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SUSQUEHANNA STEAM ELECTRIC STATION
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NFM TSB1 text LOES

B 3.8 ELECTRICAL POWER SYSTEMS

B 3.8.1 AC Sources - Operating

BASES

BACKGROUND

The unit Class 1E AC Electrical Power Distribution System AC sources consist of two offsite power sources (preferred power sources, normal and alternate), and the onsite standby power sources (diesel generators (DGs) A, B, C and D). A fifth diesel generator, DG E, can be used as a substitute for any one of the four DGs A, B, C or D. As required by 10 CFR 50, Appendix A, GDC 17 (Ref. 1), the design of the AC electrical power system provides independence and redundancy to ensure an available source of power to the Engineered Safety Feature (ESF) systems.

The Class 1E AC distribution system is divided into redundant load groups, so loss of any one group does not prevent the minimum safety functions from being performed. Each load group has connections to two preferred offsite power supplies and a single DG.

The two qualified circuits between the offsite transmission network and the onsite Class 1E AC Electrical Power Distribution System are supported by two independent offsite power sources. A 230 kV line from the Susquehanna T10 230 kV switching station feeds start-up transformer No. 10; and, a 230 kV tap from the 500-230 kV tie line feeds the startup transformer No. 20.

The two independent offsite power sources are supplied to and are shared by both units. These two electrically and physically separated circuits provide AC power, through startup transformers (ST) No. 10 and ST No. 20, to the four 4.16 kV Engineered Safeguards System (ESS) buses (A, B, C and D) for both Unit 1 and Unit 2. A detailed description of the offsite power network and circuits to the onsite Class 1E ESS buses is found in the FSAR, Section 8.2 (Ref. 2).

An offsite circuit consists of all breakers, transformers, switches, automatic tap changers, interrupting devices, cabling, and controls required to transmit power from the offsite transmission network to the onsite Class 1E ESS bus or buses.

(continued)

BASES

BACKGROUND (continued)

ST No. 10 and ST No. 20 each provide the normal source of power to two of the four 4.16 kV ESS buses in each Unit and the alternate source of power to the remaining two 4.16 kV ESS buses in each Unit. If any 4.16 kV ESS bus loses power, an automatic transfer from the normal to the alternate occurs after the normal supply breaker trips.

When off-site power is available to the 4.16 kV ESS Buses following a LOCA signal, the required ESS loads will be sequenced onto the 4.16 kV ESS Buses in order to compensate for voltage drops in the onsite power system when starting large ESS motors.

The onsite standby power source for 4.16 kV ESS buses A, B, C and D consists of five DGs. DGs A, B, C and D are dedicated to ESS buses A, B, C and D, respectively. DG E can be used as a substitute for any one of the four DGs (A, B, C or D) to supply the associated ESS bus. Each DG provides standby power to two 4.16 kV ESS buses—one associated with Unit 1 and one associated with Unit 2. The four "required" DGs are those aligned to a 4.16 kV ESS bus to provide onsite standby power for both Unit 1 and Unit 2.

A DG, when aligned to an ESS bus, starts automatically on a loss of coolant accident (LOCA) signal (i.e., low reactor water level signal or high drywell pressure signal) or on an ESS bus degraded voltage or undervoltage signal. After the DG has started, it automatically ties to its respective bus after offsite power is tripped as a consequence of ESS bus undervoltage or degraded voltage, independent of or coincident with a LOCA signal. The DGs also start and operate in the standby mode without tying to the ESS bus on a LOCA signal alone. Following the trip of offsite power, non-permanent loads are stripped from the 4.16 kV ESS Buses. When a DG is tied to the ESS Bus, loads are then sequentially connected to their respective ESS Bus by individual load timers. The individual load timers control the starting permissive signal to motor breakers to prevent overloading the associated DG.

In the event of loss of normal and alternate offsite power supplies, the 4.16 kV ESS buses will shed all loads except the 480 V load centers and the standby diesel generators will connect to the ESS busses. When a DG is tied to its respective ESS bus, loads are then sequentially connected to

(continued)

BASES

BACKGROUND (continued)

the ESS bus by individual load timers which control the permissive and starting signals to motor breakers to prevent overloading the DG.

In the event of a loss of normal and alternate offsite power supplies, the ESS electrical loads are automatically connected to the DGs in sufficient time to provide for safe reactor shutdown and to mitigate the consequences of a Design Basis Accident (DBA) such as a LOCA.

Certain required plant loads are returned to service in a predetermined sequence in order to prevent overloading of the DGs in the process. Within 286 seconds after the initiating signal is received, all automatic and permanently connected loads needed to recover the unit or maintain it in a safe condition are returned to service. Ratings for the DGs satisfy the requirements of Regulatory Guide 1.9 (Ref. 3).

DGs A, B, C and D have the following ratings:

a. 4000 kW—continuous,
b. 4700 kW—2000 hours,

DG E has the following ratings:

a. 5000 kW—continuous,
b. 5500 kW—2000 hours.

APPLICABLE SAFETY ANALYSES

The initial conditions of DBA and transient analyses in the FSAR, Chapter 6 (Ref. 4) and Chapter 15 (Ref. 5), assume ESF systems are OPERABLE. The AC electrical power sources 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 (RCS), 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 electrical power sources is consistent with the initial assumptions of the accident analyses and is based upon meeting the design basis of the unit and supporting safe shutdown of the other unit. This includes maintaining the onsite or offsite AC sources

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

OPERABLE during accident conditions in the event of an assumed loss of all offsite power or all onsite AC power; and a worst case single failure.

AC sources satisfy Criterion 3 of the NRC Policy Statement (Ref. 6).

LCO

Two qualified circuits between the offsite transmission network and the onsite Class 1E Distribution System and four separate and independent DGs (A, B, C and D) ensure availability of the required power to shut down the reactor and maintain it in a safe shutdown condition after an anticipated operational occurrence (AOO) or a postulated DBA. DG E can be used as a substitute for any one of the four DGs A, B, C or D.

Qualified offsite circuits are those that are described in the FSAR, and are part of the licensing basis for the unit. In addition, the required automatic load timers for each ESF bus shall be OPERABLE.

The Safety Analysis for Unit 2 assumes the OPERABILITY of some equipment that receives power from Unit 1 AC Sources. Therefore, Unit 2 Technical Specifications establish requirements for the OPERABILITY of the DG(s) and qualified offsite circuits needed to support the Unit 1 onsite Class 1E AC electrical power distribution subsystem(s) required by LCO 3.8.7, Distribution Systems—Operating.

Each offsite circuit must be capable of maintaining rated frequency and voltage, and accepting required loads during an accident, while connected to the ESS buses. One OPERABLE offsite circuit consists of an energized ST. No. 10 transformer and the respective circuit path including energized ESS transformers 101 and 111 and feeder breakers capable of supplying three of the four 4.16 kV ESS Buses. The other OPERABLE offsite circuit consists of an energized ST. No. 20 transformer, and the respective circuit path including energized ESS transformers 201 and 211 and feeder breakers capable of supplying three of the four 4.16 kV ESS Buses. Both offsite circuits are OPERABLE provided each meets the criteria described above and provided that no 4.16 kV ESS Bus has less than one OPERABLE offsite circuit

(continued)

BASES

LCO (continued)

capable of supplying the required loads. If no OPERABLE offsite circuit is capable of supplying any of the 4.16 kV ESS Buses, provided that the offsite circuits otherwise meet the above requirements, one offsite source shall be declared inoperable.

Four of the five DGs are required to be Operable to satisfy the initial assumptions of the accident analyses. Each required DG must be capable of starting, accelerating to rated speed and voltage, and connecting to its respective ESS bus on detection of bus undervoltage after the normal and alternate supply breakers open. This sequence must be accomplished within 10 seconds. Each DG must also be capable of accepting required loads within the assumed loading sequence intervals, and must continue to operate until offsite power can be restored to the ESS buses. These capabilities are required to be met from a variety of initial conditions, such as DG in standby with the engine hot and DG in normal standby conditions. Normal standby conditions for a DG mean that the diesel engine oil is being continuously circulated and engine coolant is circulated as necessary to maintain temperature consistent with manufacturer recommendations. Additional DG capabilities must be demonstrated to meet required Surveillances, e.g., capability of the DG to revert to standby status on an ECCS signal while operating in parallel test mode.

Although not normally aligned as a required DG, DG E is normally maintained OPERABLE (i.e., Surveillance Testing completed) so that it can be used as a substitute for any one of the four DGs A, B, C or D.

Proper sequencing of loads, including tripping of nonessential loads, is a required function for DG OPERABILITY.

The AC sources must be separate and independent (to the extent possible) of other AC sources. For the DGs, the separation and independence are complete. For the offsite AC sources, the separation and independence are to the extent practical. A circuit may be connected to more than one ESS bus, with automatic transfer capability to the other circuit OPERABLE, and not violate separation criteria. A circuit that is not connected to an ESS bus is required to

(continued)

BASES

LCO (continued)

have OPERABLE automatic transfer interlock mechanisms to each ESS bus to support OPERABILITY of that offsite circuit.

APPLICABILITY

The AC sources are required to be OPERABLE in MODES 1, 2, and 3 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.

The AC power requirements for MODES 4 and 5 are covered in LCO 3.8.2, "AC Sources-Shutdown."

ACTIONS

The ACTIONS are modified by a Note which allows entry into associated Conditions and Required Actions to be delayed for up to 8 hours when an OPERABLE diesel generator is placed in an inoperable status for the alignment of diesel generator E to or from the Class 1E distribution system. Use of this allowance requires both offsite circuits to be OPERABLE. Entry into the appropriate Conditions and Required Actions shall be made immediately upon the determination that substitution of a required diesel generator will not or can not be completed.

A.1

To ensure a highly reliable power source remains with one offsite circuit inoperable, it is necessary to verify the availability of the remaining required offsite circuit on a more frequent basis. Since the Required Action only specifies "perform," a failure of SR 3.8.1.1 acceptance criteria does not result in a Required Action not met. However, if a second required circuit fails SR 3.8.1.1, the second offsite circuit is inoperable, and Condition C, for two offsite circuits inoperable, is entered.

(continued)

BASES

ACTIONS (continued)

A.2

Required Action A.2, which only applies if one 4.16 kV ESS bus cannot be powered from any offsite source, is intended to provide assurance that an event with a coincident single failure of the associated DG does not result in a complete loss of safety function of critical systems. These features (e.g., system, subsystem, division, component, or device) are designed to be powered from redundant safety related 4.16 kV ESS buses. Redundant required features failures consist of inoperable features associated with an emergency bus redundant to the emergency bus that has no offsite power. The Completion Time for Required Action A.2 is intended to allow time for the operator to evaluate and repair any discovered inoperabilities. This Completion Time also allows an exception to the normal "time zero" for beginning the allowed outage time "clock." In this Required Action, the Completion Time only begins on discovery that both:

a. A 4.16 kV ESS bus has no offsite power supplying its loads; and

b. A redundant required feature on another 4.16 kV ESS bus is inoperable.

If, at any time during the existence of this Condition (one offsite circuit inoperable) a required feature subsequently becomes inoperable, this Completion Time would begin to be tracked.

Discovering no offsite power to one 4.16 kV ESS bus on the onsite Class 1E Power Distribution System coincident with one or more inoperable required support or supported features, or both, that are associated with any other emergency bus that has offsite power, results in starting the
Completion Times for the Required Action. Twenty-four hours is acceptable because it minimizes risk while allowing time for restoration before the unit is subjected to transients associated with shutdown.

The remaining OPERABLE offsite circuits and DGs are adequate to supply electrical power to the onsite Class 1E Distribution System. Thus, on a component basis, single failure protection may have been lost for the required feature's function; however, function is not lost. The 24

(continued)

BASES

ACTIONS

A.2 (continued)

hour Completion Time takes into account the component OPERABILITY of the redundant counterpart to the inoperable required feature. Additionally, the 24 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.

A.3

According to Regulatory Guide 1.93 (Ref. 7), operation may continue in Condition A for a period that should not exceed 72 hours. With one offsite circuit inoperable, the reliability of the offsite system is degraded, and the potential for a loss of offsite power is increased, with attendant potential for a challenge to the plant safety systems. In this condition, however, the remaining OPERABLE offsite circuit and DGs are adequate to supply electrical power to the onsite Class 1E Distribution System.

The 72 hour Completion Time takes into account the capacity and capability of the remaining AC sources, reasonable time for repairs, and the low probability of a DBA occurring during this period.

The second Completion Time for Required Action A.2 establishes a limit on the maximum time allowed for any combination of required AC power sources to be inoperable during any single contiguous occurrence of failing to meet the LCO. If Condition A is entered while, for instance, a DG is inoperable, and that DG is subsequently returned OPERABLE, the LCO may already have been not met for up to 72 hours. This situation could lead to a total of 144 hours, since initial failure to meet the LCO, to restore the offsite circuit. At this time, a DG could again become inoperable, the circuit restored OPERABLE, and an additional 72 hours (for a total of 9 days) allowed prior to complete restoration of the LCO. The 6 day Completion Time provides a limit on the time allowed in a specified condition after discovery of failure to meet the LCO. This limit is considered reasonable for situations in which Conditions A and B are entered concurrently. The "AND" connector between the 72 hours and 6 day Completion Times means that both

(continued)

BASES

ACTIONS

A.3 (continued)

Completion Times apply simultaneously, and the more restrictive Completion Time must be met.

As in Required Action A.2, the Completion Time allows for an exception to the normal "time zero" for beginning the allowed outage time "clock." This exception results in establishing the "time zero" at the time the LCO was initially not met, instead of at the time that Condition A was entered.

A temporary Completion Time is connected to the Completion Time requirements above (72 hours and six days from discovery of failure to meet LCO) with an "OR" connector. The temporary Completion Time is 10 days and applies to the replacement of the Startup Transformer Number 10. The temporary Completion Time of 10 days expires on December 31, 2003. If during the conduct of the prescribed Startup Transformer Number 10 Replacement, should any combination of the remaining operable AC sources be determined inoperable (on an individual unit basis), current TS requirements would apply.

B.1

To ensure a highly reliable power source remains with one required DG inoperable, it is necessary to verify the availability of the required offsite circuits on a more frequent basis. Since the Required Action only specifies "perform," a failure of SR 3.8.1.1 acceptance criteria does not result in a Required Action being not met. However, if a circuit fails to pass SR 3.8.1.1, it is inoperable. Upon offsite circuit inoperability, additional Conditions must then be entered.

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. These features are designed with redundant safety related divisions (i.e., single division systems are not included). Redundant required features failures consist of inoperable features associated with a division redundant to the division that has an inoperable DG.

The Completion Time is intended to allow the operator time to evaluate and repair any discovered inoperabilities. This Completion Time also allows for an exception to the normal "time zero" for beginning the allowed outage time "clock." In this Required Action the Completion

(continued)

BASES

ACTIONS

B.2 (continued)

Time only begins on discovery that both:

a. An inoperable DG exists; and

b. A required feature powered from another diesel generator (Division 1 or 2) is inoperable.

If, at any time during the existence of this Condition (one required DG inoperable), a required feature subsequently becomes inoperable, this Completion Time begins to be tracked.

Discovering one required DG inoperable coincident with one or more inoperable required support or supported features, or both, that are associated with the OPERABLE DGs results in starting the Completion Time for the Required Action. 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.

The remaining OPERABLE DGs 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 have been lost; however, function has not been lost. The 4 hour Completion Time takes into account the component 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, reasonable time for repairs, and low probability of a DBA occurring during this period.

B.3.1 and B.3.2

Required Action B.3.1 provides an allowance to avoid unnecessary testing of OPERABLE DGs. If it can be determined that the cause of the inoperable DG does not exist on the OPERABLE DG, SR 3.8.1.7 does not have to be performed. If the cause of inoperability exists on other DG(s), they are declared inoperable upon discovery, and Condition E of LCO 3.8.1 is entered. Once the failure is repaired, and the common cause failure no longer exists, Required Action B.3.1 is satisfied. If the cause of the initial inoperable DG cannot be determined not to exist on the remaining DG(s), performance of SR 3.8.1.7 suffices to provide assurance of continued OPERABILITY of those DGs.

(continued)

BASES

ACTIONS

B.3.1 and B.3.2 (continued)

However, the second Completion Time for Required Action B.3.2 allows a performance of SR 3.8.1.7 completed up to 24 hours prior to entering Condition B to be accepted as demonstration that a DG is not inoperable due to a common cause failure.

In the event the inoperable DG is restored to OPERABLE status prior to completing either B.3.1 or B.3.2, the plant corrective action program will continue to evaluate the common cause possibility. This continued evaluation, however, is no longer under the 24 hour constraint imposed while in Condition B.

According to Generic Letter 84-15 (Ref. 8), 24 hours is a reasonable time to confirm that the OPERABLE DGs are not affected by the same problem as the inoperable DG.

B.4

According to Regulatory Guide 1.93 (Ref. 7), operation may continue in Condition B for a period that should not exceed 72 hours. In Condition B, the remaining OPERABLE DGs and offsite circuits are adequate to supply electrical power to the onsite Class 1E Distribution System. The 72 hour Completion Time takes into account the capacity and capability of the remaining AC sources, reasonable time for repairs, and low probability of a DBA occurring during this period.

The second Completion Time for Required Action B.4 establishes a limit on the maximum time allowed for any combination of required AC power sources to be inoperable during any single contiguous occurrence of failing to meet the LCO. If Condition B is entered while, for instance, an offsite circuit is inoperable and that circuit is subsequently restored OPERABLE, the LCO may already have been not met for up to 72 hours. This situation could lead to a total of 144 hours, since initial failure of the LCO, to restore the DG. At this time, an offsite circuit could again become inoperable, the DG restored OPERABLE, and an additional 72 hours (for a total of 9 days) allowed prior to complete restoration of the LCO. The 6 day Completion Time provides a limit on the time allowed in a specified

(continued)

BASES

ACTIONS

B.4 (continued)

condition after discovery of failure to meet the LCO. This limit is considered reasonable for situations in which Conditions A and B are entered concurrently. The "AND" connector between the 72 hour and 6 day Completion Times means that both Completion Times apply simultaneously, and the more restrictive must be met.

As in Required Action B.2, the Completion Time allows for an exception to the normal "time zero" for beginning the allowed outage time "clock." This exception results in establishing the "time zero" at the time that the LCO was initially not met, instead of the time that Condition B was entered.

C.1

Required Action C.1 addresses actions to be taken in the event of concurrent inoperability of two offsite circuits. The Completion Time for Required Action C.1 is intended to allow the operator time to evaluate and repair any discovered inoperabilities.

According to Regulatory Guide 1.93 (Ref. 7), operation may continue in Condition C for a period that should not exceed 24 hours. This level of degradation means that the offsite electrical power system does not have the capability to effect a safe shutdown and to mitigate the effects of an accident; however, the onsite AC sources have not been degraded. This level of degradation generally corresponds to a total loss of the immediately accessible offsite power sources.

Because of the normally high availability of the offsite sources, this level of degradation may appear to be more severe than other combinations of two AC sources inoperable that involve one or more DGs inoperable. However, two factors tend to decrease the severity of this degradation level:

a. The configuration of the redundant AC electrical power system that remains available is not susceptible to a single bus or switching failure; and

(continued)

BASES

ACTIONS

C.1 (continued)

b. The time required to detect and restore an unavailable offsite power source is generally much less than that required to detect and restore an unavailable onsite AC source.

With both of the required offsite circuits inoperable, sufficient onsite AC sources are available to maintain the unit in a safe shutdown condition in the event of a DBA or transient. In fact, a simultaneous loss of offsite AC sources, a LOCA, and a worst case single failure were postulated as a part of the design basis in the safety analysis. Thus, the 24 hour Completion Time provides a period of time to effect restoration of one of the offsite circuits commensurate with the importance of maintaining an AC electrical power system capable of meeting its design criteria. According to Regulatory Guide 1.93 (Ref. 7), with the available offsite AC sources two less than required by the LCO, operation may continue for 24 hours. If two offsite sources are restored within 24 hours, unrestricted operation may continue. If only one offsite source is restored within 24 hours, power operation continues in accordance with Condition A.

D.1 and D.2

Pursuant to LCO 3.0.6, the Distribution System Actions would not be entered even if all AC sources to it were inoperable, resulting in de-energization. Therefore, the Required Actions of Condition D are modified by a Note to indicate that when Condition D is entered with no AC source to any ESS bus, Actions for LCO 3.8.7, "Distribution Systems-Operating," must be immediately entered. This allows Condition D to provide requirements for the loss of the offsite circuit and one DG without regard to whether a division is de-energized. LCO 3.8.7 provides the appropriate restrictions for a de-energized bus.

According to Regulatory Guide 1.93 (Ref. 7), operation may continue in Condition D for a period that should not exceed 12 hours. In Condition D, individual redundancy is lost in both the offsite electrical power system and the onsite AC electrical power system. Since power system redundancy is provided by two diverse sources of power, however, the

(continued)

BASES

ACTIONS

D.1 and D.2 (continued)

reliability of the power systems in this Condition may appear higher than that in Condition C (loss of both required offsite circuits). This difference in reliability is offset by the susceptibility of this power system configuration to a single bus or switching failure. The 12 hour. Completion Time takes into account the capacity and capability of the remaining AC sources, reasonable time for repairs, and the low probability of a DBA occurring during this period.

E.1

With two or more DGs inoperable and an assumed loss of offsite electrical power, insufficient standby AC sources are available to power the minimum required ESF functions. Since the offsite electrical power system is the only source of AC power for the majority of ESF equipment at this level of degradation, the risk associated with continued operation for a very short time could be less than that associated with an immediate controlled shutdown. (The immediate shutdown could cause grid instability, which could result in a total loss of AC power.) Since any inadvertent unit generator trip could also result in a total loss of offsite AC power, however, the time allowed for continued operation is severely restricted. The intent here is to avoid the risk associated with an immediate controlled shutdown and to minimize the risk associated with this level of degradation.

According to Regulatory Guide 1.93 (Ref. 7), with two or more DGs inoperable, operation may continue for a period that should not exceed 2 hours

F.1 and F.2

If the inoperable AC electrical power sources cannot be restored to OPERABLE status within the associated 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 12 hours and to MODE 4 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

(continued)

BASES

ACTIONS (continued)

G.1

Condition G corresponds to a level of degradation in which all redundancy in the AC electrical power supplies has been lost. At this severely degraded level, any further losses in the AC electrical power system will cause a loss of function. Therefore, no additional time is justified for continued operation. The unit is required by LCO 3.0.3 to commence a controlled shutdown.

SURVEILLANCE REQUIREMENTS

The AC sources are designed to permit inspection and testing of all important areas and features, especially those that have a standby function, in accordance with 10 CFR 50, GDC 18 (Ref. 9). Periodic component tests are supplemented by extensive functional tests during refueling outages (under simulated accident conditions). The SRs for demonstrating the OPERABILITY of the DGs are in accordance with the recommendations of Regulatory Guide 1.9 (Ref. 3), and Regulatory Guide 1.137 (Ref. 11), as addressed in the FSAR.

The Safety Analysis for Unit 2 assumes the OPERABILITY of some equipment that receives power from Unit 1 AC Sources. Therefore, Surveillance requirements are established for the Unit 1 onsite Class 1E AC electrical power distribution subsystem(s) required to support Unit 2 by LCO 3.8.7, Distribution Systems—Operating. The Unit 1 SRs required to support Unit 2 are identified in the Unit 2 Technical Specifications.

Where the SRs discussed herein specify voltage and frequency tolerances, the following summary is applicable. The minimum steady state output voltage of 3793 V is the value assumed in the degraded voltage analysis and is approximately 90% of the nominal 4160 V output voltage. This value allows for voltage drop to the terminals of 4000 V motors whose minimum operating voltage is specified as 90% or 3600 V. It also allows for voltage drops to motors and other equipment down through the 120 V level where minimum operating voltage is also usually specified as 90% of name plate rating. The specified maximum steady state output voltage of 4400 V is equal to the

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

maximum operating voltage specified for 4000 V motors. It ensures that for a lightly loaded distribution system, the voltage at the terminals of 4000 V motors is no more than the maximum rated operating voltages. The specified minimum and maximum frequencies of the DG are 58.8 Hz and 61.2 Hz, respectively. These values are equal to ± 2% of the 60 Hz nominal frequency and are derived from the recommendations found in Regulatory Guide 1.9 (Ref. 3). The lower frequency limit is necessary to support the LOCA analysis assumptions for low pressure ECCS pump flow rates. (Reference 12)

The Surveillance Table has been modified by a Note, to clarify the testing requirements associated with DG E. The Note is necessary to define the intent of the Surveillance Requirements associated with the integration of DG E. Specifically, the Note defines that a DG is only considered OPERABLE and required when it is aligned to the Class 1E distribution system. For example, if DG A does not meet the requirements of a specific SR, but DG E is substituted for DG A and aligned to the Class 1E distribution system, DG E is required to be OPERABLE to satisfy the LCO requirement of 4 DGs and DG A is not required to be OPERABLE because it is not aligned to the Class 1E distribution system. This is acceptable because only 4 DGs are assumed in the event analysis. Furthermore, the Note identifies when the Surveillance Requirements, as modified by SR Notes, have been met and performed, DG E can be substituted for any other DG and declared OPERABLE after performance of two SRs which verify switch alignment. This is acceptable because the testing regimen defined in the Surveillance Requirement Table ensures DG E is fully capable of performing all DG requirements.

SR 3.8.1.1

This SR ensures proper circuit continuity for the offsite AC electrical power supply to the onsite distribution network and availability of offsite AC electrical power. The breaker alignment verifies that each breaker is in its correct position to ensure that distribution buses and loads are connected to an Operable offsite power source and that appropriate independence of offsite circuits is maintained. The 7 day Frequency is adequate since breaker position is not likely to change without the operator being aware of it and because its status is displayed in the control room.

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.8.1.2

Not Used.

SR 3.8.1.3

This Surveillance verifies that the DGs are capable of synchronizing and accepting greater than or equal to the equivalent of the maximum expected accident loads. A minimum run time of 60 minutes is required to stabilize engine temperatures, while minimizing the time that the DG is connected to the offsite source.

Although no power factor requirements are established by this SR, the DG is normally operated at a power factor between 0.8 lagging and 1.0. The 0.8 value is the design rating of the machine, while 1.0 is an operational limitation to ensure circulating currents are minimized. The load band is provided to avoid routine overloading of the DG. Routine overloading may result in more frequent teardown inspections in accordance with vendor recommendations in order to maintain DG OPERABILITY.

Note 1 modifies this Surveillance to indicate that diesel engine runs for this Surveillance may include gradual loading, as recommended by the Cooper Bessemer Service Bulletin 728, so that mechanical stress and wear on the diesel engine are minimized.

Note 2 modifies this Surveillance by stating that momentary transients because of changing bus loads do not invalidate this test. Similarly, momentary power factor transients do not invalidate the test.

Note 3 indicates that this Surveillance should be conducted on only one DG at a time in order to avoid common cause failures that might result from offsite circuit or grid perturbations.

Note 4 stipulates a prerequisite requirement for performance of this SR. A successful DG start must precede this test to credit satisfactory performance.

Note 5 provides the allowance that DG E, when not aligned as substitute for DG A, B, C and D but being maintained available,

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.8.1.3

may use the test facility to satisfy loading requirements in lieu of synchronization with an ESS bus.

Note 6 allows a single test (instead of two tests, one for each unit) to satisfy the requirements for both units, with the DG synchronized to the 4.16 kV ESS bus of Unit 1 for one periodic test and synchronized to the 4.16 kV ESS bus of Unit 2 during the next periodic test. This is acceptable because the purpose of the test is to demonstrate the ability of the DG to operate at its continuous rating (with the exception of DG E which is only required to be tested at the continuous rating of DGs A through D) and this attribute is tested at the required Frequency. Each unit's circuit breakers and breaker control circuitry, which are only being tested every second test (due to the staggering of the tests), historically have a very low failure rate. If a DG fails this Surveillance, the DG should be considered inoperable for both units, unless the cause of the failure can be directly related to only one unit. In addition, if the test is scheduled to be performed on the other Unit, and the other Unit's TS allowance that provides an exception to performing the test is used (i.e., the Note to SR 3.8.2.1 for the other Unit provides an exception to performing this test when the other Unit is in MODE 4 or 5, or moving irradiated fuel assemblies in the secondary containment), or it is not possible to perform the test due to equipment availabililty, then the test shall be performed synchronized to this Unit's 4.16 kV ESS bus. The 31 day Frequency for this Surveillance is consistent with Regulatory Guide 1.9 (Ref. 3).

SR 3.8.1.4

This SR verifies the level of fuel oil in the engine mounted day tank is at or above the level at which fuel oil is automatically added. The level is expressed as an equivalent volume in gallons, and is selected to ensure adequate fuel oil for a minimum of 55 minutes of DG A-D and 62 minutes of DG E operation at DG continuous rated load conditions.

The 31 day Frequency is adequate to ensure that a sufficient supply of fuel oil is available, since low level alarms are provided and operators would be aware of any large uses of fuel oil during this period.

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.8.1.5

Microbiological fouling is a major cause of fuel oil degradation. There are numerous bacteria that can grow in fuel oil and cause fouling, but all must have a water environment in order to survive. Removal of water from the engine mounted day tanks once every 31 days eliminates the necessary environment for bacterial survival. This is the most effective means of controlling microbiological fouling. In addition, it eliminates the potential for water entrainment in the fuel oil during DG operation. Water may come from any of several sources, including condensation, ground water, rain water, contaminated fuel oil, and breakdown of the fuel oil by bacteria. Frequent checking for and removal of accumulated water minimizes fouling and provides data regarding the watertight integrity of the fuel oil system. The Surveillance Frequencies are established by Regulatory Guide 1.137 (Ref. 11). This SR is for preventive maintenance. The presence of water does not necessarily represent a failure of this SR provided that accumulated water is removed during performance of this Surveillance.

SR 3.8.1.6

This Surveillance demonstrates that each required fuel oil transfer pump operates and transfers fuel oil from its associated storage tank to its associated day tank. It is required to support continuous operation of standby power sources. This Surveillance provides assurance that the fuel oil transfer pump is OPERABLE, the fuel oil piping system is intact, the fuel delivery piping is not obstructed, and the controls and control systems for automatic fuel transfer systems are OPERABLE.

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.8.1.6

The Frequency for this SR is 31 days because the design of the fuel transfer system requires that the transfer pumps operate automatically. Administrative controls ensure an adequate volume of fuel oil in the day tanks. This Frequency allows this aspect of DG Operability to be demonstrated during or following routine DG operation.

SR 3.8.1.7

This SR helps to ensure the availability of the standby electrical power supply to mitigate DBAs and transients and maintain the unit in a safe shutdown condition.

To minimize the wear on moving parts that do not get lubricated when the engine is not running, this SR has been modified by Note 1 to indicate that all DG starts for these Surveillances may be preceded by an engine prelube period (which for DGs A through D includes operation of the lube oil system to ensure the DGs turbo charger is sufficiently prelubicated to prevent undo wear and tear).

For the purposes of this testing, the DGs are started from standby conditions. Standby conditions for a DG mean that the diesel engine oil is being continuously circulated and diesel engine coolant is being circulated as necessary to maintain temperature consistent with manufacturer recommendations. The DG starts from standby conditions and achieves the minimum required voltage and frequency within 10 seconds and maintains the required voltage and frequency when steady state conditions are reached. The 10 second start requirement supports the assumptions in the design basis LOCA analysis of FSAR, Section 6.3 (Ref. 12).

To minimize testing of the DGs, Note 2 allows a single test to satisfy the requirements for both units (instead of two tests, one for each unit). This is acceptable because this test is intended to demonstrate attributes of the DG that are not associated with either Unit. If the DG fails this Surveillance, the DG should be considered inoperable for both

(continued)

BASES

REQUIREMENTS SURVEILLANCE (continued)

SR 3.8.17

units, unless the cause of the failure can be directly related to one unit

The time for the DG to reach steady state operation is periodically monitored and the trend evaluated to identify degradation.

The 31 day Frequency is consistent with Regulatory Guide 1.9 (Ref. 3). This Frequency provides adequate assurance of DG OPERABILITY.

SR 3.8.1.8

Transfer of each 4.16 kV ESS bus power supply from the normal offsite circuit to the alternate offsite circuit demonstrates the OPERABILITY of the alternate circuit distribution network to power the shutdown loads. The 24 month Frequency of the Surveillance is based on engineering judgment taking into consideration the plant conditions required to perform the Surveillance, and is intended to be consistent with expected fuel cycle lengths. Operating experience has shown that these components usually pass the SR when performed on the 24 month Frequency. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

This SR is modified by a Note. The reason for the Note is that, during operation with the reactor critical, performance of the automatic transfer of the unit power supply could cause perturbations to the electrical distribution systems that could challenge continued steady state operation and, as a result, plant safety systems. The manual transfer of unit power supply should not result in any perturbation to the electrical distribution system, therefore, no mode restriction is specified. This Surveillance tests the applicable logic associated with Unit 1. The comparable test specified in Unit 2 Technical Specifications tests the applicable logic associated with Unit 2. Consequently, a test must be performed within the specified Frequency for each unit. As the Surveillance represents separate tests, the Note specifying the restriction for not performing the test while the unit is in MODE 1 or 2 does not have applicability to Unit 2. The NOTE

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.8.1.8

only applies to Unit 1, thus the Unit 1 Surveillance shall not be performed with Unit 1 in MODE 1 or 2.

SR 3.8.1.9

Each DG is provided with an engine overspeed trip to prevent damage to the engine. Recovery from the transient caused by the loss of a large load could cause diesel engine overspeed, which, if excessive, might result in a trip of the engine. This Surveillance demonstrates the DG load response characteristics and capability to reject the largest single load without exceeding predetermined voltage and frequency and while maintaining a specified margin to the overspeed trip. The largest single load for each DG is a residual heat removal (RHR) pump (1425 kW). This Surveillance may be accomplished by:

a. Tripping the DG output breaker with the DG carrying greater than or equal to its associated single largest post-accident load while paralleled to offsite power, or while solely supplying the bus; or

b. Tripping its associated single largest post-accident load with the DG solely supplying the bus.

As recommended by Regulatory Guide 1.9 (Ref. 3), the load rejection test is acceptable if the increase in diesel speed does not exceed 75% of the difference between synchronous speed and the overspeed trip setpoint, or 15% above synchronous speed, whichever is lower. For DGs A, B, C, D and E, this represents 64.5 Hz, equivalent to 75% of the difference between nominal speed and the overspeed trip setpoint.

The time, voltage, and frequency tolerances specified in this SR are derived from Regulatory Guide 1.9 (Ref. 3) recommendations for response during load sequence intervals. The 4.5 seconds specified is equal to 60% of the 7.5 second load sequence interval between loading of the RHR and core spray pumps during an undervoltage on the bus concurrent with a LOCA. The 6 seconds specified is equal to 80% of that load sequence interval. The voltage and frequency specified are

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.8.1.9 (continued)

consistent with the design range of the equipment powered by the DG. SR 3.8.1.9.a corresponds to the maximum frequency excursion, while SR 3.8.1.9.b and SR 3.8.1.9.c specify the steady state voltage and frequency values to which the system must recover following load rejection.

The 24 month Frequency is consistent with the recommendation of Regulatory Guide 1.9 (Ref. 3) and is intended to be consistent with expected fuel cycle lengths.

To minimize testing of the DGs, a Note allows a single test to satisfy the requirements for both units (instead f two tests, one for each unit). This is acceptable because this test is intended to demonstrate attributes of the DG that are not associated with either Unit. If the DG fails this Surveillance, the DG should be considered inoperable for both units, unless the cause of the failure can be directly related to only one unit.

SR 3.8.1.10

This Surveillance demonstrates the DG capability to reject a full load without overspeed tripping or exceeding the predetermined voltage limits. The DG full load rejection may occur because of a system fault or inadvertent breaker tripping. This Surveillance ensures proper engine generator load response under the simulated test conditions. This test simulates the loss of the total connected load that the DG experiences following a full load rejection and verifies that the DG does not trip upon loss of the load. These acceptance criteria provide DG damage protection. While the DG is not expected to experience this transient during an event, and continues to be available, this response ensures that the DG is not degraded for future application, including reconnection to the bus if the trip initiator can be corrected or isolated.

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.8.1.10 (continued)

To minimize testing of the DGs, a Note allows a single test to satisfy the requirements for both units (instead of two tests, one for each unit). This is acceptable because this test is intended to demonstrate attributes of the DG that are not associated with either Unit. If the DG fails this Surveillance, the DG should be considered inoperable for both units, unless the cause of the failure can be directly related to only one unit.

The 24 month Frequency is consistent with the recommendation of Regulatory Guide 1.9 (Ref. 3) and is intended to be consistent with expected fuel cycle lengths.

SR 3.8.1.11

As required by Regulatory Guide 1.9 (Ref. 3), this Surveillance demonstrates the as designed operation of the standby power sources during loss of the offsite source. This test verifies all actions encountered from the loss of offsite power, including shedding of the nonessential loads and energization of the ESS buses and respective 4.16kV loads from the DG. It further demonstrates the capability of the DG to automatically achieve and maintain the required voltage and frequency within the specified time.

The DG auto-start time of 10 seconds is derived from requirements of the licensed accident analysis for responding to a design basis large break LOCA. The Surveillance should be continued for a minimum of 5 minutes in order to demonstrate that all starting transients have decayed and stability has been achieved.

The 24 month Frequency is consistent with the recommendation of Regulatory Guide 1.9 (Ref. 3), takes into consideration plant conditions required to perform the Surveillance, and is intended to be consistent with expected fuel cycle lengths.

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.8.1.11 (continued)

This SR is modified by three Notes. The reason for Note 1 is to minimize wear and tear on the DGs during testing. Note 1 allows all DG starts to be preceded by an engine prelube period (which for DGs A through D includes operation of the lube oil system to ensure the DG's turbo charger is sufficiently prelubicated). For the purpose of this testing, the DGs shall be started from standby conditions, that is, with the engine oil being continuously circulated and engine coolant being circulated as necessary to maintain temperature consistent with manufacturer recommendations.

This SR is also modified by Note 2. The Note specifies when this SR is required to be performed for the DGs and the 4.16 kV ESS Buses. The Note is necessary because this SR involves an integrated test between the DGs and the 4.16 kV ESS Buses and the need for the testing regimen to include DG E being tested (substituted for all DGs for both Units) with all 4.16 kV ESS Buses. To ensure the necessary testing is performed, the following rotational testing regimen has been established:

UNIT IN OUTAGE	DIESEL E SUBSTITUTED FOR
2	DG E not tested
1	Diesel Generator D
2	Diesel Generator A
1	DG E not tested
2	Diesel Generator B
1	Diesel Generator A
2	Diesel Generator C
1	Diesel Generator B
2	Diesel Generator D
1	Diesel Generator C

The specified rotational testing regimen can be altered to facilitate unanticipated events which render the testing regimen impractical to implement, but any alternative

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.8.1.11 (continued)

testing regimen must provide an equivalent level of testing. This SR does not have to be performed with the normally aligned DG when the associated 4.16 kV ESS bus is tested using DG E and DG E does not need to be tested when not substituted or aligned to the Class 1E distribution system. The allowances specified in the Note are acceptable because the tested attributes of each of the five DGs and each unit's four 4.16 kV ESS buses are verified at the specified Frequency (i.e., each DG and each 4.16 kV ESS bus is tested every 24 months). Specifically, when DG E is tested with a Unit 1 4.16 kV ESS bus, the attributes of the normally aligned DG, although not tested with the Unit 1 4.16 kV ESS bus, are tested with the Unit 2 4.16 kV ESS bus within the 24 month Frequency. The testing allowances do result in some circuit pathways which do not need to change state (i.e., cabling) not being tested on a 24 month Frequency. This is acceptable because these components are not required to change state to perform their safety function and when substituted–normal operation of DG E will ensure continuity of most of the cabling not tested.

The reason for Note 3 is that performing the Surveillance would remove a required offsite circuit from service, perturb the electrical distribution system, and challenge safety systems. This Surveillance tests the applicable logic associated with Unit 1. The comparable test specified in the Unit 2 Technical Specifications tests the applicable logic associated with Unit 2. Consequently, a test must be performed within the specified Frequency for each unit. As the Surveillance represents separate tests, the Note specifying the restriction for not performing the test while the unit is in MODE 1, 2, or 3 does not have applicability to Unit 2. The Note only applies to Unit 1, thus the Unit 1 Surveillances shall not be performed with Unit 1 in MODES 1, 2 or 3.

SR 3.8.1.12

This Surveillance demonstrates that the DG automatically starts and achieves the required voltage and frequency within the specified time (10 seconds) from the design basis actuation signal (LOCA signal) and operates for ≥ 5 minutes. The 5 minute period provides sufficient time to demonstrate

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.8.1.12 (continued)

stability. SR 3.8.1.12.d and SR 3.8.1.12.e ensure that permanently connected loads and emergency loads are energized from the offsite electrical power system on a LOCA signal without loss of offsite power.

The requirement to verify the connection and power supply of permanent and autoconnected loads is intended to satisfactorily show the relationship of these loads to the loading logic for loading onto offsite power. In certain circumstances, many of these loads cannot actually be connected or loaded without undue hardship or potential for undesired operation. For instance, ECCS injection valves are not desired to be stroked open, high pressure injection systems are not capable of being operated at full flow, or RHR systems performing a decay heat removal function are not desired to be realigned to the ECCS mode of operation. In lieu of actual demonstration of the connection and loading of these loads, testing that adequately shows the capability of the DG system to perform these functions is acceptable. This testing may include any series of sequential, overlapping, or total steps so that the entire connection and loading sequence is verified. SR 3.8.1.12.a through SR 3.8.1.12.d are performed with the DG running. SR 3.8.1.12.e can be performed when the DG is not running.

The Frequency of 24 months takes into consideration plant conditions required to perform the Surveillance and is intended to be consistent with the expected fuel cycle lengths. Operating experience has shown that these components usually pass the SR when performed at the 24 month Frequency. Therefore, the Frequency is acceptable from a reliability standpoint.

This SR is modified by two Notes. The reason for Note 1 is to minimize wear and tear on the DGs during testing. Note 1 allows all DG starts to be preceded by an engine prelube period (which for DG A through D includes operation of the lube oil system to ensure the DG's turbo-charger is sufficiently prelubicated). For the purpose of this testing, the DGs must be started from standby conditions, that is, with the engine oil being continuously circulated and engine coolant being circulated as necessary to maintain temperature consistent with manufacturer recommendations.

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.8.1.13

The reason for Note 2 is to allow DG E, when not aligned as substitute for DG A, B, C or D to use the test facility to satisfy loading requirements in lieu of aligning with the Class 1E distribution system. When tested in this configuration, DG E satisfies the requirements of this test by completion of SR 3.8.1.12.a, b and c only. SR 3.8.1.12.d and 3.8.1.12.e may be performed by any DG aligned with the Class 1E distribution system or by any series of sequential, overlapping, or total steps so that the entire connection and loading sequence is verified.

This Surveillance demonstrates that DG non-critical protective functions (e.g., high jacket water temperature) are bypassed on an ECCS initiation test signal. The non-critical trips are bypassed during DBAs and provide an alarm on an abnormal engine condition. This alarm provides the operator with sufficient time to react appropriately. The DG availability to mitigate the DBA is more critical than protecting the engine against minor problems that are not immediately detrimental to emergency operation of the DG.

The 24 month Frequency is based on engineering judgment, takes into consideration plant conditions required to perform the Surveillance, and is intended to be consistent with expected fuel cycle lengths. Operating experience has shown that these components usually pass the SR when performed at the 24 month Frequency. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

The SR is modified by two Notes. To minimize testing of the DGs, Note 1 to SR 3.8.1.13 allows a single test (instead of two tests, one for each unit) to satisfy the requirements for both units. This is acceptable because this test is intended to demonstrate attributes of the DG that are not associated with either Unit. If the DG fails this Surveillance, the DG should be considered inoperable for both units, unless the cause of the failure can be directly related to only one unit.

Note 2 provides the allowance that DG E, when not aligned as a substitute for DG A, B, C, and D but being maintained available, may use a simulated ECCS initiation signal.

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.8.1.14

Regulatory Guide 1.9 (Ref. 3), requires demonstration once per 24 months that the DGs can start and run continuously at full load capability for an interval of not less than 24 hours—22 hours of which is at a load equivalent to 90% to 100% of the continuous rating of the DG, and 2 hours of which is at a load equivalent to 105% to 110% of the continuous duty rating of the DG. SSES has taken exception to this requirement and performs the two hour run at the 2000 hour rating for each DG. The requirement to perform the two hour overload test can be performed in any order provided it is performed during a single continuous time period.

The DG starts for this Surveillance can be performed either from standby or hot conditions. The provisions for prelube discussed in SR 3.8.1.7, and for gradual loading, discussed in SR 3.8.1.3, are applicable to this SR.

A load band is provided to avoid routine overloading of the DG. Routine overloading may result in more frequent teardown inspections in accordance with vendor recommendations in order to maintain DG OPERABILITY.

The 24 month Frequency is consistent with the recommendation of Regulatory Guide 1.9 (Ref. 3), takes into consideration plant conditions required to perform the Surveillance, and is intended to be consistent with expected fuel cycle lengths.

This Surveillance has been modified by four Notes. Note 1 states that momentary transients due to changing bus loads do not invalidate this test.

To minimize testing of the DGs, Note 2 allows a single test (instead of two tests, one for each unit) to satisfy the requirements for both units. This is acceptable because this test is intended to demonstrate attributes of the DG that are not associated with either Unit. If the DG fails this Surveillance, the DG should be considered inoperable for both units, unless the cause of the failure can be directly related to only one unit.

Note 3 stipulates that DG E, when not aligned as substitute for DG A, B, C or D but being maintained available, may use

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.8.1.14 (continued)

the test facility to satisfy the specified loading requirements in lieu of synchronization with an ESS bus.

SR 3.8.1.15

This Surveillance demonstrates that the diesel engine can restart from a hot condition, such as subsequent to shutdown from full load temperatures, and achieve the required voltage and frequency within 10 seconds. The 10 second time is derived from the requirements of the accident analysis to respond to a design basis large break LOCA.

The 24 month Frequency is consistent with the recommendation of Regulatory Guide 1.9 (Ref. 3), takes into consideration plant conditions required to perform the Surveillance, and is intended to be consistent with expected fuel cycle lengths.

This SR is modified by three Notes. Note 1 ensures that the test is performed with the diesel sufficiently hot. The requirement that the diesel has operated for at least 2 hours at full load conditions prior to performance of this Surveillance is based on manufacturer recommendations for achieving hot conditions. The load band is provided to avoid routine overloading of the DG. Routine overloads may result in more frequent teardown inspections in accordance with vendor recommendations in order to maintain DG OPERABILITY. Momentary transients due to changing bus loads do not invalidate this test.

Note 2 allows all DG starts to be preceded by an engine prelube period (which for DGs A through D includes operation of the lube oil system to ensure the DGs turbo charger is sufficiently prelubricated) to minimize wear and tear on the diesel during testing.

To minimize testing of the DGs, Note 3 allows a single test to satisfy the requirements for both units (instead of two tests, one for each unit). This is acceptable because this test is intended to demonstrate attributes of the DG that are not associated with either Unit. If the DG fails this Surveillance, the DG should be considered inoperable for both units, unless the cause of the failure can be directly related to only one unit.

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BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.8.1.16

As required by Regulatory Guide 1.9 (Ref. 3), this Surveillance ensures that the manual synchronization and automatic load transfer from the DG to the offsite source can be made and that the DG can be returned to ready-to-load status when offsite power is restored. It also ensures that the auto-start logic is reset to allow the DG to reload if a subsequent loss of offsite power occurs. The DG is considered to be in ready-to-load status when the DG is at rated speed and voltage, the DG controls are in isochronous and the output breaker is open.

The 24 month Frequency is consistent with the recommendation of Regulatory Guide 1.9 (Ref. 3), takes into consideration plant conditions required to perform the Surveillance, and is intended to be consistent with expected fuel cycle lengths.

This SR is modified by a note to accommodate the testing regimen necessary for DG E. See SR 3.8.1.11 for the Bases of the Note.

SR 3.8.1.17

Demonstration of the test mode override ensures that the DG availability under accident conditions is not compromised as the result of testing. Interlocks to the LOCA sensing circuits cause the DG to automatically reset to ready-to-load operation if an ECCS initiation signal is received during operation in the test mode. Ready-to-load operation is defined as the DG running at rated speed and voltage, the DG controls in isochronous and the DG output breaker open. These provisions for automatic switchover are required by IEEE-308 (Ref. 10), paragraph 6.2.6(2).

The requirement to automatically energize the emergency loads with offsite power is essentially identical to that of SR 3.8.1.12. The intent in the requirements associated with SR 3.8.1.17.b is to show that the emergency loading is not affected by the DG operation in test mode. In lieu of actual demonstration of connection and loading of loads, testing that adequately shows the capability of the emergency loads to perform these functions is acceptable. This test is performed by verifying that after the DG is tripped, the offsite source originally in parallel with the DG, remains connected to the

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BASES

SURVEILLANCE REQUIREMENTS

SR 3.8.1.17 (continued)

affected 4.16 kV ESS Bus. SR 3.8.1.12 is performed separately to verify the proper offsite loading sequence.

The 24 month Frequency is consistent with the recommendation of Regulatory Guide 1.9 (Ref. 3), takes into consideration plant conditions required to perform the Surveillance, and is intended to be consistent with expected fuel cycle lengths.

This SR is modified by a note to accommodate the testing regimen necessary for DG E. See SR 3.8.1.11 for the Bases of the Note.

SR 3.8.1.18

Under accident conditions, loads are sequentially connected to the bus by individual load timers which control the permissive and starting signals to motor breakers to prevent overloading of the AC Sources due to high motor starting currents. The load sequence time interval tolerance ensures that sufficient time exists for the AC Source to restore frequency and voltage prior to applying the next load and that safety analysis assumptions regarding ESF equipment time delays are not violated. Reference 2 provides a summary of the automatic loading of ESS buses. A list of the required timers and the associated setpoints are included in the Bases as Table B 3.8.1-1, Unit 1 and Unit 2 Load Timers. Failure of a timer identified as an offsite power timer may result in both offsite sources being inoperable. Failure of any other timer may result in the associated DG being inoperable. A timer is considered failed for this SR if it will not ensure that the associated load will energize within the Allowable Value in Table B 3.8.1-1. These conditions will require entry into applicable Conditions of this specification. With a load timer inoperable, the load can be rendered inoperable to restore OPERABILITY to the associated AC sources. In this condition, the Condition and Required Actions of the associated specification shall be entered for the equipment rendered inoperable.

The 24 month Frequency is consistent with the recommendation of Regulatory Guide 1.9 (Ref. 3), takes into consideration plant conditions required to perform the Surveillance, and is intended to be consistent with expected fuel cycle lengths.

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BASES

SURVEILLANCE REQUIREMENTS

SR 3.8.1.18 (continued)

This SR is modified by a Note that specifies that load timers associated with equipment that has automatic initiation capability disabled are not required to be Operable. This is acceptable because if the load does not start automatically, the adverse effects of an improper loading sequence are eliminated. Furthermore, load timers are associated with individual timers such that a single timer only affects a single load.

SR 3.8.1.19

In the event of a DBA coincident with a loss of offsite power, the DGs are required to supply the necessary power to ESF systems so that the fuel, RCS, and containment design limits are not exceeded.

This Surveillance demonstrates DG operation, as discussed in the Bases for SR 3.8.1.11, during a loss of offsite power actuation test signal in conjunction with an ECCS initiation signal. In lieu of actual demonstration of connection and loading of loads, testing that adequately shows the capability of the DG system to perform these functions is acceptable. This testing may include any series of sequential, overlapping, or total steps so that the entire connection and loading sequence is verified. To simulate the non-LOCA unit 4.16 kV ESS Bus loads on the DG, bounding loads are energized on the tested 4.16 kV ESS Bus after all auto connected energizing loads are energized.

The Frequency of 24 months takes into consideration plant conditions required to perform the Surveillance and is intended to be consistent with an expected fuel cycle length. This SR is modified by three Notes. The reason for Note 1 is to minimize wear and tear on the DGs during testing. Note 1 allows all DG starts to be preceded by an engine prelube period (which for DGs A through D includes operation of the lube oil system to ensure the DG's turbo charger is sufficiently prelubricated.) For the purpose of this testing, the DGs must be started from standby conditions, that is, with the engine oil being continuously circulated and engine coolant being circulated as necessary to maintain temperature consistent with manufacturer recommendations.

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BASES

SURVEILLANCE REQUIREMENTS

SR 3.8.1.19 (continued)

Note 2 is necessary to accommodate the testing regimen associated with DG E. See SR 3.8.1.11 for the Bases of the Note.

The reason for Note 3 is that performing the Surveillance would remove a required offsite circuit from service, perturb the electrical distribution system, and challenge safety systems. This Surveillance tests the applicable logic associated with Unit 1. The comparable test specified in the Unit 2 Technical Specifications tests the applicable logic associated with Unit 2. Consequently, a test must be performed within the specified Frequency for each unit. As the Surveillance represents separate tests, the Note specifying the restriction for not performing the test while the unit is in MODE 1, 2 or 3 does not have applicability to Unit 2. The Note only applies to Unit 1, thus the Unit 1 Surveillances shall not be performed with Unit 1 in MODE 1, ~~2~~ or 3.

SR 3.8.1.20

This Surveillance demonstrates that the DG starting independence has not been compromised. Also, this Surveillance demonstrates that each engine can achieve proper speed within the specified time when the DGs are started simultaneously. The 10 year Frequency is consistent with the recommendations of Regulatory Guide 1.9 (Ref. 3).

This SR is modified by two Notes. The reason for Note 1 is to minimize wear on the DG during testing. The Note allows all DG starts to be preceded by an engine prelube period (which for ~~DGs A~~ through D includes operation of the lube oil system to ensure the DG's turbo charger is sufficiently prelubricated). For the purpose of this testing, the DGs must be started from standby conditions, that is, with the engine oil continuously circulated and engine coolant being circulated as necessary to maintain temperature consistent with manufacturer recommendations.

Note 2 is necessary to identify that this test does not have to be performed with DG E substituted for any DG. The allowance is acceptable based on the design of the DG E transfer switches. The transfer of control, protection, indication,

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BASES

SURVEILLANCE REQUIREMENTS

SR 3.8.1.20 (continued)

and alarms is by switches at two separate locations. These switches provide a double break between DG E and the redundant system within the transfer switch panel. The transfer of power is through circuit breakers at two separate locations for each redundant system. There are four normally empty switch gear positions at DG E facility, associated with each of the four existing DGs. Only one circuit breaker is available at this location to be inserted into one of the four positions. At each of the existing DGs, there are two switchgear positions with only one circuit breaker available. This design provides two open circuits between redundant power sources. Therefore, based on the described design, it can be concluded that DG redundancy and independence is maintained regardless of whether DG E is substituted for any other DG.

REFERENCES

1. 10 CFR 50, Appendix A, GDC 17.
2. FSAR, Section 8.2.
3. Regulatory Guide 1.9.
4. FSAR, Chapter 6.
5. FSAR, Chapter 15.
6. Final Policy Statement on Technical Specifications Improvements, July 22, 1993 (58 FR 39132).
7. Regulatory Guide 1.93.
8. Generic Letter 84-15.
9. 10 CFR 50, Appendix A, GDC 18.
10. IEEE Standard 308.
11. Regulatory Guide 1.137.
12. FSAR, Section 6.3.
13. ASME Boiler and Pressure Vessel Code, Section XI.

(continued)

TABLE B 3.8.1-1 (page 1 of 2)
UNIT 1 AND UNIT 2 LOAD TIMERS

DEVICE TAG NO.	SYSTEM LOADING TIMER	LOCATION	NOMINAL SETTING (seconds)	ALLOWABLE VALUE (seconds)
62A-20102	RHR Pump 1A	1A201	3	≥ 2.7 and ≤ 3.6
62A-20202	RHR Pump 1B	1A202	3	≥ 2.7 and ≤ 3.6
62A-20302	RHR Pump 1C	1A203	3	≥ 2.7 and ≤ 3.6
62A-20402	RHR Pump 1D	1A204	3	≥ 2.7 and ≤ 3.6
62A-20102	RHR Pump 2A	2A201	3	≥ 2.7 and ≤ 3.6
62A-20202	RHR Pump 2B	2A202	3	≥ 2.7 and ≤ 3.6
62A-20302	RHR Pump 2C	2A203	3	≥ 2.7 and ≤ 3.6
62A-20402	RHR Pump 2D	2A204	3	≥ 2.7 and ≤ 3.6
E11A-K202B	RHR Pump 1C (Offsite Power Timer)	1C618	7.0	≥ 6.5 and ≤ 7.5
E11A-K120A	RHR Pump 1C (Offsite Power Timer)	1C617	7.0	≥ 6.5 and ≤ 7.5
E11A-K120B	RHR Pump 1D (Offsite Power Timer)	1C618	7.0	≥ 6.5 and ≤ 7.5
E11A-K202A	RHR Pump 1D (Offsite Power Timer)	1C617	7.0	≥ 6.5 and ≤ 7.5
E11A-K120A	RHR Pump 2C (Offsite Power Timer)	2C617	7.0	≥ 6.5 and ≤ 7.5
E11A-K202B	RHR Pump 2C (Offsite Power Timer)	2C618	7.0	≥ 6.5 and ≤ 7.5
E11A-K120B	RHR Pump 2D (Offsite Power Timer)	2C618	7.0	≥ 6.5 and ≤ 7.5
E11A-K202A	RHR Pump 2D (Offsite Power Timer)	2C617	7.0	≥ 6.5 and ≤ 7.5
E21A-K116A	CS Pump 1A	1C626	10.5	≥ 9.4 and ≤ 11.6
E21A-K116B	CS Pump 1B	1C627	10.5	≥ 9.4 and ≤ 11.6
E21A-K125A	CS Pump 1C	1C626	10.5	≥ 9.4 and ≤ 11.6
E21A-K125B	CS Pump 1D	1C627	10.5	≥ 9.4 and ≤ 11.6
E21A-K116A	CS Pump 2A	2C626	10.5	≥ 9.4 and ≤ 11.6
E21A-K116B	CS Pump 2B	2C627	10.5	≥ 9.4 and ≤ 11.6
E21A-K125A	CS Pump 2C	2C626	10.5	≥ 9.4 and ≤ 11.6
E21A-K125B	CS Pump 2D	2C627	10.5	≥ 9.4 and ≤ 11.6
E21A-K16A	CS Pump 1A (Offsite Power Timer)	1C626	15	≥ 14.0 and ≤ 16.0
E21A-K16B	CS Pump 1B (Offsite Power Timer)	1C627	15	≥ 14.0 and ≤ 16.0
E21A-K25A	CS Pump 1C (Offsite Power Timer)	1C626	15	≥ 14.0 and ≤ 16.0
E21A-K25B	CS Pump 1D (Offsite Power Timer)	1C627	15	≥ 14.0 and ≤ 16.0
E21A-K16A	CS Pump 2A (Offsite Power Timer)	2C626	15	≥ 14.0 and ≤ 16.0
E21A-K16B	CS Pump 2B (Offsite Power Timer)	2C627	15	≥ 14.0 and ≤ 16.0
E21A-K25A	CS Pump 2C (Offsite Power Timer)	2C626	15	≥ 14.0 and ≤ 16.0
E21A-K25B	CS Pump 2D (Offsite Power Timer)	2C627	15	≥ 14.0 and ≤ 16.0
62AX2-20108	Emergency Service Water	1A201	40	≥ 36 and ≤ 44
62AX2-20208	Emergency Service Water	1A202	40	≥ 36 and ≤ 44
62AX2-20303	Emergency Service Water	1A203	44	≥ 39.6 and ≤ 48.4
62AX2-20403	Emergency Service Water	1A204	48	≥ 43.2 and ≤ 52.8
62X3-20404	Control Structure Chilled Water System	OC877B	60	≥ 54
62X3-20304	Control Structure Chilled Water System	OC877A	60	≥ 54
62X-20104	Emergency Switchgear Rm Cooler A & RHR SW Pump H&V Fan A	OC877A	60	≥ 54
62X-20204	Emergency Switchgear Rm Cooler B & RHR SW Pump H&V Fan B	OC877B	60	≥ 54
62X-5653A	DG Room Exhaust Fan E3	OB565	60	≥ 54
62X-5652A	DG Room Exhausts Fan E4	OB565	60	≥ 54
262X-20204	Emergency Switchgear Rm Cooler B	OC877B	120	≥ 54
262X-20104	Emergency Switchgear Rm Cooler A	OC877A	120	≥ 54

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TABLE B 3.8.1-1 (page 2 of 2)
UNIT 1 AND UNIT 2 LOAD TIMERS

DEVICE TAG NO.	SYSTEM LOADING TIMER	LOCATION	NOMINAL SETTING (seconds)	ALLOWABLE VALUE (seconds)
62X-546	DG Rm Exh Fan D	OB546	120	≥ 54
62X-536	DG Rm Exh Fan C	OB536	120	≥ 54
62X-526	DG Rm Exh Fan B	OB526	120	≥ 54
62X-516	DG Rm Exh Fan A	OB516	120	≥ 54
CRX-5652A	DG Room Supply Fans E1 and E2	OB565	120	≥ 54
62X2-20410	Control Structure Chilled Water System	OC876B	180	≥ 54
62X1-20304	Control Structure Chilled Water System	OC877A	180	≥ 54
62X2-20310	Control Structure Chilled Water System	OC876A	180	≥ 54
62X1-20404	Control Structure Chilled Water System	OC877B	180	≥ 54
62X2-20304	Control Structure Chilled Water System	OC877A	210	≥ 54
62X2-20404	Control Structure Chilled Water System	OC877B	210	≥ 54
62X-K11BB	Emergency Switchgear Rm Cooling Compressor B	2CB250B	260	≥ 54
62X-K11AB	Emergency Switchgear Rm Cooling Compressor A	2CB250A	260	≥ 54