

Technical Specification Task Force Improved Standard Technical Specifications Change Traveler

Clarify SR on Bypass of DG Automatic Trips

NUREGs Affected: 1430 1431 1432 1433 1434

Classification: 3) Editorial Change

Recommended for CLIP?: No

Correction or Improvement: Improvement

NRC Fee Status: Exempt

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1.0 Description

The Bases of SR 3.8.1.13 state, "This Surveillance demonstrates that DG noncritical protective functions (e.g., high jacket water temperature) are bypassed on a loss of voltage signal concurrent with an ESF actuation test signal, and critical protective functions (engine overspeed, generator differential current[, low lube oil pressure, high crankcase pressure, and start failure relay]) trip the DG to avert substantial damage to the DG unit. The noncritical trips are bypassed during DBAs and provide an alarm on an abnormal engine condition."

SR 3.8.1.13 is revised to make clear the purpose of the SR. The SR is revised to state, "Verify each DG's noncritical automatic trips are bypassed on [actual or simulated loss of voltage signal on the emergency bus concurrent with an actual or simulated ESF (PWR)/ECCS (BWR) initiation signal.]" The Bases of SR 3.8.1.13 are revised to state, "This Surveillance demonstrates that DG noncritical protective functions (e.g., high jacket water temperature) are bypassed on a loss of voltage signal concurrent with an ESF (PWR)/ECCS(BWR) actuation test signal. The noncritical automatic trips are all automatic trips except a. Engine overspeed; b. Generator differential current; [c. Low lube oil pressure; d. High crankcase pressure; and e. Start failure relay.] The noncritical trips are bypassed during DBAs and provide an alarm on an abnormal engine condition."

2.0 Proposed Change

This change clarifies SR 3.8.1.13 and the associated Bases to state that the SR only verifies that non-critical trips are bypassed.

3.0 Background

SR 3.8.1.13 states, "Verify each DG's automatic trips are bypassed on [actual or simulated loss of voltage signal on the emergency bus concurrent with an actual or simulated ECCS initiation signal] except:

- a. Engine overspeed; [and]
- b. Generator differential current [;
- c. Low lube oil pressure;
- d. High crankcase pressure; and
- e. Start failure relay].

The SR and Bases imply that two tests are required: verification that non-critical trips are bypassed and verification that critical trips are not bypassed. This is not correct and has led to confusion at plants in implementing the SR.

30-Nov-04

4.0 Technical Analysis

Branch Technical Position ICSB-17, "Diesel Generator Protective Trip Circuit Bypasses," was replaced in 1981 by Reg Guide 1.9, Rev. 2 (December 1979), Position C.7. Reg Guide 1.9, Rev. 3, Position C.1.8, is essentially unchanged from the 1979 position. The Regulatory Guide only requires verification that the noncritical trips are bypassed and does not require verification that the critical trips are not bypassed. Regulatory Guide 1.9, Rev. 3, Section 2.2.12 states, "Protective Trip Bypass Test: Demonstrate that all automatic diesel generator trips (except engine overspeed, generator differential, and those retained with coincidental logic) are automatically bypassed on an SIAS." Therefore, this test was intended to verify that the noncritical trips are bypassed so that a spurious actuation of a noncritical trip does not take a DG out of service during an emergency.

The Branch Technical Position states that if bypasses of non-critical DG trips are used in the DG design, "the design of the bypass circuitry should include the capability for testing the status and operability of the bypass circuits." This requirement is the source of SR 3.8.1.13. However, as the SR and Bases are currently written, it is implied that it is not only necessary to verify that the bypasses are operable, but to verify the other channels are not bypassed. Therefore SR 3.8.1.13 and the associated Bases are revised to clarify the purpose of the SR. Testing to verify that critical DG trips are not bypassed is not required to satisfy the requirements of 10 CFR 50.36(c)(3).

5.0 REGULATORY ANALYSIS

5.1 No Significant Hazards Consideration

The TSTF has evaluated whether or not a significant hazards consideration is involved with the proposed generic change 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.

This change clarifies the purpose of SR 3.8.1.13, which is to verify that noncritical automatic Diesel Generator (DG) trips are bypassed in an accident. The DG automatic trips and their bypasses are not initiators of any accident previously evaluated. Therefore, the probability of any accident is not significantly increased. The function of the DG in mitigating accidents is not changed. The revised SR continues to ensure the DG will operate as assumed in the accident analysis. Therefore, the consequences of any accident previously evaluated are not affected.

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.

This change clarifies the purpose of SR 3.8.1.13, which is to verify that noncritical automatic DG trips are bypassed in an accident. The proposed change does not involve a physical alteration of the plant (no new or different type of equipment will be installed) or a change in the methods governing normal plant operation. Thus, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

Response: No.

This change clarifies the purpose of SR 3.8.1.13, which is to verify that noncritical automatic DG trips are bypassed in an accident. This change clarifies the purpose of the SR, which is to verify that the DG is capable of performing the assumed safety function. The safety function of the DG is unaffected, so the change does not affect the margin of safety. Therefore, this change does not involve a significant reduction in a margin of safety.

Based on the above, the TSTF concludes that the proposed change 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

The proposed change does not affect any regulatory requirements or criteria. The changes are consistent with NRC issued guidance on implementing regulations. Therefore, 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 approval of the proposed change 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 change 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 change 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 change 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 need be prepared in connection with the proposed change.

7.0 REFERENCES

1. ICSB-17, "Diesel Generator Protective Trip Circuit Bypasses."
2. Reg. Guide 1.9, Revision 2, Position C.7 and Rev. 3 Position C.1.8.
3. Reg. Guide 1.9, Revision 2, Section 2.2.12, "Protective Trip Bypass Test."

Revision History

OG Revision 0 **Revision Status: Closed**

Revision Proposed by: BWROG
 Revision Description:
 Original Issue

Owners Group Review Information

Date Originated by OG: 21-Mar-00
 Owners Group Comments:
 (No Comments)
 Owners Group Resolution: Approved Date: 08-Nov-00

TSTF Review Information

TSTF Received Date: 01-Feb-01 Date Distributed for Review: 06-Apr-01
 OG Review Completed: BWOG WOG CEOG BWROG

OG Revision 0**Revision Status: Closed**

TSTF Comments:

(No Comments)

TSTF Resolution: Approved

Date: 02-May-01

NRC Review Information

NRC Received Date: 24-May-01

NRC Comments:

Date of NRC Letter: 25-Feb-02

NRC e-mail dated 5/3/2002: Comment: Discussed with TSTF lead. Change is not simple Basis change; SR itself should be revised to clearly state intent. Since current Basis appears to clearly state that the SR demonstrates that both non-critical and critical trips are operable, staff is taking additional time to verify intent with technical staff.

Final Resolution: Superseded by Revision

Final Resolution Date: 25-Feb-02

TSTF Revision 1**Revision Status: Active**

Revision Proposed by: TSTF

Revision Description:

Revised the Traveler to change the SR to make clear that purpose of the test is to verify the bypassing of non-critical trips. The SR is revised and the list of critical trips is moved to the Bases.

TSTF Review Information

TSTF Received Date: 19-Jul-02

Date Distributed for Review: 19-Jul-02

OG Review Completed: BWOG WOG CEOG BWROG

TSTF Comments:

7/26/02 - TSTF questioning whether a change to the TS is required.

Also need to gather prioritization information.

TSTF Resolution: Approved

Date: 26-Jul-02

NRC Review Information

NRC Received Date: 24-Nov-03

NRC Comments:

Date of NRC Letter: 13-Nov-04

Revision 0 (Bases only change) incorporated in Revision 3 of the ISTS.

NRC approved Revision 1.

Final Resolution: NRC Approves

Final Resolution Date: 13-Nov-04

Affected Technical Specifications

SR 3.8.1.13 Bases AC Sources - Operating

SR 3.8.1.13 AC Sources - Operating

30-Nov-04

INSERT

Noncritical automatic trips are all automatic trips except:

- a. Engine Overspeed;
- b. Generator differential current,
- [c. Low lube oil pressure;
- d. High crankcase pressure, and
- e. Start failure relay.]

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.8.1.13 -----</p> <p style="text-align: center;">- NOTE -</p> <p>[This Surveillance shall not normally be performed in MODE 1 or 2. However, this Surveillance may be performed to reestablish OPERABILITY provided an assessment determines the safety of the plant is maintained or enhanced.]</p> <p><i>Noncritical</i></p> <p>Verify each DG automatic trip (s) bypassed on [actual or simulated loss of voltage signal on the emergency bus concurrent with an actual or simulated ESF actuation signal], except:</p> <div style="border: 1px solid black; padding: 5px;"> <ul style="list-style-type: none"> a. Engine overspeed, b. Generator differential current, [c. Low lube oil pressure, d. High crankcase pressure, and e. Start failure relay.] </div>	<p>[18] months</p>

BASES

SURVEILLANCE REQUIREMENTS (continued)

2. Risk insights or deterministic methods may be used for the assessment.]

SR 3.8.1.13

This Surveillance demonstrates that DG noncritical protective functions (e.g., high jacket water temperature) are bypassed on a loss of voltage signal concurrent with an ESF actuation test signal, and critical protective functions (engine overspeed, generator differential current, low lube oil pressure, high crankcase pressure, and start failure relay) trip the DG to avert substantial damage to the DG unit. The noncritical trips are bypassed during DBAs and provide an alarm on an abnormal engine condition. This alarm provides the operator with sufficient time to react appropriately. The DG availability to mitigate the DBA is more critical than protecting the engine against minor problems that are not immediately detrimental to emergency operation of the DG. Insert

The [18 month] Frequency is based on engineering judgment, taking into consideration unit conditions required to perform the Surveillance, and is intended to be consistent with expected fuel cycle lengths. Operating experience has shown that these components usually pass the SR when performed at the [18 month] Frequency. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

The SR is modified by a Note. The reason for the Note is that performing the Surveillance would remove a required DG from service. This restriction from normally performing the Surveillance in MODE 1 or 2 is further amplified to allow the Surveillance to be performed for the purpose of reestablishing OPERABILITY (e.g. post work testing following corrective maintenance, corrective modification, deficient or incomplete surveillance testing, and other unanticipated OPERABILITY concerns) provided an assessment determines plant safety is maintained or enhanced. This assessment shall, as a minimum, consider the potential outcomes and transients associated with a failed Surveillance, a successful Surveillance, and a perturbation of the offsite or onsite system when they are tied together or operated independently for the Surveillance; as well as the operator procedures available to cope with these outcomes. These shall be measured against the avoided risk of a plant shutdown and startup to determine that plant safety is maintained or enhanced when the Surveillance is performed in MODE 1 or 2. Risk insights or deterministic methods may be used for this assessment.

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.8.1.13 -----</p> <p style="text-align: center;">- NOTE -</p> <p>[This Surveillance shall not normally be performed in MODE 1 or 2. However, this Surveillance may be performed to reestablish OPERABILITY provided an assessment determines the safety of the plant is maintained or enhanced.]</p> <p>-----</p> <p>Verify each DG's automatic trips are bypassed on [actual or simulated loss of voltage signal on the emergency bus concurrent with an actual or simulated ESF actuation signal], except:</p> <div style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <ul style="list-style-type: none"> a. Engine overspeed, b. Generator differential current, [c. Low lube oil pressure, d. High crankcase pressure, and e. Start failure relay.] </div>	<p>[18] months</p>

noncritical

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.8.1.13

This Surveillance demonstrates that DG noncritical protective functions (e.g., high jacket water temperature) are bypassed on a loss of voltage signal concurrent with an ESF actuation test signal, and critical protective functions (engine overspeed, generator differential current, [low lube oil pressure, high crankcase pressure, and start failure relay]) trip the DG to avert substantial damage to the DG unit. The noncritical trips are bypassed during DBAs and provide an alarm on an abnormal engine condition. This alarm provides the operator with sufficient time to react appropriately. The DG availability to mitigate the DBA is more critical than protecting the engine against minor problems that are not immediately detrimental to emergency operation of the DG. Insert

The [18 month] Frequency is based on engineering judgment, taking into consideration unit conditions required to perform the Surveillance, and is intended to be consistent with expected fuel cycle lengths. Operating experience has shown that these components usually pass the SR when performed at the [18 month] Frequency. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

The SR is modified by a Note. The reason for the Note is that performing the Surveillance would remove a required DG from service. This restriction from normally performing the Surveillance in MODE 1 or 2 is further amplified to allow the Surveillance to be performed for the purpose of reestablishing OPERABILITY (e.g. post work testing following corrective maintenance, corrective modification, deficient or incomplete surveillance testing, and other unanticipated OPERABILITY concerns) provided an assessment determines plant safety is maintained or enhanced. This assessment shall, as a minimum, consider the potential outcomes and transients associated with a failed Surveillance, a successful Surveillance, and a perturbation of the offsite or onsite system when they are tied together or operated independently for the Surveillance; as well as the operator procedures available to cope with these outcomes. These shall be measured against the avoided risk of a plant shutdown and startup to determine that plant safety is maintained or enhanced when the Surveillance is performed in MODE 1 or 2. Risk insights or deterministic methods may be used for this assessment.

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.8.1.13 -----</p> <p style="text-align: center;">- NOTE -</p> <p>[This Surveillance shall not normally be performed in MODE 1 or 2. However, this Surveillance may be performed to reestablish OPERABILITY provided an assessment determines the safety of the plant is maintained or enhanced.]</p> <p><i>Noncritical</i></p> <p>Verify each DG automatic trip ^(G) bypassed on [actual or simulated loss of voltage signal on the emergency bus concurrent with] an actual or simulated ESF actuation signal, except:</p> <div style="border: 1px solid black; padding: 5px;"> <ul style="list-style-type: none"> a. Engine overspeed, b. Generator differential current, c. Low lube oil pressure, d. High crankcase pressure, and e. Start failure relay.] </div>	<p>[18] months</p>

BASES

SURVEILLANCE REQUIREMENTS (continued)

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 unit conditions required to perform the Surveillance and is intended to be consistent with the expected fuel cycle lengths. Operating experience has shown that these components usually pass the SR when performed at the [18 month] Frequency. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

This SR is modified by two Notes. The reason for Note 1 is to minimize wear and tear on the DGs during testing. For the purpose of this testing, the DGs must be started from standby conditions, that is, with the engine coolant and oil continuously circulated and temperature maintained consistent with manufacturer recommendations. 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, unit safety systems. This restriction from normally performing the Surveillance in MODE 1 or 2 is further amplified to allow portions of the Surveillance to be performed for the purpose of reestablishing OPERABILITY (e.g. post work testing following corrective maintenance, corrective modification, deficient or incomplete surveillance testing, and other unanticipated OPERABILITY concerns) provided an assessment determines plant safety is maintained or enhanced. This assessment shall, as a minimum, consider the potential outcomes and transients associated with a failed partial Surveillance, a successful partial Surveillance, and a perturbation of the offsite or onsite system when they are tied together or operated independently for the partial Surveillance; as well as the operator procedures available to cope with these outcomes. These shall be measured against the avoided risk of a plant shutdown and startup to determine that plant safety is maintained or enhanced when portions of the Surveillance are performed in MODE 1 or 2. Risk insights or deterministic methods may be used for the assessment.]

SR 3.8.1.13

This Surveillance demonstrates that DG noncritical protective functions (e.g., high jacket water temperature) are bypassed on a loss of voltage signal concurrent with an ESF actuation test signal, and critical protective functions (engine overspeed, generator differential current, [low lube oil

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SURVEILLANCE REQUIREMENTS (continued)

~~pressure, high crankcase pressure, and start failure (relay)) trip the DG to avert substantial damage to the DG unit.~~ The noncritical trips are bypassed during DBAs and provide an alarm on an abnormal engine condition. This alarm provides the operator with sufficient time to react appropriately. The DG availability to mitigate the DBA is more critical than protecting the engine against minor problems that are not immediately detrimental to emergency operation of the DG. *Insert*

The [18 month] Frequency is based on engineering judgment, taking into consideration unit conditions required to perform the Surveillance, and is intended to be consistent with expected fuel cycle lengths. Operating experience has shown that these components usually pass the SR when performed at the [18 month] Frequency. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

The SR is modified by a Note. The reason for the Note is that performing the Surveillance would remove a required DG from service. This restriction from normally performing the Surveillance in MODE 1 or 2 is further amplified to allow the Surveillance to be performed for the purpose of reestablishing OPERABILITY (e.g. post work testing following corrective maintenance, corrective modification, deficient or incomplete surveillance testing, and other unanticipated OPERABILITY concerns) provided an assessment determines plant safety is maintained or enhanced. This assessment shall, as a minimum, consider the potential outcomes and transients associated with a failed Surveillance, a successful Surveillance, and a perturbation of the offsite or onsite system when they are tied together or operated independently for the Surveillance; as well as the operator procedures available to cope with these outcomes. These shall be measured against the avoided risk of a plant shutdown and startup to determine that plant safety is maintained or enhanced when the Surveillance is performed in MODE 1 or 2. Risk insights or deterministic methods may be used for this assessment.

- REVIEWER'S NOTE -

The above MODE restrictions may be deleted if it can be demonstrated to the staff, on a plant specific basis, that performing the SR with the reactor in any of the restricted MODES can satisfy the following criteria, as applicable:

- a. Performance of the SR will not render any safety system or component inoperable,

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.8.1.13

This Surveillance demonstrates that DG non-critical protective functions (e.g., high jacket water temperature) are bypassed on an ECCS initiation test signal and critical protective functions (engine overspeed, generator differential current, and low lubricating oil pressure) trip the DG to avert substantial damage to the DG unit. The non-critical trips are bypassed during DBAs and provide an alarm on an abnormal engine condition. Insert

This alarm provides the operator with sufficient time to react appropriately. The DG availability to mitigate the DBA is more critical than protecting the engine against minor problems that are not immediately detrimental to emergency operation of the DG.

The [18 month] Frequency is based on engineering judgment, takes into consideration plant conditions required to perform the Surveillance, and is intended to be consistent with expected fuel cycle lengths. Operating experience has shown that these components usually pass the SR when performed at the [18 month] Frequency. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

The SR is modified by a Note. The reason for the Note is that performing the Surveillance would remove a required DG from service. This restriction from normally performing the Surveillance in MODE 1 or 2 is further amplified to allow the Surveillance to be performed for the purpose of reestablishing OPERABILITY (e.g. post work testing following corrective maintenance, corrective modification, deficient or incomplete surveillance testing, and other unanticipated OPERABILITY concerns) provided an assessment determines plant safety is maintained or enhanced. This assessment shall, as a minimum, consider the potential outcomes and transients associated with a failed Surveillance, a successful Surveillance, and a perturbation of the offsite or onsite system when they are tied together or operated independently for the Surveillance; as well as the operator procedures available to cope with these outcomes. These shall be measured against the avoided risk of a plant shutdown and startup to determine that plant safety is maintained or enhanced when the Surveillance is performed in MODE 1 or 2. Risk insights or deterministic methods may be used for this assessment.

- REVIEWER'S NOTE -

The above MODE restrictions may be deleted if it can be demonstrated to the staff, on a plant specific basis, that performing the SR with the reactor

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.8.1.13 -----</p> <p style="text-align: center;">- NOTE -</p> <p>[This Surveillance shall not normally be performed in MODE 1, 2, or 3. However, this Surveillance may be performed to reestablish OPERABILITY provided an assessment determines the safety of the plant is maintained or enhanced.]</p> <p>-----</p> <p><i>noncritical</i> Verify each DG's automatic trips are bypassed on [actual or simulated loss of voltage signal on the emergency bus concurrent with an actual or simulated ECCS initiation signal], except:</p> <ul style="list-style-type: none"> a. Engine overspeed, b. Generator differential current, [c. Low lube oil pressure, d. High crankcase pressure, and e. Start failure relay.] 	<p>[18] months</p>

BASES

SURVEILLANCE REQUIREMENTS (continued)

plant shutdown and startup to determine that plant safety is maintained or enhanced when portions of the Surveillance are performed in MODE 1 or 2. Risk insights or deterministic methods may be used for the assessment.]

SR 3.8.1.13

This Surveillance demonstrates that DG non-critical protective functions (e.g., high jacket water temperature) are bypassed on a loss of voltage signal concurrent with an ECCS initiation test signal and critical protective functions (engine overspeed, generator differential current, and low lube oil pressure) trip the DG to avert substantial damage to the DG unit. The non-critical trips are bypassed during DBAs and provide an alarm on an abnormal engine condition. This alarm provides the operator with sufficient time to react appropriately. The DG availability to mitigate the DBA is more critical than protecting the engine against minor problems that are not immediately detrimental to emergency operation of the DG. Insert

The [18 month] Frequency is based on engineering judgment, taking into consideration plant conditions required to perform the Surveillance, and is intended to be consistent with expected fuel cycle lengths. Operating experience has shown that these components usually pass the SR when performed at the [18 month] Frequency. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

The SR is modified by a Note. The reason for the Note is that performing the Surveillance removes a required DG from service. This restriction from normally performing the Surveillance in MODE 1 or 2 is further amplified to allow the Surveillance to be performed for the purpose of reestablishing OPERABILITY (e.g. post work testing following corrective maintenance, corrective modification, deficient or incomplete surveillance testing, and other unanticipated OPERABILITY concerns) provided an assessment determines plant safety is maintained or enhanced. This assessment shall, as a minimum, consider the potential outcomes and transients associated with a failed Surveillance, a successful Surveillance, and a perturbation of the offsite or onsite system when they are tied together or operated independently for the Surveillance; as well as the operator procedures available to cope with these outcomes. These shall be measured against the avoided risk of a plant shutdown and startup to determine that plant safety is maintained or enhanced when the Surveillance is performed in MODE 1 or 2. Risk insights or deterministic methods may be used for this assessment.

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.8.1.13</p> <p style="text-align: center;">- NOTE -</p> <p>[This Surveillance shall not normally be performed in MODE 1, 2 or 3. However, this Surveillance may be performed to reestablish OPERABILITY provided an assessment determines the safety of the plant is maintained or enhanced.]</p> <p><i>noncritical</i></p> <p>Verify each DG's automatic trips are bypassed on [actual or simulated loss of voltage signal on the emergency bus concurrent with an actual or simulated ECCS initiation signal], except:</p> <ul style="list-style-type: none"> a. Engine overspeed, b. Generator differential current, [c. Low lube oil pressure, d. High crankcase pressure, and e. Start failure relay.] 	<p>[18] months</p>