Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

August 9, 1991

Dr. Thomas E. Murley, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Document Control Desk

Subject: Dresden Nuclear Power Station Units 2 and 3
Application for Amendment to
Facility Operating Licenses DPR-19 and DPR-25,
Appendix A, Technical Specifications
NRC Docket Nos. 50-237 and 50-249

Dr. Murley:

Pursuant to 10 CFR 50.90, Commonwealth Edison Company (CECo) proposes to amend Appendix A, Technical Specifications, of Facility Operating Licenses DPR-19 and DPR-25. The proposed amendment reflects CECo's efforts to upgrade Technical Specification Section 3/4.9 (Auxiliary Electrical Systems) as part of the Dresden Station Technical Specification Improvement Program. Additionally, the amendment proposes miscellaneous administrative changes to Technical Specification Sections 3/4.10.F (Spent Fuel Cask Handling), 3/4.11 (High Energy Piping Integrity), and 6.0 (Administrative Controls).

The proposed amendment request is provided in the following manner.

- Attachment 'A' provides a description of the amendment request.
- Attachment 'B' provides a summary of the proposed changes to the Technical Specifications.
- Attachment 'C' provides the marked-up Technical Specification pages with the requested changes.
- Attachment 'D' provides CECo's evaluation performed in accordance with 10 CFR 50.92(c), which confirms that no significant hazards consideration is involved.
- Attachment 'E' provides the Environmental Assessment.

The proposed amendment has been reviewed and approved by CECo On-Site and Off-Site Review committees in accordance with company procedures.

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To the best of my knowledge and belief, the statements contained herein are true and correct. In some respects these statements are not based on my personal knowledge, but obtained information furnished by other CECo employees, contract employees, and consultants. Such information has been reviewed in accordance with company practice, and I believe it to be reliable.

CECo is notifying the State of Illinois of this application for amendment by transmitting a copy of this letter and its attachments to the designated State Official.

Please contact this office should further information be required.

Respectfully,

Milton H. Richter

Milton H. Richter
Nuclear Licensing Administrator

Attachments: A - Description of Amendment Request
B - Summary of Proposed Changes
C - Proposed Changes to Technical Specification Pages
D - Evaluation of Significant Hazards Consideration
E - Environmental Assessment

cc: A.B. Davis - Regional Administrator, Region III
B.L. Siegel - NRR Project Manager
W.G. Rogers - Senior Resident Inspector, Dresden
Illinois Department of Nuclear Safety

Signed before me on this 9th day of August, 1991, by _____.
Notary Public

" OFFICIAL SEAL "
SANDRA C. LARA
NOTARY PUBLIC, STATE OF ILLINOIS
MY COMMISSION EXPIRES 6/25/94

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50-237 DRESDEN 2 CEC

PROPOSED CHANGE TO TECH SPECS RE EFFORTS TO UPGRADE AUX ELECTRICAL SYSTEMS

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ATTACHMENT A

DESCRIPTION OF PROPOSED AMENDMENT

INTRODUCTION

This proposed amendment to the Technical Specifications for Dresden Units 2 and 3 (Operating Licenses DPR-19 and DPR-25, respectively) is part of the Dresden Station Technical Specification Improvement Program. The amendment proposes to:

- restructure and reword Technical Specification Section 3/4.9 (Auxiliary Electrical Systems) to provide a clear and concise specification;

- clarify the diesel generator monthly operability test requirements in Technical Specification Section 3/4.9;

- revise the required alternate diesel generator operability verification (in Technical Specification Section 3/4.9) when making a diesel generator inoperable for the performance of planned preventive maintenance (or surveillance testing);

- remove specific limiting condition for operation (LCO) and surveillance requirements in Technical Specification Section 3/4.10.F (Spent Fuel Cask Handling) which are no longer applicable;

- remove Technical Specification Section 3/4.11 (High Energy Piping Integrity) which is no longer applicable;

- incorporate a recent title change for the Assistant Vice President (AVP) of Quality Programs and Assessment in Technical Specification Section 6.0 (Administrative Controls); and

- remove the Fire Protection Surveillance Requirements (4.12.A through 4.12.H), which were previously deleted in previous amendments, from the Table of Contents.

TECHNICAL SPECIFICATION SECTION 3/4.9

Technical Specification Section 3/4.9 provides the requirements for Dresden Station's Auxiliary Electrical Systems. These requirements provide assurance that an adequate supply of electrical power is available to the plant during operating and shutdown conditions. The equipment encompassed by this specification are the incoming (off-site) 138 kV and 345 kV transmission lines and associated switchgear, the station batteries, the emergency diesel generators, and the in-plant AC buses important to reactor safety.

Elements of the proposed amendment to Section 3/4.9 are: 1) the restructuring of Section 3/4.9 (which restructures and rewords the LCO statements to enhance clarity, restructures the surveillance requirements for consistency with the LCO statements, and incorporates surveillance requirements for the incoming (off-site) power lines as well as on-site buses important to safety); 2) the clarification of the diesel generator monthly operability surveillance requirement with respect

to equilibrium temperature conditions; and 3) the revision of the required alternate diesel generator operability verification when making a diesel generator inoperable for the performance of planned preventive maintenance or surveillance testing. The following provides details on the above elements of the proposed amendment to Section 3/4.9.

Restructuring of Section 3/4.9

Currently, Specification 3.9.A provides the operability requirements for specific electrical equipment needed prior to making the reactor critical. Specification 3.9.B provides the actions which must be taken in the event the electrical equipment operability requirements contained in Specification 3.9.A are not met during Hot Shutdown, Startup or Run conditions. In particular, Specification 3.9.B provides the required actions in the event: 1) one or both of the incoming (off-site) power lines is unavailable; 2) one of the two required diesel generators, and/or its associated safety bus, is inoperable; or 3) one of the two 125 V or 250 V battery systems is inoperable. Diesel fuel requirements for the diesel generators are presented in Specification 3.9.C, and Specification 3.9.D provides the diesel generator operability requirements during Cold Shutdown or Refueling conditions.

The current structure and wording in Specification 3.9.B does not provide for a clear and concise specification, and therefore can be subject to misinterpretation. Potential misinterpretations may occur as a result of:

- use of multiple "exception" clauses in Specification 3.9.B (shown below) when defining the applicable plant conditions and equipment availability requirements;

  "Except when the reactor is in the Cold Shutdown or Refueling modes with the head off, the availability of electric power shall be as specified in 3.9.A, except as specified in 3.9.B.1, 3.9.B.2, and 3.9.B.3."

- multiple equipment inoperability conditions within one LCO statement;

  LCO statement 3.9.B.1 addresses (in one paragraph) the provisions for continued operation when incoming (off-site) power is reduced to one line, or when there is a total loss of incoming (off-site) power.

- provisions for continued operation which are not consolidated in one LCO statement;

  The provisions for continued operation in the event one of the diesel generators, and/or its associated safety bus, is made or found inoperable are contained in two LCO statements (3.9.B.2.a and 3.9.B.2.c).

- provisions for continued operation which are not applicable.

  LCO statement 3.9.B.2.a refers to Specification 3.9.D for provisions for continued reactor operation in the event one of the diesel generators, and/or its associated safety bus, is made or found inoperable; however, Specification 3.9.D is only applicable during Cold Shutdown or Refueling conditions.

Interpretation of Specification 3.9.B has been unnecessarily burdensome on station personnel, and has resulted in operability demonstrations of the diesel generators which were not required. Therefore, the scope of this amendment encompasses a restructuring and rewording of various LCO statements of Specification 3.9 (as presented in Attachment 'B') in order to enhance clarity and reduce the potential for misinterpretation.

In conjunction with the proposed changes to the LCO statements, the surveillance requirements for the diesel generators and station batteries were relocated, for consistency, with their corresponding LCO statements (see proposed Surveillance Requirements 4.9.A.2 and 4.9.A.5). Additionally, new surveillance requirements are being proposed which verify the availability of the incoming (off-site) power lines, the status of the 4 kV and 480 volt essential safety buses, and the status of the 4 kV safety bus crosstie (see proposed Surveillance Requirements 4.9.A.1, 4.9.A.3 and 4.9.A.4).

A summary of the proposed changes to Technical Specification Section 3/4.9, and its associated bases, is presented in Attachment 'B' of this submittal. It should be noted that the restructuring of 3/4.9 does not reduce any equipment operability requirements or increase any associated allowable out of service times.

Diesel Generator Equilibrium Temperature

Surveillance Requirement 4.9.D.1 currently presents the monthly operability test requirements for the diesel generators. The surveillance requirement specifies that each diesel generator shall be started and loaded each month to demonstrate operational readiness, and that the duration of each surveillance test shall be sufficient to ensure that both the diesel engine and the generator have achieved equilibrium temperature conditions while full load output is maintained.

The generator units at Dresden Station are not equipped with instrumentation for the monitoring of stator temperature, which was not a standard feature by the manufacturer. Currently, the monthly operability surveillance requires full load to be maintained on the diesel generator for a minimum of one hour to achieve equilibrium temperature conditions prior to acquisition of data (e.g., cylinder head temperatures, diesel engine cooling water temperature, etc.) which verifies normal diesel engine performance. The time duration specified by the surveillance to achieve equilibrium temperature conditions for the diesel engine has been demonstrated by test, and exceeds the recommended timeframe (45 to 50 minutes) provided by the vendor. The current surveillance testing approach is consistent with monthly surveillance requirements in later BWR Technical Specifications which require the diesel generator to be loaded near rated capacity for a duration of at least 60 minutes to demonstrate operational readiness. Therefore, removal of the equilibrium temperature requirement for the generator as proposed in this amendment (see proposed Surveillance Requirement 4.9.A.2.a) will not prevent the intent of the surveillance requirement (i.e., the demonstration of operational readiness) from being met.

Operability Verification for Alternate Diesel Generator

Currently, LCO statement 3.9.B.2.a requires that in the event one of the diesel generators is made or found inoperable during Hot Shutdown, Startup or Run conditions, the alternate diesel generator must be demonstrated operable immediately. LCO statement 3.9.B.2.b does allow a diesel generator to be made inoperable for a period of 1-1/2 hours for the purposes of preventive maintenance; however, an operability demonstration on the alternate diesel generator is required prior to the performance of the maintenance activity. Therefore, a pre-planned, short duration diesel generator outage for the purposes of preventive maintenance currently results in an additional diesel generator operability demonstration (for the alternate diesel generator).

With the current LCO requirements, station implementation of an INPO (and vendor) recommended practice, intended to reduce the potential for damage to a diesel engine during starts, is impractical. In accordance with the recommended practice, a diesel generator would be manually rotated, or "barred", one revolution prior to each routine start, in order to check for fluid in the engine's cylinders. For personnel safety during this procedure, the automatic start capability of the diesel generator needs to be disabled (by isolating the air supply to the air start motors), thereby rendering the diesel generator inoperable. Consequently, implementation of this practice with the current Technical Specifications would result in an additional diesel generator operability demonstration (for the alternate diesel generator).

In the proposed amendment (proposed LCO statement 3.9.B.3.b), a diesel generator inoperability period of up to 1-1/2 hours is allowed for the purposes of conducting preventive maintenance or surveillance testing provided: 1) two incoming (off-site) lines are available; 2) the alternate diesel generator is operable; and 3) all core and containment cooling systems are operable. Since these pre-planned preventive maintenance or surveillance testing activities are unrelated to potential generic concerns, the operability verification for the alternate diesel generator will not be based on an operability demonstration. This operability verification approach is consistent with later BWR Technical Specifications and practices for pre-planned diesel generator outages for the purposes of preventive maintenance or testing. It should also be noted that in the event the diesel generator will be inoperable for greater than 1-1/2 hours, the alternate diesel generator is required to be demonstrated operable (proposed LCO statement 3.9.B.3.b.(5)).

The provisions in the proposed amendment (proposed LCO statement 3.9.B.3.b) ensure that adequate electrical sources and vital safety systems are available during the allowed diesel generator inoperability period.

SPENT FUEL CASK HANDLING

Technical Specification Section 3/4.10.F provides the operating provisions and surveillance requirements which govern spent fuel cask handling. Currently, LCO statement 3.10.F.3 contains interim operating restrictions for fuel cask handling which were applicable prior to August 30, 1976. Similarly, Surveillance Requirement 4.10.F.2 contains interim testing requirements for the reactor

building overhead crane handling system which were applicable prior to August 30, 1976. These operating restrictions and surveillance requirements were established because the overhead crane handling system had not yet been equipped with a redundant mechanical limit switch in the main hoist power circuit, an electrical interlock system to prevent crane travel in restricted areas, and a slow speed drive motor. The overhead crane handling system has subsequently been equipped with these features; therefore, this amendment request proposes to remove the interim operating restrictions (in LCO statement 3.10.F.3) and surveillance requirements (in Surveillance Requirement 4.10.F.2) which were applicable prior to August 30, 1976.

REMOVAL OF HIGH ENERGY LINE BREAK REQUIREMENTS

Technical Specification Section 3/4.11 (High Energy Piping Integrity) contains requirements to assure the integrity of specific sections of piping in high energy systems. These sections of high energy piping had the potential, in the event of failure, to inhibit safe plant shutdown. As indicated in LCO statement 3.11.2, the requirements of Section 3/4.11 were applicable on an interim basis until modifications, which would minimize the consequences from a line break in those specific sections of high energy piping, could be completed. These modifications were completed for Units 2 and 3 in 1978 and 1977, respectively. Since these modifications have been implemented, Technical Specification Section 3/4.11 is no longer applicable; therefore, this amendment request proposes to remove Technical Specification Section 3.4/11 and its associated bases section.

TITLE CHANGE FOR AVP QUALITY PROGRAMS AND ASSESSMENT

The proposed amendment revises Technical Specification Section 6.0 (Administrative Controls) to incorporate a title change within the Commonwealth Edison Company (CECo) corporate organization structure. This amendment is necessary to ensure that CECo's corporate organization structure is properly reflected in the Technical Specifications. The title of the Assistant Vice President (AVP) Quality Programs and Assessment has been modified to General Manager (GM) Quality Programs and Assessment. The change is administrative in nature and does not affect the scope or responsibility of the position; therefore, there is no change in the Off-Site corporate support to Dresden Station as a result of this change.

REMOVAL OF FIRE PROTECTION SURVEILLANCE REQUIREMENTS FROM TABLE OF CONTENTS

In accordance with the guidance provided by Generic Letters 86-10 and 88-12, Amendments 106 (DPR-19) and 101 (DPR-25) removed the Fire Protection Technical Specifications (3/4.12) for Units 2 and 3, respectively. The amendments inadvertently failed to remove the listing of Surveillance Requirements 4.12.A through 4.12.H from the Table of Contents (page vi); therefore, the proposed amendment removes the listing of these surveillance requirements from the Table of Contents.

ATTACHMENT B

SUMMARY OF THE PROPOSED CHANGES TO APPENDIX A, TECHNICAL SPECIFICATIONS, OF FACILITY OPERATING LICENSES DPR-19 AND DPR-25

Table of Contents, Page iii

Revise the table entry for Specification 3.9.A from "Requirements" to "Normal AC, Emergency AC, and DC Power Availability".

Revise the table entry for Specification 3.9.B from "Availability of Electric Power" to "Alternate Electric Power Availability Requirements".

Table of Contents, Page iv

Revise the table entry for Specification 3.9.D. from "Diesel Generator Operability" to "Diesel Generator Operability during Refueling or Cold Shutdown".

Revise the table entry for Specification 3.11 ("High Energy Piping Integrity") to state that this section is deleted per the appropriate amendment number.

Table of Contents, Page vi

Revise the table entry for Surveillance Requirement 4.9.A from "Station Batteries" to "Normal AC, Emergency AC, and DC System Surveillances".

Revise the table entry for Surveillance Requirement 4.9.D from "Diesel Generator Operability" to "N/A".

Revise table entry for Surveillance Requirement 4.11 ("High Energy Piping Integrity") to state that this section is deleted per the appropriate amendment number.

Revise table entries for Surveillance Requirements 4.12.A through 4.12.H ("Fire Protection Systems") to state that these sections were deleted per Generic Letters 86-10 and 88-12 in Amendment (106 for DPR-19/101 for DPR-25).

List of Tables, Page vii (DPR-19)

Revise the table entry for Table 4.11-1 from "Surveillance Requirements for High Energy Piping Outside Containment" to "Deleted".

List of Tables, Page vii (DPR-25)

Revise the table entry for Table 4.11-1 from "Surveillance Requirements for High Energy Piping Outside Containment" to "Deleted".

Revise the table entry for Table 3.12-1 from "Fire Detection Instruments" to "Deleted".

List of Tables, Page viii (DPR-19)

Revise the table entry for Table 3.12-1 from "Fire Detection Instruments" to "Deleted".

Revise the table entry for Table 3.12-2 from "Sprinkler Systems" to "Deleted".

Revise the table entry for Table 3.12-3 from "CO_2 Systems" to "Deleted".

Revise the table entry for Table 3.12-4 from "Fire Hose Stations" to "Deleted".

List of Tables, Page viii (DPR-25)

Revise the table entry for Table 3.12-2 from "Sprinkler Systems" to "Deleted".

Revise the table entry for Table 3.12-3 from "CO_2 Systems" to "Deleted".

Revise the table entry for Table 3.12-4 from "Fire Hose Stations" to "Deleted".

Pages 3/4.9-1 through 3/4.9-6a and B 3/4.9-7 through B 3/4.9-9

The summary of changes for Technical Specification Section 3/4.9 (Auxiliary Electrical Systems) and its associated bases section are presented on pages 4 through 9 of this attachment.

Page 3/4.10-6

In Surveillance Requirement 4.10.F.2, delete the surveillance testing required prior to August 30, 1976.

Page 3/4.10-7

In Specification 3.10.F.3, delete the spent fuel cask handling restrictions imposed prior to August 30, 1976.

Pages 3/4.11-1, 3/4.11-2, 3/4.11-3, and B 3/4.11-4

Delete Technical Specification Section 3/4.11 and its associated bases section on High Energy Piping Integrity.

Page 6-3

Change "Assistant Vice President (AVP) Quality Programs and Assessment" to "General Manager (GM) Quality Programs and Assessment" in Section 6.1.G.1.a.

Pages 6-5, 6-6, 6-7, 6-11 and 6-12

Change "AVP Quality Programs and Assessment" to "GM Quality Programs and Assessment" in Sections 6.1.G.1.a.(10), 6.1.G.1.b, 6.1.G.1.b.(12), 6.1.G.1.c, 6.1.G.2.a.(8), and 6.1.G.2.c.(1).

Summary of Proposed Changes to Section 3.9

Section 3.9.A	Incorporated a title for this section, "Normal AC, Emergency AC, and DC Power Availability". Incorporated a direct reference to LCO statements 3.9.A.1 through 3.9.A.5.
Section 3.9.A.1	No content or wording changes.
Section 3.9.A.2	No content changes. The words "Dresden 2" (Dresden 3) have been changed to "Unit 2" (Unit 3).
Section 3.9.A.3	No content or wording changes.
Section 3.9.A.4	No content or wording changes.
Section 3.9.A.5	No content or wording changes.
Section 3.9.B	Incorporated a title for this section, "Alternate Electric Power Availability Requirements". Reworded to clearly state that the electric power availability of 3.9.A applies during the Run, Startup/Hot Standby and Hot Shutdown conditions. The rewording has eliminated the use of multiple exception clauses, and eliminated terminology ("with the head off") which can lead to misinterpretation. The rewording did not result in any content change.
Section 3.9.B.1	Reworded and separated into proposed sections 3.9.B.1 and 3.9.B.2. Section B.1 contains the provisions for continued operation in the event incoming (off-site) power is reduced to one line. The rewording did not result in any content change. Section B.2 contains the provisions (in step format) for continued operation in the event there is no incoming (off-site) power. The rewording and reformatting did not result in any content change.

Summary of Proposed Changes to Section 3.9

Section 3.9.B.2.a	Reworded and renumbered as proposed section 3.9.B.3.a. Proposed section 3.9.B.3.a consolidated (in step format) all of the provisions for continued operation with only one diesel generator available. Previously, these provisions were contained in more than one LCO statement (current LCO statements 3.9.B.2.a and 3.9.B.2.c). The provisions for continued operation with only one diesel generator operable remain unchanged.
Section 3.9.B.2.b	This section has been rewritten and renumbered as proposed section 3.9.B.3.b. Current section 3.9.B.2.b provides an allowed diesel generator inoperability period of 1-1/2 hours for the purposes of performing preventive maintenance. Prior to performing the maintenance, the alternate diesel generator must be demonstrated operable and the two off-site lines must be available. Proposed section 3.9.B.3.b has been rewritten (in step format) with the following changes: 1) surveillance testing is allowed during the diesel generator inoperability period; 2) incorporated an operability verification for the core and containment cooling systems; and 3) the operability verification for the alternate diesel generator is not dependent on an operability demonstration (note, in the event the diesel generator will be inoperable for greater than 1-1/2 hours, the alternate diesel generator is required to be demonstrated operable).
Section 3.9.B.2.c	This section is renumbered as proposed section 3.9.B.3.c. The section has been rewritten to identify the specifications which are governed by the shutdown requirements. The rewrite also establishes shutdown requirements for partial or full loss of incoming (off-site) power situations, which were previously governed by LCO statement 3.0.A. The operability requirements for the low pressure core cooling and containment cooling systems have been incorporated into proposed sections 3.9.B.3.a and 3.9.B.3.b.

Summary of Proposed Changes to Section 3.9

Section 3.9.B.3	This section is renumbered as proposed section 3.9.B.4, and reworded to remove the phrase "From and after the date...". The rewording did not result in any content change.
Section 3.9.B.4.a	No content or wording changes.
Section 3.9.B.4.b	No content or wording changes.
Section 3.9.C	No content or wording changes.
Section 3.9.D	The title of this section has been expanded to "Diesel Generator Operability during Refueling or Cold Shutdown". Additionally, the content has been rewritten into step format.

ATTACHMENT B (CONTINUED)

Summary of Proposed Changes to Section 4.9

Section 4.9.A	Reworded the title of this section from "Station Batteries" to "Normal AC, Emergency AC, and DC System Surveillances".
Section 4.9.A.1	Transferred to proposed section 4.9.A.5.a. No content or wording changes.
Section 4.9.A.2	Transferred to proposed section 4.9.A.5.b. No content or wording changes.
Section 4.9.A.3	For DPR-19, the first paragraph has been transferred to proposed section 4.9.A.5.c. The second paragraph (for existing section 4.9.A.3) is no longer applicable since Amendment 87 previously changed the scope of the first paragraph from the "station's batteries" to the "unit's batteries". Therefore, the second paragraph is being removed. For DPR-25, the first (and only) paragraph has been transferred to proposed section 4.9.A.5.c.
Section 4.9.B	No content or wording changes.
Section 4.9.C	No content or wording changes.
Section 4.9.D.1	Transferred to proposed section 4.9.A.2.a. The sentence segment "...until both the diesel and the generator are at equilibrium conditions of temperature while full load output is maintained" has been revised to remove the reference to the generator. This sentence segment has been revised to read "...until the diesel engine is at equilibrium temperature conditions while full load output is maintained".

Summary of Proposed Changes Section 4.9

Section 4.9.D.2	Transferred to proposed section 4.9.A.2.b. No content or wording changes.
Section 4.9.D.3	Transferred to proposed section 4.9.A.2.c. No content or wording changes.
Section 4.9.D.4	Transferred to proposed section 4.9.A.2.d. The word "off-site" has been changed to "incoming".
New Surveillance Sections 4.9.A.1 4.9.A.3, and 4.9.A.4	Proposed Surveillance Requirements 4.9.A.1, A.3, and A.4 verifies the availability of incoming (off-site) AC power lines, the status of the 4 kV and 480 volt essential safety buses, and the status of the 4 kV safety bus crosstie. Breaker alignment verifications will ensure the essential safety buses are connected to their preferred power source.

Summary of Proposed Changes to Section 3.9 Bases

Bases 3.9.A	No content or wording changes.
Bases 3.9.B	Incorporated paragraphs for the loss of both incoming (off-site) lines and the allowed diesel generator inoperability period for the purposes of preventive maintenance or surveillance testing. Minor rewording was performed for clarity, no content change resulted.
Bases 3.9.C	No content or wording changes.
Bases 3.9.D	Incorporated a paragraph for the diesel generator operability requirements during Refueling or Cold Shutdown conditions.

Summary of Proposed Changes to Section 4.9 Bases

Bases 4.9.A	Incorporated a paragraph for the daily surveillances on the AC electrical system. Incorporated the paragraphs from existing bases section 4.9.C to reflect the proposed relocation of the diesel generator operability surveillances. Minor rewording was performed for clarity, no content change resulted.
Bases 4.9.B	Existing bases paragraph has been relocated to bases section 4.9.C to reflect the current location of the diesel fuel surveillance requirements. Since there is currently no surveillance requirement 4.9.B, bases section 4.9.B has been changed to "N/A".
Bases 4.9.C	Existing bases paragraphs have been relocated to bases section 4.9.A to reflect the proposed location of the diesel generator operability surveillances. Incorporated the paragraph from existing bases section 4.9.B to reflect the current location of the diesel fuel surveillance requirements.
Bases 4.9.D	Since there is no proposed surveillance requirement 4.9.D, bases section 4.9.D is shown as "N/A".