

From: "BICE, DAVID B" <DBICE@entergy.com>
To: "Tom Alexion" <twalex@nrc.gov>
Date: 2/26/04 5:18PM
Subject: Proposed EDG AOT Bases Wording

Tom,

Attached are markups and clean pages for info only. Thanks.

David Bice
ANO Licensing

CC: "SHORT, BRADLEY W" <BSHORT@entergy.com>, "PYLE, STEPHENIE L" <SPYLE@entergy.com>

Mail Envelope Properties (403E70AD.AC4 : 21 : 51908)

Subject: Proposed EDG AOT Bases Wording
Creation Date: 2/26/04 5:15PM
From: "BICE, DAVID B" <DBICE@entergy.com>

Created By: DBICE@entergy.com

Recipients

nrc.gov
 owf4_po.OWFN_DO
 TWA (Thomas Alexion)

entergy.com
 SPYLE CC (PYLE, STEPHENIE L)
 BSHORT CC (SHORT, BRADLEY W)

Post Office
 owf4_po.OWFN_DO

Route
 nrc.gov
 entergy.com

Files	Size	Date & Time
MESSAGE	96	02/26/04 05:15PM
Part.001	868	
3b0802aR.001A.doc	33792	
3b08020R.001A.doc	34304	
3b0802aR.001.doc	33792	
3b08020R.001.doc	34304	
Mime.822	189779	

Options

Expiration Date: None
Priority: Standard
Reply Requested: No
Return Notification: None

Concealed Subject: No
Security: Standard

BASES

TS 3.8.1.1 Action "a" includes an allowance for extending the allowable outage time for Startup Transformer No. 2 only, for up to 30 days. The 30-day allowance is permitted not more than once in any 10-year period, which is considered sufficient for proper maintenance of the transformer. The 30-day window should permit extensive preplanned preventative maintenance without placing either unit in an action statement of short duration and would allow both units to be operating during such maintenance. Because this allowance assumes parts are prestaged, appropriate personnel are available, and proper contingencies have been established, it is not intended to be used for an unexpected loss of the transformer. Pre-established contingencies will consider the projected stability of the offsite electrical grid, the atmospheric stability projected for the maintenance window, the ability to adequately control other ongoing plant maintenance activities that coincide with the window, projected flood levels, and the availability of all other power sources. Since a station blackout is the most affected event that could occur when power sources are inoperable, the steam driven emergency feedwater pump will also be maintained available during the evolution.

TS 3.8.1.1 Action "b" allows for the extension of the EDG AOT up to 14 days. Typically, use of the extended AOT will be restricted to once per 18-month cycle per EDG for voluntary planned maintenance or inspections, but it may be used for failures or other corrective maintenance activities provided plant risk is managed. The following contingencies shall be met prior to entering the extended EDG AOT when pre-planned maintenance activities are scheduled or within 72 hours if unplanned entry into the action is required:

1. Weather conditions will be evaluated prior to entering the extended EDG AOT for voluntary planned maintenance. An extended EDG AOT will not be entered for voluntary planned maintenance purposes if weather related grid disturbances are forecast during the AOT.
2. The condition of the offsite power supply and switchyard will be evaluated prior to entering the extended AOT.
3. No discretionary switchyard maintenance will be allowed. In addition, no discretionary maintenance will be allowed on the main, auxiliary, or startup transformers associated with the unit.
4. No maintenance or testing that affects the reliability of the ANO-2 train associated with the OPERABLE EDG will be scheduled during the extended AOT. If any testing and maintenance activities must be performed while the extended AOT is in effect, a 10 CFR 50.65(a)(4) evaluation will be performed.
5. The Alternate AC Diesel Generator (AACDG) will be available as a backup to the inoperable EDG and will not be used for non-safety functions such as power peaking to the grid. After entering the extended AOT, the AACDG will be verified available every 8 hours and treated as protected equipment.
6. ANO-1 personnel will be notified to ensure no elective maintenance activities will be scheduled on the ANO-1 EDGs and will be made aware of the dedication of the AACDG to ANO-2.

3/4.8 ELECTRICAL POWER SYSTEMS

BASES

7. The steam driven emergency feedwater pump will not be taken out of service for planned maintenance activities and will be treated as protected equipment.
8. The system dispatcher will be contacted once per day and informed of the EDG status, along with the power needs of the facility.
9. Should weather related conditions for the local area result in potential grid disturbances, an operator will be available should local operation of the AACDG be required as a result of on-site weather-related damage.
10. ANO-2 on-shift Operations crews will discuss and review appropriate normal and emergency operating procedures upon or prior to assuming the watch for the first time after having scheduled days off while the AOT is in effect.
11. ANO-2 on-shift Operations crews will be briefed concerning the ANO-2 EDG activities, including compensatory measures established and the importance of promptly starting and aligning the AACDG following instruction of the ANO-2 Shift Manager upon a loss of offsite power event. This briefing will be performed upon or prior to assuming the watch for the first time after having scheduled days off while the AOT is in effect.
12. During the EDG outage, welding and transient combustibles will be controlled and continuous fire watch(es) established in the vicinity of the Turbine Building Switchgear (2A1/2A2/2A9).
13. During the EDG outage, welding and transient combustibles in the following areas will be controlled: the transformer yard; the south Switchgear Room (SS/2100-Z); the Cable Spreading Room (G/2098-L); Intake Structure (OO/IS); Diesel Corridor (JJ/2109-U); Lower South Electrical/Piping Penetration Room (EE/2055SC); and Electrical Equipment Room (TT/2108-S).
14. Prior to the EDG outage, the ANO-2 Operations personnel and ANO-1 fire brigade personnel will be briefed on information related to fighting electrical fires and fires that may occur in the transformer yard. The briefing will include relevant industry operating experience related to fires in these areas and will also include a discussion of equipment restoration.
15. Prior to the EDG outage, the operability of the fire suppression in the transformer yard will be confirmed. This will be accomplished by verifying that surveillances are current and the system is not isolated. If the system is isolated, then fire hoses will be staged to the transformer yard area during the EDG maintenance outage.

Note 1 of TS 3.8.1.1 Action "b" requires availability of the AACDG when an EDG is removed from service. If the AACDG becomes unavailable, then the allowable outage time is reduced to 72 hours from the time the AACDG becomes unavailable, not to exceed 14 days from the initial entry related to the inoperable EDG. Either the AACDG or the EDG may be restored within the 72 hours. If the EDG is restored, then TS 3.8.1.1, action "b" is exited. If the AACDG is restored within the 72 hours, then restoration of the EDG must be accomplished within the initial 14 day AOT (i.e. 14 days from the time the EDG was initially declared inoperable and action "b" was entered).

BASES

TS 3.8.1.1 Action "a" includes an allowance for extending the allowable outage time for Startup Transformer No. 2 only, for up to 30 days. The 30-day allowance is permitted not more than once in any 10-year period, which is considered sufficient for proper maintenance of the transformer. The 30-day window should permit extensive preplanned preventative maintenance without placing either unit in an action statement of short duration and would allow both units to be operating during such maintenance. Because this allowance assumes parts are prestaged, appropriate personnel are available, and proper contingencies have been established, it is not intended to be used for an unexpected loss of the transformer. Pre-established contingencies will consider the projected stability of the offsite electrical grid, the atmospheric stability projected for the maintenance window, the ability to adequately control other ongoing plant maintenance activities that coincide with the window, projected flood levels, and the availability of all other power sources. Since a station blackout is the most affected event that could occur when power sources are inoperable, the steam driven emergency feedwater pump will also be maintained available during the evolution.

TS 3.8.1.1 Action "b" allows for the extension of the EDG AOT up to 14 days. Typically, use of the extended AOT will be restricted to once per 18-month cycle per EDG for voluntary planned maintenance or inspections, but it may be used for failures or other corrective maintenance activities provided plant risk is managed. The following contingencies shall be met prior to entering the extended EDG AOT when pre-planned maintenance activities are scheduled or within 72 hours if unplanned entry into the action is required:

1. Weather conditions will be evaluated prior to entering the extended EDG AOT for voluntary planned maintenance. An extended EDG AOT will not be entered for voluntary planned maintenance purposes if weather related grid disturbances are forecasts during the AOT.
2. The condition of the offsite power supply and switchyard will be evaluated prior to entering the extended AOT.
3. No discretionary switchyard maintenance will be allowed. In addition, no discretionary maintenance will be allowed on the main, auxiliary, or startup transformers associated with the unit.
4. No maintenance or testing that affects the reliability of the ANO-2 train associated with the OPERABLE EDG will be scheduled during the extended AOT. If any testing and maintenance activities must be performed while the extended AOT is in effect, a 10 CFR 50.65(a)(4) evaluation will be performed.
5. The Alternate AC Diesel Generator (AACDG) will be available as a backup to the inoperable EDG and will not be used for non-safety functions such as power peaking to the grid. After entering the extended AOT, the AACDG will be verified available every 8 hours and treated as protected equipment.
6. ANO-1 personnel will be notified to ensure no elective maintenance activities will be scheduled on the ANO-1 EDGs and will be made aware of the dedication of the AACDG to ANO-2.

3/4.8 ELECTRICAL POWER SYSTEMS

BASES

7. The steam driven emergency feedwater pump will not be taken out of service for planned maintenance activities and will be treated as protected equipment.
8. The system dispatcher will be contacted once per day and informed of the EDG status, along with the power needs of the facility.
9. Should weather related conditions for the local area result in potential grid disturbances, an operator will be available should local operation of the AACDG be required as a result of on-site weather-related damage.
10. ANO-2 on-shift Operations crews will discuss and review appropriate normal and emergency operating procedures upon or prior to assuming the watch for the first time after having scheduled days off while the AOT is in effect.
11. ANO-2 on-shift Operations crews will be briefed concerning the ANO-2 EDG activities, including compensatory measures established and the importance of promptly starting and aligning the AACDG following instruction of the ANO-2 Shift Manager upon a loss of offsite power event. This briefing will be performed upon or prior to assuming the watch for the first time after having scheduled days off while the AOT is in effect.
12. During the EDG outage, welding and transient combustibles will be controlled and continuous fire watch(es) established in the vicinity of the Turbine Building Switchgear (2A1/2A2/2A9).
13. During the EDG outage, welding and transient combustibles in the following areas will be controlled: the transformer yard; the south Switchgear Room (SS/2100-Z); the Cable Spreading Room (G/2098-L); Intake Structure (OO/IS); Diesel Corridor (JJ/2109-U); Lower South Electrical/Piping Penetration Room (EE/2055SC); and Electrical Equipment Room (TT/2108-S).
14. Prior to the EDG outage, the ANO-2 Operations personnel and ANO-1 fire brigade personnel will be briefed on information related to fighting electrical fires and fires that may occur in the transformer yard. The briefing will include relevant industry operating experience related to fires in these areas and will also include a discussion of equipment restoration.
15. Prior to the EDG outage, the operability of the fire suppression in the transformer yard will be confirmed. This will be accomplished by verifying that surveillances are current and the system is not isolated. If the system is isolated, then fire hoses will be staged to the transformer yard area during the EDG maintenance outage.

Note 1 of TS 3.8.1.1 Action "b" requires availability of the AACDG when an EDG is removed from service. If the AACDG becomes unavailable, then the allowable outage time is reduced to 72 hours from the time the AACDG becomes unavailable, not to exceed 14 days from the initial entry related to the inoperable EDG. Either the AACDG or the EDG may be restored within the 72 hours. If the EDG is restored, then TS 3.8.1.1, action "b" is exited. If the AACDG is restored within the 72 hours, then restoration of the EDG must be accomplished within the initial 14 day AOT (i.e. 14 days from the time the EDG was initially declared inoperable and action "b" was entered).