

Summary of Exelon's Proposal for Implementation of TSTF-500- Technical Specification Changes

The proposed changes modify the wording in TS Limiting Condition for Operation (LCO) 3.8.4, DC Sources – Operating to add an additional LCO for the opposite Unit's inoperable battery charger condition. The proposed changes are required to fix simultaneous conflicting LCO Required Action Completion Times of 72 hours for one unit and 12 hours for the other unit for a single inoperable battery charger on one Unit. The current conflicting concurrent 12-hour and 72-hour Completion Times for Unit 2 and Unit 3 for one unit's inoperable battery charger was an unidentified imbedded error incorporated under TS Amendments 320 and 323, which adopted TSTF-500.

Please see attached Technical Specification proposed markups for Unit 2 and Unit 3, respectively.

3.8 ELECTRICAL POWER SYSTEMS

3.8.4 DC Sources—Operating

- LCO 3.8.4 The following DC electrical power subsystems shall be OPERABLE:
- a. Unit 2 Division I and Division II DC electrical power subsystems; and
 - b. Unit 3 Division I and Division II DC electrical power subsystems.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One Unit 3 DC electrical power subsystem inoperable due to performance of SR 3.8.4.7 or SR 3.8.6.6.	<p>-----NOTE----- Enter applicable Conditions and Required Actions of LCO 3.8.7, "Distribution Systems—Operating," when Condition A results in de-energization of a Unit 2 4 kV emergency bus or de-energization of a Unit 3 DC bus. -----</p> <p>A.1 Restore Unit 3 DC electrical power subsystem to OPERABLE status.</p>	7 days

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<u>B. One Unit 3 battery charger on one subsystem inoperable.</u>	<u>B.1 Restore Unit 3 battery terminal voltage to greater than or equal to the minimum established float voltage.</u>	<u>12 hours</u>
	<u>AND</u> <u>B.2 Verify battery float current < 2 amps.</u>	<u>Once per 12 hours</u>
	<u>AND</u> <u>B.3 Restore battery charger to OPERABLE status.</u>	<u>72 hours</u>

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
B C. One Unit 3 DC electrical power subsystem inoperable for reasons other than Condition A <u>or B</u> .	-----NOTE----- Enter applicable Conditions and Required Actions of LCO 3.8.7, "Distribution Systems—Operating," when Condition B results in de-energization of a Unit 2 4 kV emergency bus. -----	
	B C.1 Restore Unit 3 DC electrical power subsystem to OPERABLE status.	12 hours
E D. One <u>Unit 2</u> battery charger on one subsystem inoperable.	E D.1 Restore <u>Unit 2</u> battery terminal voltage to greater than or equal to the minimum established float voltage.	2 hours
	AND	
	E D.2 Verify battery float current < 2 amps.	Once per 12 hours
	AND E D.3 Restore battery charger to OPERABLE status.	72 hours

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D <u>E</u> . One Unit 2 DC electrical power subsystem inoperable for reasons other than condition C <u>D</u> .	D <u>E</u> .1 Restore Unit 2 DC electrical power subsystem to OPERABLE status.	2 hours
E <u>F</u> . Required Action and Associated Completion Time of Condition A, B, C, D, <u>or E</u> not met.	E <u>F</u> .1 Be in MODE 3. <u>AND</u>	12 hours
	D <u>E</u> .2 Be in MODE 4.	36 hours
F <u>G</u> . Two or more inoperable DC electrical power subsystems.	F <u>G</u> .1 Enter LCO 3.0.3.	Immediately

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 - b. Unit 2 Division I and Division II DC electrical power subsystems.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One Unit 2 DC electrical power subsystem inoperable due to performance of SR 3.8.4.7 or SR 3.8.6.6.	<p>-----NOTE----- Enter applicable Conditions and Required Actions of LCO 3.8.7, "Distribution Systems—Operating," when Condition A results in de-energization of a Unit 3 4 kV emergency bus or de-energization of a Unit 2 DC bus. -----</p> <p>A.1 Restore Unit 2 DC electrical power subsystem to OPERABLE status.</p>	7 days

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<u>B. One Unit 2 battery charger on one subsystem inoperable.</u>	<u>B.1 Restore Unit 2 battery terminal voltage to greater than or equal to the minimum established float voltage.</u>	<u>12 hours</u>
	<u>AND</u>	
	<u>B.2 Verify battery float current < 2 amps.</u>	<u>Once per 12 hours</u>
	<u>AND</u>	
	<u>B.3 Restore battery charger to OPERABLE status.</u>	<u>72 hours</u>

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>B<u>C</u>. One Unit 2 DC electrical power subsystem inoperable for reasons other than Condition A <u>or</u> B.</p>	<p>-----NOTE----- Enter applicable Conditions and Required Actions of LCO 3.8.7, "Distribution Systems—Operating," when Condition B results in de-energization of a Unit 3 4 kV emergency bus. -----</p>	
	<p>B<u>C</u>.1 Restore Unit 2 DC electrical power subsystem to OPERABLE status.</p>	12 hours
<p>E<u>D</u>. One <u>Unit 3</u> battery charger on one subsystem inoperable.</p>	<p>E<u>D</u>.1 Restore <u>Unit 3</u> battery terminal voltage to greater than or equal to the minimum established float voltage.</p>	2 hours
	<p><u>AND</u></p>	
	<p>E<u>D</u>.2 Verify battery float current < 2 amps.</p>	Once per 12 hours
	<p><u>AND</u></p>	
	<p>E<u>D</u>.3 Restore battery charger to OPERABLE status.</p>	72 hours

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D <u>E</u> . One Unit 3 DC electrical power subsystem inoperable for reasons other than conditions C <u>D</u> .	D <u>E</u> .1 Restore Unit 3 DC electrical power subsystem to OPERABLE status.	2 hours
E <u>E</u> . Required Action and Associated Completion Time of Condition A, B, C, D, <u>or</u> E not met.	E <u>E</u> .1 Be in MODE 3. <u>AND</u>	12 hours
	E <u>E</u> .2 Be in MODE 4.	36 hours
F <u>G</u> . Two or more inoperable DC electrical power subsystems.	F <u>G</u> .1 Enter LCO 3.0.3.	Immediately