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August 14, 2006

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

Serial No. 05-699A  
MPS Lic/WDB R0  
Docket Nos. 50-336/423  
License Nos. DPR-65  
NPF-49

**DOMINION NUCLEAR CONNECTICUT, INC.**  
**MILLSTONE POWER STATION UNITS 2 AND 3**  
**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION**  
**REGARDING PROPOSED TECHNICAL SPECIFICATION CHANGES FOR**  
**AUXILIARY FEEDWATER SYSTEM ALLOWED OUTAGE TIME**

In a letter dated February 7, 2006, Dominion Nuclear Connecticut, Inc. (DNC) requested an amendment in the form of changes to the Technical Specifications to Facility Operating License Number DPR-65 and NPF-49 for Millstone Power Station Units 2 and 3. The proposed changes were requested based on the NRC approved Technical Specification Task force Traveler Number 340, Revision 3. In a facsimile dated June 14, 2006, the NRC requested additional information to facilitate the technical review being conducted by the staff. A conference call to discuss the requested additional information was held between DNC and the NRC on June 28, 2006. Attachments 1 and 2 of this letter provide the response to the request for additional information.

The additional information provided in this letter does not affect the conclusions of the safety summary and significant hazards consideration discussion in DNC's submittal of February 7, 2006.

If you have any questions or require additional information, please contact Mr. David W. Dodson at (860) 447-1791, extension 2346.

Very truly yours,

Gerald T. Bischof  
Vice President – Nuclear Engineering

Attachments (4)

Commitments made in this letter: None.

cc: U.S. Nuclear Regulatory Commission  
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COMMONWEALTH OF VIRGINIA     )  
  )  
COUNTY OF HENRICO                    )

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by Gerald T. Bischof, who is Vice President - Nuclear Engineering, of Dominion Nuclear Connecticut, Inc. He has affirmed before me that he is duly authorized to execute and file the foregoing document in behalf of that Company, and that the statements in the document are true to the best of his knowledge and belief.

Acknowledged before me this 14<sup>th</sup> day of August, 2006.

My Commission Expires: August 31, 2008.

Margaret B. Bennett  
Notary Public

(SEAL)

**ATTACHMENT 1**

**PROPOSED TECHNICAL SPECIFICATION CHANGES**  
**AUXILIARY FEEDWATER SYSTEM ALLOWED OUTAGE TIME**  
**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION**

**DOMINION NUCLEAR CONNECTICUT, INC.**  
**MILLSTONE POWER STATION UNITS 2 AND 3**

**PROPOSED TECHNICAL SPECIFICATION CHANGES  
AUXILIARY FEEDWATER SYSTEM ALLOWED OUTAGE TIME  
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Below is the response to the request for additional information:

**NRC Question 1**

The submittal letter states that “Additional changes are necessary to support the proposed allowed outage time increase, and to improve the format of action requirements.”

- It is not clear that this submittal describes all the associated changes. Please indicate that there are no changes beyond those described in this package to fully enact this change. Or, if there are additional changes beyond those in this package, please provide a reference or other trackable means to allow the staff to review and evaluate them as part of an integrated review. Note: as these plants do not currently have the standard technical specifications, any other sections that are interdependent to allow safe operation must be identified.

**DNC Response**

There are no changes required, beyond those described in the February 7, 2006 submittal package, to fully implement this change. As stated on Attachment 1, Page 19, the proposed amendment does not impact any other sections of the MPS 2 and 3 TS.

**NRC Question 2**

The submittal states that there is no increase in risk to the extending of the completion time to return the turbine driven pump and/or its steam supply to operable status from the current 72 hours to 7 days.

- Please describe and justify the input, assumptions and process used to conclude this non-increase. Note: as these plants do not currently have standard technical specifications, a probabilistic risk assessment for this change from the plants'

current specifications should be performed to demonstrate that the modification will not adversely affect the safety of plant operation.

### **DNC Response**

Based on the discussion regarding the requested information that was held with the NRC on June 28, 2006, it was jointly decided that no response for this question is required.

### **NRC Question 3**

The submittal makes the statement, in Paragraph 2 of Section 1, that this change will result in a reduction in personnel exposure and a reduction in plant refueling outage duration.

- It is unclear how changing the allowed outage time will affect personnel exposure or reduce the outage time. Please explain and justify this statement.

### **DNC Response**

This statement was provided to elaborate on the statement in the justification section of TSTF-340, Rev. 3, that states the change will reduce the number of unnecessary MODE changes and requests for enforcement discretion by providing added flexibility in MODE 3 to repair and test the turbine-driven AFW pump following a refueling outage. Reducing the number of MODE changes will result in a reduction in personnel exposure and a reduction in plant refueling outage duration. For example, when the plant is maneuvered from MODE 3 to MODE 4, there are a number of surveillance tests that must be re-performed prior to entering MODE 3 again. Some of these surveillance tests require entering radiological areas to perform activities such as valve lineup verifications and tests and calibrations thus resulting in more personnel exposure and increased refueling outage duration. The avoided outage time associated with cycling the plant from normal operating pressure and temperature (Mode 3) to shutdown cooling operation (Mode 4) and back is approximately 38 hours for each unit. The avoided additional personnel exposure associated with the above activities is approximately 220 millirem per unit.

### **NRC Question 4**

The submittal states that this change will result in each plant's TSs more closely reflecting the standard technical specifications. However, one notable difference is that the requirement to perform the surveillance is not present in the proposal. Specifically, the "24 hours" is stricken from the surveillance requirement of testing within 24 hours of reaching 800 PSI in the steam generators. (TS 4.7.1.2 Unit 2)

- The standard technical specification for CE plants retains the "24 hours" with "24" in brackets to indicate it is a proposed number. Please explain and justify the proposed open-ended window within which the surveillance testing will be accomplished.

### **DNC Response**

Based on the discussion held with the NRC on June 28, 2006, DNC is hereby withdrawing the request to remove the words "24 hours" from Surveillance Requirement 4.7.1.2.b, thus resulting in no change being proposed for this Surveillance Requirement. Those portions of the remainder of the submittal related to the proposed change to Surveillance Requirement 4.7.1.2.b are also withdrawn.

Attachment 2 to this response to the request for additional information is provided to reflect withdrawal of the request to remove the words "24 hours" and to replace the originally proposed marked up pages included in the DNC proposed license amendment request dated February 7, 2006.

Included below, for information only, is an additional statement that will be incorporated into the Technical Specification Bases related to MPS Unit 2 Surveillance Requirement 4.7.1.2.b that provides clarification regarding when this Surveillance is to be performed.

"Once the unit reaches 800 psig, 24 hours would be allowed for completing the Surveillance."

### **NRC Question 5**

The submittal proposes to allow 2 of 3 steam supplies to the turbine-driven auxiliary feedwater pump to be inoperable before requiring action for Millstone, Unit 3.

- Please explain and justify this increase beyond the 'one supply inoperable' requirement of the standard technical specifications.

### **DNC Response**

As stated in section 3.2 of the proposed amendment, the MPS 3 turbine-driven AFW pump design includes steam supplies from three of the four steam generators. As compared to a plant design that has only two steam supplies to the turbine-driven AFW pump such as Unit 2, the presence of a third steam supply provides an additional level of redundancy. Since only one steam supply is necessary to operate the turbine-driven AFW pump, the proposed change accommodates the plant specific design of Unit 3 by specifying two inoperable steam supplies as the condition that warrants action.

The three steam supplies to the turbine-driven AFW pump at MPS Unit 3 each consist of a normally closed air-operated valve and a normally open motor operated valve that

feed a common line that in turn leads to the AFW turbine control valve. The solenoid valves associated with the air-operated valves are powered from vital DC busses. The air-operated valves open on an actuation signal and fail open on a loss of DC control power to the solenoid valves or a loss of instrument air. The air-operated valves are not affected by a loss of normal or emergency ac power. The motor operated valves fail as is (i.e., open) on a loss of normal or emergency ac power. Accordingly, the three steam supplies are not ac power train dependent.

### **NRC Question 6**

The submittal uses the word “pump” in the Inoperable Equipment descriptions where the standard technical specifications for both the CE and Westinghouse plants, use the word “train”.

- Explain and justify the reduction in scope of equipment governed by this Technical Specification.

### **Response 6**

The current customized technical specifications as approved for both Units 2 and 3 address AFW pumps, as compared to AFW trains as described in the standard technical specifications. There was no intention to change the existing AFW LCO or applicability as part of the proposed changes to the associated action statements. The proposed change is limited to changes to the action statements and their format. Accordingly, because there is no proposed change to the LCO or applicability as currently approved for Units 2 and 3, there is no reduction in scope of equipment governed by this technical specification compared to the existing technical specifications. It is recognized that the current customized technical specifications for Units 2 and 3 differ from the standard technical specifications in the use of the word “pump” versus the word ‘train’; however, the changes to the action statements are sufficiently complex in themselves such that additional changes to the LCO were not considered prudent or necessary.

While the term “pump” is used in the current Unit 2 and 3 technical specifications, the manner in which the LCO is applied is consistent with the standard technical specifications in that any component in the associated train becoming inoperable results in the associated pump being declared inoperable.



**ATTACHMENT 2**

**LICENSE AMENDMENT REQUEST (LBDCR 04-MP2-013)**  
**AUXILIARY FEEDWATER ALLOWED OUTAGE TIME**

**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION**

**REVISED MARKED-UP PAGES**

**DOMINION NUCLEAR CONNECTICUT, INC.**  
**MILLSTONE POWER STATION UNIT 2**

PLANT SYSTEMS

AUXILIARY FEEDWATER PUMPS

LIMITING CONDITION FOR OPERATION

3.7.1.2 At least three steam generator auxiliary feedwater pumps shall be OPERABLE with:

- a. Two feedwater pumps capable of being powered from separate OPERABLE emergency busses, and
- b. One feedwater pump capable of being powered from an OPERABLE steam supply system.

APPLICABILITY: MODES 1, 2 and 3.

ACTION:

Insert A →

- a. ~~With one auxiliary feedwater pump inoperable, restore the required auxiliary feedwater pumps to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.~~
- b. ~~With two auxiliary feedwater pumps inoperable be in at least HOT STANDBY within 6 hours and in HOT SHUTDOWN within the following 6 hours.~~
- c. ~~With three auxiliary feedwater pumps inoperable, immediately initiate corrective action to restore at least one auxiliary feedwater pump to OPERABLE status as soon as possible. Entry into an OPERATIONAL MODE or other specified condition under the provisions of Specification 3.0.4 shall not be made with three auxiliary feedwater pumps inoperable.~~

SURVEILLANCE REQUIREMENTS

4.7.1.2 Each auxiliary feedwater pump shall be demonstrated OPERABLE:

- a. At least once per 31 days by verifying each auxiliary feedwater manual, power operated, and automatic valve in each water flow path and in each steam supply flow path to the steam turbine driven pump, that is not locked, sealed, or otherwise secured in position, is in the correct position.
- b. By verifying the developed head of each auxiliary feedwater pump at the flow test point is greater than or equal to the required developed head when tested pursuant to Specification 4.0.5. (Not required to be performed for the steam turbine driven auxiliary feedwater pump until 24 hours after reaching 800 psig in the steam generators. The provisions of Specification 4.0.4 are not applicable to the steam turbine driven auxiliary feedwater pump for entry into MODE 3.

Insert A

Millstone Power Station Unit 2  
Technical Specifications  
Page 3/4 7-4

Inoperable Equipment	Required ACTION
<p>a.* One steam supply to turbine-driven auxiliary feedwater pump.</p>	<p>a. Restore affected equipment to OPERABLE status within 7 days. If these ACTIONS are not met, be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 12 hours.</p>
<p>b.*</p> <p style="text-align: center;">-----NOTE-----  Only applicable if MODE 2 has not been entered following REFUELING.  -----</p> <p>One turbine-driven auxiliary feedwater pump in MODE 3 following REFUELING.</p>	<p>b. Restore affected equipment to OPERABLE status within 7 days. If these ACTIONS are not met, be in at least HOT SHUTDOWN within the following 12 hours.</p>
<p>c.* One auxiliary feedwater pump in MODE 1, 2, or 3 for reasons other than a. or b. above.</p>	<p>c. Restore the required auxiliary feedwater pump to OPERABLE status within 72 hours. If these ACTIONS are not met, be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 12 hours.</p>
<p>d. Two auxiliary feedwater pumps in MODE 1, 2, or 3.</p>	<p>d. Be in at least HOT STANDBY within 6 hours and in HOT SHUTDOWN within the following 12 hours.</p>

Inoperable Equipment	Required ACTION
<p>e. Three auxiliary feedwater pumps in MODE 1, 2, or 3.</p>	<p>e.</p> <p style="text-align: center;">-----NOTE-----</p> <p>LCO 3.0.3 and all other LCO Required ACTIONS requiring MODE changes are suspended until one AFW pump is restored to OPERABLE status.</p> <p style="text-align: center;">-----</p> <p>Immediately initiate ACTION to restore one auxiliary feedwater pump to OPERABLE status.</p>

\* Separate condition entry is allowed for (1) an inoperable steam supply to the turbine-driven auxiliary feedwater pump, (2) if MODE 2 has not been entered following REFUELING, an inoperable turbine-driven auxiliary feedwater pump in MODE 3 following REFUELING, and (3) one inoperable AFW pump in MODES 1, 2, or 3 for reasons other than a. or b. above. Should a combination of the above conditions result in the loss of two auxiliary feedwater pumps, then ACTION d. must be entered.

Insert B

(Withdrawn)

**ATTACHMENT 3**

**LICENSE AMENDMENT REQUEST (LBDCR 04-MP2-013)**  
**AUXILIARY FEEDWATER ALLOWED OUTAGE TIME**

**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION**

**REVISED RETYPED PAGES**

**DOMINION NUCLEAR CONNECTICUT, INC.  
MILLSTONE POWER STATION UNIT 2**

PLANT SYSTEMS

AUXILIARY FEEDWATER PUMPS

LIMITING CONDITION FOR OPERATION

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3.7.1.2 At least three steam generator auxiliary feedwater pumps shall be OPERABLE with:

- a. Two feedwater pumps capable of being powered from separate OPERABLE emergency busses, and
- b. One feedwater pump capable of being powered from an OPERABLE steam supply system.

APPLICABILITY: MODES 1, 2 and 3.

ACTION:

Inoperable Equipment	Required ACTION
a. * One steam supply to turbine-driven auxiliary feedwater pump.	a. Restore affected equipment to OPERABLE status within 7 days. If these ACTIONS are not met, be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 12 hours.
b. *  - - - - NOTE - - - - Only applicable if MODE 2 has not been entered following REFUELING.  - - - - -  One turbine-driven auxiliary feedwater pump in MODE 3 following REFUELING.	b. Restore affected equipment to OPERABLE status within 7 days. If these ACTIONS are not met, be in at least HOT SHUTDOWN within the following 12 hours.
c. * One auxiliary feedwater pump in MODE 1, 2, or 3 for reasons other than a. or b. above.	c. Restore the required auxiliary feedwater pump to OPERABLE status within 72 hours. If these ACTIONS are not met, be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 12 hours.
d. Two auxiliary feedwater pumps in MODE 1, 2, or 3.	d. Be in at least HOT STANDBY within 6 hours and in HOT SHUTDOWN within the following 12 hours.

PLANT SYSTEMS

AUXILIARY FEEDWATER PUMPS

LIMITING CONDITION FOR OPERATION

ACTION: (Continued)

Inoperable Equipment	Required ACTION
<p>e. Three auxiliary feedwater pumps in MODE 1, 2, or 3.</p>	<p>e.</p> <p style="text-align: center;">- - - - - NOTE - - - - -</p> <p style="text-align: center;">LCO 3.0.3 and all other LCO Required ACTIONS requiring MODE changes are suspended until one AFW pump is restored to OPERABLE status.</p> <p style="text-align: center;">- - - - -</p> <p>Immediately initiate ACTION to restore one auxiliary feedwater pump to OPERABLE status.</p>

\* Separate condition entry is allowed for (1) an inoperable steam supply to the turbine-driven auxiliary feedwater pump, (2) if MODE 2 has not been entered following REFUELING, an inoperable turbine-driven auxiliary feedwater pump in MODE 3 following REFUELING, and (3) one inoperable AFW pump in MODES 1, 2, or 3 for reasons other than a. or b. above. Should a combination of the above conditions result in the loss of two auxiliary feedwater pumps, then ACTION d. must be entered.

SURVEILLANCE REQUIREMENTS

4.7.1.2 Each auxiliary feedwater pump shall be demonstrated OPERABLE:

- a. At least once per 31 days by verifying each auxiliary feedwater manual, power operated, and automatic valve in each water flow path and in each steam supply flow path to the steam turbine driven pump, that is not locked, sealed, or otherwise secured in position, is in the correct position.
- b. By verifying the developed head of each auxiliary feedwater pump at the flow test point is greater than or equal to the required developed head when tested pursuant to Specification 4.0.5. (Not required to be performed for the steam turbine driven auxiliary feedwater pump until 24 hours after reaching 800 psig in the steam generators. The provisions of Specification 4.0.4 are not applicable to the steam turbine driven auxiliary feedwater pump for entry into MODE 3.

## PLANT SYSTEMS

### AUXILIARY FEEDWATER PUMPS

#### SURVEILLANCE REQUIREMENTS (Continued)

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- c. At least once per 18 months by verifying each auxiliary feedwater automatic valve that is not locked, sealed, or otherwise secured in position, actuates to the correct position, as designed, on an actual or simulated actuation signal.
- d. At least once per 18 months by verifying each auxiliary feedwater pump starts automatically, as designed, on an actual or simulated actuation signal.
- e. By verifying the proper alignment of the required auxiliary feedwater flow paths by verifying flow from the condensate storage tank to each steam generator prior to entering MODE 2 whenever the unit has been in MODE 5, MODE 6, or defueled for a cumulative period of greater than 30 days.



**ATTACHMENT 4**

**LICENSE AMENDMENT REQUEST (LBDCR 04-MP2-013)**  
**AUXILIARY FEEDWATER ALLOWED OUTAGE TIME**

**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION**

**REVISED MARKED-UP PAGES OF**  
**TECHNICAL SPECIFICATION BASES**  
**(INFORMATION ONLY)**

**DOMINION NUCLEAR CONNECTICUT, INC.**  
**MILLSTONE POWER STATION UNIT 2**

3/4.7 PLANT SYSTEMS

BASES

3/4.7.1.2 AUXILIARY FEEDWATER PUMPS (Continued)

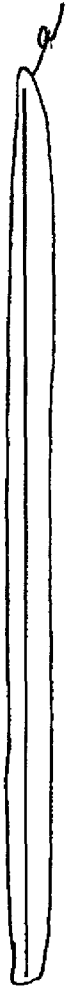
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During quarterly surveillance testing of the turbine driven AFW pump, valve 2-CN-27A is closed and valve 2-CN-28 is opened to prevent overheating the water being circulated. In this configuration, the suction of the turbine driven AFW pump is aligned to the Condensate Storage Tank via the motor driven AFW pump suction flow path, and the pump minimum flow is directed to the Condensate Storage Tank by the turbine driven AFW pump suction path upstream of 2-CN-27A in the reverse direction. During this surveillance, the suction path to the motor driven AFW pump suction path remains OPERABLE, and the turbine driven AFW suction path is inoperable. In this situation, the ACTION requirements of Technical Specification 3.7.1.2 for one AFW pump are applicable.

Surveillance Requirement 4.7.1.2.a verifies the correct alignment for manual, power operated, and automatic valves in the Auxiliary Feedwater (AFW) System flow paths (water and steam) to provide assurance that the proper flow paths will exist for AFW operation. This surveillance does not apply to valves that are locked, sealed, or otherwise secured in position, since these valves were verified to be in the correct position prior to locking, sealing, or securing. A valve that receives an actuation signal is allowed to be in a nonaccident position provided the valve automatically repositions within the proper stroke time. This surveillance does not require any testing or valve manipulation. Rather, it involves verification that those valves capable of being mispositioned are in the correct position. The 31 day frequency is appropriate because the valves are operated under procedural control and an improper valve position would only affect a single train. This frequency has been shown to be acceptable through operating experience.

Surveillance Requirement 4.7.1.2.b, which addresses periodic surveillance testing of the AFW pumps to detect gross degradation caused by impeller structural damage or other hydraulic component problems, is required by Section XI of the ASME Code. This type of testing may be accomplished by measuring the pump developed head at only one point of the pump characteristic curve. This verifies both that the measured performance is within an acceptable tolerance of the original pump baseline performance and that the performance at the test flow is greater than or equal to the performance assumed in the unit safety analysis. The surveillance requirements are specified in the Inservice Testing Program, which encompasses Section XI of the ASME Code. Section XI of the ASME Code provides the activities and frequencies necessary to satisfy the requirements. This surveillance is modified to indicate that the test can be deferred for the steam driven AFW pump until suitable plant conditions are established. This deferral is required because steam pressure is not sufficient to perform the test until after MODE 3 is entered. However, the test, if required, must be performed prior to entering MODE 2.

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Millstone Power Station Unit 2  
Technical Specifications  
Page B 3/4 7-2b

If one of the steam supplies to the turbine-driven auxiliary feedwater train is inoperable in MODES 1, 2, and 3, or if a turbine-driven auxiliary feedwater pump is inoperable while in MODE 3 immediately following REFUELING, action must be taken to restore the inoperable equipment to an OPERABLE status within 7 days. The 7 day allowed outage time is reasonable, based on the following:

- a. For the inoperability of a steam supply to the turbine-driven auxiliary feedwater pump, the 7 day allowed outage time is reasonable since the auxiliary feedwater system design affords adequate redundancy for the steam supply line for the turbine-driven pump.
- b. For the inoperability of a turbine-driven auxiliary feedwater pump while in MODE 3 immediately subsequent to a refueling, the 7 day allowed outage time is reasonable due to the minimal decay heat levels in this situation.
- c. For both the inoperability of a steam supply line to the turbine-driven pump and an inoperable turbine-driven auxiliary feedwater pump while in MODE 3 immediately following a refueling outage, the 7 day allowed outage time is reasonable due to the availability of redundant OPERABLE motor driven auxiliary feedwater pumps, and due to the low probability of an event requiring the use of the turbine-driven auxiliary feedwater pump.

The required ACTION dictates that if the 7 day allowed outage time is reached the unit must be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 12 hours.

The allowed time is reasonable, based on operating experience, to reach the required conditions from full power conditions in an orderly manner and without challenging plant systems.

A Note limits the applicability of the inoperable equipment condition b. to when the unit has not entered MODE 2 following a REFUELING. Required ACTION b. allows one auxiliary feedwater pump to be inoperable for 7 days vice the 72 hour allowed outage time in required ACTION c. This longer allowed outage time is based on the reduced decay heat following REFUELING and prior to the reactor being critical.

With one of the required auxiliary feedwater pumps inoperable in MODE 1, 2, or 3 for reasons other than ACTION a. or b., ACTION must be taken to restore OPERABLE status within 72 hours. This includes the loss of both steam supply lines to the turbine-driven auxiliary feedwater pump. The 72 hour allowed outage time is reasonable, based on redundant capabilities afforded by the auxiliary feedwater system, time needed for repairs, and the low probability of a DBA occurring during this time period. Two auxiliary feedwater pumps and flow paths remain to supply feedwater to the steam generators.

The ACTION Statement is modified by a Note indicating that separate condition entry is allowed for "(1) an inoperable steam supply to the turbine-driven auxiliary feedwater pump, (2) if MODE 2 has not been entered following REFUELING, one turbine-driven auxiliary feedwater pump in MODE 3 following REFUELING, and (3) one inoperable AFW pump in MODES 1, 2, or 3 for reasons other than a. or b. above." If situations are discovered that require entry into more than one Inoperable Equipment condition at a time, the restoration of the affected equipment must be performed within the associated Required ACTION allowed outage time. Should a combination of the above conditions result in the loss of two auxiliary feedwater pumps, then ACTION d. must be entered. When in multiple Inoperable Equipment conditions, separate allowed outage times are tracked for each Inoperable Equipment condition starting from the time of discovery of the situation that required entry into the condition.

If all three AFW pumps are inoperable in MODE 1, 2, or 3, the unit is in a seriously degraded condition with no safety related means for conducting a cooldown, and only limited means for conducting a cooldown with non-safety related equipment. In such a condition, the unit should not be perturbed by any action, including a power change, that might result in a trip. The seriousness of this condition requires that action be started immediately to restore one AFW pump to OPERABLE status. Required ACTION e. is modified by a Note indicating that all required MODE changes or power reductions are suspended until one AFW pump is restored to OPERABLE status. In this case, LCO 3.0.3 is not applicable because it could force the unit into a less safe condition.

#### Insert G

Once the unit reaches 800 psig, 24 hours would be allowed for completing the Surveillance.