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SEP 0 8 2004

U.S. Nuclear Regulatory Commission
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Washington, DC 20555

SUSQUEHANNA STEAM ELECTRIC STATION
PROPOSED AMENDMENT NO. 266 TO LICENSE NPF-14 AND PROPOSED AMENDMENT NO. 231 TO LICENSE NPF-22: INCORPORATION OF TSTF-16 AND EDITORIAL CHANGES
PLA-5756

Docket Nos. 50-387 and 50-388

In accordance with the provisions of 10 CFR 50.90, PPL Susquehanna, LLC is submitting a request for an amendment to the Technical Specifications for Susquehanna Units 1 and 2.

The proposed amendment incorporates Technical Specification Task Force (TSTF) 16 and three (3) editorial changes.

These proposed changes have been reviewed by the Plant Operations Review Committee and approved by the Susquehanna Review Committee.

The Enclosure to this letter provides a description of the proposed change, the requested confirmation of applicability, and plant-specific verifications. Attachment 1 provides the existing Technical Specification pages marked-up to show the proposed change. Attachment 2 provides revised "Camera Ready" TS pages. Attachment 3 provides the corresponding TS Bases "markup" pages. No new regulatory commitments are made herein.

We request approval of the proposed License Amendment by August 01, 2005, with the amendment being implemented within 60 days following approval.

In accordance with 10 CFR 50.91(b), PPL Susquehanna, LLC is providing the Commonwealth of Pennsylvania with a copy of this proposed License Amendment request.

A001

If you have any questions regarding this submittal, please contact Mr. Neil Coddington at (610) 774-4019.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 9-8-04

B. T. McKinney

Enclosure:
PPL Susquehanna Evaluation of the Proposed Changes

Attachments:
Attachment 1 - Proposed Technical Specification Changes Units 1 & 2, (Mark-ups)
Attachment 2 - Proposed Technical Specification Pages Units 1 & 2, (Camera Ready)
Attachment 3 - Technical Specification Bases Changes, (Provided for Information)

cc: NRC Region I
Mr. A. J. Blamey, NRC Sr. Resident Inspector
Mr. R. V. Guzman, NRC Project Manager
Mr. R. Janati, DEP/BRP

Enclosure to PLA-5756

PPL Susquehanna Evaluation of Proposed Change Incorporation of TSTF-16 and Editorial Changes

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PPL EVALUATION

1.0 DESCRIPTION

This is a request to amend Operating Licenses NPF-14 and NPF-22 for PPL Susquehanna, LLC (PPL), Susquehanna Steam Electric Station Units 1 and 2 (SSES) respectively.

This amendment request proposes four unrelated changes. These changes are as follows:

(1) Add an Action Note to both the Unit 1 and Unit 2 TS 3.8.7 to address the potential for deenergized Class 1E battery chargers. The need for this added restriction was identified by Technical Specification Task Force (TSTF) change TSTF-16 (during Revision 2 changes). The note is added to direct entry into applicable Conditions and Required Actions of LCO 3.8.4, "DC Sources - Operating," for DC sources made inoperable by inoperable AC power distribution subsystems. This Note is reflected in NUREG-1433, "Standard Technical Specifications for General Electric Plants (BWR/4)," Revision 2 (Reference 1). The corresponding TS Bases section is also revised.

(2) Correct several editorial and formatting errors in both Unit 1 and Unit 2 TS to be consistent with NUREG-1433.

(3) Revise the one time 10-day completion time allowance in both Unit 1 and Unit 2 LCO 3.8.1 Condition A for the replacement of Startup transformer No. T-10. The corresponding TS Bases section is also revised.

(4) Correct typographical errors in both Unit 1 and Unit 2 TS 3.3.1.1 and TS 3.3.5.1. The changes are:

- in Table 3.3.1.1-1 for Function 1.b, revise SR 3.3.2.2.15 to SR 3.3.1.1.15.
- in the APT Note in TS 3.3.5.1 revise Function 3.f to Function 3.e.

2.0 PROPOSED CHANGE

The four proposed changes are discussed separately as follows:

(1) Add a Note to Required Action A.1 of both the Unit 1 and Unit 2 SSES TS 3.8.7. The Note states: "Enter applicable Conditions and Required Actions of LCO 3.8.4, "DC Sources—Operating," for DC source(s) made inoperable by inoperable

AC electrical power distribution subsystems." This will assure that upon loss of AC power to required battery chargers, the appropriate actions of TS 3.8.4 are entered.

(2) Correct various pages of the Unit 1 and Unit 2 TS Section 3.8, Electrical Power Systems, for editorial and format content. These changes establish consistency with other SSES TS presentations of similar content and consistency with the wording and format presented in NUREG 1433 (Reference 3). The affected Specifications are:

- Unit 1 and Unit 2 TS 3.8.2 Applicability statement format;
- Unit 1 and Unit 2 TS 3.8.7 Required Actions A.1 and B.1 revise "s" to "(s)";
- Unit 1 TS 3.8.7 Completion Times for Required Actions A.1 and B.1 remove extraneous periods; and
- Unit 1 TS 3.8.8 Applicability statement format.

These changes are consistent with NUREG-1433, "Standard Technical Specifications for General Electric Plants (BWR/4)," Revision 2 (Reference 3).

(3) Revise the one time 10-day completion time allowance in both Unit 1 and Unit 2 LCO 3.8.1 Condition A for the replacement of Startup transformer No. T-10.

(4) Correct typographical errors in both Unit 1 and Unit 2 TS 3.3.1.1 and 3.3.5.1. The changes are:

- in Table 3.3.1.1-1 for Function 1.b, revise SR 3.3.2.2.15 to SR 3.3.1.1.15.
- in the APT Note in TS 3.3.5.1 revise Function 3.f to Function 3.e.

Associated TS Bases changes that reflect the intent of the TS changes are also provided for information in an Attachment.

3.0 BACKGROUND

The onsite Class 1E AC and DC electrical power distribution system is divided into redundant and independent AC electrical power distribution subsystems and redundant independent DC electrical power distribution subsystems. The safety-related AC distribution system consists of four 4.16 kV Engineered Safeguards System (ESS) buses each having a primary and alternate offsite source of power as well as an onsite diesel generator (DG) source that supports one 4.16 kV ESS bus in each unit.

Portions of the Unit 1 AC Distribution System are shared between both units, since the common equipment (Emergency Service Water (ESW), Standby Gas Treatment System (SGTS), Control Structure HVAC (CREOAS), etc.) is energized only from the Unit 1 AC Distribution System. As such, some components that are required by Unit 2 receive power through Unit 1 electrical power distribution subsystems. The Unit 1 electrical power distribution subsystems needed to support the required Unit 2 equipment are addressed in Unit 2 LCO 3.8.7, Table 3.8.7-1. Refer to SSES Final Safety Analysis Report (FSAR) Sections 8.1.3 and 8.3.1 for further details and discussion, including references to applicable drawings.

Proposed Change No. 1:

In conjunction with TS LCO 3.0.6, TS 3.8.7 would allow the safety related 480 VAC buses powering the safety related battery chargers to be deenergized for periods of time longer than allowed by TS 3.8.4 (which provides the Actions for inoperable battery chargers). This potential non-conservative allowance was generically identified by the Technical Specification Task Force (TSTF). As a result, an added restriction was identified in TSTF-16 during Revision 2 changes. A note is added to the Unit 1 and Unit 2 Technical Specifications to direct entry into applicable Conditions and Required Actions of LCO 3.8.4, "DC Sources - Operating," for DC sources made inoperable by inoperable AC power distribution subsystems. This Note is also reflected in NUREG-1433, "Standard Technical Specifications for General Electric Plants (BWR/4)," Revision 2 (Reference 1).

Proposed Change No. 2:

During the conversion to the Improved Technical Specifications several editorial and formatting errors occurred. The correction of these errors is consistent with NUREG-1433, "Standard Technical Specifications for General Electric Plants (BWR/4)," Revision 2.

Proposed Change No. 3:

In order to provide adequate time for the installation of a replacement for Startup Transformer T-10, a one-time 10-day completion time allowance was requested and granted. Startup Transformer T-10 was replaced on October 18, 2003. Therefore, the one-time allowance is no longer applicable.

Proposed Change No. 4:

Several typographical errors were introduced during the initial production of the Improved Technical Specifications (Table 3.3.1.1-1) and the production of an amendment to TS LCO 3.3.5.1.

4.0 TECHNICAL ANALYSIS

Proposed Change No. 1:

The request also adds a Note to Required Action A.1 for both the Unit 1 and Unit 2 SSES TS 3.8.7 stating: "Enter applicable Conditions and Required Actions of LCO 3.8.4, "DC Sources—Operating," for DC source(s) made inoperable by inoperable AC electrical power distribution subsystems." This added requirement will address the potential for deenergized Class 1E battery chargers, which was identified by Technical Specification Task Force (TSTF) change TSTF-16 (during Revision 2 changes), and incorporated into NUREG-1433, Revision 2 (Reference 1).

TS 3.8.7 Condition A, associated with the added Note, applies to one or more AC electrical power distribution subsystems inoperable (i.e., deenergized) and would allow 8 hours to restore the inoperable subsystem. Inoperability of a distribution subsystem can result in loss of charging power to batteries and eventual loss of DC power. The added Note ensures that the appropriate attention is given to restoring charging power to batteries (in accordance with the Actions of TS 3.8.4), as necessary, after loss of distribution systems. The current SSES TS 3.8.4 Actions for an inoperable battery charger impose 2-hour restorative and/or compensatory action. As such this change imposed more conservative actions appropriate to enhancing the safe and reliable operation of the facility.

Proposed Change No. 2:

Several proposed editorial and formatting corrections are consistent with NUREG-1433, "Standard Technical Specifications for General Electric Plants (BWR/4)," Revision 2 (Reference 3).

Proposed Change No. 3:

The one time completion time allowance is no longer applicable since Startup Transformer T-10 was replaced on October 18, 2003. Deletion of this one time allowance does not affect the Technical Specifications or the operation of SSES.

Proposed Change No. 4:

Correction of the typographical errors does not have any effect on the technical contents of the Technical Specifications nor does it cause any other document or procedure to be revised.

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

5.0 REGULATORY SAFETY ANALYSIS

5.1 No Significant Hazards Consideration

This No Significant Hazards Consideration evaluates the following changes to the Technical Specifications:

(1) Add a Note to Required Action A.1 of both the Unit 1 and Unit 2 SSES TS 3.8.7. The Note states: "Enter applicable Conditions and Required Actions of LCO 3.8.4, "DC Sources—Operating," for DC source(s) made inoperable by inoperable AC electrical power distribution subsystems."

(2) Correct various pages of the Unit 1 and Unit 2 TS Section 3.8, Electrical Power Systems, for editorial and format content. The affected Specifications are:

- Unit 1 and Unit 2 TS 3.8.2 Applicability statement format;
- Unit 1 and Unit 2 TS 3.8.7 Required Actions A.1 and B.1 revise "s" to "(s)";
- Unit 1 TS 3.8.7 Completion Times for Required Actions A.1 and B.1 remove extraneous periods; and
- Unit 1 TS 3.8.8 Applicability statement format.

(3) Revise the one time 10-day completion time allowance in both Unit 1 and Unit 2 LCO 3.8.1 Condition A for the replacement of Startup transformer No. T-10.

(4) Correct typographical errors in both Unit 1 and Unit 2 TS 3.3.1.1 and 3.3.5.1. The changes are:

- in Table 3.3.1.1-1 for Function 1.b, revise SR 3.3.2.2.15 to SR 3.3.1.1.15.
- in the APT Note in TS 3.3.5.1 revise Function 3.f to Function 3.e.

PPL Susquehanna, LLC (PPL) has evaluated whether or not a significant hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

1. **Does the proposed change involve a significant increase in the probability of occurrence or consequences of an accident previously evaluated?**

   Response: No.

   The Technical Specification allowed Completion Time for any inoperability is not an initiator to any accident sequence analyzed in the Final Safety Analysis Report (FSAR). The changes do not involve any physical change to structures, systems, or components (SSCs) and does not alter the method of operation or control of SSCs. The current assumptions in the safety analysis regarding accident initiators and mitigation of accidents are unaffected by these changes. No additional failure modes or mechanisms are being introduced and the likelihood of previously analyzed failures remains unchanged.

   Operation in accordance with the proposed Technical Specification (TS) ensures that the AC distribution system and supported equipment functions remain capable of performing the function as described in the FSAR. Therefore, the mitigative functions supported by the system will continue to provide the protection assumed by the analysis.

   The correction of typographical errors, changes in format and the deletion of a no longer required one-time exemption are administrative changes.

   Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. **Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?**

   Response: No.

   The proposed change does not involve a physical alteration of the plant. No new equipment is being introduced, and installed equipment is not being operated in a new or different manner. There are no setpoints, at which protective or mitigative actions are initiated, affected by this change. This change will not alter the manner in which equipment operation is initiated, nor will the function demands on credited equipment be changed. No alterations in the procedures that ensure the plant remains within analyzed limits are being proposed, and no changes are being made to the procedures relied upon to respond to an off-normal event as described in the FSAR. The correction of typographical errors, changes in format and the deletion of a no longer required one-time exemption are administrative changes. As such, no new failure modes are being introduced. The change does not alter assumptions made in the safety analysis and licensing basis.

3. Does the proposed change involve a significant reduction in a margin of safety?

Response: No.

The margin of safety is established through equipment design, operating parameters, and the setpoints at which automatic actions are initiated. The proposed change is acceptable because the restoration times for deenergized AC distribution subsystems has been previously evaluated in Unit 2 Amendment No. 148. Additional margin of safety is gained with the inclusion of the requirement to enter applicable actions for inoperable Class 1E battery chargers as a result of inoperable AC bus(es). The correction of typographical errors, changes in format and the deletion of a no longer required one-time exemption are administrative changes. Therefore the plant response to analyzed events will continue to provide the margin of safety assumed by the analysis.

5.2 Applicable Regulatory Requirements/Criteria

SSES FSAR Sections 3.1 and 3.13 provide detailed discussion of SSES compliance with the applicable regulatory requirements and guidance. The proposed TS amendment:

(a) Does not alter the design or function of any system;
(b) Does not result in any change in the qualifications of any component; and
(c) Does not result in the reclassification of any component's status in the areas of shared, safety related, independent, redundant, and physically or electrically separated.

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

6.0 ENVIRONMENTAL CONSIDERATIONS

10 CFR 51.22(c)(9) identifies certain licensing and regulatory actions, which are eligible for categorical exclusion from the requirement to perform an environmental assessment. A proposed amendment to an operating license for a facility does not require an environmental assessment if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant hazards consideration; (2) result in a

significant change in the types or significant increase in the amounts of any effluents that may be released offsite; or (3) result in a significant increase in individual or cumulative occupational radiation exposure. PPL Susquehanna, LLC has evaluated the proposed changes and has determined that the proposed change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Accordingly, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment needs to be prepared in connection with issuance of the amendment. The basis for this determination, using the above criteria, follows:

Basis

As demonstrated in the No Significant Hazards Consideration Evaluation, the proposed amendment does not involve a significant hazards consideration.

There is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite. The proposed change does not involve any physical alteration of the plant (no new or different type of equipment will be installed) or change in methods governing normal plant operation.

There is no significant increase in individual or cumulative occupational radiation exposure. The proposed changes do not involve any physical alteration of the plant (no new or different type of equipment will be installed) or change in methods governing normal plant operation.

7.0 REFERENCES

1. NUREG-1433, "Standard Technical Specifications, General Electric Plants, BWR/4," Revision 2, dated June 2001.

Attachment 1 to PLA-5756

Proposed Technical Specification Changes

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(Mark-ups)

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NFM TS1 text TOC.doc

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Reactor Protection System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER TRIP SYSTEM	CONDITIONS REFERENCED FROM REQUIRED ACTION D.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1. Intermediate Range Monitors					
a. Neutron Flux—High	2	3	G	SR 3.3.1.1.1 SR 3.3.1.1.4 SR 3.3.1.1.6 SR 3.3.1.1.7 SR 3.3.1.1.11 SR 3.3.1.1.15	≤ 122/125 divisions of full scale
	5[a]	3	H	SR 3.3.1.1.1 SR 3.3.1.1.5 SR 3.3.1.1.11 SR 3.3.1.1.15	≤ 122/125 divisions of full scale
b. Inop	2	3	G	SR 3.3.1.1.4 SR 3.3.1.1.15	NA
	5[a]	3	H	SR 3.3.1.1.5 SR ~~3.3.2.2.15~~ 3.3.1.1.15	NA
2. Average Power Range Monitors					
a. Neutron Flux—High, Setdown	2	2	G	SR 3.3.1.1.1 SR 3.3.1.1.4 SR 3.3.1.1.7 SR 3.3.1.1.8 SR 3.3.1.1.11 SR 3.3.1.1.15	≤ 20% RTP
b. Flow Biased Simulated Thermal Power—High	1	2	F	SR 3.3.1.1.1 SR 3.3.1.1.2 SR 3.3.1.1.3 SR 3.3.1.1.8 SR 3.3.1.1.9 SR 3.3.1.1.11 SR 3.3.1.1.14 SR 3.3.1.1.15 SR 3.3.1.1.17	≤ 0.58 W + 62% RTP[b]) and ≤ 115.5% RTP

(continued)

(a) With any control rod withdrawn from a core cell containing one or more fuel assemblies.

(b) 0.58 W + 57% RTP when reset for single loop operation per LCO 3.4.1, "Recirculation Loops Operating."

SURVEILLANCE REQUIREMENTS

NOTES

1. Refer to Table 3.3.5.1-1 to determine which SRs apply for each ECCS Function.

2. When a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed as follows: (a) for up to 6 hours for Functions 3.c and 3.e and (b) for up to 6 hours for Functions other than 3.c and 3.e provided the associated Function or the redundant Function maintains ECCS initiation capability.

SURVEILLANCE		FREQUENCY
SR 3.3.5.1.1	Perform CHANNEL CHECK.	12 hours
SR 3.3.5.1.2	A test of all required contacts does not have to be performed. Perform CHANNEL FUNCTIONAL TEST.	92 days
SR 3.3.5.1.3	Perform CHANNEL CALIBRATION.	92 days
SR 3.3.5.1.4	Perform CHANNEL CALIBRATION.	24 months
SR 3.3.5.1.5	Perform LOGIC SYSTEM FUNCTIONAL TEST.	24 months

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. (continued)	A.3 Restore offsite circuit to OPERABLE status.	72 hours AND 6 days from discovery of failure to meet LCO ~~OR~~ ~~10 days for a one-time outage for replacement of Startup Transformer Number 10 to be completed by December 31, 2003.~~
B. One required DG inoperable.	B.1 Perform SR 3.8.1.1 for OPERABLE offsite circuits. AND B.2 Declare required feature(s), supported by the inoperable DG, inoperable when the redundant required feature(s) are inoperable. AND	1 hour AND Once per 8 hours thereafter 4 hours from discovery of Condition B concurrent with inoperability of redundant required feature(s) (continued)

3.8 ELECTRICAL POWER SYSTEMS

3.8.2 AC Sources—Shutdown

LCO 3.8.2 The following AC electrical power sources shall be OPERABLE:

a. One qualified circuit between the offsite transmission network and the onsite Class 1E AC electrical power distribution subsystem(s) required by LCO 3.8.8, "Distribution Systems—Shutdown"; and

b. Two diesel generators (DGs) capable of supplying the onsite Class 1E AC electrical power distribution subsystem(s) required by LCO 3.8.8.

APPLICABILITY: MODES 4 and 5, ~~and~~
During movement of irradiated fuel assemblies in the secondary containment.

Indent

3.8 ELECTRICAL POWER SYSTEMS

3.8.7 Distribution Systems—Operating

LCO 3.8.7 The electrical power distribution subsystems in Table 3.8.7-1 shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

Insert A.1

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. ---------NOTE---------- Not applicable to DG E DC electrical power subsystem. ---------- One or more Unit 1 AC electrical power distribution subsystems inoperable.	A.1 Restore Unit 1 AC electrical power distribution subsystem~~s~~ (s) to OPERABLE status.	8 hours AND 16 hours from discovery of failure to meet LCO 3.8.7 except for Condition D or ~~E~~ A
B. ---------NOTE---------- Not applicable to DG E DC electrical power subsystem. ---------- One or more Unit 1 DC electrical power distribution subsystems inoperable.	B.1 Restore Unit 1 DC electrical power distribution subsystem~~s~~ (s) to OPERABLE status.	2 hours AND 16 hours from discovery of failure to meet LCO 3.8.7 except for Condition D or ~~E~~ A

(continued)

INSERT "A.1" (U1: pg 3.8-37)

----------NOTE----------
Enter applicable Conditions and Required Actions of LCO 3.8.4, "DC Sources - Operating," for DC source(s) made inoperable by inoperable power distribution subsystem(s).

3.8 ELECTRICAL POWER SYSTEMS

3.8.8 Distribution Systems—Shutdown

LCO 3.8.8 The necessary portions of the AC and DC electrical power distribution subsystems listed in Table 3.8.7-1 shall be OPERABLE to support equipment required to be OPERABLE.

APPLICABILITY: MODES 4 and 5, During movement of irradiated fuel assemblies in the secondary containment.
<Indent 2nd line>

ACTIONS

----------NOTE----------

LCO 3.0.3 is not applicable.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. ----------NOTE---------- Not applicable to DG E DC electrical power subsystem. ---------- One or more required AC or DC electrical power distribution subsystems inoperable.	A.1 Declare associated supported required feature(s) inoperable. OR	Immediately

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Reactor Protection System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER TRIP SYSTEM	CONDITIONS REFERENCED FROM REQUIRED ACTION D.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1. Intermediate Range Monitors					
a. Neutron Flux—High	2	3	G	SR 3.3.1.1.1 SR 3.3.1.1.4 SR 3.3.1.1.6 SR 3.3.1.1.7 SR 3.3.1.1.11 SR 3.3.1.1.15	≤ 122/125 divisions of full scale
	5[a]	3	H	SR 3.3.1.1.1 SR 3.3.1.1.5 SR 3.3.1.1.11 SR 3.3.1.1.15	≤ 122/125 divisions of full scale
b. Inop	2	3	G	SR 3.3.1.1.4 SR 3.3.1.1.15	NA
	5[a]	3	H	SR 3.3.1.1.5 SR ~~3.3.2.2.15~~ 3.3.1.1.15	NA
2. Average Power Range Monitors					
a. Neutron Flux—High, Setdown	2	2	G	SR 3.3.1.1.1 SR 3.3.1.1.4 SR 3.3.1.1.7 SR 3.3.1.1.8 SR 3.3.1.1.11 SR 3.3.1.1.15	≤ 20% RTP
b. Flow Biased Simulated Thermal Power—High	1	2	F	SR 3.3.1.1.1 SR 3.3.1.1.2 SR 3.3.1.1.3 SR 3.3.1.1.8 SR 3.3.1.1.9 SR 3.3.1.1.11 SR 3.3.1.1.14 SR 3.3.1.1.15 SR 3.3.1.1.17	≤ 0.58 W + 62% RTP[b] and ≤ 115.5% RTP

(continued)

(a) With any control rod withdrawn from a core cell containing one or more fuel assemblies.

(b) 0.58 W + 57% RTP when reset for single loop operation per LCO 3.4.1, "Recirculation Loops Operating."

SURVEILLANCE REQUIREMENTS

NOTES

1. Refer to Table 3.3.5.1-1 to determine which SRs apply for each ECCS Function.

2. When a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed as follows: (a) for up to 6 hours for Functions 3.c and 3.f; and (b) for up to 6 hours for Functions other than 3.c and 3.f provided the associated Function or the redundant Function maintains ECCS initiation capability.

SURVEILLANCE		FREQUENCY
SR 3.3.5.1.1	Perform CHANNEL CHECK.	12 hours
SR 3.3.5.1.2	A test of all required contacts does not have to be performed. Perform CHANNEL FUNCTIONAL TEST.	92 days
SR 3.3.5.1.3	Perform CHANNEL CALIBRATION.	92 days
SR 3.3.5.1.4	Perform CHANNEL CALIBRATION.	24 months
SR 3.3.5.1.5	Perform LOGIC SYSTEM FUNCTIONAL TEST.	24 months

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. (continued)	A.2 Declare required feature(s) with no offsite power available inoperable when the redundant required feature(s) are inoperable.	24 hours from discovery of no offsite power to one 4.16 kV ESS bus concurrent with inoperability of redundant required feature(s).
	AND	
	A.3 Restore offsite circuit to OPERABLE status.	72 hours AND 6 days from discovery of failure to meet LCO ~~OR~~ ~~10 days from a one-time outage for replacement of Startup Transformer Number 10 to be completed by December 31, 2003.~~

(continued)

3.8 ELECTRICAL POWER SYSTEMS

3.8.2 AC Sources—Shutdown

LCO 3.8.2 The following AC electrical power sources shall be OPERABLE:

a. One qualified circuit between the offsite transmission network and the onsite Class 1E AC electrical power distribution subsystem(s) required by LCO 3.8.8, "Distribution Systems—Shutdown"; and

b. Two diesel generators (DGs) capable of supplying the onsite Class 1E AC electrical power distribution subsystem(s) required by LCO 3.8.8.

c. One qualified circuit between the offsite transmission network and the Unit 1 onsite Class 1E AC electrical power distribution subsystem(s) required by LCO 3.8.8, Distribution Systems—Shutdown; and

d. The DG(s) capable of supplying the Unit 1 onsite Class 1E electrical power distribution subsystem(s) required by LCO 3.8.8.

APPLICABILITY: MODES 4 and 5, ~~and~~
During movement of irradiated fuel assemblies in the secondary containment.

< indent >

3.8 ELECTRICAL POWER SYSTEMS

3.8.7 Distribution Systems – Operating

LCO 3.8.7 The electrical power distribution subsystems in Table 3.8.7-1 shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

Insert A.1

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. ---------NOTE--------- Not applicable to DG E DC Bus 0D597. ---------- One or more Unit 2 AC electrical power distribution subsystems inoperable.	A.1 Restore Unit 2 AC electrical power distribution subsystem~~s~~ (s) to OPERABLE status.	8 hours AND 16 hours from discovery of failure to meet LCO 3.8.7 except for Condition E or F
B. ---------NOTE--------- Not applicable to DG E DC Bus 0D597. ---------- One or more Unit 2 DC electrical power distribution subsystems inoperable.	B.1 Restore Unit 2 DC electrical power distribution subsystem~~s~~ (s) to OPERABLE status.	2 hours AND 16 hours from discovery of failure to meet LCO 3.8.7 except for Condition E or F
C. One or more Unit 1 AC electrical power distribution subsystems inoperable.	C.1 Restore Unit 1 AC electrical power distribution subsystem to OPERABLE status.	72 hours

(continued)

INSERT "A.1" (U2: pg 3.8-44)

----------NOTE----------
Enter applicable Conditions and Required Actions of LCO 3.8.4, "DC Sources - Operating," for DC source(s) made inoperable by inoperable power distribution subsystem(s).

Attachment 2 to PLA-5756

Proposed Technical Specification Pages

Units 1 & 2

("Camera Ready")

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FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER TRIP SYSTEM	CONDITIONS REFERENCED FROM REQUIRED ACTION D.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1. Intermediate Range Monitors					
a. Neutron Flux—High	2	3	G	SR 3.3.1.1.1 SR 3.3.1.1.4 SR 3.3.1.1.6 SR 3.3.1.1.7 SR 3.3.1.1.11 SR 3.3.1.1.15	≤ 122/125 divisions of full scale
	5[a]	3	H	SR 3.3.1.1.1 SR 3.3.1.1.5 SR 3.3.1.1.11 SR 3.3.1.1.15	≤ 122/125 divisions of full scale
b. Inop	2	3	G	SR 3.3.1.1.4 SR 3.3.1.1.15	NA
	5[a]	3	H	SR 3.3.1.1.5 SR 3.3.1.1.15	NA
2. Average Power Range Monitors					
a. Neutron Flux—High, Setdown	2	2	G	SR 3.3.1.1.1 SR 3.3.1.1.4 SR 3.3.1.1.7 SR 3.3.1.1.8 SR 3.3.1.1.11 SR 3.3.1.1.15	≤ 20% RTP
b. Flow Biased Simulated Thermal Power—High	1	2	F	SR 3.3.1.1.1 SR 3.3.1.1.2 SR 3.3.1.1.3 SR 3.3.1.1.8 SR 3.3.1.1.9 SR 3.3.1.1.11 SR 3.3.1.1.14 SR 3.3.1.1.15 SR 3.3.1.1.17	≤ 0.58 W + 62% RTP[b]) and ≤ 115.5% RTP

(continued)

(a) With any control rod withdrawn from a core cell containing one or more fuel assemblies.

(b) 0.58 W + 57% RTP when reset for single loop operation per LCO 3.4.1, "Recirculation Loops Operating."

SURVEILLANCE REQUIREMENTS

----------NOTES----------

1. Refer to Table 3.3.5.1-1 to determine which SRs apply for each ECCS Function.

2. When a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed as follows: (a) for up to 6 hours for Functions 3.c and 3.e; and (b) for up to 6 hours for Functions other than 3.c and 3.e provided the associated Function or the redundant Function maintains ECCS initiation capability.

SURVEILLANCE		FREQUENCY
SR 3.3.5.1.1	Perform CHANNEL CHECK.	12 hours
SR 3.3.5.1.2	---------- A test of all required contacts does not have to be performed. ---------- Perform CHANNEL FUNCTIONAL TEST.	92 days
SR 3.3.5.1.3	Perform CHANNEL CALIBRATION.	92 days
SR 3.3.5.1.4	Perform CHANNEL CALIBRATION.	24 months
SR 3.3.5.1.5	Perform LOGIC SYSTEM FUNCTIONAL TEST.	24 months

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. (continued)	A.3 Restore offsite circuit to OPERABLE status.	72 hours AND 6 days from discovery of failure to meet LCO
B. One required DG inoperable.	B.1 Perform SR 3.8.1.1 for OPERABLE offsite circuits. AND B.2 Declare required feature(s), supported by the inoperable DG, inoperable when the redundant required feature(s) are inoperable. AND	1 hour AND Once per 8 hours thereafter 4 hours from discovery of Condition B concurrent with inoperability of redundant required feature(s) (continued)

3.8 ELECTRICAL POWER SYSTEMS

3.8.2 AC Sources—Shutdown

LCO 3.8.2 The following AC electrical power sources shall be OPERABLE:

a. One qualified circuit between the offsite transmission network and the onsite Class 1E AC electrical power distribution subsystem(s) required by LCO 3.8.8, "Distribution Systems—Shutdown"; and

b. Two diesel generators (DGs) capable of supplying the onsite Class 1E AC electrical power distribution subsystem(s) required by LCO 3.8.8.

APPLICABILITY: MODES 4 and 5

During movement of irradiated fuel assemblies in the secondary containment.

3.8 ELECTRICAL POWER SYSTEMS

3.8.7 Distribution Systems—Operating

LCO 3.8.7 The electrical power distribution subsystems in Table 3.8.7-1 shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
----------NOTE---------- Not applicable to DG E DC electrical power subsystem. ----------	----------NOTE---------- Enter applicable Conditions and Required Actions of LCO 3.8.4, "DC Sources – Operating," for DC source(s) made inoperable by inoperable power distribution subsystem(s). ----------	8 hours AND
A. One or more Unit 1 AC electrical power distribution subsystems inoperable.	A.1 Restore Unit 1 AC electrical power distribution subsystem(s) to OPERABLE status.	16 hours from discovery of failure to meet LCO 3.8.7 except for Condition D or E
B. ----------NOTE---------- Not applicable to DG E DC electrical power subsystem. ---------- One or more Unit 1 DC electrical power distribution subsystems inoperable.	B.1 Restore Unit 1 DC electrical power distribution subsystem(s) to OPERABLE status.	2 hours AND 16 hours from discovery of failure to meet LCO 3.8.7 except for Condition D or E

(continued)

3.8 ELECTRICAL POWER SYSTEMS

3.8.8 Distribution Systems—Shutdown

LCO 3.8.8 The necessary portions of the AC and DC electrical power distribution subsystems listed in Table 3.8.7-1 shall be OPERABLE to support equipment required to be OPERABLE.

APPLICABILITY: MODES 4 and 5,
During movement of irradiated fuel assemblies in the secondary containment.

ACTIONS

----------NOTE----------
LCO 3.0.3 is not applicable.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. ----------NOTE---------- Not applicable to DG E DC electrical power subsystem. ---------- One or more required AC or DC electrical power distribution subsystems inoperable.	A.1 Declare associated supported required feature(s) inoperable. OR	Immediately

(continued)

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Reactor Protection System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER TRIP SYSTEM	CONDITIONS REFERENCED FROM REQUIRED ACTION D.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1. Intermediate Range Monitors					
a. Neutron Flux—High	2	3	G	SR 3.3.1.1.1 SR 3.3.1.1.4 SR 3.3.1.1.6 SR 3.3.1.1.7 SR 3.3.1.1.11 SR 3.3.1.1.15	≤ 122/125 divisions of full scale
	5[a]	3	H	SR 3.3.1.1.1 SR 3.3.1.1.5 SR 3.3.1.1.11 SR 3.3.1.1.15	≤ 122/125 divisions of full scale
b. Inop	2	3	G	SR 3.3.1.1.4 SR 3.3.1.1.15	NA
	5[a]	3	H	SR 3.3.1.1.5 SR 3.3.1.1.15	NA
2. Average Power Range Monitors					
a. Neutron Flux—High, Setdown	2	2	G	SR 3.3.1.1.1 SR 3.3.1.1.4 SR 3.3.1.1.7 SR 3.3.1.1.8 SR 3.3.1.1.11 SR 3.3.1.1.15	≤ 20% RTP
b. Flow Biased Simulated Thermal Power—High	1	2	F	SR 3.3.1.1.1 SR 3.3.1.1.2 SR 3.3.1.1.3 SR 3.3.1.1.8 SR 3.3.1.1.9 SR 3.3.1.1.11 SR 3.3.1.1.14 SR 3.3.1.1.15 SR 3.3.1.1.17	≤ 0.58 W + 62% RTP[b] and ≤ 115.5% RTP

(continued)

(a) With any control rod withdrawn from a core cell containing one or more fuel assemblies.

(b) 0.58 W + 57% RTP when reset for single loop operation per LCO 3.4.1, "Recirculation Loops Operating."

SURVEILLANCE REQUIREMENTS

----------NOTES----------

1. Refer to Table 3.3.5.1-1 to determine which SRs apply for each ECCS Function.

2. When a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed as follows: (a) for up to 6 hours for Functions 3.c and 3.e; and (b) for up to 6 hours for Functions other than 3.c and 3.e provided the associated Function or the redundant Function maintains ECCS initiation capability.

SURVEILLANCE		FREQUENCY
SR 3.3.5.1.1	Perform CHANNEL CHECK.	12 hours
SR 3.3.5.1.2	---------- A test of all required contacts does not have to be performed. ---------- Perform CHANNEL FUNCTIONAL TEST.	92 days
SR 3.3.5.1.3	Perform CHANNEL CALIBRATION.	92 days
SR 3.3.5.1.4	Perform CHANNEL CALIBRATION.	24 months
SR 3.3.5.1.5	Perform LOGIC SYSTEM FUNCTIONAL TEST.	24 months

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. (continued)	A.2 Declare required feature(s) with no offsite power available inoperable when the redundant required feature(s) are inoperable. AND	24 hours from discovery of no offsite power to one 4.16 kV ESS bus concurrent with inoperability of redundant required feature(s).
	A.3 Restore offsite circuit to OPERABLE status.	72 hours AND 6 days from discovery of failure to meet LCO

(continued)

3.8 ELECTRICAL POWER SYSTEMS

3.8.2 AC Sources—Shutdown

LCO 3.8.2 The following AC electrical power sources shall be OPERABLE:

a. One qualified circuit between the offsite transmission network and the onsite Class 1E AC electrical power distribution subsystem(s) required by LCO 3.8.8, "Distribution Systems—Shutdown"; and

b. Two diesel generators (DGs) capable of supplying the onsite Class 1E AC electrical power distribution subsystem(s) required by LCO 3.8.8.

c. One qualified circuit between the offsite transmission network and the Unit 1 onsite Class 1E AC electrical power distribution subsystem(s) required by LCO 3.8.8, Distribution Systems—Shutdown; and

d. The DG(s) capable of supplying the Unit 1 onsite Class 1E electrical power distribution subsystem(s) required by LCO 3.8.8.

APPLICABILITY: MODES 4 and 5

During movement of irradiated fuel assemblies in the secondary containment.

3.8 ELECTRICAL POWER SYSTEMS

3.8.7 Distribution Systems—Operating

LCO 3.8.7 The electrical power distribution subsystems in Table 3.8.7-1 shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
----------NOTE---------- Not applicable to DG E DC Bus 0D597. ----------	----------NOTE---------- Enter applicable Conditions and Required Actions of LCO 3.8.4, "DC Sources – Operating," for DC source(s) made inoperable by inoperable power distribution subsystem(s). ----------	8 hours AND
A. One or more Unit 2 AC electrical power distribution subsystems inoperable	A.1 Restore Unit 2 AC electrical power distribution subsystems to OPERABLE status.	16 hours from discovery of failure to meet LCO 3.8.7 except for Condition E or F
B. ----------NOTE---------- Not applicable to DG E DC Bus 0D597 ---------- One or more Unit 2 DC electrical power distribution subsystems inoperable.	B.1 Restore Unit 2 DC electrical power distribution subsystems to OPERABLE status.	2 hours AND 16 hours from discovery of failure to meet LCO 3.8.7 except for Condition E or F
C. One or more Unit 1 AC electrical power distribution subsystems inoperable.	C.1 Restore Unit 1 AC electrical power distribution subsystem to OPERABE status.	72 hours

(continued)

Attachment 3 to PLA-5756

Technical Specification Bases Changes

(Provided for Information)

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

LCO (continued)

subsystem is only considered Inoperable when the subsystem is not energized to its proper voltage.

APPLICABILITY

The electrical power distribution subsystems 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.

Electrical power distribution subsystem requirements for MODES 4 and 5 are covered in the Bases for LCO 3.8.8, "Distribution Systems—Shutdown."

ACTIONS

A.1

With one or more required Unit 1 AC buses, load centers, motor control centers, or distribution panels inoperable but not resulting in a loss of safety function, the remaining AC 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 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.

The Condition A worst scenario is one division without AC power (i.e., no offsite power to the division 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 operators' attention be focused on minimizing the potential for loss of power to the remaining division by stabilizing the unit, and on restoring power to the affected division. The 8 hour time limit

(continued)

BASES

ACTIONS

A.1 (continued)

before requiring a unit shutdown in this Condition is acceptable because:

a. There is a potential for decreased safety if the attention of unit operators is diverted from the evaluations and actions necessary to restore power to the affected division to the actions associated with taking the unit to shutdown within this time limit.

b. The potential for an event in conjunction with a single failure of a redundant component in the division with AC power. (The redundant component is verified OPERABLE in accordance with Specification 5.5.11, "Safety Function Determination Program (SFDP).")

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 continuous occurrence of failing to meet LCO 3.8.7. If Condition A is entered while, for instance, a DC bus is inoperable and subsequently returned OPERABLE, this LCO may already have been not met for up to 2 hours. This situation could lead to a total duration 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 could be restored OPERABLE. This could continue indefinitely.

Condition A is modified by a Note that states that Condition A is not applicable to the DG E DC electrical power subsystem. Condition D or E is applicable to an inoperable DG E DC electrical power subsystem.

This Completion Time allows for an exception to the normal "time zero" for beginning the allowed outage time "clock." This results in establishing the "time zero" at the time this LCO was initially not met, instead of at 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. The completion time exception is not applicable to Condition D or E because Conditions D and E are only applicable to DG E DC electrical power subsystem.

INSERT Bases A.1

(continued)

INSERT "Bases A.1" (U1: pg B 3.8-81)

Required Action A.1 is modified by a Note that requires the applicable Conditions and Required Actions of LCO 3.8.4, "DC Sources - Operating," to be entered for DC subsystems made inoperable by inoperable AC electrical power distribution subsystems. This is an exception to LCO 3.0.6 and ensures the proper actions are taken for inoperable DC sources. Inoperability of a distribution subsystem can result in loss of charging power to batteries and eventual loss of DC power. This Note ensures that the appropriate attention is given to restoring charging power to batteries, if necessary, after loss of distribution systems.

BASES

ACTIONS

A.3 (continued)

and B are entered concurrently. The "AND" connector between the 72 hours and 6 day Completion Times means that both 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.

(continued)

BASES (continued)

LCO

subsystem is only considered Inoperable when the subsystem is not energized to its proper voltage.

APPLICABILITY

The electrical power distribution subsystems 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.

Electrical power distribution subsystem requirements for MODES 4 and 5 are covered in the Bases for LCO 3.8.8, "Distribution Systems—Shutdown."

ACTIONS

A.1

With one or more required Unit 2 AC buses, load centers, motor control centers, or distribution panels inoperable but not resulting in a loss of safety function, the remaining AC 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 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.

The Condition A worst scenario is one division without AC power (i.e., no offsite power to the division 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 operators' attention be focused on minimizing the potential for loss of power to the remaining division by stabilizing the unit, and on restoring power to the affected division. The 8 hour time limit before

(continued)

BASES (continued)

ACTIONS

A.1 (continued)

requiring a unit shutdown in this Condition is acceptable because:

a. There is a potential for decreased safety if the attention of unit operators is diverted from the evaluations and actions necessary to restore power to the affected division to the actions associated with taking the unit to shutdown within this time limit.

b. The potential for an event in conjunction with a single failure of a redundant component in the division with AC power. (The redundant component is verified OPERABLE in accordance with Specification 5.5.11, "Safety Function Determination Program (SFDP).")

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 continuous occurrence of failing to meet LCO 3.8.7. If Condition A is entered while, for instance, a DC bus is inoperable and subsequently returned OPERABLE, this LCO may already have been not met for up to 2 hours. This situation could lead to a total duration 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 could be restored OPERABLE. This could continue indefinitely.

Condition A is modified by a Note that states that Condition A is not applicable to the DG E DC electrical power subsystem. Condition E or F is applicable to an inoperable DG E DC electrical power subsystem.

This Completion Time allows for an exception to the normal "time zero" for beginning the allowed outage time "clock." This results in establishing the "time zero" at the time this LCO was initially not met, instead of at 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. The completion time exception is not applicable to Condition E or F because Condition E and F are only applicable to DG E DC electrical power subsystem.

Insert Bases A.1

(continued)

INSERT "Bases A.1" (U2: pg B 3.8-87)

Required Action A.1 is modified by a Note that requires the applicable Conditions and Required Actions of LCO 3.8.4, "DC Sources - Operating," to be entered for DC subsystems made inoperable by inoperable AC electrical power distribution subsystems. This is an exception to LCO 3.0.6 and ensures the proper actions are taken for inoperable DC sources. Inoperability of a distribution subsystem can result in loss of charging power to batteries and eventual loss of DC power. This Note ensures that the appropriate attention is given to restoring charging power to batteries, if necessary, after loss of distribution systems.