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August 31, 2012



Docket Nos.: 50-424
50-425

NL-12-1002

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

Vogtle Electric Generating Plant, Units 1 and 2
License Amendment Request for Incorporation of Previously NRC Approved
Technical Specification Task Force (TSTF) Standard Technical Specification
Change Traveler TSTF-439-A, Revision 2, "Eliminate Second Completion
Times Limiting Time from Discovery of Failure to Meet an LCO" and
Administrative Revision to Technical Specification 3.6.6

Ladies and Gentlemen:

In accordance with the provisions of Title 10, Part 50, Section 90 of the Code of Federal Regulations (10 CFR 50.90), Southern Nuclear Operating Company (SNC) is submitting a request for an amendment to the Technical Specifications (TSs) for Vogtle Electric Generating Plant (VEGP), Units 1 and 2.

This License Amendment Request (LAR) proposes to revise VEGP TSs 3.6.6, 3.7.5, 3.8.1, 3.8.9, and TS Example 1.3-3 by eliminating second Completion Times from the TSs. These changes are consistent with NRC-approved Industry/Technical Specification Task Force (TSTF) Traveler TSTF-439-A, Revision 2, "Eliminate Second Completion Times Limiting Time from Discovery of Failure to Meet an LCO," dated June 20, 2005 [Agencywide Documents Access and Management System (ADAMS) Accession Number ML051860296].

Additionally, the proposed LAR will make an administrative revision to TS 3.6.6 by removing an obsolete note associated with Condition 3.6.6.A.

Enclosure 1 provides a description of the proposed changes and the requested confirmation of applicability associated with TSTF-439-A. Enclosure 2 provides the existing VEGP Units 1 and 2 TS and TS Bases pages marked up to show the proposed changes. Enclosure 3 provides revised, clean-typed pages for the VEGP Units 1 and 2 TSs.

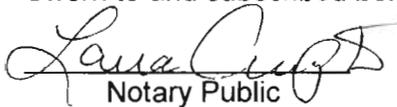
SNC requests approval of the proposed LAR by August 31, 2013 with the amendment being implemented within 90 days of issuance of the amendment.

In accordance with 10 CFR 50.91, a copy of this LAR with enclosures is being provided to the designated Georgia State Officials.

There are no NRC commitments contained in this letter. If you have any questions, please contact Lesa Hill at (205) 992-5727.

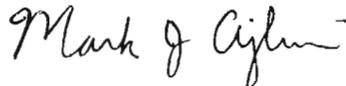
Mr. Ajluni states he is Nuclear Licensing Director of Southern Nuclear Operating Company, is authorized to execute this oath on behalf of Southern Nuclear Operating Company and, to the best of his knowledge and belief, the facts set forth in this letter are true.

Sworn to and subscribed before me this 31st day of August, 2012.


Notary Public

My commission expires: 11-02-2013

Respectfully submitted,



M. J. Ajluni
Nuclear Licensing Director

MJA/EGA/lac

- Enclosures:
1. Basis for Proposed Change – Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler TSTF-439-A and Administrative Revision to Technical Specification 3.6.6
 2. Technical Specifications and Technical Specifications Bases Marked-Up Pages
 3. Technical Specifications Clean-Typed Pages

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cc: Southern Nuclear Operating Company
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Mr. D. G. Bost, Executive Vice President & Chief Nuclear Officer
Mr. T. E. Tynan, Vice President – Vogtle
Mr. B. L. Ivey, Vice President – Regulatory Affairs
Mr. B. J. Adams, Vice President – Fleet Operations
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U. S. Nuclear Regulatory Commission
Mr. V. M. McCree, Regional Administrator
Mr. R. E. Martin, NRR Senior Project Manager - Vogtle
Mr. L. M. Cain, Senior Resident Inspector – Vogtle
Mr. M. O. Miller, Senior Project Engineer, NRC Region II

State of Georgia
Mr. J. H. Turner, Environmental Director Protection Division

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Enclosure 1

**Basis for Proposed Change – Technical Specification Task Force (TSTF)
Standard Technical Specification Change Traveler TSTF-439-A and
Administrative Revision to Technical Specification 3.6.6**

Enclosure 1 to NL-12-1002
Basis for Proposed Change

Table of Contents

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1. Summary Description

Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler TSTF-439-A, Revision 2, modifies the Vogtle Electric Generating Plant (VEGP) Technical Specification (TS) Completion Times Example 1.3-3 to eliminate the second completion times and to replace the discussion regarding second Completion Times with a new discussion. The second Completion Times associated with TS 3.6.6 Required Actions (RAs) A.1 and B.1, TS 3.7.5 RAs A.1 and B.1, TS 3.8.1 RA A.3, and TS 3.8.9 RAs A.1, B.1, and C.1 are being deleted. The TS Bases associated with these RAs are also being revised to delete the discussion of the second Completion Time.

Additionally, the proposed change addresses an administrative change to TS 3.6.6. There is a note associated with Condition 3.6.6.A that is obsolete, so it is being deleted. The time constraints on this note are no longer applicable. There are no TS Bases changes required for this deletion.

2. Detailed Description

TS Example 1.3-3 is revised to eliminate the second Completion Times and to replace the discussion regarding second Completion Times with the following:

"It is possible to alternate between Conditions A, B, and C in such a manner that operation could continue indefinitely without ever restoring systems to meet the LCO. However, doing so would be inconsistent with the basis of the Completion Times. Therefore, there shall be administrative controls to limit the maximum time allowed for any combination of Conditions that result in a single contiguous occurrence of failing to meet the LCO. These administrative controls shall ensure that the Completion Times for those Conditions are not inappropriately extended."

A second Completion Time is included for certain Conditions/Required Actions to establish a limit on the maximum time allowed for any combination of Conditions that result in a single contiguous failure to meet the Limiting Condition for Operation (LCO).

These second Completion Times are joined by an "AND" logical connector to the Condition specific Completion Time and state "X hours/days from discovery of failure to meet the LCO."

The second Completion Times associated with TS 3.6.6 RAs A.1 and B.1, TS 3.7.5 RAs A.1 and B.1, TS 3.8.1 RA A.3, and TS 3.8.9 RAs A.1, B.1, and C.1 are being deleted.

It is proposed to revise VEGP TS Section 1.3 to conform to the above changes. Additionally, the TS Bases pages are revised in accordance with the TSTF to conform to the changes in TS 1.3. There is one deviation from the TSTF. The change to Condition 3.8.1.B in TSTF 439-A, Revision 2, will

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Basis for Proposed Change

not be adopted in this license amendment request. The markup of pages for VEGP Units 1 and 2 TSs and TS Bases are included in Enclosure 2.

The administrative change requested by this amendment is to delete the note from TS RA 3.6.6.A, which states, "For the VEGP Unit 2 June 23, 2008 entry into Technical Specification 3.6.6, the Containment Spray Pump B may be inoperable for a period not to exceed 7 days"

3. Technical Evaluation

TSTF-439-A, Revision 2: As discussed in TSTF-439-A, Revision 2, the adoption of a second Completion Time was based on a NRC concern that a plant could continue to operate indefinitely with a LCO governing safety significant systems never being met by alternately meeting the requirements of separate Conditions. In 1991, the NRC could not identify any regulatory requirement or program which could prevent this misuse of the Technical Specifications. However, that is no longer the case. There are now two programs which would provide a strong disincentive to continued operation with concurrent multiple inoperabilities of the type the second Completion Times were designed to prevent.

The Maintenance Rule: 10 CFR 50.65(a)(1), the Maintenance Rule, requires each licensee to monitor the performance or condition of SSCs against licensee-established goals to ensure that the SSCs are capable of fulfilling their intended functions. If the performance or condition of an SSC does not meet established goals, appropriate corrective action is required to be taken. The NRC Resident Inspectors monitor the licensee's Corrective Action process and could take action if the licensee's maintenance program allowed the systems required by a single LCO to become concurrently inoperable multiple times. The performance and condition monitoring activities required by 10 CFR 50.65(a)(1) and (a)(2) would identify if poor maintenance practices resulted in multiple entries into the ACTIONS of the Technical Specifications and unacceptable unavailability of these SSCs. The effectiveness of these performance monitoring activities, and associated corrective actions, is evaluated at least every refueling cycle, not to exceed 24 months per 10 CFR 50.65(a)(3).

Under the Technical Specifications, the Completion Time for one system is not affected by other inoperable equipment. The second Completion Times were an attempt to influence the Completion Time for one system based on the condition of another system, if the two systems were required by the same LCO. However 10 CFR 50.65(a)(4) is a much better mechanism to apply this influence as the Maintenance Rule considers all inoperable risk-significant equipment, not just the one or two systems governed by the same LCO.

Under 10 CFR 50.65(a)(4), the risk impact of all inoperable risk-significant equipment is assessed and managed when performing preventative or corrective maintenance. The risk assessments are conducted using the procedures and guidance endorsed by Regulatory Guide 1.182, "Assessing and Managing Risk before Maintenance Activities at Nuclear Power Plants."

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Basis for Proposed Change

Regulatory Guide 1.182 endorses the guidance in Section 11 of NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." These documents address general guidance for conduct of the risk assessment, quantitative and qualitative guidelines for establishing risk management actions, and example risk management actions. These include actions to plan and conduct other activities in a manner that controls overall risk, increased risk awareness by shift and management personnel, actions to reduce the duration of the condition, actions to minimize the magnitude of risk increases (establishment of backup success paths or compensatory measures), and determination that the proposed maintenance is acceptable. This comprehensive program provides much greater assurance of safe plant operation than the second Completion Times in the Technical Specifications.

The Reactor Oversight Process: NEI 99-02, "Regulatory Assessment Performance Indicator Guideline," describes the tracking and reporting of performance indicators to support the NRC's Reactor Oversight Process (ROP). The NEI document is endorsed by RIS 2001-11, "Voluntary Submission of Performance Indicator Data." NEI 99-02, Section 2.2, describes the Mitigating Systems Cornerstone. NEI 99-02 specifically addresses emergency AC Sources (which encompasses the AC Sources and Distribution System LCOs). Extended unavailability due to multiple entries into the ACTIONS would affect the NRC's evaluation of the licensee's performance under the ROP.

In addition to these programs, a requirement is added to Section 1.3 of the Technical Specifications to require licensees to have administrative controls to limit the maximum time allowed for any combination of Conditions that result in a single contiguous occurrence of failing to meet the LCO. These administrative controls should consider plant risk and shall limit the maximum contiguous time of failing to meet the LCO. This TS requirement, when considered with the regulatory processes discussed above, provides an equivalent or superior level of plant safety without the unnecessary complication of the TSs by second Completion Times on some Specifications.

Administrative Revision: TS Condition 3.6.6.A was modified via a one-time emergency TS change for a specific date of entry, June 23, 2008. As a result of the completed work on the system, it is no longer necessary to retain the note in TS 3.6.6.

This note was added to TS 3.6.6 via Amendment Number 131 to the VEGP Unit 2 TS, which was issued by the NRC in "Vogtle Electric Generating Plant, Unit 2, Issuance of Emergency Amendment Regarding One-Time Extension to Allowed Outage time for Technical Specification 3.6.6 (TAC No. MD9003)" on June 25, 2008 – Agency Wide Documents Access and Management System (ADAMS) Accession Number ML081770464.

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This note expired when the June 23, 2008 entry into TS 3.6.6 was exited, and it is no longer necessary to retain it at the bottom of page 3.6.6-1 of the TS. Therefore, this change is considered administrative.

4. Regulatory Evaluation:

4.1. Significant hazards Consideration

SNC 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 amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The change proposed by incorporating TSTF-439-A, Revision 2, eliminates certain Completion Times from the Technical Specifications. Completion Times are not an initiator to any accident previously evaluated. As a result, the probability of an accident previously evaluated is not affected. The consequences of an accident during the revised Completion Time are no different than the consequences of the same accident during the existing Completion Times. As a result, the consequences of an accident previously evaluated are not affected by this change. The proposed change does not alter or prevent the ability of structures, systems, and components (SSCs) from performing their intended function to mitigate the consequences of an initiating event within the assumed acceptance limits.

The proposed change described above does not affect the source term, containment isolation, or radiological release assumptions used in evaluating the radiological consequences of an accident previously evaluated. Further, the proposed change does not increase the types or amounts of radioactive effluent that may be released offsite, nor significantly increase individual or cumulative occupational/public radiation exposures. The proposed change is consistent with the safety analysis assumptions and resultant consequences. Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

Additionally, the proposed change to delete the note from TS Condition 3.6.6.A is administrative in nature and does not impact the operation, physical configuration, or function of plant structures systems, or components (SSCs). The proposed change does not impact the initiators or assumptions of analyzed events, nor does the proposed change impact the mitigation of accidents or

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transient events. Therefore, this proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

Response: No.

The proposed changes do not involve a physical alteration of the plant (i.e. no new or different type of equipment will be installed) or a change in the methods governing normal plant operation. The proposed changes do not alter any assumptions made in the safety analysis. Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

Response: No.

The proposed change to delete the second Completion Time does not alter the manner in which safety limits, limiting safety system settings or limiting conditions for operation are determined. The safety analysis acceptance criteria are not affected by this change. The proposed change will not result in plant operation in a configuration outside of the design basis. Therefore, the proposed change does not involve a significant reduction in a margin of safety.

The proposed change to delete the note from TS Condition 3.6.6.A is administrative in nature and does not involve any physical changes to plant SSCs, or the manner in which SSCs are operated, maintained, modified, tested, or inspected. The proposed change does not involve a change to any safety limits, limiting safety system settings, limiting conditions of operation, or design parameters for any SSC. The proposed change does not impact any safety analysis assumptions and do not involve a change in initial conditions, system response times, or other parameters affecting any accident analysis. The proposed change will not result in plant operation in a configuration outside of the design basis. Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, SNC concludes that the proposed amendment does not involve a 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.

4.2. Applicable Regulatory Requirements/Criteria

10 CFR 50.36, "Technical Specifications" - 10 CFR 50.36(c)(2) states, "When a limiting condition for operation of a nuclear reactor is not met, the licensee shall shut down the reactor or follow any remedial action permitted by the technical specifications until the condition can be met." The proposed change continues to meet the requirements of this regulation.

10 CFR 50.65, "Requirements for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants" - The overall objective of this performance-based rule is to ensure that nuclear power plant structures, systems, and components (SSCs) will be maintained so that they will perform their intended function when required.

4.3. Precedent

TSTF-439-A, Revision 2 was approved for use as described in the following letter:

1. Letter from J. D. Hughey (U. S. Nuclear Regulatory Commission) to M. J. Pacilio (Exelon Nuclear), "Peach Bottom Atomic Power Station, Units 2 And 3 -Issuance Of Amendments Re: Adoption Of Technical Specification Task Force (TSTF) Traveler 439, Revision 2, 'Eliminate Second Completion Times Limiting Time From Discovery of Failure To Meet An LCO (Limiting Condition For Operation),' (TAC NOS. MD9449 AND MD9450)," dated July 30, 2010.

4.4. Conclusions

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. Environmental Consideration

SNC has evaluated the proposed amendment and has determined that 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 effluents 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.

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6. References

1. Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change TSTF-439, Revision 2, "Eliminate Second Completion Time From Discovery of Failure To Meet an LCO," June 20, 2005.
2. NRC Letter dated January 11, 2006, to the Technical Specification Task Force regarding "Status of TSTF 439, 'Eliminate Second Completion Times Limiting Time from Discovery of Failure to Meet an LCO'."
3. Letter from J. D. Hughey (U. S. Nuclear Regulatory Commission) to M. J. Pacilio (Exelon Nuclear), "Peach Bottom Atomic Power Station, Units 2 And 3 -Issuance Of Amendments Re: Adoption Of Technical Specification Task Force (TSTF) Traveler 439, Revision 2, 'Eliminate Second Completion Times Limiting Time From Discovery of Failure To Meet An LCO (Limiting Condition For Operation),' (TAC NOS. MD9449 AND MD9450)," dated July 30, 2010.
4. Letter from R. A. Jervey (U. S. Nuclear Regulatory Commission) to T. E. Tynan (Southern Nuclear Operating Company), "Vogtle Electric Generating Plant, Unit 2, Issuance of Emergency Amendment Regarding One-Time Extension to Allowed Outage time for Technical Specification 3.6.6 (TAC No. MD9003)" dated June 25, 2008.

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Enclosure 2

**Technical Specifications and Technical Specification Bases
Marked-Up Pages**

1.3 Completion Times

DESCRIPTION
(continued)

However, when a subsequent train, subsystem, component, or variable expressed in the Condition is discovered to be inoperable or not within limits, the Completion Time(s) may be extended. To apply this Completion Time extension, two criteria must first be met. The subsequent inoperability:

- a. Must exist concurrent with the first inoperability; and
- b. Must remain inoperable or not within limits after the first inoperability is resolved.

The total Completion Time allowed for completing a Required Action to address the subsequent inoperability shall be limited to the more restrictive of either:

- a. The stated Completion Time, as measured from the initial entry into the Condition, plus an additional 24 hours; or
- b. The stated Completion Time as measured from discovery of the subsequent inoperability.

The above Completion Time extensions do not apply to those Specifications that have exceptions that allow completely separate re-entry into the Condition (for each train, subsystem, component, or variable expressed in the Condition) and separate tracking of Completion Times based on this re-entry. These exceptions are stated in individual Specifications.

The above Completion Time extension does not apply to a Completion Time with a modified "time zero." This modified "time zero" may be expressed as a repetitive time (i.e., "once per 8 hours," where the Completion Time is referenced from a previous completion of the Required Action versus the time of Condition entry) or as a time modified by the phrase "from discovery . . ." Example 1.3-3 illustrates one use of this type of Completion Time. The 10 day Completion Time specified for Conditions A and B in Example 1.3-3 may not be extended.

(continued)

1.3 Completion Times

EXAMPLES
(continued)

EXAMPLE 1.3-3 MULTIPLE FUNCTION COMPLETION TIMES/
SEPARATE COMPLETION TIMES

ACTIONS

| CONDITION | REQUIRED ACTION | COMPLETION TIME |
|---|---|---|
| A. One Function X train inoperable. | A.1 Restore Function X train to OPERABLE status. | 7 days <u>AND</u> 10 days from discovery of failure to meet the LCO |
| B. One Function Y train inoperable. | B.1 Restore Function Y train To OPERABLE Status. | 72 hours <u>AND</u> 10 days from discovery of failure to meet the LCO |
| C. One Function X train inoperable. <u>AND</u> One Function Y train inoperable. | C.1 Restore Function X train To OPERABLE Status. <u>OR</u> C.2 Restore Function Y train To OPERABLE Status. | 72 hours 72 hours |

(continued)

1.3 Completion Times

EXAMPLES

EXAMPLE 1.3-3 (continued)

When one Function X train and one Function Y train are inoperable, Condition A and Condition B are concurrently applicable. The Completion Times for Condition A and Condition B are tracked separately for each train starting from the time each train was declared inoperable and the Condition was entered. A separate Completion Time is established for Condition C and tracked from the time the second train was declared inoperable (i.e., the time the situation described in Condition C was discovered).

If Required Action C.2 is completed within the specified Completion Time, Conditions B and C are exited. If the Completion Time for Required Action A.1 has not expired, operation may continue in accordance with Condition A. The remaining Completion Time in Condition A is measured

from the time the affected train was declared inoperable (i.e., initial entry into Condition A).

~~The Completion Times of Conditions A and B are modified by a logical connector with a separate 10 day Completion Time measured from the time it was discovered the LCO was not met. In this example, without the separate Completion Time, it would be possible to alternate between Conditions A, B, and C in such a manner that operation could continue indefinitely without ever restoring systems to meet the LCO. The separate Completion Time modified by the phrase "from discovery of failure to meet the LCO" is designed to prevent indefinite continued operation while not meeting the LCO. This Completion Time allows for an exception to the normal "time-zero" for beginning the Completion Time "clock." In this instance, the Completion Time "time-zero" is specified as commencing at the time the LCO was initially not met, instead of at the time the associated Condition was entered.~~

INSERT →

(continued)

INSERT

It is possible to alternate between Conditions A, B, and C in such a manner that operation could continue indefinitely without ever restoring systems to meet the LCO. However, doing so would be inconsistent with the basis of the Completion Times. Therefore, there shall be administrative controls to limit the maximum time allowed for any combination of Conditions that result in a single contiguous occurrence of failing to meet the LCO. These administrative controls shall ensure that the Completion Times for those Conditions are not inappropriately extended.

3.6 CONTAINMENT SYSTEMS

3.6.6 Containment Spray and Cooling Systems

LCO 3.6.6 Two containment spray trains and two containment cooling trains shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTIONS

| CONDITION | REQUIRED ACTION | COMPLETION TIME |
|--|---|--|
| A. One containment spray train inoperable. | A.1 Restore containment spray train to OPERABLE status. | 72 hours* <u>AND</u> 6 days from discovery of failure to meet the LCO* |
| B. One containment cooling train inoperable. | B.1 Restore containment cooling train to OPERABLE status. | 72 hours <u>AND</u> 6 days from discovery of failure to meet the LCO |
| C. Required Action and associated Completion Time not met. | C.1 Be in MODE 3. <u>AND</u> C.2 Be in MODE 5. | 6 hours 84 hours |

* For the VEGP Unit 2 June 23, 2008 entry into Technical Specification 3.6.6, the Containment Spray Pump B may be inoperable for a period not to exceed 7 days.

3.7 PLANT SYSTEMS

3.7.5 Auxiliary Feedwater (AFW) System

LCO 3.7.5 Three AFW trains shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

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

| CONDITION | REQUIRED ACTION | COMPLETION TIME |
|--|---|---|
| <p>A. One steam supply to turbine driven AFW pump inoperable.</p> | <p>A.1 Restore steam supply to OPERABLE status.</p> | <p>7 days</p> <div style="border: 1px solid black; padding: 5px;"> <p>AND</p> <p>10 days from discovery of failure to meet the LCO</p> </div> |
| <p>B. One AFW train inoperable for reasons other than Condition A.</p> | <p>B.1 Restore AFW train to OPERABLE status.</p> | <p>72 hours</p> <div style="border: 1px solid black; padding: 5px;"> <p>AND</p> <p>10 days from discovery of failure to meet the LCO</p> </div> |

(continued)

ACTIONS

| CONDITION | REQUIRED ACTION | COMPLETION TIME |
|----------------|--|---|
| A. (continued) | A.2 Declare required feature(s) with no offsite power available inoperable when its redundant required feature(s) is inoperable. | 24 hours from discovery of no offsite power to one train concurrent with inoperability of redundant required feature(s) |
| | <p style="text-align: center;"><u>AND</u></p> A.3 Restore required offsite circuit to OPERABLE status. | 72 hours <div style="border: 1px solid black; padding: 5px; width: fit-content;"> <p style="text-align: center;"><u>AND</u></p> 14 days from discovery of failure to meet LCO </div> |

(continued)

3.8 ELECTRICAL POWER SYSTEMS

3.8.9 Distribution Systems – Operating

LCO 3.8.9 The required AC, DC, and AC vital bus electrical power distribution subsystems shall be OPERABLE.

-----NOTE-----
 The redundant emergency buses of 4160 V switchgear 1/2AAO2 and 1/2BAO3 may be manually connected within the unit by tie breakers in order to allow transfer of preferred offsite power sources provided SR 3.8.1.1 is successfully performed within 12 hours prior to the interconnection. The interconnection shall be implemented without adversely impacting the ability to simultaneously sequence both trains of LOCA loads.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTIONS

| CONDITION | REQUIRED ACTION | COMPLETION TIME |
|--|---|--|
| A. One or more AC electrical power distribution subsystems inoperable. | A.1 Restore AC electrical power distribution subsystems to OPERABLE status. | 8 hours <div style="border: 1px solid black; padding: 5px;"> <u>AND</u> 16 hours from discovery of failure to meet LCO </div> |
| B. One or more AC vital bus electrical power distribution subsystems inoperable. | B.1 Restore AC vital bus electrical power distribution subsystems to OPERABLE status. | 2 hours <div style="border: 1px solid black; padding: 5px;"> <u>AND</u> 16 hours from discovery of failure to meet LCO </div> |

(continued)

ACTIONS (continued)

| CONDITION | REQUIRED ACTION | COMPLETION TIME |
|---|---|--|
| C. One or more DC electrical power distribution subsystems inoperable. | C.1 Restore DC electrical power distribution subsystems to OPERABLE status. | 2 hours <div style="border: 1px solid black; padding: 2px;"><u>AND</u> 16 hours from discovery of failure to meet LCO</div> |
| D. Required Action and associated Completion Time not met. | D.1 Be in MODE 3. <u>AND</u> D.2 Be in MODE 5. | 6 hours 36 hours |
| E. Two or more electrical power distribution subsystems inoperable that result in a loss of function. | E.1 Enter LCO 3.0.3. | Immediately |

SURVEILLANCE REQUIREMENTS

| SURVEILLANCE | FREQUENCY |
|---|---|
| SR 3.8.9.1 Verify correct breaker alignments and voltage to required AC, DC, and AC vital bus electrical power distribution subsystems. | In accordance with the Surveillance Frequency Control Program |

BASES

APPLICABILITY
(continued)

In MODES 5 and 6, the probability and consequences of these events are reduced due to the pressure and temperature limitations of these MODES. Thus, the Containment Spray System and the Containment Cooling System are not required to be OPERABLE in MODES 5 and 6.

ACTIONS

A.1

With one containment spray train inoperable, the inoperable containment spray train must be restored to OPERABLE status within 72 hours. In this Condition, the remaining OPERABLE spray and cooling trains are adequate to perform the iodine removal and containment cooling functions. The 72 hour Completion Time takes into account the redundant heat removal capability afforded by the Containment Spray System, reasonable time for repairs, and low probability of a DBA occurring during this period.

~~The 6 day portion of the Completion Time for Required Action A.1 is based upon engineering judgment. It takes into account the low probability of coincident entry into two Conditions in this Specification coupled with the low probability of an accident occurring during this time. Refer to Section 1.3, "Completion Times," for a more detailed discussion of the purpose of the "from discovery of failure to meet the LCO" portion of the Completion Time.~~

B.1

With one of the required containment cooling trains inoperable, the inoperable required containment cooling train must be restored to OPERABLE status within 72 hours. The components in this degraded condition provide iodine removal capabilities and are capable of providing at least 100% of the heat removal needs. The 72 hour Completion Time was developed taking into account the redundant heat removal capabilities afforded by combinations of the Containment Spray System and Containment Cooling System, and the low probability of a DBA occurring during this period.

(continued)

BASES

ACTIONS

B.1 (continued)

~~The 6 day portion of the Completion Time for Required Action B.1 is based upon engineering judgment. It takes into account the low probability of coincident entry into two Conditions in this Specification coupled with the low probability of an accident occurring during this time. Refer to Section 1.3 for a more detailed discussion of the purpose of the "from discovery of failure to meet the LCO" portion of the Completion Time.~~

C.1 and C.2

If the inoperable containment spray or cooling train cannot be restored to OPERABLE status within the required Completion Time, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 6 hours and to MODE 5 within 84 hours. The allowed Completion Time of 6 hours is reasonable, based on operating experience, to reach MODE 3 from full power conditions in an orderly manner and without challenging plant systems. The extended interval to reach MODE 5 allows additional time for attempting restoration of the containment spray or cooling train and is reasonable when considering the driving force for a release of radioactive material from the Reactor Coolant System is reduced in MODE 3.

SURVEILLANCE
REQUIREMENTS

SR 3.6.6.1

Verifying the correct alignment for manual, power operated, and automatic valves in the containment spray flow path provides assurance that the proper flow paths will exist for Containment Spray System operation. This SR does not apply to valves that are locked, sealed, or otherwise secured in position, since these were verified to be in the correct position prior to locking, sealing, or securing. This SR does not require any testing or valve manipulation. Rather, it involves verification that those valves outside containment (only check valves are inside containment) and capable of potentially being mispositioned are in the correct position.

(continued)

BASES

APPLICABILITY
(continued)

In MODE 5 or 6, the steam generators are not normally used for heat removal, and the AFW System is not required.

ACTIONS

A Note prohibits the application of LCO 3.0.4b to an inoperable AFW train. There is an increased risk associated with an AFW train inoperable and the provisions of LCO 3.0.4b, which allow entry into a MODE or other specified condition in the Applicability with the LCO not met after performance of a risk assessment addressing inoperable systems and components, should not be applied in this circumstance.

A.1

If one of the two steam supplies to the turbine driven AFW train is inoperable, action must be taken to restore OPERABLE status within 7 days. The 7 day Completion Time is reasonable, based on the following reasons:

- a. The redundant OPERABLE steam supply to the turbine driven AFW pump;
- b. The availability of redundant OPERABLE motor driven AFW pumps; and
- c. The low probability of an event occurring that requires the inoperable steam supply to the turbine driven AFW pump.

~~The second Completion Time for Required Action A.1 establishes a limit on the maximum time allowed for any combination of Conditions to be inoperable during any continuous failure to meet this LCO.~~

~~The 10 day Completion Time provides a limitation time allowed in this specified Condition after discovery of failure to meet the LCO. This limit is considered reasonable for situations in which Conditions A and B are entered concurrently. The AND connector between 7 days and 10 days dictates that both Completion Times apply simultaneously, and the more restrictive must be met.~~

B.1

With one of the required AFW trains (pump or flow path) inoperable for reasons other than Condition A, action must be taken to restore OPERABLE status within 72 hours. This

(continued)

BASES

ACTIONS

B.1 (continued)

Condition includes the loss of two steam supply lines to the turbine driven AFW pump. The 72 hour Completion Time is reasonable, based on redundant capabilities afforded by the AFW System, time needed for repairs, and the low probability of a DBA occurring during this time period.

~~The second Completion Time for Required Action B.1 establishes a limit on the maximum time allowed for any combination of Conditions to be inoperable during any continuous failure to meet this LCO.~~

~~The 10 day Completion Time provides a limitation time allowed in this specified Condition after discovery of failure to meet the LCO. This limit is considered reasonable for situations in which Conditions A and B are entered concurrently. The AND connector between 72 hours and 10 days dictates that both Completion Times apply simultaneously, and the more restrictive must be met.~~

C.1 and C.2

When Required Action A.1 or B.1 cannot be completed within the required Completion Time, or if two AFW trains are inoperable, the unit must be placed in a MODE in which the LCO does not apply. To achieve this status, the unit must be placed in at least MODE 3 within 6 hours, and in MODE 4 within 12 hours.

The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems.

In MODE 4, AFW is not required since RHR is available.

D.1

If all three AFW trains are inoperable, the unit is in a seriously degraded condition with no safety related means for conducting a cooldown, and only limited means for conducting a cooldown with nonsafety related equipment. In such a condition, the unit should not be perturbed by any action, including a power change, that might result in a trip. The seriousness of this condition requires that action be started immediately to restore one AFW train to OPERABLE status.

(continued)

BASES

ACTIONS
(continued)

A.3

According to Regulatory Guide 1.93 (Ref. 6), operation may continue in Condition A for a period that should not exceed 72 hours. With one required offsite circuit inoperable, the reliability of the offsite system is degraded, and the potential for a loss of offsite power is increased, with attendant potential for a challenge to the unit safety systems. In this Condition, however, the remaining OPERABLE offsite circuit and DGs are adequate to supply electrical power to the onsite Class 1E Distribution System.

The 72 hour Completion Time takes into account the capacity and capability of the remaining AC sources, a reasonable time for repairs, and the low probability of a DBA occurring during this period.

~~The second Completion Time for Required Action A.3 establishes a limit on the maximum time allowed for any combination of required AG power sources to be inoperable during any single contiguous occurrence of failing to meet the LCO. If Condition A is entered while, for instance, a DG is inoperable and that DG is subsequently returned OPERABLE, the LCO may already have been not met for up to 11 days. This could lead to a total of 14 days, since initial failure to meet the LCO, to restore the offsite circuit. At this time, a DG could again become inoperable, the circuit restored OPERABLE, and an additional 72 hours, or 14 days depending on SAT availability, allowed prior to complete restoration of the LCO. The 14 day Completion Time provides a limit on the time allowed in a specified condition after discovery of failure to meet the LCO. This limit is considered reasonable for situations in which Conditions A and B are entered concurrently. The "AND" connector between the 72 hour and 14 day Completion Times means that both Completion Times apply simultaneously, and the more restrictive Completion Time must be met.~~

~~Tracking the 14 day Completion Time is a requirement for beginning the Completion Time "clock" that is in addition to the normal Completion Time requirements. With respect to the 14 day Completion Time, the "time zero" is specified as~~

(continued)

BASES

ACTIONS

A.3 (continued)

~~commencing at the time LCO 3.8.1 was initially not met, instead of at the time Condition A was entered. This results in the requirement when in this Condition to track the time elapsed from both the Condition A "time zero" and the "time zero" when LCO 3.8.1 was initially not met.~~

B.1

To ensure a highly reliable power source remains with an inoperable DG, it is necessary to verify the availability of the offsite circuits on a more frequent basis. Since the Required Action only specifies "perform," a failure of SR 3.8.1.1 acceptance criteria does not result in a Required Action being not met. However, if a circuit fails to pass SR 3.8.1.1, it is inoperable. Upon offsite circuit inoperability, additional Conditions and Required Actions must then be entered.

B.2

The 13.8/4.16 kV Standby Auxiliary Transformer (SAT) is a qualified offsite circuit that may be connected to the onsite Class 1E distribution system independently of the RATs and may be utilized to meet the LCO 3.8.1 requirements for an offsite circuit. Its availability permits an extension of the allowable out-of-service time for a DG to 14 days from the discovery of failure to meet LCO 3.8.1. The SAT is available when it is:

- Operable in accordance with plant procedures;
- Not already being applied to any of the four 4.16 kV ESF buses for Units 1 and 2 in accordance with Specification 3.8.1 as either an offsite source or to meet the requirements of an LCO 3.8.1 Condition; and,
- Not providing power to the other unit when that unit is in MODE 5 or 6 or defueled.

(continued)

BASES (continued)

ACTIONS

A.1

With one or more required AC buses, load centers, motor control centers, or distribution panels, except AC vital buses, inoperable, and the remaining AC electrical power distribution subsystems capable of supporting the minimum safety functions necessary to shut down the reactor and maintain it in a safe shutdown condition, assuming no single failure, the overall system reliability is reduced. A single failure in the remaining power distribution subsystems could result in the minimum required ESF functions not being supported. Therefore, the required AC buses, load centers, motor control centers, and distribution panels must be restored to OPERABLE status within 8 hours.

Condition A worst scenario is one train without AC power (i.e., no offsite power to the train and the associated DG inoperable). In this Condition, the unit is more vulnerable to a complete loss of AC power. The 8 hour time limit before requiring a unit shutdown in this Condition is acceptable because of:

- a. The potential for decreased safety if the unit operator's attention is diverted from the evaluations and actions necessary to restore power to the affected train, to the actions associated with taking the unit to shutdown within this time limit; and
- b. The potential for an event in conjunction with a single failure of a redundant component in the train with AC power.

~~The second Completion Time for Required Action A.1 establishes a limit on the maximum time allowed for any combination of required distribution subsystems to be inoperable during any single contiguous occurrence of failing to meet the LCO. If Condition A is entered while, for instance, a DC bus is inoperable and subsequently restored OPERABLE, the LCO may already have been not met for up to 2 hours. This could lead to a total of 10 hours, since initial failure of the LCO, to restore the AC distribution system. At this time, a DG circuit could again become inoperable, and AC distribution restored OPERABLE. This could continue indefinitely.~~

(continued)

BASES

ACTIONS

A.1 (continued)

The Completion Time allows for an exception to the normal "time zero" for beginning the allowed outage time "clock." This will result in establishing the "time zero" at the time the LCO was initially not met, instead of the time Condition A was entered. The 16 hour Completion Time is an acceptable limitation on this potential to fail to meet the LCO indefinitely.

B.1

With one or more AC vital buses inoperable and the remaining OPERABLE AC vital buses capable of supporting the minimum safety functions necessary to shut down the unit and maintain it in the safe shutdown condition, overall reliability is reduced. An additional single failure could result in the minimum required ESF functions not being supported. Therefore, the required AC vital buses must be restored to OPERABLE status within 2 hours by powering the bus from the associated inverter with DC power available to the inverter or the Class 1E regulating transformer.

Condition B represents one or more AC vital buses without power; potentially both the DC source and the associated AC source are nonfunctioning. In this situation, the unit is significantly more vulnerable to a complete loss of all noninterruptable power.

This 2 hour limit is more conservative than Completion Times allowed for the vast majority of components that are without adequate vital AC power. Taking exception to LCO 3.0.2 for components without adequate vital AC power, that would have the Required Action Completion Times shorter than 2 hours if declared inoperable, is acceptable because of:

- a. The potential for decreased safety by requiring a change in unit conditions (i.e., requiring a shutdown) and not allowing stable operations to continue;
- b. The potential for decreased safety by requiring entry into numerous Applicable Conditions and Required Actions for components without adequate vital AC power and not providing sufficient time for the operators to

(continued)

BASES

ACTIONS

B.1

b. (continued)

perform the necessary evaluations and actions for restoring power to the affected train; and

c. The potential for an event in conjunction with a single failure of a redundant component.

The 2 hour Completion Time takes into account the importance to safety of restoring the AC vital buses to OPERABLE status, the redundant capability afforded by the other OPERABLE vital buses, and the low probability of a DBA occurring during this period.

~~The second Completion Time for Required Action B.1 establishes a limit on the maximum allowed for any combination of required distribution subsystems to be inoperable during any single contiguous occurrence of failing to meet the LCO. If Condition B is entered while, for instance, an AC bus is inoperable and subsequently returned OPERABLE, the LCO may already have been not met for up to 8 hours. This could lead to a total of 10 hours, since initial failure of the LCO, to restore the vital bus distribution system. At this time, an AC train could again become inoperable, and vital bus distribution restored OPERABLE. This could continue indefinitely.~~

~~This Completion Time allows for an exception to the normal "time zero" for beginning the allowed outage time "clock." This will result in establishing the "time zero" at the time the LCO was initially not met, instead of the time Condition B was entered. The 16 hour Completion Time is an acceptable limitation on this potential to fail to meet the LCO indefinitely.~~

C.1

With one or more DC buses inoperable and the remaining DC electrical power distribution subsystems capable of supporting the minimum safety functions necessary to shut down the reactor and maintain it in a safe shutdown condition, assuming no single failure, the overall system reliability is reduced. A single failure in the remaining DC electrical power distribution subsystem could result in

(continued)

BASES

ACTIONS

C.1 (continued)

the minimum required ESF functions not being supported. Therefore, the required DC buses must be restored to OPERABLE status within 2 hours by powering the bus from the associated battery or charger.

Condition C represents one or more DC subsystems without adequate DC power; potentially both with the battery significantly degraded and the associated charger nonfunctioning. In this situation, the unit is significantly more vulnerable to a complete loss of all DC power.

This 2 hour limit is more conservative than Completion Times allowed for the vast majority of components that would be without power. Taking exception to LCO 3.0.2 for components without adequate DC power, which would have Required Action Completion Times shorter than 2 hours, is acceptable because of:

- a. The potential for decreased safety by requiring a change in unit conditions (i.e., requiring a shutdown) while allowing stable operations to continue;
- b. The potential for decreased safety by requiring entry into numerous applicable Conditions and Required Actions for components without DC power and not providing sufficient time for the operators to perform the necessary evaluations and actions for restoring power to the affected train; and
- c. The potential for an event in conjunction with a single failure of a redundant component.

The 2 hour Completion Time for DC buses is consistent with Regulatory Guide 1.93 (Ref. 3).

~~The second Completion Time for Required Action C.1 establishes a limit on the maximum time allowed for any combination of required distribution subsystems to be inoperable during any single contiguous occurrence of failing to meet the LCO. If Condition C is entered while, for instance, an AC bus is inoperable and subsequently~~

(continued)

BASES

ACTIONS

C.1 (continued)

~~returned OPERABLE, the LCO may already have been not met for up to 8 hours. This could lead to a total of 10 hours, since initial failure of the LCO, to restore the DC distribution system. At this time, an AG train could again become inoperable, and DC distribution restored OPERABLE. This could continue indefinitely.~~

~~This Completion Time allows for an exception to the normal "time zero" for beginning the allowed outage time "clock." This will result in establishing the "time zero" at the time the LCO was initially not met, instead of the time Condition C was entered. The 16 hour Completion Time is an acceptable limitation on this potential to fail to meet the LCO indefinitely.~~

D.1 and D.2

If the inoperable distribution subsystem cannot be restored to OPERABLE status within the required Completion Time, the unit must be brought to a MODE in which the LCO does not apply. To achieve this status, the unit must be brought to at least MODE 3 within 6 hours and to MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging plant systems.

E.1

With two or more electrical power distribution subsystems inoperable that result in a loss of safety function, vital functions for DBA mitigation would be compromised, and immediate plant shutdown in accordance with LCO 3.0.3 is required.

SURVEILLANCE
REQUIREMENTS

SR 3.8.9.1

This Surveillance verifies that the required AC, DC, and AC vital bus electrical power distribution systems are

(continued)

**Vogtle Electric Generating Plant, Units 1 and 2
License Amendment Request for Incorporation of Previously NRC Approved
Technical Specification Task Force (TSTF) Standard Technical Specification
Change Traveler TSTF-439-A, Revision 2, "Eliminate Second Completion
Times Limiting Time from Discovery of Failure to Meet an LCO" and
Administrative Revisions to Technical Specification 3.6.6**

Enclosure 3

Technical Specifications Clean-Typed Pages

1.3 Completion Times

DESCRIPTION
(continued)

However, when a subsequent train, subsystem, component, or variable expressed in the Condition is discovered to be inoperable or not within limits, the Completion Time(s) may be extended. To apply this Completion Time extension, two criteria must first be met. The subsequent inoperability:

- a. Must exist concurrent with the first inoperability; and
- b. Must remain inoperable or not within limits after the first inoperability is resolved.

The total Completion Time allowed for completing a Required Action to address the subsequent inoperability shall be limited to the more restrictive of either:

- a. The stated Completion Time, as measured from the initial entry into the Condition, plus an additional 24 hours; or
- b. The stated Completion Time as measured from discovery of the subsequent inoperability.

The above Completion Time extensions do not apply to those Specifications that have exceptions that allow completely separate re-entry into the Condition (for each train, subsystem, component, or variable expressed in the Condition) and separate tracking of Completion Times based on this re-entry. These exceptions are stated in individual Specifications.

The above Completion Time extension does not apply to a Completion Time with a modified "time zero." This modified "time zero" may be expressed as a repetitive time (i.e., "once per 8 hours," where the Completion Time is referenced from a previous completion of the Required Action versus the time of Condition entry) or as a time modified by the phrase "from discovery . . ."

(continued)

1.3 Completion Times

EXAMPLES
(continued)

EXAMPLE 1.3-3 MULTIPLE FUNCTION COMPLETION TIMES/
SEPARATE COMPLETION TIMES

ACTIONS

| CONDITION | REQUIRED ACTION | COMPLETION TIME |
|---|---|----------------------------------|
| A. One Function X train inoperable. | A.1 Restore Function X train to OPERABLE status. | 7 days |
| B. One Function Y train inoperable. | B.1 Restore Function Y train To OPERABLE Status. | 72 hours |
| C. One Function X train inoperable. <u>AND</u> One Function Y train inoperable. | C.1 Restore Function X train To OPERABLE Status. <u>OR</u> C.2 Restore Function Y train To OPERABLE Status. | 72 hours 72 hours |

(continued)

1.3 Completion Times

EXAMPLES

EXAMPLE 1.3-3 (continued)

When one Function X train and one Function Y train are inoperable, Condition A and Condition B are concurrently applicable. The Completion Times for Condition A and Condition B are tracked separately for each train starting from the time each train was declared inoperable and the Condition was entered. A separate Completion Time is established for Condition C and tracked from the time the second train was declared inoperable (i.e., the time the situation described in Condition C was discovered).

If Required Action C.2 is completed within the specified Completion Time, Conditions B and C are exited. If the Completion Time for Required Action A.1 has not expired, operation may continue in accordance with Condition A.

It is possible to alternate between Conditions A, B, and C in such a manner that operation could continue indefinitely without ever restoring systems to meet the LCO. However, doing so would be inconsistent with the basis of the Completion Times. Therefore, there shall be administrative controls to limit the maximum time allowed for any combination of Conditions that result in a single contiguous occurrence of failing to meet the LCO. These administrative controls shall ensure that the Completion Times for those Conditions are not inappropriately extended.

(continued)

3.6 CONTAINMENT SYSTEMS

3.6.6 Containment Spray and Cooling Systems

LCO 3.6.6 Two containment spray trains and two containment cooling trains shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTIONS

| CONDITION | REQUIRED ACTION | COMPLETION TIME |
|--|---|-----------------|
| A. One containment spray train inoperable. | A.1 Restore containment spray train to OPERABLE status. | 72 hours |
| B. One containment cooling train inoperable. | B.1 Restore containment cooling train to OPERABLE status. | 72 hours |
| C. Required Action and associated Completion Time not met. | C.1 Be in MODE 3. | 6 hours |
| | <u>AND</u> C.2 Be in MODE 5. | 84 hours |

3.7 PLANT SYSTEMS

3.7.5 Auxiliary Feedwater (AFW) System

LCO 3.7.5 Three AFW trains shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

-----NOTE-----
LCO 3.0.4b 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 |
| B. One AFW train inoperable for reasons other than Condition A. | B.1 Restore AFW train to OPERABLE status. | 72 hours |

(continued)

ACTIONS

| CONDITION | REQUIRED ACTION | COMPLETION TIME |
|----------------|---|--|
| A. (continued) | <p>A.2 Declare required feature(s) with no offsite power available inoperable when its redundant required feature(s) is inoperable.</p> <p><u>AND</u></p> <p>A.3 Restore required offsite circuit to OPERABLE status.</p> | <p>24 hours from discovery of no offsite power to one train concurrent with inoperability of redundant required feature(s)</p> <p>72 hours</p> |

(continued)

3.8 ELECTRICAL POWER SYSTEMS

3.8.9 Distribution Systems – Operating

LCO 3.8.9 The required AC, DC, and AC vital bus electrical power distribution subsystems shall be OPERABLE.

-----NOTE-----
 The redundant emergency buses of 4160 V switchgear 1/2AAO2 and 1/2BAO3 may be manually connected within the unit by tie breakers in order to allow transfer of preferred offsite power sources provided SR 3.8.1.1 is successfully performed within 12 hours prior to the interconnection. The interconnection shall be implemented without adversely impacting the ability to simultaneously sequence both trains of LOCA loads.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTIONS

| CONDITION | REQUIRED ACTION | COMPLETION TIME |
|--|---|-----------------|
| A. One or more AC electrical power distribution subsystems inoperable. | A.1 Restore AC electrical power distribution subsystems to OPERABLE status. | 8 hours |
| B. One or more AC vital bus electrical power distribution subsystems inoperable. | B.1 Restore AC vital bus electrical power distribution subsystems to OPERABLE status. | 2 hours |

(continued)

ACTIONS (continued)

| CONDITION | REQUIRED ACTION | COMPLETION TIME |
|---|---|-----------------|
| C. One or more DC electrical power distribution subsystems inoperable. | C.1 Restore DC electrical power distribution subsystems to OPERABLE status. | 2 hours |
| D. Required Action and associated Completion Time not met. | D.1 Be in MODE 3. | 6 hours |
| | <u>AND</u> D.2 Be in MODE 5. | 36 hours |
| E. Two or more electrical power distribution subsystems inoperable that result in a loss of function. | E.1 Enter LCO 3.0.3. | Immediately |

SURVEILLANCE REQUIREMENTS

| SURVEILLANCE | FREQUENCY |
|---|---|
| SR 3.8.9.1 Verify correct breaker alignments and voltage to required AC, DC, and AC vital bus electrical power distribution subsystems. | In accordance with the Surveillance Frequency Control Program |