

June 2, 2006

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555-0001

**Subject: Docket Nos. 50-361 and 50-362
Proposed Change Number (PCN) 567
Emergency Diesel Generator Fuel Oil Volume Requirements
San Onofre Nuclear Generating Station, Units 2 and 3**

Dear Sir or Madam:

Pursuant to 10 CFR 50.90, Southern California Edison (SCE) hereby requests the following amendment to operating licenses NPF-10 and NPF-15 for San Onofre Nuclear Generating Station Units 2 and 3, respectively: revise Technical Specifications (TS) 3.8.1, "AC Sources – Operating," and 3.8.3, "Diesel Fuel Oil, Lube Oil, and Starting Air," to increase the required amount of stored diesel fuel oil to support a change to Ultra Low Sulfur Diesel (ULSD) fuel from the California diesel fuel presently in use. This change in the type of fuel oil is mandated by California air pollution control regulations.

SCE has evaluated whether or not a significant hazards consideration is involved with the proposed amendments and concludes that the proposed amendments present no significant hazards consideration under the standards set forth in 10CFR50.92(c).

SCE will make appropriate revisions to the Bases for the affected TS. Because the revisions are straightforward, they are not being included for NRC information in this submittal.

SCE requests approval of the proposed amendments at your earliest convenience. SCE is required by the state mandate to begin procuring ULSD after June 1, 2006. (The mandate only requires beginning, not completing, the fuel oil changeover by June.) Until NRC approval is received, SCE will maintain the diesel fuel oil inventories at the values proposed in this license amendment request by administrative means.

If you have any questions or require additional information, please contact Mr. Jack Rainsberry at (949) 368-7420.

Sincerely,

A handwritten signature in black ink that reads "Brian Katz". The signature is written in a cursive style with a large, stylized "K" at the end.

Enclosures:

1. Notarized affidavits
2. Licensee's Evaluation

Attachments

- A. Existing Technical Specification pages, Unit 2
- B. Existing Technical Specification pages, Unit 3
- C. Proposed Technical Specification pages, redline and strikeout, Unit 2
- D. Proposed Technical Specification pages, redline and strikeout, Unit 3
- E. Proposed Technical Specification pages, Unit 2
- F. Proposed Technical Specification pages, Unit 3

cc: B. S. Mallett, Regional Administrator, NRC Region IV
N. Kalyanam, NRC Project Manager, San Onofre Units 2 & 3
C. C. Osterholtz, NRC Senior Resident Inspector, San Onofre Units 2 & 3
S. Y. Hsu, Department of Health Services, Radiologic Health Branch

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

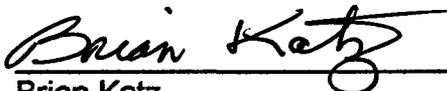
Application of SOUTHERN CALIFORNIA)
EDISON, ET AL. for a Class 103) Docket No. 50-361
License to Acquire, Possess, and Use a) Amendment Application Number 244
Utilization Facility as Part of Unit No. 2)
of the San Onofre Nuclear Generating)
Station)

SOUTHERN CALIFORNIA EDISON, ET AL., pursuant to 10 CFR § 50.90, hereby submit Amendment Application Number 244 to Facility Operating License NPF-10. This change is a request to revise the Technical Specification required quantities of emergency diesel generator fuel oil for Ultra Low Sulfur Diesel fuel.

In accordance with 10 CFR § 50.30(b), the following affirmation is provided:

Brian Katz states that he is Vice President of Southern California Edison, is authorized to execute this oath on behalf of Southern California Edison and, to the best of his knowledge and belief, the facts set forth in this letter are true.

Respectfully submitted,



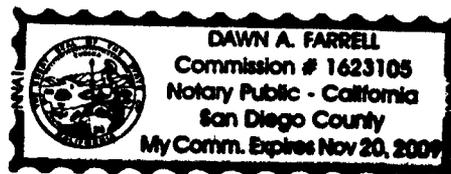
Brian Katz
Vice President
Southern California Edison

State of California
County of San Diego

Subscribed and sworn to ~~(or affirmed)~~ before me, this 2nd day of
June, 2006, by Brian Katz

~~personally known to me or proved to me on the basis of satisfactory evidence to be~~
the person who appeared before me.


Notary Public



**UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION**

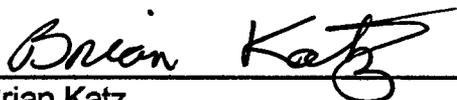
Application of SOUTHERN CALIFORNIA)
EDISON, ET AL. for a Class 103) Docket No. 50-362
License to Acquire, Possess, and Use a) Amendment Application Number 229
Utilization Facility as Part of Unit No. 3)
of the San Onofre Nuclear Generating)
Station)

SOUTHERN CALIFORNIA EDISON, ET AL., pursuant to 10 CFR § 50.90, hereby submit Amendment Application Number 229 to Facility Operating License NPF-15. This change is a request to revise the Technical Specification required quantities of emergency diesel generator fuel oil for Ultra Low Sulfur Diesel fuel.

In accordance with 10 CFR § 50.30(b), the following affirmation is provided:

Brian Katz states that he is Vice President of Southern California Edison, is authorized to execute this oath on behalf of Southern California Edison and, to the best of his knowledge and belief, the facts set forth in this letter are true.

Respectfully submitted,

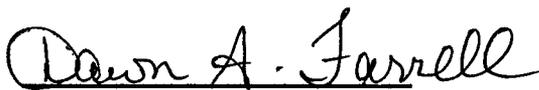


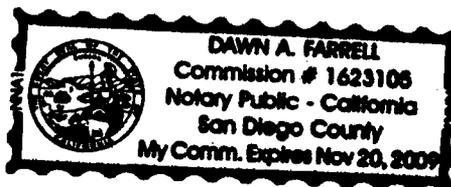
Brian Katz
Vice President
Southern California Edison

State of California
County of San Diego

Subscribed and sworn to ~~(or affirmed)~~ before me, this 2nd day of
June, 2006, by Brian Katz,

~~personally known to me or proved to me on the basis of satisfactory evidence to be~~
the person who appeared before me.


Notary Public



LICENSEE'S EVALUATION

PCN-567

DIESEL FUEL OIL STORAGE AND DAY TANKS LEVEL LIMITS

Technical Specifications 3.8.1 and 3.8.3

- 1.0 INTRODUCTION
- 2.0 DESCRIPTION OF PROPOSED AMENDMENT
- 3.0 BACKGROUND
- 4.0 TECHNICAL ANALYSIS
- 5.0 REGULATORY SAFETY ANALYSIS
 - 5.1 No Significant Hazards Consideration
 - 5.2 Applicable Regulatory Requirements/Criteria

6.0 ENVIRONMENTAL CONSIDERATION

7.0 REFERENCES

ATTACHMENTS

- A. Existing Technical Specification pages, Unit 2
- B. Existing Technical Specification pages, Unit 3
- C. Proposed Technical Specification pages, Redline and Strikeout, Unit 2
- D. Proposed Technical Specification pages, Redline and Strikeout, Unit 3
- E. Proposed Technical Specification pages, Unit 2
- F. Proposed Technical Specification pages, Unit 3

1.0 INTRODUCTION

This letter is a request to amend Operating Licenses NPF-10 and NPF-15 for San Onofre Nuclear Generating Station Units 2 and 3 (SONGS 2 and 3), respectively.

The proposed change would revise the Operating Licenses to amend Technical Specifications (TS) 3.8.1, "AC Sources Operating", and 3.8.3, "Diesel Fuel Oil, Lube Oil, and Starting Air," to increase the required amount of stored diesel fuel to support the purchase/acceptance of Ultra Low Sulfur Diesel (ULSD) fuel rather than the existing California Air Resources Board (CARB) diesel fuel. This change in the type of diesel fuel oil is mandated by California air pollution control regulations (Reference 7.1).

2.0 DESCRIPTION OF PROPOSED AMENDMENT

Existing TS 3.8.3, "Diesel Fuel Oil, Lube Oil, and Starting Air," Condition A, currently states that during Modes 1 through 4, if one or more Diesel Generators (DG) has a fuel level in the storage tank less than 45,662 gallons and greater than 39,468 gallons, then fuel oil level must be restored to within limits within 48 hours. The 45,662 gallon storage level requirement is based on the need to maintain a 7-day supply of diesel fuel in Modes 1 through 4. The 39,468 gallon storage level requirement is based on the need to maintain at least a 6-day supply of diesel fuel in Modes 1 through 4. With less than a 6-day supply, TS 3.8.3 condition G requires that the affected DG be declared inoperable immediately.

Existing TS 3.8.3, "Diesel Fuel Oil, Lube Oil, and Starting Air," Condition C, states that during Modes 5 and 6, if one DG has a fuel level in the storage tank less than 41,691 gallons and greater than 35,735 gallons, then fuel oil level must be restored to within limits within 48 hours. The 41,691 gallon storage level requirement is based on the need to maintain a 7-day supply of diesel fuel in Modes 5 and 6. The 35,735 gallon storage level requirement is based on the need to maintain at least a 6-day supply of diesel fuel in Modes 5 and 6. With less than a 6-day supply, TS 3.8.3 condition G requires that the affected DG be declared inoperable immediately.

Existing Surveillance Requirement (SR) 3.8.3.1 requires that each diesel fuel oil storage tank level be verified every 31 days to be greater than or equal to 45,662 gallons in Modes 1 through 4 and greater than or equal to 41,691 gallons in Modes 5 and 6.

Existing SR 3.8.1.4 requires that each DG fuel oil day tank level be verified every 31 days to be greater than or equal to 30 inches of diesel fuel oil. The 30-inch day tank level requirement is based on the need to maintain at least a one-hour supply of diesel fuel plus a 10% margin.

This proposed change increases the required amount of stored diesel fuel. The change is necessary to support the use of Ultra Low Sulfur Diesel (ULSD) fuel rather than the existing CARB diesel fuel. This change is mandated by California air pollution control regulations (Reference 7.1). The new requirements will continue to ensure that sufficient fuel is available to supply loads for the necessary time periods (7-day supply, 6-day supply and one-hour day tank level for each of the four SONGS 2 and 3 DGs).

Therefore, following approval of this proposed change, TS 3.8.3, Condition A, will be invoked when the volume of fuel in a tank is less than 48,400 gallons and greater than 41,800 gallons in Modes 1 through 4. TS 3.8.3, Condition C, will be invoked when the volume of fuel in the tank is less than 43,600 gallons and greater than 37,400 gallons in Modes 5 and 6. SR 3.8.3.1 will require verification that the volume of fuel in each storage tank is greater than or equal to 48,400 gallons in Modes 1 through 4 and greater than or equal to 43,600 gallons in Modes 5 and 6. Also, SR 3.8.1.4 will require verification that the level in each day tank is greater than or equal to 31.5 inches. TS 3.8.3 condition G will be unchanged, and will continue to require that with less than a 6-day supply, the affected DG be declared inoperable immediately.

Southern California Edison (SCE) will change the Bases of TS 3.8.1 and 3.8.3 for consistency with the proposed changes described above, upon NRC approval of this amendment request.

In summary, the proposed change would revise the Operating Licenses for SONGS 2 and 3 to amend TS 3.8.1, "AC Sources Operating", and TS 3.8.3, "Diesel Fuel Oil, Lube Oil, and Starting Air," to increase the required amount of stored diesel fuel to support the use of Ultra Low Sulfur Diesel (ULSD) fuel rather than the existing CARB diesel fuel. The change in type of fuel oil is mandated by California air pollution control regulations (Reference 7.1). The Bases to TS 3.8.1 and 3.8.3 will be revised to reflect these changes.

3.0 BACKGROUND

The standby power supply for SONGS 2 and 3 consists of one emergency diesel generator for each safety-related load group (two per unit) including a fuel storage and transfer system for each DG. Each DG is required to have sufficient stored diesel fuel oil to operate for a period of 7 days while supplying maximum post Loss of Coolant Accident (LOCA) load demand. The TS fuel oil inventory requirements for the diesel fuel oil storage tanks are based on the fuel volume needed for 7 days of diesel generator operation.

Existing TS 3.8.3 Condition A requires that each diesel fuel storage tank contain greater than 45,662 gallons during Modes 1, 2, 3, and 4. Existing TS 3.8.3 Condition

C requires that the diesel fuel oil storage tanks contain greater than 41,691 gallons during Modes 5 and 6.

Existing SR 3.8.1.4 requires that each DG fuel oil day tank level be verified every 31 days to be greater than or equal to 30 inches of diesel fuel oil. This requirement is based on one hour of DG operation fully loaded plus a 10% margin.

SONGS is required by California state regulation (Reference 7.1) as implemented by the San Diego Air Pollution Control District (APCD) to discontinue purchase of the current California Diesel fuel and begin purchasing Ultra Low Sulfur Diesel (ULSD) fuel for emissions control purposes. The worst case Lower Heating Value (LHV) of ULSD fuel is slightly lower on a per gallon basis than that of the existing fuel. Therefore, the BTU content of the fuel on a per gallon basis may also be lower. Calculations have been performed to determine the amount of fuel required based on the worst case LHV of ULSD fuel.

When use of ULSD fuel is taken into account, the amount of stored fuel required to ensure a 7-day supply of fuel in Modes 1 through 4 is 48,400 gallons. For Modes 5 and 6, the required amount of stored fuel for a 7-day supply is 43,600 gallons. The DG fuel oil storage tank capacity is 55,000 gallons for each DG.

The DGs are described in Updated Final Safety Analysis Report (UFSAR) section 8.3.1.1.4. The DG fuel oil storage and transfer system is described in UFSAR section 9.5.4.

4.0 TECHNICAL ANALYSIS

Each diesel generator is required to have sufficient fuel for 7 days of operation. This requirement is expressed as minimum storage tank level limits. The basis of these tank level limits is to provide sufficient fuel for operation with the most limiting time dependent load profile over a period of 7 days. The required amount of fuel is calculated in gallons, and an allowance for instrument Total Loop Uncertainty (TLU) is added to determine the required tank level limit. The methodology of calculating the instrument TLU has not changed. When a 7-day fuel supply is not available, the required action depends on whether or not at least a 6-day fuel supply is available. TS 3.8.3 condition G will be unchanged and will continue to require that with less than a 6-day supply, the affected DG be declared inoperable immediately.

The required diesel fuel volumes have been re-calculated for ULSD fuel in accordance with ANSI 195/ANS 59.51, "Fuel Oil Systems for Standby Diesel Generators" (Reference 7.2). Both the day tanks and the storage tanks minimum diesel fuel requirements have been re-calculated with the worst case lower heating value (LHV) of the new ULSD fuel which is lower on a per gallon basis than of the existing diesel fuel. These calculations conservatively assume that the diesel fuel

inventory is entirely ULSD fuel¹ with the worst case LHV. The results are displayed in Tables 1, 2, and 3 below.

Table 1

Diesel Fuel Storage Requirements, Modes 1 through 4

	7 day fuel supply (gallons)	6 day fuel supply (gallons)
Current Requirement	45,662	39,468
Proposed Requirement	48,400	41,800

Table 2

Diesel Fuel Storage Requirements, Modes 5 and 6

	7 day fuel supply (gallons)	6 day fuel supply (gallons)
Current Requirement	41,691	35,735
Proposed Requirement	43,600	37,400

Table 3

Diesel Fuel Day Tank Requirements

	31 day Surveillance Requirement (1 hour fuel supply)
Current Requirement	≥ 30"
Proposed Requirement	≥ 31.5"

Pending NRC approval of this license amendment request, and prior to accepting delivery of ULSD fuel, SCE will impose administrative controls to ensure the new

¹ The state mandate does not require disposal of existing inventories of CARB fuel. Consequently, SCE intends to retain the CARB fuel inventories existing on June 1, 2006 and replace fuel consumed after that date with ULSD fuel. Thus, for an indefinite period the fuel oil storage tanks will contain a mixture of CARB and ULSD fuel. The calculations conservatively assume that during this period only ULSD fuel is present.

minimum volumes of diesel fuel oil will be maintained in both the day tanks and the storage tanks for the new ULSD fuel oil per Tables 1, 2, and 3 above.

5.0 REGULATORY SAFETY ANALYSIS

Southern California Edison (SCE) is requesting a change to the operating licenses for San Onofre Nuclear Generating Station Units 2 and 3 (SONGS 2 and 3). This proposed change will increase the minimum required amount of stored diesel fuel. This change is requested to support the use of Ultra Low Sulfur Diesel (ULSD) fuel rather than the existing California Air Resources Board (CARB) diesel fuel. This change in the type of diesel fuel oil is mandated by California air pollution control regulations (Title 13 California Code of Regulations Division 3, Chapter 5, Article 2, Sections 2280-2285).

ANSI 195/ANS 59.51, "Fuel Oil Systems for Standby Diesel Generators" (Reference 7.2) requires that onsite fuel oil storage shall be sufficient to operate the minimum number of diesel generators following the limiting design basis accident for either seven (7) days, or the time required to replenish the oil from sources outside the plant site following any limiting design basis event without interrupting the operation of the diesel, whichever is longer.

Technical Specification (TS) 3.8.3 requires that a 7-day supply of diesel fuel be available and provides required actions when less than a 7-day supply of fuel is available. These required actions depend upon whether or not at least a 6-day supply of fuel is available.

Using the methods described in ANSI 195/ANS 59.51, SCE has re-calculated the minimum required volume of fuel necessary to ensure a 7-day or 6-day supply of ULSD fuel is available for each diesel generator. Also, the day tank minimum volume requirement of ULSD fuel has been re-calculated.

Following this change, the minimum amount of stored diesel fuel in Modes 1 through 4 will be increased from 45,662 gallons to 48,400 gallons (7-day supply of fuel) and from 39,468 gallons to 41,800 gallons (6-day supply of fuel). The minimum amount of fuel in Modes 5 and 6 will be increased from 41,691 gallons to 43,600 gallons (7-day supply of fuel) and from 35,735 gallons to 37,400 gallons (6-day supply of fuel). The minimum level of the DG day tank will increase from 30 inches to 31.5 inches. Following implementation of these proposed changes, there will be no change in the ability of the diesel fuel oil storage and transfer system to supply the diesel generators over the required 7-day and 6-day periods.

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.

5.1 NO SIGNIFICANT HAZARDS CONSIDERATION

Southern California Edison (SCE) has evaluated whether or not a significant hazards consideration is involved with the proposed amendments by focusing on the three standards set forth in 10CFR50.92, "Issuance of Amendment," as discussed below.

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

Response: No.

This proposed change increases the minimum amount of stored diesel fuel. The change supports the use of Ultra Low Sulfur Diesel (ULSD) fuel rather than the existing California Air Resources Board diesel fuel as mandated by California air pollution control regulations (Title 13 California Code of Regulations Division 3, Chapter 5, Article 2, Sections 2280-2285).

Technical Specification (TS) 3.8.3, "Diesel Fuel Oil, Lube Oil, and Starting Air," requires that each diesel generator have sufficient fuel to operate for a period of 7 days, while the diesel generator (DG) is supplying maximum post Loss of Coolant Accident (LOCA) load demand.

Because the Lower Heating Value (LHV) per gallon of ULSD fuel is less than that of existing diesel fuel, it was necessary to re-calculate the amount of fuel required to supply necessary loads for the required time periods. For Modes 1 through 4, the resulting minimum volumes of ULSD fuel are 48,400 gallons and 41,800 gallons for the 7-day and 6-day fuel supply, respectively. For Modes 5 and 6, the required volumes of ULSD fuel are 43,600 gallons and 37,400 gallons for a 7-day supply and a 6-day supply, respectively.

The DGs and the associated support systems such as the fuel oil storage and transfer systems are designed to mitigate accidents and are not accident initiators. Increasing the minimum volumes of stored fuel in the storage and day tanks will not result in a significant increase in the probability of any accident previously evaluated.

Following implementation of this proposed change, there will be no change in the ability of the diesel generators to supply maximum post-LOCA load demand for 7 days. The proposed minimum volumes of fuel, 48,400 gallons and 41,800 gallons, ensure that a 7-day and 6-day

supply of fuel, respectively, are available in Modes 1 through 4. The proposed minimum volumes of fuel, 43,600 gallons and 37,400 gallons, ensure that a 7-day and a 6-day supply, respectively, of fuel is available in Modes 5 and 6. This is identical to the current requirements, except for the increased volume of fuel required due to the decreased heat content of the ULSD fuel. Therefore, this change will not result in a significant increase in the consequences of any accident previously evaluated.

Therefore, the proposed 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.

Following this change, the diesel generators will still be able to supply maximum post-LOCA load demand. The current 7-day and 6-day fuel supply requirements will be maintained following this change. The new required fuel oil volumes are within the capacities of the fuel oil storage tanks.

Therefore, this proposed change will not create the possibility of a new or different kind of accident from any accident that has been previously evaluated.

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

Response: No.

The Bases to TS 3.8.3 state that "Each diesel generator (DG) is provided with a storage tank having a fuel oil capacity sufficient to operate that diesel for a period of 7 days, while the DG is supplying maximum post loss of coolant accident load demand." When the fuel oil tank level is less than required to support 7-day of operation, the required action depends on whether or not a 6-day supply of fuel is available.

The proposed tank level limits will maintain these 7-day and 6-day fuel supply requirements in all operating Modes following changeout to ULSD fuel.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, SCE concludes that the proposed amendments present no significant hazards consideration under the standards set forth in 10CFR50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

5.2 APPLICABLE REGULATORY REQUIREMENTS/CRITERIA

ANSI 195/ANS 59.51, "Fuel Oil Systems for Standby Diesel Generators" (Reference 7.2) requires that onsite fuel oil storage shall be sufficient to operate the minimum number of diesel generators following the limiting design basis accident for either seven (7) days, or the time required to replenish the oil from sources outside the plant site following any limiting design basis event without interrupting the operation of the diesel, whichever is longer.

The ANSI standard also provides guidance for calculating storage requirements. ANSI 195/ANS 59.51 was used in the preparation of calculations to support this change.

The requirement for minimum volume in the day tank and for a 7-day supply of diesel fuel for each diesel generator at San Onofre Units 2 and 3 is also stated in the Bases to TS 3.8.1 and 3.8.3.

6.0 ENVIRONMENTAL CONSIDERATION

A review has determined that the proposed amendments would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10CFR20, or would change an inspection or surveillance requirement. However, the proposed amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10CFR51.22(c)(9). Therefore, pursuant to 10CFR51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

7.0 REFERENCES

7.1 Title 13 California Code of Regulations Division 3, Chapter 5, Article 2, Sections 2280-2285.

7.2 ANSI 195/ANS 59.51, "Fuel Oil Systems For Standby Diesel Generators".

PCN-567

ATTACHMENT A

Existing Technical Specification pages, Unit 2

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.8.1.3 -----NOTES-----</p> <ol style="list-style-type: none"> 1. DG loadings may include gradual loading as recommended by the manufacturer. 2. Momentary transients outside the load range do not invalidate this test. 3. This Surveillance shall be conducted on only one DG at a time. 4. This SR shall be preceded by, and immediately follow without shutdown, a successful performance of SR 3.8.1.2 or SR 3.8.1.7. 5. To ensure Operability of an AVR, it must have been aligned to the DG during the performance of SR 3.8.1.2 and SR 3.8.1.3 within the last 60 days, plus any allowance per SR 3.0.2. <p>-----</p> <p>Verify each DG is synchronized and loaded, and operates for ≥ 60 minutes at a load ≥ 4450 kW and ≤ 4700 kW.</p>	<p>As specified in Table 3.8.1-1</p>
<p>SR 3.8.1.4 Verify each day tank contains ≥ 30 inches of fuel oil.</p>	<p>31 days</p>
<p>SR 3.8.1.5 Check for and remove accumulated water from each day tank.</p>	<p>31 days</p>
<p>SR 3.8.1.6 Verify the fuel oil transfer system operates to transfer fuel oil from storage tank to the day tank.</p>	<p>31 days</p>

(continued)

3.8 ELECTRICAL POWER SYSTEMS

3.8.3 Diesel Fuel Oil, Lube Oil, and Starting Air

LCO 3.8.3 The stored diesel fuel oil, lube oil, and starting air subsystem shall be within limits for each required diesel generator (DG).

APPLICABILITY: When associated DG is required to be OPERABLE.

ACTIONS

-----NOTE-----
Separate Condition entry is allowed for each DG.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more DGs with fuel volume < 45,662 gallons and > 39,468 gallons in storage tank during MODE 1,2,3 or 4.	A.1 Restore fuel oil level to within limits.	48 hours
B. One or more DGs with lube oil inventory < TS min and ≥ TS inop.	B.1 Restore lube oil inventory to within limits.	48 hours
C. One required DG with fuel volume in the storage tank < 41,691 gallons and > 35,735 gallons during MODE 5 or 6.	C.1 Restore fuel oil level to within limits.	48 hours
D. One or more DGs with stored fuel oil total particulates not within limits.	D.1 Restore fuel oil total particulates to within limits.	7 days

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
E. One or more DGs with new fuel oil properties not within limits.	E.1 Restore stored fuel oil properties to within limits.	30 days
F. One or more DGs with starting air receiver pressure < 175 psig and ≥ 136 psig.	F.1 Restore starting air receiver pressure to ≥ 175 psig.	48 hours
G. Required Action and associated Completion Time of Condition A, B, C, D, E or F not met. <u>OR</u> One or more DGs with diesel fuel oil, lube oil, or starting air subsystem not within limits for reasons other than Condition A, B, C, D, E, or F.	G.1 Declare associated DG inoperable.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.8.3.1 Verify each fuel oil storage tank contains ≥ 45,662 gallons in MODE 1,2,3 or 4 and ≥ 41,691 gallons in MODE 5 or 6.	31 days

(continued)

PCN-567

ATTACHMENT B

Existing Technical Specification pages, Unit 3

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.8.1.3</p> <p>-----NOTES-----</p> <ol style="list-style-type: none"> 1. DG loadings may include gradual loading as recommended by the manufacturer. 2. Momentary transients outside the load range do not invalidate this test. 3. This Surveillance shall be conducted on only one DG at a time. 4. This SR shall be preceded by, and immediately follow without shutdown, a successful performance of SR 3.8.1.2 or SR 3.8.1.7. 5. To ensure Operability of an AVR, it must have been aligned to the DG during the performance of SR 3.8.1.2 and SR 3.8.1.3 within the last 60 days, plus any allowance per SR 3.0.2. <p>-----</p> <p>Verify each DG is synchronized and loaded, and operates for ≥ 60 minutes at a load ≥ 4450 kW and ≤ 4700 kW.</p>	<p>As specified in Table 3.8.1-1</p>
<p>SR 3.8.1.4</p> <p>Verify each day tank contains ≥ 30 inches of fuel oil.</p>	<p>31 days</p>
<p>SR 3.8.1.5</p> <p>Check for and remove accumulated water from each day tank.</p>	<p>31 days</p>
<p>SR 3.8.1.6</p> <p>Verify the fuel oil transfer system operates to transfer fuel oil from storage tank to the day tank.</p>	<p>31 days</p>

(continued)

3.8 ELECTRICAL POWER SYSTEMS

3.8.3 Diesel Fuel Oil, Lube Oil, and Starting Air

LCO 3.8.3 The stored diesel fuel oil, lube oil, and starting air subsystem shall be within limits for each required diesel generator (DG).

APPLICABILITY: When associated DG is required to be OPERABLE.

ACTIONS

-----NOTE-----
Separate Condition entry is allowed for each DG.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more DGs with fuel volume < 45,662 gallons and > 39,468 gallons in storage tank during MODE 1,2,3 or 4.	A.1 Restore fuel oil level to within limits.	48 hours
B. One or more DGs with lube oil inventory < TS min and ≥ TS inop.	B.1 Restore lube oil inventory to within limits.	48 hours
C. One required DG with fuel volume in the storage tank < 41,691 gallons and > 35,735 gallons during MODE 5 or 6.	C.1 Restore fuel oil level to within limits.	48 hours
D. One or more DGs with stored fuel oil total particulates not within limits.	D.1 Restore fuel oil total particulates to within limits.	7 days

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
E. One or more DGs with new fuel oil properties not within limits.	E.1 Restore stored fuel oil properties to within limits.	30 days
F. One or more DGs with starting air receiver pressure < 175 psig and ≥ 136 psig.	F.1 Restore starting air receiver pressure to ≥ 175 psig.	48 hours
G. Required Action and associated Completion Time of Condition A, B, C, D, E or F not met. <u>OR</u> One or more DGs with diesel fuel oil, lube oil, or starting air subsystem not within limits for reasons other than Condition A, B, C, D, E, or F.	G.1 Declare associated DG inoperable.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.8.3.1 Verify each fuel oil storage tank contains ≥ 45,662 gallons in MODE 1,2,3 or 4 and ≥ 41,691 gallons level in MODE 5 or 6.	31 days

(continued)

PCN-567

ATTACHMENT C

Proposed Technical Specification pages, redline and strikeout, Unit 2

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.8.1.3 -----NOTES-----</p> <ol style="list-style-type: none"> 1. DG loadings may include gradual loading as recommended by the manufacturer. 2. Momentary transients outside the load range do not invalidate this test. 3. This Surveillance shall be conducted on only one DG at a time. 4. This SR shall be preceded by, and immediately follow without shutdown, a successful performance of SR 3.8.1.2 or SR 3.8.1.7. 5. To ensure Operability of an AVR, it must have been aligned to the DG during the performance of SR 3.8.1.2 and SR 3.8.1.3 within the last 60 days, plus any allowance per SR 3.0.2. <p>-----</p> <p>Verify each DG is synchronized and loaded, and operates for ≥ 60 minutes at a load ≥ 4450 kW and ≤ 4700 kW.</p>	<p>As specified in Table 3.8.1-1</p>
<p>SR 3.8.1.4 Verify each day tank contains ≥ 30 31.5 inches of fuel oil.</p>	<p>31 days</p>
<p>SR 3.8.1.5 Check for and remove accumulated water from each day tank.</p>	<p>31 days</p>
<p>SR 3.8.1.6 Verify the fuel oil transfer system operates to transfer fuel oil from storage tank to the day tank.</p>	<p>31 days</p>

(continued)

3.8 ELECTRICAL POWER SYSTEMS

3.8.3 Diesel Fuel Oil, Lube Oil, and Starting Air

LCO 3.8.3 The stored diesel fuel oil, lube oil, and starting air subsystem shall be within limits for each required diesel generator (DG).

APPLICABILITY: When associated DG is required to be OPERABLE.

ACTIONS

-----NOTE-----
Separate Condition entry is allowed for each DG.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more DGs with fuel volume < 45,662 48,400 gallons and > 39,468 41,800 gallons in storage tank during MODE 1,2,3 or 4.	A.1 Restore fuel oil level to within limits.	48 hours
B. One or more DGs with lube oil inventory < TS min and ≥ TS inop.	B.1 Restore lube oil inventory to within limits.	48 hours
C. One required DG with fuel volume in the storage tank < 41,691 43,600 gallons and > 35,735 37,400 gallons during MODE 5 or 6.	C.1 Restore fuel oil level to within limits.	48 hours
D. One or more DGs with stored fuel oil total particulates not within limits.	D.1 Restore fuel oil total particulates to within limits.	7 days

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
E. One or more DGs with new fuel oil properties not within limits.	E.1 Restore stored fuel oil properties to within limits.	30 days
F. One or more DGs with starting air receiver pressure < 175 psig and ≥ 136 psig.	F.1 Restore starting air receiver pressure to ≥ 175 psig.	48 hours
G. Required Action and associated Completion Time of Condition A, B, C, D, E or F not met. <u>OR</u> One or more DGs with diesel fuel oil, lube oil, or starting air subsystem not within limits for reasons other than Condition A, B, C, D, E, or F.	G.1 Declare associated DG inoperable.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.8.3.1 Verify each fuel oil storage tank contains ≥ 45,662 48,400 gallons in MODE 1,2,3 or 4 and ≥ 41,691 43,600 gallons in MODE 5 or 6.	31 days

(continued)

PCN-567

ATTACHMENT D

Proposed Technical Specification pages, redline and strikeout, Unit 3

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.8.1.3 -----NOTES-----</p> <ol style="list-style-type: none"> 1. DG loadings may include gradual loading as recommended by the manufacturer. 2. Momentary transients outside the load range do not invalidate this test. 3. This Surveillance shall be conducted on only one DG at a time. 4. This SR shall be preceded by, and immediately follow without shutdown, a successful performance of SR 3.8.1.2 or SR 3.8.1.7. 5. To ensure Operability of an AVR, it must have been aligned to the DG during the performance of SR 3.8.1.2 and SR 3.8.1.3 within the last 60 days, plus any allowance per SR 3.0.2. <p>-----</p> <p>Verify each DG is synchronized and loaded, and operates for ≥ 60 minutes at a load ≥ 4450 kW and ≤ 4700 kW.</p>	<p>As specified in Table 3.8.1-1</p>
<p>SR 3.8.1.4 Verify each day tank contains ≥ 30 31.5 inches of fuel oil.</p>	<p>31 days</p>
<p>SR 3.8.1.5 Check for and remove accumulated water from each day tank.</p>	<p>31 days</p>
<p>SR 3.8.1.6 Verify the fuel oil transfer system operates to transfer fuel oil from storage tank to the day tank.</p>	<p>31 days</p>

(continued)

3.8 ELECTRICAL POWER SYSTEMS

3.8.3 Diesel Fuel Oil, Lube Oil, and Starting Air

LC0 3.8.3 The stored diesel fuel oil, lube oil, and starting air subsystem shall be within limits for each required diesel generator (DG).

APPLICABILITY: When associated DG is required to be OPERABLE.

ACTIONS

-----NOTE-----
Separate Condition entry is allowed for each DG.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more DGs with fuel volume < 45,662 48,400 gallons and > 39,468 41,800 gallons in storage tank during MODE 1,2,3 or 4.	A.1 Restore fuel oil level to within limits.	48 hours
B. One or more DGs with lube oil inventory < TS min and ≥ TS inop.	B.1 Restore lube oil inventory to within limits.	48 hours
C. One required DG with fuel volume in the storage tank < 41,691 43,600 gallons and > 35,735 37,400 gallons during MODE 5 or 6.	C.1 Restore fuel oil level to within limits.	48 hours
D. One or more DGs with stored fuel oil total particulates not within limits.	D.1 Restore fuel oil total particulates to within limits.	7 days

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
E. One or more DGs with new fuel oil properties not within limits.	E.1 Restore stored fuel oil properties to within limits.	30 days
F. One or more DGs with starting air receiver pressure < 175 psig and ≥ 136 psig.	F.1 Restore starting air receiver pressure to ≥ 175 psig.	48 hours
G. Required Action and associated Completion Time of Condition A, B, C, D, E or F not met. <u>OR</u> One or more DGs with diesel fuel oil, lube oil, or starting air subsystem not within limits for reasons other than Condition A, B, C, D, E, or F.	G.1 Declare associated DG inoperable.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.8.3.1 Verify each fuel oil storage tank contains ≥ 45,662 48,400 gallons in MODE 1,2,3 or 4 and ≥ 41,691 43,600 gallons level in MODE 5 or 6.	31 days

(continued)

PCN-567

ATTACHMENT E

Proposed Technical Specification pages, Unit 2

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.8.1.3 -----NOTES-----</p> <ol style="list-style-type: none"> 1. DG loadings may include gradual loading as recommended by the manufacturer. 2. Momentary transients outside the load range do not invalidate this test. 3. This Surveillance shall be conducted on only one DG at a time. 4. This SR shall be preceded by, and immediately follow without shutdown, a successful performance of SR 3.8.1.2 or SR 3.8.1.7. 5. To ensure Operability of an AVR, it must have been aligned to the DG during the performance of SR 3.8.1.2 and SR 3.8.1.3 within the last 60 days, plus any allowance per SR 3.0.2. <p>-----</p> <p>Verify each DG is synchronized and loaded, and operates for ≥ 60 minutes at a load ≥ 4450 kW and ≤ 4700 kW.</p>	<p>As specified in Table 3.8.1-1</p>
<p>SR 3.8.1.4 Verify each day tank contains ≥ 31.5 inches of fuel oil.</p>	<p>31 days</p>
<p>SR 3.8.1.5 Check for and remove accumulated water from each day tank.</p>	<p>31 days</p>
<p>SR 3.8.1.6 Verify the fuel oil transfer system operates to transfer fuel oil from storage tank to the day tank.</p>	<p>31 days</p>

(continued)

3.8 ELECTRICAL POWER SYSTEMS

3.8.3 Diesel Fuel Oil, Lube Oil, and Starting Air

LCO 3.8.3 The stored diesel fuel oil, lube oil, and starting air subsystem shall be within limits for each required diesel generator (DG).

APPLICABILITY: When associated DG is required to be OPERABLE.

ACTIONS

-----NOTE-----
Separate Condition entry is allowed for each DG.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more DGs with fuel volume < 48,400 gallons and > 41,800 gallons in storage tank during MODE 1,2,3 or 4.	A.1 Restore fuel oil level to within limits.	48 hours
B. One or more DGs with lube oil inventory < TS min and ≥ TS inop.	B.1 Restore lube oil inventory to within limits.	48 hours
C. One required DG with fuel volume in the storage tank < 43,600 gallons and > 37,400 gallons during MODE 5 or 6.	C.1 Restore fuel oil level to within limits.	48 hours
D. One or more DGs with stored fuel oil total particulates not within limits.	D.1 Restore fuel oil total particulates to within limits.	7 days

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
E. One or more DGs with new fuel oil properties not within limits.	E.1 Restore stored fuel oil properties to within limits.	30 days
F. One or more DGs with starting air receiver pressure < 175 psig and ≥ 136 psig.	F.1 Restore starting air receiver pressure to ≥ 175 psig.	48 hours
G. Required Action and associated Completion Time of Condition A, B, C, D, E or F not met. <u>OR</u> One or more DGs with diesel fuel oil, lube oil, or starting air subsystem not within limits for reasons other than Condition A, B, C, D, E, or F.	G.1 Declare associated DG inoperable.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.8.3.1 Verify each fuel oil storage tank contains ≥ 48,400 gallons in MODE 1,2,3 or 4 and ≥ 43,600 gallons in MODE 5 or 6.	31 days

(continued)

PCN-567

ATTACHMENT F

Proposed Technical Specification pages, Unit 3

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.8.1.3 -----NOTES-----</p> <ol style="list-style-type: none"> 1. DG loadings may include gradual loading as recommended by the manufacturer. 2. Momentary transients outside the load range do not invalidate this test. 3. This Surveillance shall be conducted on only one DG at a time. 4. This SR shall be preceded by, and immediately follow without shutdown, a successful performance of SR 3.8.1.2 or SR 3.8.1.7. 5. To ensure Operability of an AVR, it must have been aligned to the DG during the performance of SR 3.8.1.2 and SR 3.8.1.3 within the last 60 days, plus any allowance per SR 3.0.2. <p>-----</p> <p>Verify each DG is synchronized and loaded, and operates for ≥ 60 minutes at a load ≥ 4450 kW and ≤ 4700 kW.</p>	<p>As specified in Table 3.8.1-1</p>
<p>SR 3.8.1.4 Verify each day tank contains ≥ 31.5 inches of fuel oil.</p>	<p>31 days</p>
<p>SR 3.8.1.5 Check for and remove accumulated water from each day tank.</p>	<p>31 days</p>
<p>SR 3.8.1.6 Verify the fuel oil transfer system operates to transfer fuel oil from storage tank to the day tank.</p>	<p>31 days</p>

(continued)

3.8 ELECTRICAL POWER SYSTEMS

3.8.3 Diesel Fuel Oil, Lube Oil, and Starting Air

LC0 3.8.3 The stored diesel fuel oil, lube oil, and starting air subsystem shall be within limits for each required diesel generator (DG).

APPLICABILITY: When associated DG is required to be OPERABLE.

ACTIONS

-----NOTE-----
Separate Condition entry is allowed for each DG.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more DGs with fuel volume < 48,400 gallons and > 41,800 gallons in storage tank during MODE 1,2,3 or 4.	A.1 Restore fuel oil level to within limits.	48 hours
B. One or more DGs with lube oil inventory < TS min and ≥ TS inop.	B.1 Restore lube oil inventory to within limits.	48 hours
C. One required DG with fuel volume in the storage tank < 43,600 gallons and > 37,400 gallons during MODE 5 or 6.	C.1 Restore fuel oil level to within limits.	48 hours
D. One or more DGs with stored fuel oil total particulates not within limits.	D.1 Restore fuel oil total particulates to within limits.	7 days

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
E. One or more DGs with new fuel oil properties not within limits.	E.1 Restore stored fuel oil properties to within limits.	30 days
F. One or more DGs with starting air receiver pressure < 175 psig and ≥ 136 psig.	F.1 Restore starting air receiver pressure to ≥ 175 psig.	48 hours
G. Required Action and associated Completion Time of Condition A, B, C, D, E or F not met. <u>OR</u> One or more DGs with diesel fuel oil, lube oil, or starting air subsystem not within limits for reasons other than Condition A, B, C, D, E, or F.	G.1 Declare associated DG inoperable.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.8.3.1 Verify each fuel oil storage tank contains ≥ 48,400 gallons in MODE 1,2,3 or 4 and ≥ 43,600 gallons level in MODE 5 or 6.	31 days

(continued)