

ATTACHMENT ONE

ST. LUCIE UNIT 2

MARKED-UP TECHNICAL SPECIFICATION PAGE

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# ELECTRICAL POWER SYSTEMS

## ACTION (Continued)

- If either EDG has not been successfully tested within the past 24 hours demonstrate its OPERABILITY by performing Surveillance Requirement 4.8.1.1.2a.4 separately for each such EDG within 24 hours.*
- d. With two of the required offsite A.C. circuits inoperable, demonstrate the OPERABILITY of two diesel generators by sequentially performing Surveillance Requirement 4.8.1.1.2a.4 on both diesels within 8 hours, unless the diesel generators are already operating; restore one of the inoperable offsite sources to OPERABLE status within 24 hours or be in at least HOT STANDBY within the next 6 hours. Following restoration of one offsite source, follow ACTION Statement a. with the time requirement of that ACTION Statement based on the time of initial loss of the remaining inoperable offsite A.C. circuit.
  - e. With two of the above required diesel generators inoperable, demonstrate the OPERABILITY of two offsite A.C. circuits by performing Surveillance Requirement 4.8.1.1.1.a within 1 hour and at least once per 8 hours thereafter; restore one of the inoperable diesel generators to OPERABLE status within 2 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours. Following restoration of one diesel generator unit, follow ACTION Statement b. with the time requirement of that ACTION Statement based on the time of initial loss of the remaining inoperable diesel generator.
  - f. With one Unit 2 startup transformer (2A or 2B) inoperable and with a Unit 1 startup transformer (1A or 1B) connected to the same A or B offsite power circuit and administratively available to both units, then should Unit 1 require the use of the startup transformer administratively available to both units, Unit 2 shall demonstrate the operability of the remaining A.C. sources by performing Surveillance Requirements ~~4.8.1.1.1a. and 4.8.1.1.2a.4~~ within 1 hour and at least once per 8 hours thereafter. Restore the inoperable startup transformer to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and COLD SHUTDOWN within the following 30 hours.

## SURVEILLANCE REQUIREMENTS

4.8.1.1.1 Each of the above required independent circuits between the offsite transmission network and the onsite Class 1E distribution system shall be:

- a. Determined OPERABLE at least once per 7 days by verifying correct breaker alignments, indicated power availability; and
- b. Demonstrated OPERABLE at least once per 18 months by transferring (manually and automatically) unit power supply from the normal circuit to the alternate circuit.

4.8.1.1.2 Each diesel generator shall be demonstrated OPERABLE:

- a. In accordance with the frequency specified in Table 4.8-1 on a STAGGERED TEST BASIS BY:

ATTACHMENT TWO  
SAFETY ANALYSIS

Background

On February 7, 1989, the NRC issued Amendment 39 to the St. Lucie Unit 2 Technical Specifications. This amendment incorporated the diesel generator surveillance testing methods recommended by Generic Letter 84-15, "Proposed Staff Actions to Improve and Maintain Diesel Generator Reliability", revisions to the ACTION statements, as well as other changes.

As the result of this amendment, a difference now exists between ACTION Statements 3.8.1.1.a and 3.8.1.1.f for St. Lucie Unit 2 concerning the loss of one off-site power source. ACTION Statement 3.8.1.1.f, provides for administrative utilization of a Unit 1 start-up transformer and requires diesel generator operability testing which is not in accordance with the reliability-oriented testing practices specified in Generic Letter 84-15. The intent of this proposed license amendment is to bring ACTION Statement 3.8.1.1.f in line with the other ACTION statements related to A. C. Sources - Operating.

ACTION Statement 3.8.1.1.f allows both St. Lucie Units 1 and 2 to take administrative credit for a single Unit 1 startup transformer while both units are at power. One startup transformer for Unit 1, if not required for use in Unit 1, is physically capable of being connected between the offsite transmission network and the onsite Class 1E distribution system for Unit 2 and supplying the required Unit 2 loads. Therefore, there is no need to declare one of the independent circuits inoperable when one of the Unit 2 startup transformers is inoperable. However, should Unit 1 require the use of the startup transformer, then Unit 2 would no longer have that offsite power source administratively available for its use, and the OPERABILITY requirements of LCO 3.8.1.1.a would not be met.

Prior to the issuance of Amendment 39, the ACTIONS specified by ACTION Statement 3.8.1.1.f were the same as those required by ACTION Statement 3.8.1.1.a, i.e., pertaining to the operability testing of diesel generators and the verification of the availability of the second offsite power source when one offsite circuit is inoperable. The intent of this proposed license amendment is to restore consistency between ACTION Statement 3.8.1.1.a, which addresses the actions to be taken if one offsite power source is inoperable, and ACTION Statement 3.8.1.1.f. by revising ACTION Statement 3.8.1.1.f.

This amendment is considered to be administrative in nature in that the intent of this change is to resolve a discrepancy between ACTION statements pertaining to similar operating conditions; i.e., when one offsite power source is inoperable.

### ATTACHMENT THREE

#### DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

The standards used to arrive at a determination that a request for amendment involves no significant hazards considerations are included in the Commission's regulations, 10 CFR 50.92, which states that no significant hazards considerations are involved if the operation of the facility in accordance with the proposed amendment would not (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident previously evaluated or (3) involve a significant reduction in a margin of safety. Each standard is discussed as follows:

- (1) Operation of the facility in accordance with the proposed amendment would not involve a significant increase in the probability or consequences of an accident previously evaluated.

The probability of an accident previously evaluated in the Updated Final Safety Analysis Report (UFSAR) has not been affected as the proposed change is administrative in nature, and is intended to restore consistency in testing requirements for the emergency diesel generators when one offsite power source is inoperable. No parameters which affect the probabilities of occurrence of any accident are affected by this change.

The consequences of an accident previously evaluated in the UFSAR have not been increased as the proposed surveillance requirements will not adversely affect the operation or operability of the diesels or any other safety related equipment.

The probability of a malfunction of equipment important to safety has not changed since reducing the test frequency of the diesel generators and modifying the starting requirements to be consistent with the manufacturer's recommendations are intended to enhance diesel reliability by minimizing severe test conditions which can lead to premature failures.

- (2) Use of the modified specification would not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed change is administrative in nature and is intended to restore consistency between ACTION statements relative to the starting of emergency diesel generators when one offsite power source is inoperable. The net effect of this change is to reduce the diesel generator testing

frequency and starting requirements such that there is still a high degree of assurance that they would operate, if called upon, when one offsite circuit is inoperable, and has no impact on actual accident analysis.

The possibility of a malfunction of equipment important to safety of a different type than any analyzed in the UFSAR has not been increased in that the proposed license amendment incorporates the starting and testing requirements recommended by Generic Letter 84-15. The intent of the change is to enhance the reliability of the emergency diesel generators by adherence to manufacturer recommendations regarding engine prelube and warmup.

- (3) Use of the modified specification would not involve a significant reduction in a margin of safety.

The proposed change restores consistency between action statements in St. Lucie Unit 2 Technical Specification 3/4.8.1.1, reducing the frequency of diesel engine starts and diesel engine fast, cold starts while providing a high degree of assurance that they would operate, if called upon, when one offsite power circuit is inoperable. The reduction of diesel generator testing frequency should increase the reliability of the diesel generators because the diesel engines will be properly conditioned before startup and the number of starts decreased to reduce wear.

Based upon the above, we have determined that the amendment request does not (1) involve a significant increase in the probability or consequences of an accident previously evaluated, (2) create the probability of a new or different kind of accident from any accident previously evaluated or (3) involve a significant reduction in a margin of safety, and therefore does not involve a significant hazards consideration.