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December 15, 2009

NL-09-167

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

SUBJECT: Proposed Exigent License Amendment Regarding One Time Extension of the
Auxiliary Boiler Feedwater Pump Allowed Outage Time
Indian Point Unit Number 3
Docket No. 50-286
License No. DPR-64

Dear Sir or Madam:

Pursuant to 10 CFR 50.90, Entergy Nuclear Operations, Inc, (Entergy) hereby requests a License Amendment to Operating License DPR-64, Docket No. 50-286 for Indian Point Nuclear Generating Unit No. 3 (IP3). The proposed amendment will allow a one time extension of the 72 hour completion time of TS 3.7.5, Condition B, Action B.1 "Restore AFW train to OPERABLE status" by 34 hours.

Entergy has evaluated the proposed change in accordance with 10 CFR 50.91(a)(1) using the criteria of 10 CFR 50.92(c) and Entergy has determined that this proposed change involves no significant hazards consideration, as described in Attachment 1. The marked-up page showing the proposed change is provided in Attachment 2. A copy of this application and the associated attachments are being submitted to the designated New York State official in accordance with 10 CFR 50.91.

Entergy requests approval of the proposed amendment on an exigent basis by January 5, 2010 with basis explained in Attachment 1. The commitments being made in this submittal are in Attachment 3. If you have any questions or require additional information, please contact Mr. Robert Walpole, Manager, Licensing at (914) 734-6710.

A001
NRR

I declare under penalty of perjury that the foregoing is true and correct. Executed on December 15, 2009.

Sincerely,


D. Mayer for
J. P. Mack

JEP/sp

- Attachments:
1. Analysis of Proposed Technical Specification Change Regarding One Time Extension of the Auxiliary Boiler Feedwater Pump Allowed Outage Time
 2. Markup of Technical Specifications Page for Proposed Change Regarding One Time Extension of the Auxiliary Boiler Feedwater Pump Allowed Outage Time
 3. Commitments

cc: Mr. John P. Boska, Senior Project Manager, NRC NRR DORL
Mr. Samuel J. Collins, Regional Administrator, NRC Region 1
NRC Resident Inspectors
Mr. Francis J. Murray, Jr., President and CEO, NYSERDA
Mr. Paul Eddy, New York State Dept. of Public Service

ATTACHMENT 1 TO NL-09-167

**ANALYSIS OF PROPOSED TECHNICAL SPECIFICATION CHANGE
REGARDING ONE TIME EXTENSION OF THE
AUXILIARY BOILER FEEDWATER PUMP ALLOWED OUTAGE TIME**

**ENERGY NUCLEAR OPERATIONS, INC.
INDIAN POINT NUCLEAR GENERATING UNIT NO. 3
DOCKET NO. 50-286**

1.0 DESCRIPTION

Entergy Nuclear Operations, Inc (Entergy) is requesting an amendment to Operating License Operating License DPR-64, Docket No. 50-286 for Indian Point Nuclear Generating Unit No. 3 (IP3). The proposed change will allow a one time extension of the 72 hour completion time of TS 3.7.5, Condition B, Action B.1 "Restore AFW train to OPERABLE status."

The specific proposed changes are listed in the following section.

2.0 PROPOSED CHANGES

The proposed TS change is as follows:

Change that portion of the TS 3.7.5, Condition B Completion Time from

"72 hours

To

"72 hours ⁽¹⁾

(1) A one time extension to 106 hours during the first 45 days after amendment approval for repairs to AFW pump 32."

The marked up Technical Specification page showing this change is in Attachment 2.

3.0 BACKGROUND

The Auxiliary Feedwater System (AFWS) is used for plant startup. It also supplies high pressure feedwater to the steam generators. This feedwater supply is needed to maintain sufficient water inventory in the steam generators to allow removal of decay heat from the Reactor Coolant System by secondary steam releases in the event that the Main Feedwater System is unavailable.

The AFWS loop utilizes a steam turbine driven auxiliary boiler feedwater pump (ABFP) and two motor driven ABFPs. The design ensures that at least two of the four steam generators will not boil dry and that the Primary Coolant System will not relieve water through the pressurizer relief/safety valves following a loss of main feedwater flow.

After a start signal, steam flow to the turbine for the steam driven pump must be throttled manually in order to bring the turbine up to speed. In addition, the steam driven pump discharge flow control valves are manually opened as necessary to provide adequate auxiliary feedwater flow. The steam turbine driven pump was designed to supply 800 gpm of feedwater flow to the steam generators, conservatively assumed to be 596 gpm in the relevant Chapter 14 analyses. These analyses evaluate the feedwater supply needed to maintain sufficient water inventory in the steam generators to allow removal of decay heat from the Reactor Coolant System by secondary steam releases in the event that the Main Feedwater System is unavailable.

Redundancy and diversity of auxiliary feedwater supply is provided by utilizing two different types of motive power to the pumps. One supply utilizes the steam turbine driven pump and the other utilizes two redundant motor driven pumps. The steam turbine driven pump is capable of delivering auxiliary feedwater to all four steam generators. Each motor driven pump is capable of providing auxiliary feedwater to two steam generators. The design ensures that at least two of the four steam generators will not boil dry and that the Primary Coolant System will not relieve water through the pressurizer relief/safety valves following a loss of main feedwater flow. One motor driven pump has sufficient capacity to maintain a sufficient water inventory in the steam generators to which it is connected, preventing relief through the primary coolant system pressurizer relief valve following a reactor/turbine trip. Thus, in the event of a loss of the steam driven pump, a single motor driven pump is adequate to ensure safety of the public.

The purpose of the current TS request is to allow online assessment and repair of the steam driven 32 ABFP. On November 23, 2009 the 32 ABFP was found to have high axial vibrations. Previously, the 32 ABFW pump had been running with a 0.3 inches per second axial vibration. Assessment of the high vibrations included replacement of the oil and inspection of the coupling. The coupling proved not to be the issue and the oil sample showed high levels of tin and iron indicating wear of the turbine journal thrust bearings and leaching of iron from the turbine bearing housing. Both were known conditions. The bearing housing requires a coating to prevent leaching and this is being evaluated but there are no unacceptable consequences. The bearing oil high tin content was determined to be higher during the last refuel outage. This was prior to the replacement of the turbine outboard journal bearing during that outage. The 32 ABFW pump was tested after the November work and the vibrations steadied out at 0.6 inches per second which is acceptable for operability but places the pump in the alert range. This testing was done using a digital vibration monitor which has a higher frequency response than the analog meter used during quarterly testing. An operability evaluation concluded the potential cause of the increased vibration was pump to turbine misalignment which was insufficient to affect the safety mission of the pump.

An exigent TS change is being requested in order to further evaluate the cause of the high vibrations, to inspect / replace the bearing and to perform other corrective actions as needed to increase the reliability of the pump. The exigent TS is being sought in order to avoid the potential for the 32 ABFP to degrade. Since the mission time of the turbine pump is fairly short, the 32 ABFP pump is credited for 29 hours prior to transfer to the residual heat removal system, there is no reason to believe the pump would not perform as required. The vibrations have been steady at 0.6 inch per second during the last test and it is expected they would remain there. Performing further assessment / repairs would provide greater assurance that the pump will not see an unexpected increase in vibrations in future testing. In order to allow the assessments and potential bearing replacement the exigent TS change is being requested. The preferred timing is to allow the pump to be fixed prior to testing to avoid any potential for increased vibration due to more frequent testing. In the alert stage, the pump is tested at half the normal interval which would require testing by January 9, 2010.

The planned work tasks, schedule and potential concerns with the schedule are as follows:

- Check cold alignment using optiline (to verify alignment) – 5 hours
- Check footprint adequacy using optiline – 6 hours
- Loosen steam inlet pipe and check effect on alignment using optiline – 7 hours
- Remove bearing covers and assess – 9 hours
- Replace journal and thrust bearings as required (fit up, align, etc) – 43 hours

- Clear tag out, perform 2 hour run, reapply tag out – 4 hours
- Perform hot alignment and adjustments - 11.25 hours
- Uncouple pump / turbine and perform overspeed test – 3 hours
- Recouple turbine and perform quarterly run – 4 hours

The request includes 13.75 hours for contingency should some step of the planned work go wrong. For example, inspection results requiring further engineering evaluation such as tolerance deviation on mating surfaces / piping strain that may increase the work scope.

4.0 TECHNICAL ANALYSIS

The one time extension of an allowed outage time is requested based on compensatory measures that will be taken to reduce the risk that the AFWP will be required and an evaluation of the risk associated with the extension. The request is to allow a 34 hour extension of the AOT within 45 days of the TS change which will allow the repairs to be performed before the next surveillance test or shortly thereafter.

Feed and bleed of the primary system is the only alternative to the use of the auxiliary feed water system so the extension to the allowed outage is based on compensatory actions. Compensatory measures will be taken to reduce the risk associated with the extension; these are based on both event mitigation and initiating event likelihood. In order to minimize risk during the period of noncompliance, IP3 proposes the following actions when the 32 ABFWP is out of service:

1. No equipment directly associated with motor driven auxiliary feedwater pumps 31 and 33 will be removed from service.
2. No equipment associated with the AC power system will be removed from service or worked on for the duration of the 32 ABFP allowed completion time. This includes work on the offsite circuit and EDGs 31, 32, and 33. The offsite circuit, emergency diesel generators 31, 32, and 33, and motor driven auxiliary feedwater pumps 31 and 33 will be protected with physical barriers and administrative controls (posting of protected train signage), preventing work on this equipment.
3. Access will be limited to the following areas important for maintaining the plant in a stable condition: auxiliary feedwater pump room, diesel generators 31, 32, and 33 rooms, control building-15 foot switchgear room and 125 volt dc battery charger and station battery rooms. Access will be controlled by posted signs requiring approval by the operations shift manager prior to entry.
4. The following equipment will be protected by critical plant equipment sign(s) during the time the 32 ABFP is out of service:
 - Motor Driven Auxiliary Feedwater Pumps 31 and 33
 - Emergency Diesel Generators 31, 32, and 33
 - 125V DC Power Panels 32 and 33 and 125V DC Batteries 32 and 33
 - Safety Injection Pumps 31, 32 and 33
 - Component Cooling Water Pumps 31, 32 and 33
 - Service Water Pumps 31, 32, 33, 34, 35 and 36
 - Residual Heat Removal Pumps 31 and 32
 - EDG Room 31, 32 and 33 Ventilation System

- PORVs (PCV-455C & 456) and associated block valve (535 & 536, respectively)
5. The physical barriers referenced above will be verified shiftly for the duration of the inoperability of the 32 ABFP and logged in the Operations log.
 6. No switchyard work will be allowed.
 7. The CO2 suppression in the Switchgear Room and Cable Spreading Room will be ensured to remain available
 8. Hot work will be prohibited in Control Building Switchgear Rooms, Batteries and Chargers, Cable Spreading Room, Electric Tunnels, EDG Rooms 31, 32, and 33, and Auxiliary Feedwater Pump Room. Transient combustible loading in these rooms will be minimized as well.
 9. IP3 will discuss with the grid operator the IP3 condition and the need for heightened sensitivity and continual monitoring of grid conditions to anticipate challenges to offsite power availability.
 10. Operators will be briefed on sensitivity to safety bus electrical power supply issues to recognize and respond expeditiously to a station black out or loss of offsite power event.
 11. A continuous fire / flood watch will be implemented in Auxiliary Feedwater Pump Room, Cable Spreading Room, 31 EDG Room and Control Building Switchgear Room until 32 ABFP is declared operable. The 10 inch fire header pipe going through the switchgear room will be isolated during the allowed outage time.
 12. Trip risks which could lead to Main Turbine trips or impact main condenser will be identified and avoided.
 13. If an equipment failure occurs that could affect the margin to safety on the remaining auxiliary feedwater pump 31 or 33 secondary cooling function, the operations manager will be contacted to notify the NRC and convene an onsite safety review committee meeting to evaluate plant status, and determine if the basis for the license amendment is affected.
 14. The plant operations crew will be briefed on these risk management measures.
 15. Prior to initiating any work on 32 ABFP the weather will be assessed to assure there are no severe weather conditions forecasted for the proposed period of work that would require entry into the severe weather procedure. This is to assure no plant vulnerabilities related to weather conditions exist.

It can be concluded that the proposed change does not involve a significant increase in the probability of an accident previously evaluated or create the possibility of a new or different kind of accident from any accident previously evaluated. The extension of the allowed outage time does not increase the probability of an accident since the availability of the pump does not affect accident probability. The extension of the allowed outage time does not alter any plant equipment, change the manner in which the plant is operated or revise any operating procedure so no new or different kind of accident is possible. It can be concluded that the proposed change does not involve a significant increase in the consequences of an accident previously evaluated or result in a significant reduction in a margin of safety. The unavailability of the 32 AFWP does not significantly increase the consequences of an accident since a single failure of this pump is already

evaluated in accidents. This assumption is still applicable since there is no significant decrease in the margin of safety. The margin of safety of continued IP3 operation with ABFP 32 out of service during a 34 hour extension of the allowed outage time is acceptable. The increase in core damage frequency (CDF) associated with continued IP3 operation with ABFP 32 out of service for a duration of 106 hours (which represents a 34 hour period beyond the current allowed outage time) is $3.9E-5$ per reactor year (ry). This results in an incremental conditional core damage probability (ICCDP) of $4.8E-07$, which is below the ICCDP guidance threshold of $5E-07$ identified in NRC Inspection Manual Part 9900. The ICCDP includes risk for external events such as seismic, fire, and flood. The increase in large early release frequency (LERF) was estimated as $4.2E-7$ /ry (including external events), which results in an incremental conditional large early release probability (ICLERP) of $5.1E-9$. The CDF and LERF results were generated using the baseline model which includes nominal maintenance unavailabilities for PSA-modeled components. For determining the impact on CDF associated with having 32 ABFP out of service, credit was taken for the following compensatory measures:

1. The fire non-suppression probabilities for the Switchgear Room, Cable Spreading Room, 31 EDG Room and ABFP Room were reduced by a factor of 10 to credit the continuous fire watch that will be implemented while 32ABFP is out of service.
2. The frequency of an event associated with the rupture of the 10-inch fire protection deluge line in the switchgear room was reduced by a factor of 10 to reflect that this line will be isolated while 32ABFP is out of service. This is conservative since with the line isolated, a rupture of the fire protection piping will not result in failure of the switchgear due to flooding.
3. Credit was taken for the fact that no maintenance will be allowed which could adversely impact availability of any EDG, remaining motor-driven ABFP or safety injection pump.
4. Credit was taken for operator action to recover a fast transfer failure should a loss of 125VDC Power Panel 32 occur, assuming a non-recovery failure probability of 0.1. Because this action is proceduralized but is not credited in the baseline model, the baseline risk was adjusted (decreased) to take credit for this recovery action. This is conservative compared with the nominal baseline risk since it results in a higher increase in risk due to a lower baseline value.

While additional compensatory measures are also being implemented to further reduce risk and provide additional defense-in-depth, no quantitative credit was taken for compensatory measures other than the ones listed directly above.

5.0 REGULATORY ANALYSIS

5.1 No Significant Hazards Consideration

Entergy Nuclear Operations, Inc. (Entergy) has evaluated the safety significance of the proposed change to the Indian Point 3 Technical Specification which revise the allowed outage time for the 32 Auxilliary Boiler Feedwater pump by 34 hours for one time repair work. The proposed changes have been evaluated according to the criteria of 10 CFR 50.92, "Issuance of Amendment". Entergy has determined that the subject changes do not involve a Significant Hazards Consideration as discussed below:

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

No. The proposed change revises the allowed outage time (AOT) for the steam driven Auxiliary Boiler Feedwater Pump (ABFP) on a one time basis. Revising the AOT is not an accident initiator since an ABFP is a mitigating system. Therefore the proposed changes do not increase the probability of an accident occurring. The proposed AOT change is a one time increase that will allow repairs without the transient of shutdown. The plant is designed for single failure and recognizes that inoperability for short periods does not cause a significant increase in the consequences of an accident. The one time increase in this outage time is compensated with measures to reduce the potential need for the ABFP and the effects of events that could require the pump. Therefore the increase does not significantly increase the consequences of an accident. Therefore the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?

No. The proposed change revises the allowed outage time for the ABFP on a one time basis. The proposed change does not involve installation of new equipment or modification of existing equipment, so no new equipment failure modes are introduced. The proposed revision is not a change to the way that the equipment or facility is operated or analyzed and no new accident initiators are created. Therefore the proposed 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?

No. The reduction in the margin of safety associated with continued IP3 operation with Auxiliary Boiler Feedwater (ABF) pump 32 out of service during a 34 hour period beyond current allowed outage time is represented by an increase of approximately 50 percent in the allowed outage time. This change in the margin of safety has been compensated for by specific compensatory measures to reduce the potential need for the pump and to address postulated events that could require the pump. The increase in core damage frequency (CDF) associated with continued IP3 operation with ABFP 32 out of service for a duration of 106 hours which represents a 34 hour period beyond the current allowed outage time) is $3.9E-5$ per reactor year (ry). This results in an incremental conditional core damage probability (ICCDP) of $4.8E-07$, which is below the ICCDP guidance threshold of $5E-07$ identified in NRC Inspection Manual Part 9900. The ICCDP includes risk due to external events due to seismic, fire, and flood. The increase in large early release frequency (LERF) was estimated as $4.2E-7$ /ry (including external events), which results in an incremental conditional large early release probability (ICLERP) of $5.1E-9$. Therefore the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, Entergy concludes that the proposed amendment to the Indian Point 3 Technical Specification 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 extension of the allowed outage time does not affect design and therefore does not affect compliance with:

1. GDC 2 requirements since there is no effect related to structures housing the system and the system itself being capable of withstanding the effects of earthquakes, tornados and floods.
2. GDC 4 requirements since there is no effect on the capability of structures housing the system and the system itself being capable of withstanding the effects of external missiles and internally generated missiles, pipe whip, and jet impingement forces associated with pipe breaks.
3. GDC 5 requirements since there are no required shared systems and components important to safety to perform required safety functions.
4. GDC 19 requirements since there is no effect on the design capability of system instrumentation and controls for prompt hot shutdown of the reactor and potential capability for subsequent cold shutdown.
5. GDC 45 requirements since there is no effect on the provisions made to permit periodic in service inspection of system components and equipment.
6. GDC 46 requirements to permit appropriate functional testing of the system and components to assure structural integrity and leak-tightness, operability and performance of active components, and capability of the integrated system to function as intended during normal, shutdown, and accident conditions since none of these are affected.
7. 10 CFR 50.62 requirements for automatic initiation of the AFWS.

The extension of the allowed outage time for the ABFP can affect the capability to comply with the following criteria:

1. GDC 34 and 44 requirements to assure redundancy of components for performance of the safety function under accident conditions, assuming a single active component failure (perhaps coincident with the loss of offsite power for certain events) would be slightly affected but within the acceptable margins of safety.
2. 10 CFR 50.63 requirements for withstanding and recovering from a station blackout, including an acceptable degree of independence from the ac power system and the capability for removal of decay heat at an appropriate rate for an appropriate duration would be slightly affected but within the acceptable margins of safety.
3. 10 CFR 50.48 requirements for fire protection including shutdown and decay heat removal would be slightly affected but within the acceptable margins of safety.

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

(3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

5.3 Environmental Considerations

The proposed change to the IP3 Technical Specifications 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 need be prepared in connection with the proposed amendment.

6.0 PRECEDENCE

No specific approvals for an extension to the allowed outage time for the auxiliary boiler feedwater pump were identified. A notice of enforcement discretion was granted to South Texas Project, Unit 1, by letter dated December 20, 2006.

ATTACHMENT 2 TO NL-09-167

MARKUP OF TECHNICAL SPECIFICATION PAGE FOR
PROPOSED CHANGE REGARDING ONE TIME EXTENSION OF
THE AUXILIARY BOILER FEEDPUMP ALLOWED OUTAGE TIME

Changes indicated by lineout for deletion and Bold/Italics for additions

ENTERGY NUCLEAR OPERATIONS, INC.
INDIAN POINT NUCLEAR GENERATING UNIT NO. 3
DOCKET NO. 50-286

3.7 PLANT SYSTEMS

3.7.5 Auxiliary Feedwater (AFW) System

LCO 3.7.5 Three AFW trains shall be OPERABLE.

-----NOTE-----
Only one AFW train, which includes a motor driven pump capable of supporting the credited steam generator(s), is required to be OPERABLE in MODE 4.

APPLICABILITY: MODES 1, 2, and 3,
MODE 4 when steam generator is relied upon for heat removal.

ACTIONS

-----NOTE-----
LCO 3.0.4.b is not applicable.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One steam supply to turbine driven AFW pump inoperable.	A.1 Restore steam supply to OPERABLE status.	7 days <u>AND</u> 10 days from discovery of failure to meet the LCO
B. One AFW train inoperable in MODE 1, 2 or 3 for reasons other than Condition A.	B.1 Restore AFW train to OPERABLE status.	72 hours ⁽¹⁾ <u>AND</u> 10 days from discovery of failure to meet the LCO

(1) A one time extension to 106 hours during the first 45 days after amendment approval for repairs to AFW pump 32.

(continued)

ATTACHMENT 3 TO NL-09-167

COMMITMENTS

ENERGY NUCLEAR OPERATIONS, INC.
INDIAN POINT NUCLEAR GENERATING UNIT NO. 3
DOCKET NO. 50-286

List of Commitments

Commitment Number	Commitment	Due
NL-09-167-01	<p>In order to minimize risk during the period of noncompliance, IP3 has identified additional controls to increase operator awareness of critical equipment, provide assurance that assumptions in the risk model are maintained, and minimize the likelihood of a plant transient. IP3 proposes the following actions for the extended completion time to manage risk:</p> <ol style="list-style-type: none"> 1. No equipment directly associated with motor driven auxiliary feedwater pumps 31 and 33 will be removed from service. 2. No equipment associated with the AC power system will be removed from service or worked on for the duration of the 32 ABFP allowed completion time. This includes work on the offsite circuit and EDGs 31, 32, and 33. The offsite circuit, emergency diesel generators 31, 32, and 33, and motor driven auxiliary feedwater pumps 31 and 33 will be protected with physical barriers and administrative controls (posting of protected train signage), preventing work on this equipment. 3. Access will be limited to the following areas important for maintaining the plant in a stable condition: auxiliary feedwater pump room, diesel generators 31, 32, and 33 rooms, control building-15 foot switchgear room and 125 volt dc battery charger and station battery rooms. Access will be controlled by posted signs requiring approval by the operations shift manager prior to entry. 4. The following equipment will be protected by critical plant equipment sign(s) during the time the 32 ABFP is out of service: <ul style="list-style-type: none"> • Motor Driven Auxiliary Feedwater Pumps 31 and 33 • Emergency Diesel Generators 31, 32, and 33 • 125V DC Power Panels 32 and 33 and 125V DC Batteries 32 and 33 • Safety Injection Pumps 31, 32 and 33 • Component Cooling Water Pumps 31, 32 and 33 • Service Water Pumps 31, 32, 33, 34, 35 and 36 • Residual Heat Removal Pumps 31 and 32 • EDG Room 31, 32 and 33 Ventilation System 	At time of entry into 32 ABFP AOT with one time extension

	<ul style="list-style-type: none">• PORVs (PCV-455C & 456) and associated block valve (535 & 536, respectively) <ol style="list-style-type: none">5. The physical barriers referenced above will be verified shiftly for the duration of the inoperability of the 32 ABFP and logged in the Operations log.6. No switchyard work will be allowed.7. The CO2 suppression in the Switchgear Room and Cable Spreading Room will be ensured to remain available8. Hot work will be prohibited in Control Building Switchgear Rooms, Batteries and Chargers, Cable Spreading Room, Electric Tunnels, EDG Rooms 31, 32, and 33, and Auxiliary Feedwater Pump Room. Transient combustible loading in these rooms will be minimized as well.9. IP3 will discuss with the grid operator the IP3 condition and the need for heightened sensitivity and continual monitoring of grid conditions to anticipate challenges to offsite power availability.10. Operators will be briefed on sensitivity to safety bus electrical power supply issues to recognize and respond expeditiously to a station black out or loss of offsite power event.11. A continuous fire / flood watch will be implemented in Auxiliary Feedwater Pump Room, Cable Spreading Room, 31 EDG Room and Control Building Switchgear Room until 32 ABFP is declared operable. The 10 inch fire header pipe going through the switchgear room will be isolated during the allowed outage time.12. Trip risks which could lead to Main Turbine trips or impact main condenser will be identified and avoided.13. If an equipment failure occurs that could affect the margin to safety on the remaining auxiliary feedwater pump 31 or 33 secondary cooling function, the operations manager will be contacted to notify the NRC and convene an onsite safety review committee meeting to evaluate plant status, and determine if the basis for the license amendment is affected.14. The plant operations crew will be briefed on these risk management measures.	
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	<p>15. Prior to initiating any work on 32 ABFP the weather will be assessed to assure there are no severe weather conditions forecasted for the proposed period of work that would require entry into the severe weather procedure. This is to assure no plant vulnerabilities related to weather conditions exist.</p>	
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