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10 CFR 50.90

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

Limerick Generating Station, Units 1 and 2
Facility Operating License Nos. NPF-39 and NPF-85
NRC Docket Nos. 50-352 and 50-353

Subject: Supplement to License Amendment Request Related to Proposed Changes to Emergency Diesel Generator Fuel Oil Requirements

Reference: Letter dated August 24, 2007, from P. B. Cowan, Exelon Generation Company, LLC, to USNRC, "Proposed Changes to Emergency Diesel Generator Fuel Oil Requirements."

In the referenced letter, Exelon Generation Company, LLC (Exelon), requested changes to the Technical Specifications (TS), Appendix A of Facility Operating License Nos. NPF-39 and NPF-85 for Limerick Generating Station (LGS), Units 1 and 2, respectively. The proposed changes would modify the TS and current licensing basis described in the Updated Final Safety Analysis Report (UFSAR) regarding fuel oil requirements for emergency diesel generators (EDGs). Exelon subsequently determined that portions of the changes proposed in the Reference submittal were no longer necessary. Therefore, Exelon hereby withdraws the following proposed changes described in Section 2.0 (Proposed Changes) of the Reference submittal:

1. **Section 2.1: EDG Fuel Oil Storage Tank Volume** - This section described a proposed change to the current licensing basis specified in UFSAR Section 9.5.4 to allow for the transfer of diesel fuel oil between the separate onsite EDG fuel oil storage tanks (FOSTs) on a reactor unit to ensure a seven day supply of fuel oil would be maintained for the continuous rated load operation of the minimum number of EDGs required during a design basis accident with a loss of offsite power. The UFSAR markups reflecting this requested change, as provided in Attachment 2 of the Reference submittal, are hereby withdrawn.

   In support of this proposed change, the Reference submittal included one regulatory commitment to establish and maintain the capability to transfer fuel oil between the EDG FOSTs on a reactor unit assuming that the permanently installed fuel oil transfer pump was

not available. This regulatory commitment, specified in Attachment 5 of the Reference submittal, is hereby withdrawn.

This section also proposed to reduce the minimum fuel oil volume required by TS Sections 3.8.1.1.b.2 (AC Sources - Operating) and 3.8.1.2.b.2 (AC Sources - Shutdown) for each separate EDG FOST from 33,500 gallons to 31,000 gallons. The TS markups reflecting this requested change, as provided in Attachment 3 of the Reference submittal, are hereby withdrawn.

2. **Section 2.2: New EDG Fuel Oil Storage Tank Volume Action Requirement** - This section described a proposed change to add a new Limiting Condition for Operation (LCO) Action requirement to restore the stored fuel oil inventory within each EDG FOST to greater than or equal to 31,000 gallons within 48 hours when the fuel oil volume decreases below 31,000 gallons but is greater than 27,000 gallons. Otherwise, the associated EDG would be declared inoperable and the appropriate LCO Action for an inoperable EDG would be applied. The TS markups reflecting this requested change, as provided in Attachment 3 of the Reference submittal, are hereby withdrawn.

3. **Section 2.4: New Fuel Oil Storage Tank Inspection Action Requirement** - This section described a proposed change to add a new LCO Action requirement to TS Section 3.8.1.1, which would require that, with one FOST inoperable for inspection, cleaning, or repair activities, the associated EDG would be declared inoperable, and appropriate actions would be taken within 48 hours to ensure there is sufficient fuel oil available on site to support continuous rated load operation of the minimum required number of EDGs for seven (7) days. Otherwise, additional EDG(s) would be declared inoperable. The TS markups reflecting this requested change, as provided in Attachment 3 of the Reference submittal, are hereby withdrawn.

4. **Section 2.5: TS Bases Changes** - This section indicated that the TS Bases would be revised to provide clarification, where needed, of the proposed TS changes. The proposed TS Bases changes were provided for information only. The TS Bases markups, provided in Attachment 4 of the Reference submittal, are hereby withdrawn.

The technical justification for the proposed changes described above was provided in the respective Subsections 4.1, 4.2, 4.4, and 4.5 of Section 4.0 (Technical Analysis) of the Reference submittal.

Exelon continues to request the proposed change described in **Section 2.3: EDG Fuel Oil Day Tank Volume** of the Reference submittal. This section describes a proposed change to increase the minimum fuel oil volume required by TS for each separate EDG fuel oil day tank from 200 gallons to 250 gallons. A revised evaluation for this proposed change is provided in Attachment 1 to this letter. Revised TS markups reflecting this proposed change to TS Sections 3.8.1.1.b.1 and 3.8.1.2.b.1 are provided in Attachment 2 to this letter. There are no UFSAR changes associated with this remaining proposed change.

As noted above, to support the continued request for the proposed change to the minimum EDG fuel oil day tank volume, a revised Evaluation of the Proposed Change is provided in Attachment 1 to this letter. This Evaluation of the Proposed Change consolidates information specific to the EDG fuel oil day tank from the Reference submittal, and supercedes the Evaluation of the Proposed Changes provided in Attachment 1 of the Reference submittal.

Also as noted above, to support the continued request for the proposed change to the minimum EDG fuel oil day tank volume, revised TS markup pages are provided in Attachment 2 to this letter which supercede the applicable TS markup pages from the Reference submittal. The Attachment 2 TS markups are now the only markups associated with this license amendment request. All markups provided in the Reference submittal, including the UFSAR markups, TS markups and TS Bases markups, are hereby withdrawn.

If you have any questions or require additional information, please contact Glenn Stewart at 610-765-5529.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 11th day of June, 2008.

Respectfully,

Pamela B. Cowan
Director, Licensing & Regulatory Affairs
Exelon Generation Company, LLC

Attachments: 1. Evaluation of the Proposed Change
2. Revised Markup of Technical Specification Pages

cc:	Regional Administrator - NRC Region I	w/ attachments
	NRC Senior Resident Inspector - Limerick Generating Station	"
	NRC Project Manager, NRR - Limerick Generating Station	"
	Director, Bureau of Radiation Protection - Pennsylvania Department of Environmental Protection	"

ATTACHMENT 1

Supplement to License Amendment Request

Limerick Generating Station, Units 1 and 2

Docket Nos. 50-352 and 50-353

EVALUATION OF THE PROPOSED CHANGE

Subject: **Proposed Change to Emergency Diesel Generator Fuel Oil Requirements**

1.0 DESCRIPTION

2.0 PROPOSED CHANGE

3.0 BACKGROUND

4.0 TECHNICAL ANALYSIS

5.0 REGULATORY ANALYSIS

6.0 ENVIRONMENTAL CONSIDERATION

7.0 REFERENCES

1.0 DESCRIPTION

Pursuant to 10 CFR 50.90, "Application for amendment of license or construction permit," Exelon Generation Company, LLC (Exelon), hereby proposes a change to the Technical Specifications (TS), Appendix A of Operating License Nos. NPF-39 and NPF-85 for Limerick Generating Station (LGS), Units 1 and 2, respectively. The proposed change would modify the TS regarding fuel oil requirements for emergency diesel generators (EDGs).

The proposed change is the result of an Exelon safety systems self-assessment, which identified that the design basis calculations for the LGS EDG fuel oil supply did not address some parameters that influence fuel consumption. Therefore, Exelon has completed a thorough design analysis of EDG fuel oil consumption that also addresses the use of Ultra Low Sulfur Diesel (ULSD) fuel oil. Based on the results of the new design analysis, it was determined that the minimum EDG fuel oil day tank volume required by TS was not sufficient to support one hour of continuous rated load operation of each respective EDG as described in the LGS Updated Final Safety Analysis Report (UFSAR), Section 9.5.4 (Reference 1). Therefore, the proposed change involves increasing the minimum fuel oil volume required for each separate EDG fuel oil day tank from 200 gallons to 250 gallons. An interim compensatory measure is not required for the EDG fuel oil day tank since the day tank is currently maintained (automatically) at a level greater than 250 gallons.

2.0 PROPOSED CHANGE

The change requested by this amendment application is described below.

2.1 EDG Fuel Oil Day Tank Volume

LGS TS Section 3.8.1.1.b.1 (A.C Sources - Operating) requires four separate and independent diesel generators, each with a separate day tank containing a minimum of 200 gallons of fuel. LGS TS Section 3.8.1.2.b.1 (A.C. Sources - Shutdown) requires two diesel generators, each with a day fuel tank containing a minimum of 200 gallons of fuel. These TS requirements provide operators with sufficient time to respond to and correct an off-normal EDG fuel oil supply condition, such as failure of the fuel oil transfer pump to start, so that EDG operation is not interrupted.

LGS UFSAR, Section 9.5.4, states, "Sufficient fuel oil for approximately one hour of full load operation remains at the point where the low level alarm annunciates." American National Standards Institute (ANSI) Standard N195-1976 (Reference 2) states: "This capacity [of the fuel oil day tank] shall be based on the fuel consumption at a load of 100% of the continuous rating of the diesel plus a minimum margin of 10%." Using this method as a conservative guideline for calculating the EDG fuel oil day tank capacity, Exelon has determined that approximately 242 gallons (including the 10% added margin) should be provided to allow for one hour of operation of each EDG at the continuous load rating.

Therefore, Exelon proposes to increase the minimum fuel oil volume required by TS Sections 3.8.1.1.b.1 and 3.8.1.2.b.1 for each separate EDG fuel oil day tank from 200 gallons to 250 gallons. The LGS EDG day tanks provide sufficient design margin to accommodate an increase in the TS requirement for the quantity of fuel oil to be maintained in the day tanks without the need for any modifications or setpoint changes. The proposed TS changes are shown on the TS markup pages provided in Attachment 2.

3.0 BACKGROUND

The following paragraph provides a summary description of the LGS EDG fuel oil day tank as presented in LGS UFSAR, Section 9.5.4.

> One 850 gallon capacity diesel oil day tank is provided for each EDG. Each tank has capacity for sufficient fuel oil for more than three hours of continuous EDG operation at rated load. In the unlikely event of a failure in one of the supply systems, the associated day tank low level alarm will annunciate when the fuel oil remaining in the tank will provide approximately one more hour of rated load operation so that the operator can take corrective action to prevent loss of the diesel.

4.0 TECHNICAL ANALYSIS

The technical analysis addresses the proposed change as described below.

4.1 EDG Fuel Oil Day Tank Volume

A revised design analysis for EDG fuel oil consumption was performed. The LGS EDG continuous load rating is 2850 kW. Input parameters affecting predicted fuel oil consumption and necessary fuel oil volume were addressed. This analysis accounts for the variation of fuel heat content with specific gravity, accounts for parasitic engine driven shaft loads subtracted from the reported EDG factory test load, and addresses generator efficiency. The revised analysis also includes a specific allowance for the potential reduction in the fuel oil heat content of ULSD fuel oil.

Based on this revised analysis, Exelon has determined that the EDG fuel oil consumption rate could be as high as 220 gallons per hour at the continuous rating load of 2850 kW. Based on the guidance provided in ANSI N195-1976, the EDG fuel oil day tank's capacity should be sufficient to maintain the EDG in continuous operation while supplying its rated load for one hour, plus a minimum 10% margin, which is approximately 242 gallons (110% of 220 gallons). As indicated previously, LGS UFSAR, Section 9.5.4, states, "Sufficient fuel oil for approximately one hour of full load operation remains at the point where the low level alarm annunciates." Therefore, Exelon proposes to change the TS requirement for the minimum fuel oil to be stored in each EDG fuel oil day tank from 200 gallons to 250 gallons. This TS change requires no plant modifications or setpoint changes since the EDG fuel oil day tank is currently maintained (automatically) at a level greater than 250 gallons. More than 300 gallons of fuel oil remain in the day tank when the low level alarm annunciates.

4.2 Summary

The proposed change, to increase the minimum fuel oil volume for each separate EDG fuel oil day tank, ensures that each EDG fuel oil day tank will have sufficient fuel oil to maintain one hour of operation at continuous rated load in accordance with the current licensing basis described in LGS UFSAR, Section 9.5.4.

5.0 REGULATORY ANALYSIS

5.1 No Significant Hazards Consideration

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

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

Response: No

The proposed change involves increasing the minimum volume of fuel oil required to be maintained in each emergency diesel generator (EDG) fuel oil day tank. The proposed minimum volume of fuel oil ensures that sufficient fuel oil will be available to allow each EDG to operate for one hour at continuous rated load in accordance with the current licensing basis described in Limerick Generating Station (LGS) Updated Final Safety Analysis Report (UFSAR), Section 9.5.4. The proposed amendment has no effect on the performance or operation of the EDGs, and will not affect the long-term reliability of the EDGs. The EDGs will continue to operate as designed to supply the electrical loads assumed to mitigate the consequences of accidents previously evaluated. The proposed change to the EDG fuel oil day tank minimum volume requirement has no effect on accident initiators or assumptions of analyzed events.

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.

No permanent physical changes to the EDGs, the EDG fuel oil day tanks, or the fuel oil storage and transfer system are involved with the proposed change. The proposed change does not involve the permanent installation of any new or different type of equipment. Operation of the EDGs is associated with mitigating the consequences of an accident, and not accident prevention or initiation. The

proposed change ensures that the EDGs will continue to perform their design function.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

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

Response: No.

There is no defined margin of safety that is affected by the minimum required volume of fuel oil maintained in the EDG fuel oil day tank. The proposed change does not involve a change to any safety limits, limiting safety system settings, or design parameters for any SSC. The proposed change does not impact any safety analysis assumptions and does not involve a change in initial conditions, system response times, or other parameters affecting an accident analysis. The proposed change ensures that sufficient fuel oil will be available to allow each EDG to operate for one hour at continuous rated load in accordance with the current licensing basis described in the LGS UFSAR, Section 9.5.4, and does not adversely affect any equipment important to safety.

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

Based on the above, Exelon concludes that the proposed amendment presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

5.2 Applicable Regulatory Requirements/Criteria

10 CFR 50, Appendix A, GDC 17 (Reference 3) requires that an onsite electric power system and an offsite electric power system be provided to permit functioning of structures, systems, and components important to safety. In addition, GDC 17 contains requirements concerning system capacity, capability, independence, redundancy, availability, testability, and reliability. As indicated in LGS UFSAR, Section 9.5.4, the EDG fuel oil system is designed so that failure of any one component results in the loss of fuel supply to no more than one EDG, and therefore, does not preclude safe shutdown of the plant following a loss of offsite power and/or loss-of-coolant accident. As a result of the proposed change, sufficient fuel oil will be available to allow each EDG to operate for one hour at continuous rated load in accordance with the current licensing basis described in LGS UFSAR, Section 9.5.4. Therefore, the requirements of GDC 17 will continue to be satisfied as a result of implementing the proposed change.

ANSI N195-1976 provides design criteria for EDG fuel oil systems. For LGS, conformance to ANSI N195-1976 is limited as discussed in Section 1.8 of the LGS UFSAR. However, the capacity of the fuel oil day tank, as described in ANSI N195-1976,

was used as a conservative guideline to establish the minimum fuel oil day tank volume for each EDG. The proposed change ensures that each EDG fuel oil day tank will have sufficient fuel oil to maintain one hour of operation at continuous rated load in accordance with the current licensing basis described in LGS UFSAR, Section 9.5.4.

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

6.0 ENVIRONMENTAL CONSIDERATION

A review has determined that the proposed amendment would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, 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 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment needs to be prepared in connection with the proposed amendment.

7.0 REFERENCES

1. Limerick Generating Station, Updated Final Safety Analysis Report, Section 9.5.4, "Diesel Generator Fuel Oil System."

2. American National Standards Institute (ANSI) N195 / American National Standard (ANS) 59.51, "Fuel Oil Systems for Standby Diesel-Generators," approved April 12, 1976.

3. 10 CFR 50, Appendix A, General Design Criterion 17, "Electric Power Systems."

ATTACHMENT 2

Supplement to License Amendment Request

Limerick Generating Station, Units 1 and 2
Docket Nos. 50-352 and 50-353

Proposed Change to Emergency
Diesel Generator Fuel Oil Requirements

Revised Markup of Proposed Technical Specification Pages

Unit 1 TS Pages
3/4 8-1
3/4 8-9

Unit 2 TS Pages
3/4 8-1
3/4 8-9

3/4.8 ELECTRICAL POWER SYSTEMS

3/4.8.1 A.C. SOURCES

A.C. SOURCES - OPERATING

LIMITING CONDITION FOR OPERATION

3.8.1.1 As a minimum, the following A.C. electrical power sources shall be OPERABLE:

a. Two physically independent circuits between the offsite transmission network and the onsite Class 1E distribution system, and

b. Four separate and independent diesel generators, ~~each~~ with:

   1. A separate day tank containing a minimum of ~~200~~ 250 gallons of fuel,

   2. A separate fuel storage system containing a minimum of 33,500 gallons of fuel, and

   3. A separate fuel transfer pump.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, and 3.

ACTION:

a. With one diesel generator of the above required A.C. electrical power sources inoperable, demonstrate the OPERABILITY of the remaining A.C. sources by performing Surveillance Requirement 4.8.1.1.1.a within 24 hours and at least once per 7 days thereafter. If the diesel generator became inoperable due to any cause other than an inoperable support system, an independently testable component, or preplanned preventive maintenance or testing, demonstrate the OPERABILITY of the remaining operable diesel generators by performing Surveillance Requirement 4.8.1.1.2.a.4 for one diesel generator at a time, within 24 hours, unless the absence of any potential common-mode failure for the remaining diesel generators is determined. Restore the inoperable diesel generator to OPERABLE status within 30 days or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours. See also ACTION e.

b. With two diesel generators of the above required A.C. electrical power sources inoperable, demonstrate the OPERABILITY of the remaining A.C. sources by performing Surveillance Requirement 4.8.1.1.1.a within 1 hour and at least once per 8 hours thereafter. If either of the diesel generators became inoperable due to any cause other than an inoperable support system, an independently testable component, or preplanned preventive maintenance or testing, demonstrate the OPERABILITY of the remaining diesel generators by performing Surveillance Requirement 4.8.1.1.2.a.4 for one diesel generator at a time, within 8 hours, unless the absence of any potential common-mode failure for the remaining diesel generators is determined. Restore at least one of the inoperable diesel generators to OPERABLE status within 72 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours. See also ACTION e.

A.C. SOURCES - SHUTDOWN

LIMITING CONDITION FOR OPERATION

3.8.1.2 As a minimum, the following A.C. electrical power sources shall be OPERABLE:

a. One circuit between the offsite transmission network and the onsite Class 1E distribution system, and

b. Two diesel generators each with:

1. A day fuel tank containing a minimum of ~~200~~ 250 gallons of fuel.

2. A fuel storage system containing a minimum of 33,500 gallons of fuel.

3. A fuel transfer pump.

APPLICABILITY: OPERATIONAL CONDITIONS 4, 5, and *.

ACTION:

a. With less than the above required A.C. electrical power sources OPERABLE, suspend CORE ALTERATIONS, handling of irradiated fuel in the secondary containment, operations with a potential for draining the reactor vessel and crane operations over the spent fuel storage pool when fuel assemblies are stored therein. In addition, when in OPERATIONAL CONDITION 5 with the water level less than 22 feet above the reactor pressure vessel flange, immediately initiate corrective action to restore the required power sources to OPERABLE status as soon as practical.

b. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.8.1.2 At least the above required A.C. electrical power sources shall be demonstrated OPERABLE per Surveillance Requirements 4.8.1.1.1, 4.8.1.1.2, and 4.8.1.1.3.

*When handling irradiated fuel in the secondary containment.

3/4.8 ELECTRICAL POWER SYSTEMS

3/4.8.1 A.C. SOURCES

A.C. SOURCES - OPERATING

LIMITING CONDITION FOR OPERATION

3.8.1.1 As a minimum, the following A.C. electrical power sources shall be OPERABLE:

a. Two physically independent circuits between the offsite transmission network and the onsite Class 1E distribution system, and

b. Four separate and independent diesel generators, each with:

1. A separate day tank containing a minimum of ~~200~~ 250 gallons of fuel,

2. A separate fuel storage system containing a minimum of 33,500 gallons of fuel, and

3. A separate fuel transfer pump.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, and 3.

ACTION:

a. With one diesel generator of the above required A.C. electrical power sources inoperable, demonstrate the OPERABILITY of the remaining A.C. sources by performing Surveillance Requirement 4.8.1.1.1.a within 24 hours and at least once per 7 days thereafter. If the diesel generator became inoperable due to any cause other than an inoperable support system, an independently testable component, or preplanned preventive maintenance or testing, demonstrate the OPERABILITY of the remaining operable diesel generators by performing Surveillance Requirement 4.8.1.1.2.a.4 for one diesel generator at a time, within 24 hours, unless the absence of any potential common-mode failure for the remaining diesel generators is determined. Restore the inoperable diesel generator to OPERABLE status within 30 days or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours. See also ACTION e.

b. With two diesel generators of the above required A.C. electrical power sources inoperable, demonstrate the OPERABILITY of the remaining A.C. sources by performing Surveillance Requirement 4.8.1.1.1.a within 1 hour and at least once per 8 hours thereafter. If either of the diesel generators became inoperable due to any cause other than an inoperable support system, an independently testable component, or preplanned preventive maintenance or testing, demonstrate the OPERABILITY of the remaining diesel generators by performing Surveillance Requirement 4.8.1.1.2.a.4 for one diesel generator at a time, within 8 hours, unless the absence of any potential common-mode failure for the remaining diesel generators is determined. Restore at least one of the inoperable diesel generators to OPERABLE status within 72 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours. See also ACTION e.

A.C. SOURCES - SHUTDOWN

LIMITING CONDITION FOR OPERATION

3.8.1.2 As a minimum, the following A.C. electrical power sources shall be OPERABLE:

a. One circuit between the offsite transmission network and the onsite Class 1E distribution system, and

b. Two diesel generators each with:

1. A day fuel tank containing a minimum of ~~200~~ 250 gallons of fuel.

2. A fuel storage system containing a minimum of 33,500 gallons of fuel.

3. A fuel transfer pump.

APPLICABILITY: OPERATIONAL CONDITIONS 4, 5, and *.

ACTION:

a. With less than the above required A.C. electrical power sources OPERABLE, suspend CORE ALTERATIONS, handling of irradiated fuel in the secondary containment, operations with a potential for draining the reactor vessel and crane operations over the spent fuel storage pool when fuel assemblies are stored therein. In addition, when in OPERATIONAL CONDITION 5 with the water level less than 22 feet above the reactor pressure vessel flange, immediately initiate corrective action to restore the required power sources to OPERABLE status as soon as practical.

b. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.8.1.2 At least the above required A.C. electrical power sources shall be demonstrated OPERABLE per Surveillance Requirements 4.8.1.1.1, 4.8.1.1.2, and 4.8.1.1.3.

*When handling irradiated fuel in the secondary containment.

Amendment No. ~~AUG 2 5 1989~~