

ENCLOSURE 1

PROPOSED TECHNICAL SPECIFICATIONS BASES

Marked-up Bases pages:

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Revised Bases pages incorporating the proposed change:

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* Bases pages revised or added to resolve pagination problems.

BASES

SURVEILLANCE
REQUIREMENTS
(continued)SR 3.8.1.14

Regulatory Guide 1.9 (Ref. 3), paragraph C2.2.9, requires demonstration once per 18 months that the DGs can start and run continuously for an interval of not less than 24 hours, ≥ 2 hours of which is at a load between 105% and 110% of the continuous duty rating and the remainder of the time at a load equivalent to 90-100% of the continuous duty rating of the DG. The DG starts for this Surveillance can be performed either from standby or hot conditions. The provisions for prelubricating and warmup, discussed in SR 3.8.1.2, and for gradual loading, discussed in SR 3.8.1.3, are applicable to this SR.

In order to ensure that the DG is tested under load conditions that are as close to design conditions as possible, testing must be performed using a power factor of ≥ 0.8 and ≤ 0.9 . This power factor is chosen to be representative of the actual design basis inductive loading that the DG would experience. The load band is provided to avoid routine overloading of the DG. Routine overloading may result in more frequent teardown inspections in accordance with vendor recommendations in order to maintain DG OPERABILITY.

~~The 18 month Frequency is consistent with the recommendations of Regulatory Guide 1.9 (Ref. 3), Table 1, takes into consideration plant conditions required to perform the Surveillance, and is intended to be consistent with expected fuel cycle lengths.~~

This Surveillance is modified by three ~~two~~ Notes. Note 1 states that momentary transients due to changing bus loads do not invalidate this test. Similarly, momentary power factor transients above the power factor limit will not invalidate the test. ~~The reason for Note 2 is that during operation with the reactor critical, performance of this Surveillance could cause perturbations to the electrical distribution systems that could challenge continued steady state operation and, as a result, plant safety systems.~~ establishes that this SR may be performed on only one DG at a time while in MODE 1, 2, 3, or 4. This is necessary to ensure the proper response to an operational transient (i.e., loss of offsite power, ESF actuation). Therefore, three DGs must be maintained operable and in a standby condition during performance of this test. In this configuration, the plant will remain within its design basis, since at all times safe shutdown can be achieved with two DGs in the same train.

Note 3 establishes that ~~C~~credit may be taken for unplanned events that satisfy this SR. Examples of unplanned events may include:

- 1) Unexpected operational events which cause the equipment to perform the function specified by this Surveillance, for

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SURVEILLANCE
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SR 3.8.1.14 (continued)

which adequate documentation of the required performance is available; and

- 2) Post corrective maintenance testing that requires performance of this Surveillance in order to restore the component to OPERABLE, provided the maintenance was required, or performed in conjunction with maintenance required to maintain OPERABILITY or reliability.

Prior to performance of this SR in Modes 1 or 2, actions are taken to establish that adequate conditions exist for performance of the SR. The actions include the performance of the following:

1. Verification of the stability of the offsite power system in the vicinity of WBN. This action establishes that the power system is within "single contingency limits" and is capable of remaining stable upon the loss of any single component supporting the system.
2. Establishing of the expected weather conditions for the 24-hour testing period.
3. Postponement of the test, if a grid stability problem exists or if inclement weather such as severe thunderstorms or heavy snowfall is projected for the upcoming 24 hour period.

If during the performance of the test, a stability problem with the offsite power system arises or inclement weather (i.e., tornado watch or warning, heavy snowfall, etc.) is experienced, the testing is to be suspended.

SR 3.8.1.15

This Surveillance demonstrates that the diesel engine can restart from a hot condition, such as subsequent to shutdown from normal Surveillances, and achieve the required voltage and frequency within 10 seconds. The minimum voltage and frequency stated in the SR are those necessary to ensure the DG can accept DBA

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SURVEILLANCE
REQUIREMENTSSR 3.8.1.15 (continued)

loading while maintaining acceptable voltage and frequency levels. Stable operation at the nominal voltage and frequency values is also essential to establishing DG OPERABILITY, but a time constraint is not imposed. This is because a typical DG will experience a period of voltage and frequency oscillations prior to reaching steady state operation if these oscillations are not dampened out by load application. This period may extend beyond the 10 second acceptance criteria and could be a cause for failing the SR. In lieu of a time constraint in the SR, WBN will monitor and trend the actual time to reach steady state operation as a means of ensuring there is no voltage regulator or governor degradation which could cause a DG to become inoperable. The 10 second time is derived from the requirements of the accident analysis to respond to a design basis large break LOCA. The 18 month Frequency is consistent with the recommendations of Regulatory Guide 1.9 (Ref. 3), Table 1.

The DG engines for WBN have an oil circulation and soakback system that operates continuously to preclude the need for a prelube and warmup when a DG is started from standby.

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

SR 3.8.1.16

As required by Regulatory Guide 1.9 (Ref. 3), paragraph C2.2.11, this Surveillance ensures that the manual synchronization and automatic load transfer from the DG to the offsite source can be made and the DG can be returned to ready to load status when offsite power is restored. It also ensures that the autostart logic is reset to allow the DG to reload if a subsequent loss of

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SR 3.8.1.16 (continued)

offsite power occurs. The DG is considered to be in ready to load status when the DG is at rated speed and voltage, the output breaker is open and can receive an autoclose signal on bus undervoltage, and the load sequence timers are reset.

The Frequency of 18 months is consistent with the recommendations of Regulatory Guide 1.9 (Ref. 3), Table 1, and takes into consideration plant conditions required to perform the Surveillance.

This SR is modified by a Note. The reason for the Note is that performing the Surveillance would remove a required offsite circuit from service, perturb the electrical distribution system, and challenge safety systems. Credit may be taken for unplanned events that satisfy this SR. Examples of unplanned events may include:

- 1) Unexpected operational events which cause the equipment to perform the function specified by this Surveillance, for which adequate documentation of the required performance is available; and
- 2) Post corrective maintenance testing that requires performance of this Surveillance in order to restore the component to OPERABLE, provided the maintenance was required, or performed in conjunction with maintenance required to maintain OPERABILITY or reliability.

SR 3.8.1.17

Demonstration of the test mode override ensures that the DG availability under accident conditions will not be compromised as the result of testing and the DG will automatically reset to ready to load operation if a LOCA actuation signal is received during operation in the test mode. Ready to load operation is defined as the DG running at rated speed and voltage with the DG output breaker open. These provisions for automatic switchover are required by IEEE-308 (Ref. 13), paragraph 6.2.6(2).

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SR 3.8.1.17 (continued)

The requirement to automatically energize the emergency loads with offsite power is essentially identical to that of SR 3.8.1.12. The intent in the requirement associated with SR 3.8.1.17.b is to show that the emergency loading was not affected by the DG operation in test mode. In lieu of actual demonstration of connection and loading of loads, testing that adequately shows the capability of the emergency loads to perform these functions is acceptable. This testing may include any series of sequential, overlapping, or total steps so that the entire connection and loading sequence is verified.

The 18 month Frequency is consistent with the recommendations of Regulatory Guide 1.9 (Ref. 3), Table 1, takes into consideration plant conditions required to perform the Surveillance, and is intended to be consistent with expected fuel cycle lengths.

This SR is modified by a Note. The reason for the Note is that performing the Surveillance would remove a required offsite circuit from service, perturb the electrical distribution system, and challenge safety systems. Credit may be taken for unplanned events that satisfy this SR. Examples of unplanned events may include:

- 1) Unexpected operational events which cause the equipment to perform the function specified by this Surveillance, for which adequate documentation of the required performance is available; and
- 2) Post corrective maintenance testing that requires performance of this Surveillance in order to restore the component to OPERABLE, provided the maintenance was required, or performed in conjunction with maintenance required to maintain OPERABILITY or reliability.

SR 3.8.1.18

Under accident and loss of offsite power conditions loads are sequentially connected to the 6.9 kV shutdown board by the automatic load sequencer. The sequencing logic controls the permissive and starting signals to motor breakers to

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SR 3.8.1.18 (continued)

prevent overloading of the DGs due to high motor starting currents. The load sequence time specified in FSAR Table 8.3-3 ensures that sufficient time exists for the DG to restore frequency and voltage prior to applying the next load block and that safety analysis assumptions regarding ESF equipment time delays are not violated. The allowable values for the time delay relays are contained in system specific setpoint scaling documents. Reference 2 provides a summary of the automatic loading of ESF buses.

The Frequency of 18 months is consistent with the recommendations of Regulatory Guide 1.9 (Ref. 3), Table 1, takes into consideration plant conditions required to perform the Surveillance, and is intended to be consistent with expected fuel cycle lengths.

This SR is modified by a Note. The reason for the Note is that performing the Surveillance would remove a required offsite circuit from service, perturb the electrical distribution system, and challenge safety systems. Credit may be taken for unplanned events that satisfy this SR. Examples of unplanned events may include:

- 1) Unexpected operational events which cause the equipment to perform the function specified by this Surveillance, for which adequate documentation of the required performance is available; and
- 2) Post corrective maintenance testing that requires performance of this Surveillance in order to restore the component to OPERABLE, provided the maintenance was required, or performed in conjunction with maintenance required to maintain OPERABILITY or reliability.

SR 3.8.1.19

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

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SURVEILLANCE
REQUIREMENTSSR 3.8.1.19 (continued)

This Surveillance demonstrates the DG operation, as discussed in the Bases for SR 3.8.1.11, during a loss of offsite power actuation test signal in conjunction with an ESF actuation signal. In lieu of actual demonstration of connection and loading of loads, testing that adequately shows the capability of the DG system to perform these functions is acceptable. This testing may include any series of sequential, overlapping, or total steps so that the entire connection and loading sequence is verified.

The Frequency of 18 months takes into consideration plant conditions required to perform the Surveillance and is intended to be consistent with an expected fuel cycle length of 18 months.

For the purpose of this testing, the DGs shall be started from standby conditions, that is, with the engine coolant and oil being continuously circulated and temperature maintained consistent with manufacturer recommendations. The DG engines for WBN have an oil circulation and soakback system that operates continuously to preclude the need for a prelube and warmup when a DG is started from standby. With WBN in one unit operation, this test will be conducted on a per train basis. Since the Unit 2 DGs are required to carry the common loads during a loss of offsite power event, the respective Unit 2 DG on the same power train will be tested with its respective Unit 1 DG. This is to minimize shutdown board room alignment and restoration.

This SR is modified by a Note. The reason for the Note is that the performance of the Surveillance would remove a required offsite circuit from service, perturb the electrical distribution system, and challenge safety systems. Credit may be taken for unplanned events that satisfy this SR. Examples of unplanned events may include:

- 1) Unexpected operational events which cause the equipment to perform the function specified by this Surveillance, for which adequate documentation of the required performance is available; and

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SR 3.8.1.19 (continued)

- 2) Post corrective maintenance testing that requires performance of this Surveillance in order to restore the component to OPERABLE, provided the maintenance was required, or performed in conjunction with maintenance required to maintain OPERABILITY or reliability.

SR 3.8.1.20

This SR verifies that DG availability is not compromised by the idle start circuitry, when in the idle mode of operation, and that an automatic or emergency start signal will disable the idle start circuitry and command the engine to go to full speed. The 18 month frequency is consistent with the expected fuel cycle lengths and is considered sufficient to detect any degradation of the idle start circuitry.

SR 3.8.1.21

This Surveillance demonstrates that the DG starting independence has not been compromised. Also, this Surveillance demonstrates that each engine can achieve proper speed within the specified time when the DGs are started simultaneously. The minimum voltage and frequency stated in the SR are those necessary to ensure the DG can accept DBA loading while maintaining acceptable voltage and frequency levels. Stable operation at the nominal voltage and frequency values is also essential to establishing DG OPERABILITY, but a time constraint is not imposed. This is because a typical DG will experience a period of voltage and frequency oscillations prior to reaching steady state operation if these oscillations are not dampened out by load application. This period may extend beyond the 10 second acceptance criteria and could be a cause for failing the SR. In lieu of a time constraint in the SR, WBN will monitor and trend the actual time to reach steady state operation as a means of ensuring there is no voltage regulator or governor degradation which could cause a DG to become inoperable.

The 10 year Frequency is consistent with the recommendations of Regulatory Guide 1.9 (Ref. 3), Table 1.

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SURVEILLANCE
REQUIREMENTSSR 3.8.1.21 (continued)

For the purpose of this testing, the DGs shall be started from standby conditions, that is, with the engine coolant and oil being continuously circulated and temperature maintained consistent with manufacturer recommendations. The DG engines for WBN have an oil circulation and soakback system that operates continuously to preclude the need for a prelube and warmup when a DG is started from standby.

Diesel Generator Test Schedule

The DG test schedule (Table 3.8.1-1) implements the recommendations of Revision 3 to Regulatory Guide 1.9 (Ref. 3). The purpose of this test schedule is to provide timely test data to establish a confidence level associated with the goal to maintain DG reliability > 0.975 per demand.

According to Regulatory Guide 1.9, Revision 3 (Ref. 3), each DG should be tested at least once every 31 days. Whenever a DG has experienced 4 or more valid failures in the last 25 valid tests, the maximum time between tests is reduced to 7 days. Four failures in 25 valid tests is a failure rate of 0.16, or the threshold of acceptable DG performance, and hence may be an early indication of the degradation of DG reliability. When considered in the light of a long history of tests, however, 4 failures in the last 25 valid tests may only be a statistically probable distribution of random events. Increasing the test Frequency will allow for a more timely accumulation of additional test data upon which to base judgment of the reliability of the DG. The increased test Frequency must be maintained until seven consecutive, failure free tests have been performed.

The Frequency for accelerated testing is 7 days, but no less than 24 hours. Tests conducted at intervals of less than 24 hours may be credited for compliance with Required Actions. However, for the purpose of re-establishing the normal 31-day Frequency, a successful test at an interval of less than 24 hours should be considered an invalid test and not count towards the 7 consecutive failure free starts, and the consecutive test count is not reset.

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Diesel Generator Test Schedule (continued)

A test interval in excess of 7 days (or 31 days as appropriate) constitutes a failure to meet the SRs and results in the associated DG being declared inoperable. It does not, however, constitute a valid test or failure of the DG, and any consecutive test count is not reset.

REFERENCES

1. Title 10, Code of Federal Regulations, Part 50, Appendix A, General Design Criterion (GDC) 17, "Electrical Power Systems."
2. Watts Bar FSAR, Section 8.2, "Offsite Power System," and Tables 8.3-1 to 8.3-3, "Safety-Related Standby Power sources and Distribution Boards," "Shutdown Board Loads Automatically Tripped Following a Loss of Nuclear Unit and Preferred Power," and "Diesel Generator Load Sequentially Applied Following a Loss of Nuclear Unit and Preferred Power."
3. Regulatory Guide 1.9, Rev. 3, "Selection, Design, Qualification and Testing of Emergency Diesel Generator Units Used as Class 1E Onsite Electric Power Systems at Nuclear Power Plants," July 1993.
4. Watts Bar FSAR Section 6, "Engineered Safety Features."
5. Watts Bar FSAR, Section 15.4, "Condition IV-Limiting Faults."
6. Regulatory Guide 1.93, Rev. 0, "Availability of Electric Power Sources," December 1974.
7. Generic Letter 84-15, "Proposed Staff Actions to Improve and Maintain Diesel Generator Reliability," July 2, 1984.
8. Title 10, Code of Federal Regulations, Part 50, Appendix A, GDC 18, "Inspection and Testing of Electric Power Systems."

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REFERENCES
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9. Regulatory Guide 1.137, Rev. 1, "Fuel Oil Systems for Standby Diesel Generators," October 1979.
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BASES

SURVEILLANCE
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(continued)SR 3.8.1.14

Regulatory Guide 1.9 (Ref. 3), paragraph C2.2.9, requires demonstration once per 18 months that the DGs can start and run continuously for an interval of not less than 24 hours, ≥ 2 hours of which is at a load between 105% and 110% of the continuous duty rating and the remainder of the time at a load equivalent to 90-100% of the continuous duty rating of the DG. The DG starts for this Surveillance can be performed either from standby or hot conditions. The provisions for prelubricating and warmup, discussed in SR 3.8.1.2, and for gradual loading, discussed in SR 3.8.1.3, are applicable to this SR.

In order to ensure that the DG is tested under load conditions that are as close to design conditions as possible, testing must be performed using a power factor of ≥ 0.8 and ≤ 0.9 . This power factor is chosen to be representative of the actual design basis inductive loading that the DG would experience. The load band is provided to avoid routine overloading of the DG. Routine overloading may result in more frequent teardown inspections in accordance with vendor recommendations in order to maintain DG OPERABILITY.

This Surveillance is modified by three Notes. Note 1 states that momentary transients due to changing bus loads do not invalidate this test. Similarly, momentary power factor transients above the power factor limit will not invalidate the test. Note 2 establishes that this SR may be performed on only one DG at a time while in MODE 1, 2, 3, or 4. This is necessary to ensure the proper response to an operational transient (i.e., loss of offsite power, ESF actuation). Therefore, three DGs must be maintained operable and in a standby condition during performance of this test. In this configuration, the plant will remain within its design basis, since at all times safe shutdown can be achieved with two DGs in the same train.

Note 3 establishes that credit may be taken for unplanned events that satisfy this SR. Examples of unplanned events may include:

- 1) Unexpected operational events which cause the equipment to perform the function specified by this Surveillance, for

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SURVEILLANCE
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SR 3.8.1.14 (continued)

which adequate documentation of the required performance is available; and

- 2) Post corrective maintenance testing that requires performance of this Surveillance in order to restore the component to OPERABLE, provided the maintenance was required, or performed in conjunction with maintenance required to maintain OPERABILITY or reliability.

Prior to performance of this SR in Modes 1 or 2, actions are taken to establish that adequate conditions exist for performance of the SR. The actions include the performance of the following:

1. Verification of the stability of the offsite power system in the vicinity of WBN. This action establishes that the power system is within "single contingency limits" and is capable of remaining stable upon the loss of any single component supporting the system.
2. Establishing of the expected weather conditions for the 24-hour testing period.
3. Postponement of the test, if a grid stability problem exists or if inclement weather such as severe thunderstorms or heavy snowfall is projected for the upcoming 24 hour period.

If during the performance of the test, a stability problem with the offsite power system arises or inclement weather (i.e., tornado watch or warning, heavy snowfall, etc.) is experienced, the testing is to be suspended.

SR 3.8.1.15

This Surveillance demonstrates that the diesel engine can restart from a hot condition, such as subsequent to shutdown from normal Surveillances, and achieve the required voltage and frequency within 10 seconds. The minimum voltage and frequency stated in the SR are those necessary to ensure the DG can accept DBA

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SURVEILLANCE
REQUIREMENTSSR 3.8.1.15 (continued)

loading while maintaining acceptable voltage and frequency levels. Stable operation at the nominal voltage and frequency values is also essential to establishing DG OPERABILITY, but a time constraint is not imposed. This is because a typical DG will experience a period of voltage and frequency oscillations prior to reaching steady state operation if these oscillations are not dampened out by load application. This period may extend beyond the 10 second acceptance criteria and could be a cause for failing the SR. In lieu of a time constraint in the SR, WBN will monitor and trend the actual time to reach steady state operation as a means of ensuring there is no voltage regulator or governor degradation which could cause a DG to become inoperable. The 10 second time is derived from the requirements of the accident analysis to respond to a design basis large break LOCA. The 18 month Frequency is consistent with the recommendations of Regulatory Guide 1.9 (Ref. 3), Table 1.

The DG engines for WBN have an oil circulation and soakback system that operates continuously to preclude the need for a prelube and warmup when a DG is started from standby.

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

SR 3.8.1.16

As required by Regulatory Guide 1.9 (Ref. 3), paragraph C2.2.11, this Surveillance ensures that the manual synchronization and automatic load transfer from the DG to the offsite source can be made and the DG can be returned to ready to load status when offsite power is restored. It also ensures that the autostart logic is reset to allow the DG to reload if a subsequent loss of

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SR 3.8.1.16 (continued)

offsite power occurs. The DG is considered to be in ready to load status when the DG is at rated speed and voltage, the output breaker is open and can receive an autoclose signal on bus undervoltage, and the load sequence timers are reset.

The Frequency of 18 months is consistent with the recommendations of Regulatory Guide 1.9 (Ref. 3), Table 1, and takes into consideration plant conditions required to perform the Surveillance.

This SR is modified by a Note. The reason for the Note is that performing the Surveillance would remove a required offsite circuit from service, perturb the electrical distribution system, and challenge safety systems. Credit may be taken for unplanned events that satisfy this SR. Examples of unplanned events may include:

- 1) Unexpected operational events which cause the equipment to perform the function specified by this Surveillance, for which adequate documentation of the required performance is available; and
- 2) Post corrective maintenance testing that requires performance of this Surveillance in order to restore the component to OPERABLE, provided the maintenance was required, or performed in conjunction with maintenance required to maintain OPERABILITY or reliability.

SR 3.8.1.17

Demonstration of the test mode override ensures that the DG availability under accident conditions will not be compromised as the result of testing and the DG will automatically reset to ready to load operation if a LOCA actuation signal is received during operation in the test mode. Ready to load operation is defined as the DG running at rated speed and voltage with the DG output breaker open. These provisions for automatic switchover are required by IEEE-308 (Ref. 13), paragraph 6.2.6(2).

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SURVEILLANCE
REQUIREMENTS

SR 3.8.1.17 (continued)

The requirement to automatically energize the emergency loads with offsite power is essentially identical to that of SR 3.8.1.12. The intent in the requirement associated with SR 3.8.1.17.b is to show that the emergency loading was not affected by the DG operation in test mode. In lieu of actual demonstration of connection and loading of loads, testing that adequately shows the capability of the emergency loads to perform these functions is acceptable. This testing may include any series of sequential, overlapping, or total steps so that the entire connection and loading sequence is verified.

The 18 month Frequency is consistent with the recommendations of Regulatory Guide 1.9 (Ref. 3), Table 1, takes into consideration plant conditions required to perform the Surveillance, and is intended to be consistent with expected fuel cycle lengths.

This SR is modified by a Note. The reason for the Note is that performing the Surveillance would remove a required offsite circuit from service, perturb the electrical distribution system, and challenge safety systems. Credit may be taken for unplanned events that satisfy this SR. Examples of unplanned events may include:

- 1) Unexpected operational events which cause the equipment to perform the function specified by this Surveillance, for which adequate documentation of the required performance is available; and
- 2) Post corrective maintenance testing that requires performance of this Surveillance in order to restore the component to OPERABLE, provided the maintenance was required, or performed in conjunction with maintenance required to maintain OPERABILITY or reliability.

SR 3.8.1.18

Under accident and loss of offsite power conditions loads are sequentially connected to the 6.9 kV shutdown board by the automatic load sequencer. The sequencing logic controls the permissive and starting signals to motor breakers to

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REQUIREMENTSSR 3.8.1.18 (continued)

prevent overloading of the DGs due to high motor starting currents. The load sequence time specified in FSAR Table 8.3-3 ensures that sufficient time exists for the DG to restore frequency and voltage prior to applying the next load block and that safety analysis assumptions regarding ESF equipment time delays are not violated. The allowable values for the time delay relays are contained in system specific setpoint scaling documents. Reference 2 provides a summary of the automatic loading of ESF buses.

The Frequency of 18 months is consistent with the recommendations of Regulatory Guide 1.9 (Ref. 3), Table 1, takes into consideration plant conditions required to perform the Surveillance, and is intended to be consistent with expected fuel cycle lengths.

This SR is modified by a Note. The reason for the Note is that performing the Surveillance would remove a required offsite circuit from service, perturb the electrical distribution system, and challenge safety systems. Credit may be taken for unplanned events that satisfy this SR. Examples of unplanned events may include:

- 1) Unexpected operational events which cause the equipment to perform the function specified by this Surveillance, for which adequate documentation of the required performance is available; and
- 2) Post corrective maintenance testing that requires performance of this Surveillance in order to restore the component to OPERABLE, provided the maintenance was required, or performed in conjunction with maintenance required to maintain OPERABILITY or reliability.

SR 3.8.1.19

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

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SURVEILLANCE
REQUIREMENTSSR 3.8.1.19 (continued)

This Surveillance demonstrates the DG operation, as discussed in the Bases for SR 3.8.1.11, during a loss of offsite power actuation test signal in conjunction with an ESF actuation signal. In lieu of actual demonstration of connection and loading of loads, testing that adequately shows the capability of the DG system to perform these functions is acceptable. This testing may include any series of sequential, overlapping, or total steps so that the entire connection and loading sequence is verified.

The Frequency of 18 months takes into consideration plant conditions required to perform the Surveillance and is intended to be consistent with an expected fuel cycle length of 18 months.

For the purpose of this testing, the DGs shall be started from standby conditions, that is, with the engine coolant and oil being continuously circulated and temperature maintained consistent with manufacturer recommendations. The DG engines for WBN have an oil circulation and soakback system that operates continuously to preclude the need for a prelube and warmup when a DG is started from standby. With WBN in one unit operation, this test will be conducted on a per train basis. Since the Unit 2 DGs are required to carry the common loads during a loss of offsite power event, the respective Unit 2 DG on the same power train will be tested with its respective Unit 1 DG. This is to minimize shutdown board room alignment and restoration.

This SR is modified by a Note. The reason for the Note is that the performance of the Surveillance would remove a required offsite circuit from service, perturb the electrical distribution system, and challenge safety systems. Credit may be taken for unplanned events that satisfy this SR. Examples of unplanned events may include:

- 1) Unexpected operational events which cause the equipment to perform the function specified by this Surveillance, for which adequate documentation of the required performance is available; and

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SR 3.8.1.19 (continued)

- 2) Post corrective maintenance testing that requires performance of this Surveillance in order to restore the component to OPERABLE, provided the maintenance was required, or performed in conjunction with maintenance required to maintain OPERABILITY or reliability.

SR 3.8.1.20

This SR verifies that DG availability is not compromised by the idle start circuitry, when in the idle mode of operation, and that an automatic or emergency start signal will disable the idle start circuitry and command the engine to go to full speed. The 18 month frequency is consistent with the expected fuel cycle lengths and is considered sufficient to detect any degradation of the idle start circuitry.

SR 3.8.1.21

This Surveillance demonstrates that the DG starting independence has not been compromised. Also, this Surveillance demonstrates that each engine can achieve proper speed within the specified time when the DGs are started simultaneously. The minimum voltage and frequency stated in the SR are those necessary to ensure the DG can accept DBA loading while maintaining acceptable voltage and frequency levels. Stable operation at the nominal voltage and frequency values is also essential to establishing DG OPERABILITY, but a time constraint is not imposed. This is because a typical DG will experience a period of voltage and frequency oscillations prior to reaching steady state operation if these oscillations are not dampened out by load application. This period may extend beyond the 10 second acceptance criteria and could be a cause for failing the SR. In lieu of a time constraint in the SR, WBN will monitor and trend the actual time to reach steady state operation as a means of ensuring there is no voltage regulator or governor degradation which could cause a DG to become inoperable.

The 10 year Frequency is consistent with the recommendations of Regulatory Guide 1.9 (Ref. 3), Table 1.

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SURVEILLANCE
REQUIREMENTSSR 3.8.1.21 (continued)

For the purpose of this testing, the DGs shall be started from standby conditions, that is, with the engine coolant and oil being continuously circulated and temperature maintained consistent with manufacturer recommendations. The DG engines for WBN have an oil circulation and soakback system that operates continuously to preclude the need for a prelube and warmup when a DG is started from standby.

Diesel Generator Test Schedule

The DG test schedule (Table 3.8.1-1) implements the recommendations of Revision 3 to Regulatory Guide 1.9 (Ref. 3). The purpose of this test schedule is to provide timely test data to establish a confidence level associated with the goal to maintain DG reliability > 0.975 per demand.

According to Regulatory Guide 1.9, Revision 3 (Ref. 3), each DG should be tested at least once every 31 days. Whenever a DG has experienced 4 or more valid failures in the last 25 valid tests, the maximum time between tests is reduced to 7 days. Four failures in 25 valid tests is a failure rate of 0.16, or the threshold of acceptable DG performance, and hence may be an early indication of the degradation of DG reliability. When considered in the light of a long history of tests, however, 4 failures in the last 25 valid tests may only be a statistically probable distribution of random events. Increasing the test Frequency will allow for a more timely accumulation of additional test data upon which to base judgment of the reliability of the DG. The increased test Frequency must be maintained until seven consecutive, failure free tests have been performed.

The Frequency for accelerated testing is 7 days, but no less than 24 hours. Tests conducted at intervals of less than 24 hours may be credited for compliance with Required Actions. However, for the purpose of re-establishing the normal 31-day Frequency, a successful test at an interval of less than 24 hours should be considered an invalid test and not count towards the 7 consecutive failure free starts, and the consecutive test count is not reset.

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BASES

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Diesel Generator Test Schedule (continued)

A test interval in excess of 7 days (or 31 days as appropriate) constitutes a failure to meet the SRs and results in the associated DG being declared inoperable. It does not, however, constitute a valid test or failure of the DG, and any consecutive test count is not reset.

REFERENCES

1. Title 10, Code of Federal Regulations, Part 50, Appendix A, General Design Criterion (GDC) 17, "Electrical Power Systems."
2. Watts Bar FSAR, Section 8.2, "Offsite Power System," and Tables 8.3-1 to 8.3-3, "Safety-Related Standby Power sources and Distribution Boards," "Shutdown Board Loads Automatically Tripped Following a Loss of Nuclear Unit and Preferred Power," and "Diesel Generator Load Sequentially Applied Following a Loss of Nuclear Unit and Preferred Power."
3. Regulatory Guide 1.9, Rev. 3, "Selection, Design, Qualification and Testing of Emergency Diesel Generator Units Used as Class 1E Onsite Electric Power Systems at Nuclear Power Plants," July 1993.
4. Watts Bar FSAR Section 6, "Engineered Safety Features."
5. Watts Bar FSAR, Section 15.4, "Condition IV-Limiting Faults."
6. Regulatory Guide 1.93, Rev. 0, "Availability of Electric Power Sources," December 1974.
7. Generic Letter 84-15, "Proposed Staff Actions to Improve and Maintain Diesel Generator Reliability," July 2, 1984.
8. Title 10, Code of Federal Regulations, Part 50, Appendix A, GDC 18, "Inspection and Testing of Electric Power Systems."

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BASES

REFERENCES
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9. Regulatory Guide 1.137, Rev. 1, "Fuel Oil Systems for Standby Diesel Generators," October 1979.
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Enclosure 2
Clarification of TVA's Response to Question 4
of NRC's RAI Dated October 29, 1997

Question 4:

"Does TVA have a risk matrix for long term planning and scheduling of online maintenance? Explain how the overall impact on plant safety is evaluated when DG batteries are taken out for service for testing."

TVA Response:

The resolution of NRC Unresolved Item (URI) 390/96-14-02 documented NRC's review of WBN's justification for performing 18-month surveillances online. The results of the review performed for URI 390/96-14-02 were documented in NRC's letter dated July 10, 1997, Inspection Report 390/97-04. WBN's process for control of safety system risk was also reviewed as part of this inspection. This portion of the review outlined the risk assessment process that was controlled by Site Standard Practice (SSP) 7.01, "Work Control," and indicated that WBN's risk calculational methods and techniques would be reviewed as part of a planned Maintenance Rule Baseline inspection. The Maintenance Rule inspection was conducted between May 18th and 22nd, 1998 and was documented in NRC's letter dated July 6, 1998, Inspection Report 390/98-05. The discussion in Inspection Report 390/98-05 identifies that the following procedures now control WBN's work control risk evaluation processes:

- Standard Programs and Processes (SPP) 7.1, "Work Control Process"
- Technical Instruction (TI) 124, "Equipment to Plant Risk Matrix"

SPP-7.1 specifies the general responsibilities and standard programmatic controls for the work control process. This procedure applies to all work activities that affect or have the potential to affect a plant component, system, or unit configuration.

WBN's long-term maintenance plan is a product of the preventive and surveillance process and specifies the frequency for implementation of maintenance and surveillance activities necessary for the reliability of critical components in each system. An established 12-week rolling schedule includes the preliminary defense-in-depth assessment, which documents the allowable combinations of system and Functional Equipment Groups (FEGs) that may be simultaneously worked online or during shutdown conditions. FEGs are sets of equipment that have been evaluated for acceptable out-of-service combinations. They are used to schedule planned maintenance and establish equipment clearances.

Predetermined FEG work windows are established for online maintenance and outage periods. The work windows are based on recommended maintenance frequencies and sequenced to minimize the risk of online maintenance. Work windows are defined by week and repeat at 12-week intervals. The work windows ensure required surveillances are performed within their required frequency and that division/train/loop/channel interferences are minimized. The WBN Scheduling organization maintains a long range schedule based on required surveillance testing of online activities and plant conditions.

The surveillance testing schedule provides the "backbone" for the long-term maintenance plan. Other periodic activities (preventive maintenance items) are scheduled with related surveillance tests to maximize component availability. FEGs are used to ensure work on related components is evaluated for inclusion in the work window. Related corrective maintenance activities are also evaluated for inclusion in the work window provided by surveillance and preventative maintenance performance. The inclusion of identified work in the FEG work window with the surveillance tests and preventive maintenance items maximizes component availability and operability.

The TI-124 risk assessment methodology is used for online maintenance activities. For online maintenance a risk assessment is performed prior to work window implementation and emergent work is evaluated against the assessed scope.

The TI-124 risk assessment guidelines utilize the results of the WBN probabilistic safety analysis (PSA). Other safety considerations, such as Technical Specifications, are also used to determine which system, component, and FEG combinations may be worked online. In addition, an assessment of scheduled activities is performed before implementation of a work window. The assessment includes reviews for the following:

- The schedule is evaluated against the risk bases outlined in the WBN PSA.
- Maximizing safety (reduce risk) when performing online work.
- Avoidance of recurrent entry into a specific limiting condition for operation (LCO) for multiple activities. Activities that require entering the same LCO are combined to limit the number of times an LCO must be established, thus maximizing the equipment's availability.
- If the risk associated with a particular activity cannot be determined, Nuclear Engineering is requested to perform a quantitative risk assessment.

For the diesel batteries, the online testing will be controlled by the following Surveillance Instructions (SIs):

- 0-SI-215-41-A, "Diesel Generator 1A-A 18 Month Service Test and Battery Charger Test"
- 0-SI-215-42-B, "Diesel Generator 1B-B 18 Month Service Test and Battery Charger Test"
- 0-SI-215-43-A, "Diesel Generator 2A-A 18 Month Service Test and Battery Charger Test"
- 0-SI-215-44-B, "Diesel Generator 2B-B 18 Month Service Test and Battery Charger Test"

The online performance of these SIs are conservatively pre-analyzed, using the WBN PSA, for risk based on the assigned FEG and other planned out-of-service FEG combinations within the work window, establishing a baseline risk for performance. When additional maintenance is planned to be performed in conjunction with the performance of the SI, a risk evaluation is performed to assess the risk due to the additional maintenance activities.