Times allowed for the vast majority of components that are without adequate vital AC power. Taking exception to LCO 3.0.2 for components without adequate vital AC power, that would have the Required Action Completion Times shorter than 2 hours if declared inoperable, is acceptable because of:

- a. The potential for decreased safety by requiring a change in unit conditions (i.e., requiring a shutdown) and not allowing stable operations to continue;

BASES

ACTIONS (continued)

- b. The potential for decreased safety by requiring entry into numerous Applicable Conditions and Required Actions for components without adequate vital AC power and not providing sufficient time for the operators to perform the necessary evaluations and actions for restoring power to the affected train; and
- c. The potential for an event in conjunction with a single failure of a redundant component.

The 2 hour Completion Time takes into account the importance to safety of restoring the AC vital bus to OPERABLE status, the redundant capability afforded by the other OPERABLE vital buses, and the low probability of a DBA occurring during this period.

The second Completion Time for Required Action B.1 establishes a limit on the maximum allowed for any combination of required distribution subsystems to be inoperable during any single contiguous occurrence of failing to meet the LCO. If Condition B is entered while, for instance, an AC bus is inoperable and subsequently returned OPERABLE, the LCO may already have been not met for up to 8 hours. This could lead to a total of 10 hours, since initial failure of the LCO, to restore the vital bus distribution system. At this time, an AC train could again become inoperable, and vital bus distribution restored OPERABLE. This could continue indefinitely.

This Completion Time allows for an exception to the normal "time zero" for beginning the allowed outage time "clock." This will result in establishing the "time zero" at the time the LCO was initially not met, instead of the time Condition B was entered. The 16 hour Completion Time is an acceptable limitation on this potential to fail to meet the LCO indefinitely.

C.1

With one DC bus in one train inoperable, the remaining DC electrical power distribution subsystems are capable of supporting the minimum safety functions necessary to shut down the reactor and maintain it in a safe shutdown condition, assuming no single failure. The overall reliability is reduced, however, because a single failure in the remaining DC electrical power distribution subsystem could result in the minimum required ESF functions not being supported. Therefore, the DC buses must be restored to OPERABLE status within 2 hours by powering the bus from the associated battery or charger.

BASES

ACTIONS (continued)

Condition C represents one DC bus without adequate DC power; potentially both with the battery significantly degraded and the associated charger nonfunctioning. It is, therefore, imperative that the operator's attention focus on stabilizing the unit, minimizing the potential for loss of power to the remaining channels and restoring power to the affected channel.

This 2 hour limit is more conservative than Completion Times allowed for the vast majority of components that would be without power. Taking exception to LCO 3.0.2 for components without adequate DC power, which would have Required Action Completion Times shorter than 2 hours, is acceptable because of:

- a. The potential for decreased safety by requiring a change in unit conditions (i.e., requiring a shutdown) while allowing stable operations to continue;
- b. The potential for decreased safety by requiring entry into numerous applicable Conditions and Required Actions for components without DC power and not providing sufficient time for the operators to perform the necessary evaluations and actions for restoring power to the affected channel; and
- c. The potential for an event in conjunction with a single failure of a redundant component.

The 2 hour Completion Time for DC buses is consistent with Regulatory Guide 1.93 (Ref. 4).

The second Completion Time for Required Action C.1 establishes a limit on the maximum time allowed for any combination of required distribution subsystems to be inoperable during any single contiguous occurrence of failing to meet the LCO. If Condition C is entered while, for instance, an AC bus is inoperable and subsequently returned OPERABLE, the LCO may already have been not met for up to 8 hours. This could lead to a total of 10 hours, since initial failure of the LCO, to restore the DC distribution system. At this time, an AC train could again become inoperable, and DC distribution restored OPERABLE. This could continue indefinitely.

This Completion Time allows for an exception to the normal "time zero" for beginning the allowed outage time "clock." This will result in establishing the "time zero" at the time the LCO was initially not met, instead of the time Condition C was entered. The 16 hour Completion Time is an acceptable limitation on this potential to fail to meet the LCO indefinitely.

BASES

ACTIONS (continued)

D.1 and D.2

If the inoperable distribution subsystem cannot be restored to OPERABLE status within the required Completion Time, the unit must be brought to a MODE in which the LCO does not apply. To achieve this status, the unit must be brought to at least MODE 3 within 6 hours and to MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging plant systems.

E.1

Condition E corresponds to a level of degradation in the electrical power distribution system that causes a required safety function to be lost. When more than one inoperable electrical power distribution subsystem results in the loss of a required function, the plant is in a condition outside the accident analysis. Therefore, no additional time is justified for continued operation. LCO 3.0.3 must be entered immediately to commence a controlled shutdown.

SURVEILLANCE
REQUIREMENTS

SR 3.8.9.1

This Surveillance verifies that the AC, DC, and AC vital bus electrical power distribution systems are functioning properly, with the correct circuit breaker alignment. The correct breaker alignment ensures the appropriate separation and independence of the electrical divisions is maintained, and the appropriate voltage is available to each required bus. The verification of proper voltage availability on the buses ensures that the required voltage is readily available for motive as well as control functions for critical system loads connected to these buses. The 7 day Frequency takes into account the redundant capability of the AC, DC, and AC vital bus electrical power distribution subsystems, and other indications available in the control room that alert the operator to subsystem malfunctions.

REFERENCES

1. UFSAR, Chapter 6.
 2. UFSAR, Chapter 15.
 3. 10 CFR 50.36, Technical Specifications, (c)(2)(ii).
 4. Regulatory Guide 1.93, December 1974.
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BASES

Table B 3.8.9-1 (page 1 of 1)
AC and DC Electrical Power Distribution Systems

TYPE	VOLTAGE	TRAIN A*	TRAIN B*
AC safety buses	4160 V	Essential Bus ETA	Essential Bus ETB
	600 V	Load Centers ELXA, ELXC	Load Centers ELXB, ELXD
	600 V	Motor Control Centers EMXA, EMXC, EMXE, 1EMXG, 1EMXH	Motor Control Centers EMXB, EMXD, EMXF, 2EMXG, 2EMXH
DC buses	125 V	Bus EVDA	Bus EVDB
		Bus EVDC	Bus EVDD
		Distribution Panels EVDA, EVDC	Distribution Panels EVDB, EVDD
AC vital buses	120 V	Bus EKVA	Bus EKVB
		Bus EKVC	Bus EKVD

* Each train of the AC and DC electrical power distribution systems is a subsystem.