

3.7 AUXILIARY ELECTRICAL SYSTEMS

Applicability

Applies to the availability of electrical power for the operation of plant auxiliaries.

Objective

To define those conditions of electrical power availability necessary (1) to provide for safe reactor operation, and (2) to provide for the continuing availability of engineered safety features.

Specification

- A. The reactor shall not be brought above the cold shutdown condition unless the following requirements are met:
1. Two physically independent transmission circuits to Buchanan Substation capable of supplying engineered safeguards loads.
 2. 6.9 KV buses 5 and 6 energized from either 138 KV feeder 95331 or 95332.
 3. Either 13.8 KV feeder 13W92 or 13W93 and its associated 13.8/6.9 KV transformer available to supply 6.9 KV power.
 4. The four 480-volt buses 2A, 3A, 5A and 6A energized and the bus tie breakers between buses 5A and 2A, and between buses 3A and 6A, opened.
 5. Three diesel generators operable with a minimum onsite supply of 6671 gallons of fuel for each of three diesel generators. In addition, 30,026 gallons of fuel compatible for operation with the diesels shall be available onsite or at the Buchanan substation. This 30,026 gallon reserve is for Indian Point Unit No. 3 usage only and is in addition to the fuel requirements for other nuclear units on site.

6. Three batteries plus three chargers and the D.C. distribution systems operable.
 7. No more than one 120 volt A.C. Instrument Bus on the backup power supply.
- B. The requirements of 3.7.A may be modified to allow any one of the following power supplies to be inoperable at any one time.
1. One diesel or any diesel fuel oil system or a diesel and its associated fuel oil system may be inoperable for up to 72 hours provided the 138 KV and the 13.8 KV sources of offsite power are available, and the engineered safety features associated with the remaining diesel generator buses are operable. If the inoperable diesel generator became inoperable due to any cause other than preplanned preventive maintenance or testing, the remaining diesel generators shall be tested within 24 hours.
 2. The 138 KV or the 13.8 KV sources of power may be inoperable for 48 hours provided the three diesel generators are operable. This operation may be extended beyond 48 hours provided the failure is reported to the NRC within the 48 hour period with an outline of the plans for restoration of offsite power and NRC approval is granted.

4. Two operable diesel generators together with total storage containing a minimum of 6671 gallons of fuel.
- G. When a system, subsystem, train, component or device is determined to be inoperable solely because its emergency power source is inoperable, or solely because its normal power source is inoperable, it may be considered operable for the purpose of satisfying the requirements of its applicable specification provided: (1) its corresponding normal or emergency power source is operable; and (2) all of its redundant system(s), subsystem(s), train(s), components(s) and device(s) are operable or likewise satisfy the requirements of the specification.

Basis

The electrical system equipment is arranged so that no single contingency can inactivate enough safeguards equipment to jeopardize the plant safety.

The 480-volt equipment is arranged on 4 buses. The 6900-volt equipment is supplied from 6 buses.

The Buchanan Substation has both 345 KV and 138 KV transmission circuits which are capable of supplying startup, normal operation, shutdown and/or engineered safeguards loads.

The 138 KV supplies or the gas turbines are capable of providing sufficient power for plant startup. Power via the station auxiliary transformer can supply all the required plant auxiliaries during normal operation, if required.

In addition to the unit transformer, four separate sources supply station service power to the plant.⁽¹⁾

The plant auxiliary equipment is arranged electrically so that multiple items receive their power from different buses. Redundant valves are individually supplied from separate motor control centers.

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The bus arrangements specified for operation ensure that power is available to an adequate number of safeguards auxiliaries. With additional switching, more equipment could be out of service without infringing on safety.

Two diesel generators have sufficient capacity to start and run within design load the minimum required engineered safeguards equipment.⁽¹⁾ The minimum onsite stored diesel fuel oil inventory is maintained at all times, normally in underground storage tanks, to assure the operation of two diesels carrying the minimum required engineered safeguards equipment load for at least 48 hours.⁽²⁾ The minimum required storage tank volume (when above cold shutdown) of 6671 gallons is the minimum volume required when sounding the tanks to obtain level information. This volume includes allowances for fuel not usable due to the oil transfer pump cutoff switch (760 gallons) and a safety margin (20 gallons). If the installed level indicators are used to measure tank volume, 6721 gallons of oil (6671 gallons plus the 50 gallon uncertainty associated with the level indicators) must be in each storage tank.

When in cold shutdown, two diesel generators must be operable with a total storage of 6671 gallons of fuel oil. The same methodology used to measure fuel volume above cold shutdown should be used. Additional fuel oil suitable for use in the diesel generators will be stored either on site or at the Buchanan Substation. The minimum storage of 30,026 gallons of additional fuel oil will assure continuous operation of two diesels at the minimum engineered safeguards load for a total of 7 days. A truck with hosing connections compatible with the diesel fuel oil storage tanks is available for transferal of diesel oil from storage areas either on site or at the Buchanan Substation. Commercial oil supplies and trucking facilities are also available.

Periodic diesel outages will be necessary to perform the corrective maintenance required as a result of previous tests or operations and the preventive maintenance recommended by the manufacturer. If a diesel generator is out of service due to preplanned preventive maintenance or testing, special surveillance testing of the remaining diesel generators is not required because the required periodic surveillance testing suffices to provide assurance of their operability. The fact that preplanned corrective maintenance is sometimes performed in conjunction with this preventive maintenance or testing does not necessitate that the remaining diesels be tested, because this corrective maintenance is on defects or potential defects that never called diesel operability into question. If a diesel generator defect or operability concern is discovered while performing this preplanned preventive maintenance or testing, the concern or defect is evaluated to determine if the same concern or defect could render the remaining diesel generators inoperable. Unless this evaluation determines that the potential for the defect or concern to effect the remaining diesel generators has been eliminated, performance of a surveillance test on each of the remaining diesel generators provides adequate assurance of their operability.

ATTACHMENT II TO IPN-99-035

**SAFETY EVALUATION OF THE
PROPOSED CHANGES TO TECHNICAL SPECIFICATION 3.7
REGARDING THE EMERGENCY DIESEL
GENERATOR FUEL OIL STORAGE TANKS**

**NEW YORK POWER AUTHORITY
INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286
DPR-64**

**Proposed Technical Specification Change Regarding
Emergency Diesel Generator Fuel Oil Storage Tanks**

Section I - Description of Changes

This application for amendment to the Indian Point 3 (IP3) Technical Specification (TS) proposes to:

1. Revise Specification 3.7.A.5 of the Limiting Conditions for Operation (LCO) to address the Emergency Diesel Generator (EDG) Fuel Oil Storage Tanks (FOSTs) without specifying that they are described as "three individual underground" storage tanks.
2. Revise LCO Specification 3.7.F.4 to remove the word "underground" when discussing the EDG fuel oil storage tanks.
3. Revise the Bases for LCO Specification 3.7 regarding the "underground" nature of the EDG FOSTs.
4. An editorial change consisting of a consolidation of LCO Specification 3.7.A.5 in its entirety to page 3.7-1.

Section II - Evaluation of Changes

IP3 TS 3.7.A.5 requires that the FOSTs for the EDGs are to be "three individual underground" storage tanks. TS 3.7.F.4 includes the description of "underground" in reference to the EDG FOSTs. These descriptions are design features that primarily reflect the fact that after installation these storage tanks were covered with backfill to provide tornado protection. As such these FOSTs are able to withstand design tornado winds and tornado driven missiles discussed in section 16.2 of the IP3 Final Safety Analysis Report (FSAR) (Reference 1). Additionally there is one stored FOST associated with each EDG. These descriptors are consistent with the Standard Technical Specifications (STS) (Reference 2) Bases for LCO specification 3.8.3 which identifies design features by saying that "all outside tanks, pumps, and piping are located underground" and that "each diesel generator is provided with a storage tank". However, neither the LCO nor the Surveillance Requirements (SR) of the STS specifically mention these "underground" or "individual" characteristics of the FOSTs, nor that there are a certain number of "individual" tanks other than tanks being associated with each EDG. The recently submitted Improved Technical Specification (ITS) LCO Specification 3.8 is also consistent with the STS and makes no mention of the design features of the EDG FOSTs. Thus, the proposed change to TS 3.7.A.5 words this LCO to indicate there is to be a dedicated onsite supply of at least 6671 gallons for each of the three diesel generators and removes the added descriptors which could restrict potential future modifications to the EDG fuel oil system, if required. TS 3.7.F.4 proposed wording also removes the added design feature descriptor as well to support future, potential FOST changes. The current licensing basis, by way of FSAR section 8.2, would continue to indicate the required design features that the installed EDG FOSTs must meet.

NRC Standard Review Plan (SRP), NUREG 0800, Section 9.5.4, "Emergency Diesel Engine Fuel Oil Storage and Transfer System" (Reference 3), was reviewed as well. It was determined that as long as the EDG FOSTs meet the appropriate General Design Criteria (which are further discussed in the IP3 FSAR), these tanks are not specified as required to be underground.

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Further, the STS state that "the DG's are designed to provide sufficient capacity, capability, redundancy, and reliability to ensure the availability of necessary power to Engineered Safety Features (ESF) systems so that fuel, Reactor Coolant System, and containment design limits are not exceeded." Since the diesel fuel oil storage system, which includes the FOSTs, is required to support the operation of the EDG's, this system is seismic Class I (with the exception of the truck loading line into FOSTs which is Class 3) and is protected from tornado missile and wind loads. Additionally, it is noted that ANSI N195-1976, "American National Standard Fuel Oil Systems for Standby Diesel-Generators" (Reference 4), which is referenced in the above SRP, indicates that in physical arrangement "fuel oil supply tanks may be located above or below ground". However, in either case of above or below ground arrangement, the FOSTs are to be designed to meet the necessary design requirements.

The New York Power Authority (the Authority) has recently submitted a conversion of Indian Point 3's TS to the STS format. However, the Authority is requesting the aforementioned revision as a line item TS improvement to provide operational flexibility and cost benefit in order to accommodate potential future repair or replacement of an EDG FOST. The proposed change will allow the Authority to evaluate potential changes utilizing the 10CFR50.59 change process should a need arise concerning designing and installing temporary FOSTs to allow maintenance to be performed on the present underground EDG FOSTs.

An example of a situation where this TS change could prove beneficial is the following: During a recent performance of a routine bottom sample test (Reference 5) it was determined that the 32 FOST had acquired some two (2) inches of water. A subsequent evaluation concluded that the tank was experiencing rain water intrusion. In addition, it was determined that there was no associated leakage of fuel oil, indicating that the point of intrusion was not along the sidewalls or bottom of the FOST. The associated EDG and FOST were determined to be operable since the fuel oil transfer line intake is several inches above the bottom of the tank, the FOST transfer pump sits on the "high-end" of the FOST and the bulk sample results demonstrated satisfactory fuel oil chemistry results. The potential for repair of the FOST to address this concern is limited by TS LCO 3.7.B.1, which grants an Allowed Outage Time (AOT) of seventy-two (72) hours for any repair efforts or, if necessary, for a replacement of the FOST. To preclude a potential plant shutdown as a result of needing more than 72 hours to repair an EDG FOST should it be declared inoperable in the future, the Authority may need to consider a modification to install a temporary FOST to supply fuel oil to 32 EDG. Any potential application of the change to circumstances such as this would require further evaluation in accordance with 10CFR50.59 to see if such a change could be made without prior NRC review and approval.

As further discussed in the above example, this proposed TS change would be a necessary step toward considering the use of above ground fuel oil storage. The new storage tank(s) would have to have the necessary capacity (i.e., 6671 gallons of fuel oil) and meet required seismic and tornado wind loading criteria, including the tornado generated missile design requirements. The availability of fuel oil to the EDGs would also need to meet single active failure criteria as well. A design change meeting the above criteria could permit the continued availability of the EDGs.

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However, as stated, the above potential design change would have to be analyzed and approved by use of the 10CFR50.59 change process to determine acceptability prior to implementation.

The changes to the Bases of LCO Specification 3.7 involve removing "underground" as a descriptor of the FOSTs to be consistent with the associated TS LCO itself.

The fact that the tanks are underground remains part of the licensing basis because the design features are described in the appropriate FSAR section 8.2. In addition, the movement of the entire LCO specification for 3.7.A.5 to one TS page provides for improved efficiency of this TS section.

Section III - No Significant Hazards Evaluation

In accordance with the requirements of 10CFR50.92, the enclosed application is judged to involve no significant hazards based upon the following information:

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

No. The proposed change would not change the design configuration or function of the permanently installed EDG FOSTs. The revision of TS 3.7.A.5 and 3.7.F.4 to remove the descriptive words "three individual underground" and "underground" from the text of the two LCOs is intended as a line item change, to remove unnecessarily restrictive wording in the TS. While the Standard Technical Specifications (STS), NUREG-1431, mentions in the Bases section that "all outside tanks, pumps, and piping are located underground", the specification itself does not contain this requirement. The intent of this TS change is to allow for, if acceptable under 10CFR50.59, the potential installation of an alternate above ground FOST to an EDG if needed to perform repairs/testing of the permanently installed FOST. This alternate tank would need to be qualified and have the required capacity to maintain the associated EDG operable. This potential modification would include design of the temporary tank to preclude winds loads from a tornadic event causing the associated EDG to become inoperable. Installation of this temporary tank would then permit repair work or replacement of an installed EDG FOST, or subsequent similar work on either of the other EDG FOSTs, one at a time. The changes to the Bases for Specification 3.7 are consistent with the change in the LCO Specification and do not alter the design or functionality of the existing EDG FOSTs. The revised LCOs are consistent with the STS in that the FOSTs will no longer be identified as "three individual underground". Control of future modifications to support EDG FOST work would ensure proper licensing and design basis compliance in accordance with the change process of 10CFR50.59. The associated changes of the TS Bases provide clarification regarding the normal underground configuration of the EDG FOSTs. The proposed TS change will not reduce the ability of any system, structure, or component in preventing or mitigating a design basis accident since no plant features are being altered in conjunction with this change, and future changes would be evaluated under 10CFR50.59. The description of the FOSTs, including the fact that they are underground, remains part of the current licensing basis because it is described in FSAR section 8.2.

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Therefore, the proposed changes to the TS will not result in an increase in the probability or consequences of any previously evaluated accidents. The other changes to the TS pages are editorial only, moving text to different pages.

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

No. The proposed change would not change the design configuration or function of the permanently installed EDG FOSTs. The changes to TS 3.7 and its bases in describing the physical location of the EDG FOSTs will not alter the required design criteria of these tanks nor their ability to withstand the effects of a tornado. These changes will not reduce the ability of the EDG's in meeting their design requirements of providing emergency power towards mitigating an accident. The intent of these changes is to permit the potential use of a temporary above ground FOST(s) to supply the EDGs and to fulfill the intent and requirements of the present EDG fuel oil storage system while allowing for maintenance on an EDG FOST. The 10CFR50.59 change process will be used to determine this potential modification acceptability. The intent of the temporary configuration of an above ground FOST would be to maintain the fuel oil system and EDG operable. The associated changes to the Bases section of TS 3.7 provide additional clarification of the "underground" nature of the EDG FOSTs. Neither the changes to the LCO in describing the EDG FOSTs (whether the normal underground tanks or any temporary above ground FOSTs) nor any changes to the TS Bases (which do not alter the design or operation of the EDG fuel oil transfer system) will affect the ability of the EDGs to provide the necessary power for operation of equipment required for mitigating previously analyzed accident scenarios. No plant features, or FSAR description of such, are being altered in conjunction with this change, and future changes would be evaluated under 10CFR50.59. Therefore, the proposed changes will not result in an unanalyzed condition and does not create the possibility of a new or different type of accident from any accident previously evaluated.

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

No. The proposed changes will not alter any assumptions, initial conditions, or the results of any accident analyses. The design and licensing requirements for the EDG fuel oil storage system are defined in other parts of the IP3 licensing and design basis, specifically in FSAR section 8.2. Potential modifications supported by this change would require a subsequent safety evaluation in accordance with 10CFR50.59 regarding the design requirements (e.g., fire loads, tornadic wind loads, tornado missile criteria, security, etc.) for an alternate FOST if repairs to present "underground" FOSTs are undertaken. The proper design criteria for the presently installed EDG FOSTs or for potential, alternate EDG FOSTs will be maintained via present licensing and design basis requirements and through the 10CFR50.59 change process as required. No plant features are being altered in conjunction with this change, and future changes would be evaluated under 10CFR50.59. Therefore, this proposed license amendment will not involve a significant reduction in the margin of safety.

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Section IV - Impact of Changes

These changes will not adversely impact the following:

1. ALARA Program
2. Security and Fire Protection Programs
3. Emergency Plan
4. FSAR or Safety Evaluation Report (SER) Conclusions
5. Overall Plant Operations and the Environment

Section V - Conclusions

The incorporation of these changes: a) will not significantly increase the probability nor the consequences of an accident or malfunction of equipment important to safety as previously evaluated in the Safety Analysis Report; b) will not create the possibility for an accident or malfunction of a different type than any evaluated previously in the Safety Analysis Report; c) will not reduce the margin of safety as defined in the Bases for any Technical Specification; and d) involves no significant hazards considerations as defined in 10CFR50.92.

Section VI - References

1. Indian Point 3 Updated Final Safety Analysis Report, dated December 1997.
2. NRC NUREG-1431, "Standard Technical Specifications - Westinghouse Plants," Revision 1, dated April 1995.
3. NRC Standard Review Plan, NUREG 0800, Section 9.5.4, "Emergency Diesel Engine Fuel Oil Storage and Transfer System", Revision 2, dated July 1981.
4. ANSI N195-1976, "American National Standard Fuel Oil Systems for Standby Diesel Generators, dated April 12, 1976.
5. NYPA Procedure RE-CA-045, "Fuel Inspection, No. 2 Diesel Fuel Oil", Revision 12, dated November 25, 1997.

ATTACHMENT III TO IPN-99-035

**MARK-UP OF TECHNICAL SPECIFICATION PAGES
FOR THE PROPOSED CHANGES TO TECHNICAL SPECIFICATION 3.7
REGARDING THE EMERGENCY DIESEL
GENERATOR FUEL OIL STORAGE TANKS**

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INDIAN POINT 3 NUCLEAR POWER PLANT
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 4. The four 480-volt buses 2A, 3A, 5A and 6A energized and the bus tie breakers between buses 5A and 2A, and between buses 3A and 6A, opened.
 5. Three diesel generators operable with a minimum onsite supply of 6671 gallons of fuel ~~in~~ for each of three ~~individual underground storage tanks~~ **diesel generators**. In addition, ~~to the underground storage tanks,~~ 30,026 gallons of fuel compatible for operation with the diesels shall be available onsite or at the Buchanan substation. This 30,026 gallon reserve is for Indian Point Unit No. 3 usage only **and is in addition to the fuel requirements for other nuclear units on site.**

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4. Two operable diesel generators together with total underground storage containing a minimum of 6671 gallons of fuel.
- G. When a system, subsystem, train, component or device is determined to be inoperable solely because its emergency power source is inoperable, or solely because its normal power source is inoperable, it may be considered operable for the purpose of satisfying the requirements of its applicable specification provided: (1) its corresponding normal or emergency power source is operable; and (2) all of its redundant system(s), subsystem(s), train(s), components(s) and device(s) are operable or likewise satisfy the requirements of the specification.

Basis

The electrical system equipment is arranged so that no single contingency can inactivate enough safeguards equipment to jeopardize the plant safety.

The 480-volt equipment is arranged on 4 buses. The 6900-volt equipment is supplied from 6 buses.

The Buchanan Substation has both 345 KV and 138 KV transmission circuits which are capable of supplying startup, normal operation, shutdown and/or engineered safeguards loads.

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In addition to the unit transformer, four separate sources supply station service power to the plant.⁽¹⁾

The plant auxiliary equipment is arranged electrically so that multiple items receive their power from different buses. Redundant valves are individually supplied from separate motor control centers.

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