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10 CFR 50.90

May 23, 2019

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

Peach Bottom Atomic Power Station, Units 2 and 3
Renewed Facility Operating License Nos. DPR-44 and DPR-56
NRC Docket Nos. 50-277 and 50-278

Subject: Supplemental Response for License Amendment Request to Revise Technical Specifications 3.8.1, Required Action A.3, for Temporary One-Time Extension of Completion Time

Reference: Letter from James Barstow, Exelon Generation Company, LLC, to U.S. Nuclear Regulatory Commission – *"License Amendment Request to Revise Technical Specifications 3.8.1, Required Action A.3, for Temporary One-Time Extension of Completion Time,"* dated April 26, 2019 (ML19116A196)

By letter dated April 26, 2019 (Reference), Exelon Generation Company, LLC (Exelon) requested amendments to Renewed Facility Operating License Nos. DPR-44 and DPR-56 for Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3, respectively. The proposed changes pertain to revising the PBAPS, Units 2 and 3, Technical Specifications (TS) to extend the Completion Time for TS Section 3.8.1, "AC Power - Operating," Required Action A.3, from seven (7) days to 21 days on a temporary one-time basis.

Exelon submitted the Reference amendment request to allow sufficient time to perform physical modification work to replace 27 electrical cables from the 3EA Emergency Auxiliary Transformer to the J-58 junction box serving the 3SU-E 4.16 kV feed switchgear. These cables are located underground and it is expected that the cable replacement and post installation work could take up to 21 days to complete.

In support of the proposed amendment request, Attachment 1 of the Reference submittal included a description of the Limiting Condition for Operation (LCO) requirements for TS 3.8.1 for Units 2 and 3. This information was unrelated to the actual requested changes being proposed and was provided as supporting information for reference. During subsequent discussions with the NRC it was noted that two differences exist in TS 3.8.1 LCO descriptions between the Unit 2 and Unit 3 TS. In particular, the Unit 3 TS LCO description under items "c" and "d" include a reference to LCO 3.6.3.1. This LCO pertained to a previously deleted TS related to the Containment Atmospheric Dilution (CAD) System.

The NRC approved the removal of the CAD System requirements from the TS as documented in a letter dated January 28, 2010 (ML100130814), issuing Amendment Nos. 274 and 278 to Renewed Facility Operating License Nos. DPR-44 and DPR-56 for PBAPS, Units 2 and 3, respectively and the requirements associated with TS 3.6.3.1 were deleted for the Unit 2 and Unit 3 TS in support of implementation of the approved amendments. It was later identified that an administrative/editorial discrepancy existed with the Unit 3 TS 3.8.1 LCO description since it still included references to LCO 3.6.3.1. Exelon has been tracking this issue and planned to address this discrepancy as part of a future administrative cleanup change amendment request. However, based upon discussions with the NRC, it was requested that this administrative/editorial discrepancy with the Unit 3 TS be addressed in conjunction with the Reference submittal.

Therefore, this supplemental response provides information to update the Unit 3 TS 3.8.1 LCO description requirements for items "c" and "d" in order to remove the reference to LCO 3.6.3.1. The Unit 2 TS 3.8.1 LCO description requirements are unaffected and remain unchanged. Attachment 1 of this submittal provides an evaluation of the proposed changes along with an updated No Significant Hazards Consideration in support of the Reference amendment request. This updated No Significant Hazards Consideration supersedes the information previously provided in the Reference letter. Attachment 2 of this submittal includes a mark-up copy of the affected Unit 3 TS page reflecting the proposed changes to requirements "c" and "d" in TS LCO 3.8.1. The TS pages submitted in the Reference letter are unchanged and the information remains valid. Attachment 3 contains a Unit 3 TS Bases page mark-up for information only.

Exelon has concluded that the proposed changes in this supplemental response present no significant hazards consideration under the standards set forth in 10 CFR 50.92, "Issuance of amendment."

The proposed changes have been reviewed by the PBAPS Plant Operations Review Committee in accordance with the requirements of the Exelon Quality Assurance Program.

This submittal contains no new regulatory commitments in support of the Reference amendment request.

In accordance with 10 CFR 50.91, "Notice for public comment; State consultation," paragraph (b), Exelon is notifying the Commonwealth of Pennsylvania of this supplemental response by transmitting a copy of this letter along with the Attachments to the designated State Official.

Should you have any questions concerning this submittal, please contact Richard Gropp at 610-765-5557.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 23rd day of May 2019.

Respectfully,

James Barstow
Director, Licensing and Regulatory Affairs
Exelon Generation Company, LLC

Attachments:
1. Evaluation of Proposed Changes – Supplemental Response for License Amendment Request to Revise Technical Specifications 3.8.1, Required Action A.3, for Temporary Extension of Completion Time
2. Mark-up of Technical Specifications Page
3. Mark-up of Technical Specifications Bases Page (for information only)

cc: w/ Attachments
Regional Administrator – NRC Region I
U.S. NRC Senior Resident Inspector – Peach Bottom Atomic Power Station
U.S. NRC Project Manager, NRR – Peach Bottom Atomic Power Station
R. R. Janati, Pennsylvania Bureau of Radiation Protection
D. A. Tancabel, State of Maryland

ATTACHMENT 1

Peach Bottom Atomic Power Station, Units 2 and 3
Renewed Facility Operating License Nos. DPR-44 and DPR-56

Evaluation of Proposed Changes
Supplemental Response for License Amendment Request
to Revise Technical Specifications 3.8.1, Condition A.3, for
Temporary Extension of Completion Time

Summary

By letter dated April 26, 2019 (Reference 1), Exelon Generation Company, LLC (Exelon) requested amendments to Renewed Facility Operating License Nos. DPR-44 and DPR-56 for Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3, respectively. The proposed changes pertain to revising the PBAPS, Units 2 and 3, Technical Specifications (TS) to extend the Completion Time for TS Section 3.8.1, "AC Power - Operating," Required Action A.3, from seven (7) days to 21 days on a temporary one-time basis. This temporary one-time extension in the TS completion time was requested to allow sufficient time to perform physical modification work to replace 27 electrical cables from the 3EA Emergency Auxiliary Transformer to the J-58 junction box serving the 3SU-E 4.16 kV feed switchgear. These cables are located underground and it is expected that the cable replacement and post installation work could take up to 21 days to complete.

In support of the proposed amendment request, Attachment 1 of the Reference 1 submittal included a description of the Limiting Condition for Operation (LCO) requirements for TS 3.8.1 for Units 2 and 3. This information was unrelated to the actual requested changes being proposed and was provided as supporting information for reference.

During subsequent discussions with the NRC it was noted that two differences exist in TS 3.8.1 LCO descriptions between the Unit 2 and Unit 3 TS. In particular, the Unit 3 TS LCO description under items "c" and "d" include a reference to LCO 3.6.3.1. This LCO pertained to a previously deleted TS related to the Containment Atmospheric Dilution (CAD) System.

The CAD System requirements were previously deleted from the TS under Amendment Nos. 274 and 278 to Renewed Facility Operating License Nos. DPR-44 and DPR-56 for PBAPS, Units 2 and 3, respectively. The reference to LCO 3.6.3.1 in the Unit 3 TS 3.8.1 should have been removed at the time the CAD requirements were deleted. This was an inadvertent oversight and is considered an administrative/editorial discrepancy.

Detailed Description

By letter dated July 30, 2009 (Reference 2), Exelon submitted an amendment request for PBAPS, Units 2 and 3, that would incorporate changes to the TS consistent with Technical Specification Task Force (TSTF) traveler 478, Revision 2, "Boiling Water Reactor (BWR) Technical Specification Changes that Implement the Revised Rule for Combustible Gas Control." Specifically, the changes would delete the requirements associated with PBAPS, Units 2 and 3, TS 3.6.3.1, "Containment Atmospheric Dilution (CAD) System," as permitted by 10 CFR Section 50.44, "Combustible gas control for nuclear power reactors."

The NRC approved the removal of the CAD System requirements from the TS as documented in a letter dated January 28, 2010 (Reference 3), issuing Amendment Nos. 274 and 278 to Renewed Facility Operating License Nos. DPR-44 and DPR-56 for PBAPS, Units 2 and 3, respectively.

The current TS 3.8.1 LCO requirements for Units 2 and 3 are described below.

Unit 2

AC Sources—Operating
3.8.1

3.8 ELECTRICAL POWER SYSTEMS

3.8.1 AC Sources—Operating

LCO 3.8.1 The following AC electrical power sources shall be OPERABLE:

a. Two qualified circuits between the offsite transmission network and the Unit 2 onsite Class 1E AC Electrical Power Distribution System;

b. Four diesel generators (DGs) capable of supplying the Unit 2 onsite Class 1E AC Electrical Power Distribution System;

c. The qualified circuit(s) between the offsite transmission network and the Unit 3 onsite Class 1E AC electrical power distribution subsystem(s) needed to support the Unit 3 powered equipment required to be OPERABLE by LCO 3.6.4.3, "Standby Gas Treatment (SGT) System," LCO 3.7.3, "Emergency Heat Sink," and LCO 3.8.4, "DC Sources—Operating"; and

d. The DG(s) capable of supplying the Unit 3 onsite Class 1E AC electrical power distribution subsystem(s) needed to support the Unit 3 powered equipment required to be OPERABLE by LCO 3.6.4.3, LCO 3.7.3, and LCO 3.8.4.

APPLICABILITY: MODES 1, 2, and 3.

Unit 3

3.8 ELECTRICAL POWER SYSTEMS

3.8.1 AC Sources—Operating

LCO 3.8.1 The following AC electrical power sources shall be OPERABLE:

a. Two qualified circuits between the offsite transmission network and the onsite Unit 3 Class 1E AC Electrical Power Distribution System;

b. Four diesel generators (DGs) capable of supplying the Unit 3 onsite Class 1E AC Electrical Power Distribution System;

c. The qualified circuit(s) between the offsite transmission network and the Unit 2 onsite Class 1E AC electrical power distribution subsystem(s) needed to support the Unit 2 powered equipment required to be OPERABLE by LCO 3.6.3.1, "Containment Atmospheric Dilution (CAD) System," LCO 3.6.4.3, "Standby Gas Treatment (SGT) System," LCO 3.7.2, "Emergency Service Water (ESW) System and Normal Heat Sink," LCO 3.7.4, "Main Control Room Emergency Ventilation (MCREV) System," and LCO 3.8.4, "DC Sources—Operating"; and

d. The DG(s) capable of supplying the Unit 2 onsite Class 1E AC electrical power distribution subsystem(s) needed to support the Unit 2 powered equipment required to be OPERABLE by LCO 3.6.3.1, LCO 3.6.4.3, LCO 3.7.2, LCO 3.7.4, and LCO 3.8.4.

APPLICABILITY: MODES 1, 2, and 3.

It was later discovered that the noted administrative/editorial discrepancy (as highlighted above) existed with the Unit 3 TS 3.8.1 LCO description for requirements "c" and "d" since it still included references to LCO 3.6.3.1. Exelon has been tracking this issue and planned to address this discrepancy as part of a future administrative cleanup change amendment request. However, based upon discussions with the NRC, it was requested that this

administrative/editorial discrepancy with the Unit 3 TS be addressed in conjunction with the Reference submittal. The corresponding Unit 2 TS requirements are not impacted.

During subsequent discussions with the NRC regarding the Reference 1 submittal, this administrative/editorial discrepancy with the Unit 3 TS was discussed and it was requested that Exelon consider addressing this issue in conjunction with the Reference 1 amendment request. Therefore, this supplemental response revises the Unit 3 TS 3.8.1 LCO description for requirements "c" and "d" in order to remove the reference to LCO 3.6.3.1.

Technical Review

The identified discrepancy with the Unit 3 TS 3.8.1 LCO description is considered administrative/editorial in nature. The corresponding Unit 2 TS is not impacted.

The changes described to remove the reference to LCO 3.6.3.1 from the Unit TS 3.8.1 LCO requirements "c" and "d" strictly involve an editorial correction. The reference to LCO 3.6.3.1 was inadvertently retained and should have been deleted as part of the Reference 2 submittal as approved by the NRC in Reference 3. These proposed changes to the Unit 3 TS are non-substantive changes that have no impact on safe operation of the plant in that they do not involve any physical changes to Structures, Systems, or Components (SSCs) in the plant, or the way SSCs are operated or controlled.

Regulatory Review

The proposed changes to the Unit 3 TS 3.8.1 LCO requirements "c" and "d" to remove the reference to LCO 3.6.3.1 are administrative in nature and do not involve any physical changes to plant SSCs or the manner in which SSCs are operated, maintained, modified, tested, or inspected. The proposed changes do not involve a change to any safety limits, limiting safety system settings, limiting control settings, limiting conditions for operation, surveillance requirements, design features, or administrative controls required by 10 CFR 50.36.

The regulatory review performed as documented in Attachment 1 of the Reference 1 submittal remains applicable and supports this proposed change to the Unit 3 TS.

No Significant Hazards Consideration

The discussion below updates and supersedes the No Significant Hazards Consideration information previously provided in the Reference 1 submittal in order to include an assessment of the impact of the identified Unit 3 TS administrative/editorial discrepancy.

Updated No Significant Hazards Consideration

Pursuant to 10 CFR 50.90, "Application for amendment of license, construction permit, or early site permit," Exelon Generation Company, LLC (Exelon) is requesting amendments to Renewed Facility Operating License Nos. DPR-44 and DPR-56 for Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3, respectively, in the form of changes to the Technical Specifications (TS). Specifically, Exelon is requesting a temporary one-time extension of the Completion Time

for Technical Specifications (TS) Section 3.8.1, "AC Power – Operating," Condition A.3, from seven (7) days to 21 days. This temporary one-time TS change is needed to allow sufficient time to perform physical modification work to replace 27 cables from the 3EA Emergency Auxiliary Transformer to the J-58 junction box serving a 4.16 kV switchgear. Exelon is also requesting a change to the Unit 3 TS 3.8.1 Limiting Condition for Operation (LCO) requirements "c" and "d" to correct an administrative/editorial discrepancy that was identified. This discrepancy involved inadvertently retaining a reference to LCO 3.6.3.1 in the Unit 3 TS when it should have been deleted as part of removing the Containment Atmospheric Dilution (CAD) System requirements as previously approved by the NRC. Exelon has concluded that the proposed changes to PBAPS, Units 2 and 3, TS Section 3.8.1, to extend the Completion Time of Required Action A.3 on a temporary one-time basis from seven (7) days to 21 days and to correct an administrative/editorial discrepancy with Unit 3 TS 3.8.1 LCO requirements does not involve a Significant Hazards Consideration.

Exelon has evaluated whether or not a significant hazards consideration is involved with the proposed changes in accordance with the three (3) standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below.

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

   No. The proposed temporary one-time change to extend the Completion Time for TS 3.8.1, Required Action A.3, will not increase the probability of an accident, since the proposed Completion Time extension in the time duration that one qualified offsite circuit is out of service has no direct physical impact on the plant. The proposed inoperable offsite circuit limits the available redundancy of the offsite electrical system to a period not to exceed 21 days. Therefore, the proposed TS change does not have a direct impact on the plant that would make an accident more likely to occur due to extended Completion Time. Other sources of offsite and onsite power remain available.

   During transients or events which require these systems/subsystems to be operating, there is sufficient capacity in the operable systems/subsystems to support plant operation or shutdown. Therefore, failures that are accident initiators will not occur more frequently than previously postulated as a result of the proposed temporary one-time TS change.

   In addition, the consequences of an accident previously evaluated in the Updated Final Safety Analysis Report (UFSAR) will not be increased. With one offsite circuit inoperable, the consequences of any postulated accidents occurring on Unit 2 or Unit 3 during the proposed one-time Completion Time extension are bounded by the previous analyses as described in the UFSAR. The minimum equipment required to mitigate the consequences of an accident and/or safely shut down the plant will be operable or available during the extended Completion Time period of 21 days.

   A risk evaluation has also been performed for the temporary one-time 21-day Completion Time extension. The evaluation concluded that the probability of a Loss of Offsite Power (LOOP) for the proposed configuration is very low. Therefore, the proposed change does not significantly increase the probability of an accident previously evaluated because: a) the

emergency buses continue to be fed from a reliable offsite source and; b) the effect of the proposed configuration on the probability of a LOOP is very low.

In addition, the proposed changes to the Unit 3 TS 3.8.1 LCO requirements "c" and "d" are administrative/editorial in nature and do not impact the physical configuration or function of plant Structures, Systems, or Components (SSCs) or the manner in which SSCs are operated, maintained, modified, tested, or inspected. The proposed editorial changes do not impact the initiators or assumptions of analyzed events, nor do they impact mitigation of accidents or transient events.

Therefore, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

No. The proposed temporary one-time change to extend the Completion Time for TS 3.8.1, Required Action A.3, will not create the possibility of a new or different type of accident since it will only extend the time period that one of the offsite circuits can be out of service; the extension of the time duration for one offsite circuit being inoperable has no direct physical impact on the plant and does not create any new accident initiators. Other sources of offsite and onsite power remain available. The systems involved are accident mitigation systems. The possible impacts that the inoperable equipment may have on supported systems was previously analyzed in the UFSAR. The impact of inoperable support systems was also previously assessed, and any accident initiators created by the inoperable systems were evaluated. Extending the duration of the Completion Time does not create any additional accident initiators for the plant.

In addition, the proposed administrative/editorial changes to the Unit 3 TS 3.8.1 LCO requirements "c" and "d" do not alter plant configuration, require that new plant equipment be installed, alter assumptions made about accidents previously evaluated, or impact the function of plant SSCs or the manner in which SSCs are operated, maintained, modified, tested, or inspected.

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 change involve a significant reduction in a margin of safety?**

No. The existing TS Completion Time limit of seven (7) days for one offsite circuit inoperable was established to ensure that sufficient safety-related equipment is available for response to all accident conditions and that sufficient decay heat removal capability is available for a Loss of Coolant Accident (LOCA) coincident with a LOOP on one unit and simultaneous safe shutdown of the other unit. Although a very slight reduction in the margin of safety might be incurred during the proposed one-time extended Completion Time period, this slight reduction is judged to be minimal due to the low probability of an event occurring during the extended period. Other sources of offsite and onsite power remain available and

operable during the 21-day extended period along with maintaining the availability of essential Emergency Core Cooling System (ECCS)/decay heat removal capability. The very slight reduction in the margin of safety resulting from extending the Completion Time from seven (7) days to 21 days when an offsite circuit is inoperable is not considered significant, since the remaining operable offsite circuit, the emergency Diesel Generators (DGs), the Station Blackout (SBO) line, and the FLEX DGs are available and provide an effective defense-in-depth plan to support the station electrical plant configurations during the extended 21-day Completion Time period.

The proposed TS change to extend the Completion Time does not affect the acceptance criteria for any analyzed event, nor is there a change to any safety limit. The proposed TS change does not affect any Structures, Systems or Components (SSC) or their capability to perform their intended functions. The proposed change does not alter the manner in which safety limits, limiting safety system settings, or limiting conditions for operation are determined. Neither the safety analyses nor the safety analysis acceptance criteria are affected by this change. The proposed change will not result in plant operation in a configuration outside the current design basis. The margin of safety is maintained by maintaining the capability to supply emergency buses with a redundant, separate, reliable offsite power source, and maintaining the onsite power sources in their design basis configuration.

Operations personnel are fully qualified and trained to respond to, and mitigate, a Design Basis Accident (DBA), including actions needed to ensure decay heat removal systems are available while PBAPS, Units 2 and 3, are in the operational electrical configurations described within this submittal. Accordingly, existing procedures are in place that address safe plant shutdown and decay heat removal for situations applicable during the extended one-time Completion Time period.

In addition, the proposed administrative/editorial changes to the Unit 3 TS 3.8.1 LCO requirements "c" and "d" do not involve any physical changes to plant SSCs or the manner in which SSCs are operated, maintained, modified, tested, or inspected. The proposed editorial changes do not involve a change to any safety limits, limiting safety system settings, limiting conditions for operation, or design parameters for any SSC. The proposed editorial changes do not impact any safety analysis assumptions and do not involve a change in initial conditions, system response times, or other parameters affecting an accident analysis.

Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

Conclusions

There are no changes being proposed in this amendment application such that commitments to the regulatory requirements and guidance documents above would come into question. The evaluations documented above confirm that PBAPS will continue to comply with all applicable regulatory requirements.

In conclusion, 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 the health and safety of the public.

Based on the above evaluation, Exelon concludes that the proposed amendment presents no significant hazards consideration under the standards set forth in 10 CFR 50.92, paragraph (c), and accordingly, a finding of no significant hazards consideration is justified.

Environmental Consideration

The environmental consideration information provided as documented in Attachment 1 of the Reference 1 submittal remains applicable and continues to support this proposed change to the Unit 3 TS. The proposed changes meet 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.

References

1. Letter from James Barstow, Exelon Generation Company, LLC, to U.S. Nuclear Regulatory Commission – *"License Amendment Request to Revise Technical Specifications 3.8.1, Required Action A.3, for Temporary One-Time Extension of Completion Time,"* dated April 26, 2019 (ML19116A196)

2. Letter from Pamela B. Cowan, Exelon Generation Company, LLC, to U.S. Nuclear Regulatory Commission – *"License Amendment Request for Adoption of TSTF-478-A, Revision 2, 'BWR Technical Specification Changes that Implement the Revised Rule for Combustible Gas Control,' Using the Consolidated Line Item Improvement Process,"* dated July 30, 2009 (ML092220045)

3. Letter from John D. Hughey, U.S. Nuclear Regulatory Commission to Charles G. Pardee, Exelon Generation Company, LLC – *"Peach Bottom Atomic Power Station, Units 2 and 3 - Issuance of Amendments to Incorporate TSTF-478, Revision 2, 'BWR Technical Specifications Changes that Implement the Revised Rule for Combustible Gas Control (TAC Nos. ME1857 and ME1858),"* dated January 28, 2010 (ML100130814)

Attachment 2

Peach Bottom Atomic Power Station Units 2 and 3
Renewed Facility Operating License Nos. DPR-44 and DPR-56

Mark-up of Technical Specifications Page

Unit 3

3.8-1

3.8 ELECTRICAL POWER SYSTEMS

3.8.1 AC Sources—Operating

LCO 3.8.1 The following AC electrical power sources shall be OPERABLE:

a. Two qualified circuits between the offsite transmission network and the onsite Unit 3 Class 1E AC Electrical Power Distribution System;

b. Four diesel generators (DGs) capable of supplying the Unit 3 onsite Class 1E AC Electrical Power Distribution System;

c. The qualified circuit(s) between the offsite transmission network and the Unit 2 onsite Class 1E AC electrical power distribution subsystem(s) needed to support the Unit 2 powered equipment required to be OPERABLE by ~~LCO 3.6.3.1, "Containment Atmospheric Dilution (CAD) System,"~~ LCO 3.6.4.3, "Standby Gas Treatment (SGT) System," LCO 3.7.2, "Emergency Service Water (ESW) System and Normal Heat Sink," LCO 3.7.4, "Main Control Room Emergency Ventilation (MCREV) System," and LCO 3.8.4, "DC Sources—Operating"; and

d. The DG(s) capable of supplying the Unit 2 onsite Class 1E AC electrical power distribution subsystem(s) needed to support the Unit 2 powered equipment required to be OPERABLE by ~~LCO 3.6.3.1,~~ LCO 3.6.4.3, LCO 3.7.2, LCO 3.7.4, and LCO 3.8.4.

APPLICABILITY: MODES 1, 2, and 3.

Attachment 3

Peach Bottom Atomic Power Station Units 2 and 3
Renewed Facility Operating License Nos. DPR-44 and DPR-56

Mark-up of Technical Specifications Bases Page
(For Information Only)

Unit 3

B 3.8-84

BASES (continued)

APPLICABLE SAFETY ANALYSES

The initial conditions of Design Basis Accident (DBA) and transient analyses in the UFSAR, Chapter 14 (Ref. 1), assume Engineered Safety Feature (ESF) systems are OPERABLE. The AC and DC electrical power distribution systems are designed to provide sufficient capacity, capability, redundancy, and reliability to ensure the availability of necessary power to ESF systems so that the fuel, Reactor Coolant System, and containment design limits are not exceeded. These limits are discussed in more detail in the Bases for Section 3.2, Power Distribution Limits; Section 3.5, Emergency Core Cooling Systems (ECCS) and Reactor Core Isolation Cooling (RCIC) System; and Section 3.6 Containment Systems.

The OPERABILITY of the AC and DC electrical power distribution subsystems is consistent with the initial assumptions of the accident analyses and is based upon meeting the design basis of the unit. This includes maintaining distribution systems OPERABLE during accident conditions in the event of:

a. An assumed loss of all offsite power or all onsite AC electrical power; and

b. A postulated worst case single failure.

The AC and DC electrical power distribution system satisfies Criterion 3 of the NRC Policy Statement.

LCO

The Unit 3 AC and DC electrical power distribution subsystems are required to be OPERABLE. The required Unit 3 electrical power distribution subsystems listed in Table B 3.8.7-1 ensure the availability of AC and DC electrical power for the systems required to shut down the reactor and maintain it in a safe condition after an abnormal operational transient or a postulated DBA. As stated in the Table, each division of the AC and DC electrical power distribution systems is a subsystem. In addition, since some components required by Unit 3 receive power through Unit 2 electrical power distribution subsystems (e.g., ~~Containment Atmospheric Dilution (CAD) System,~~ Standby Gas Treatment (SGT) System, Emergency Service Water System, Main Control Room Emergency Ventilation (MCREV) System, and DC control power for two of the four 4 kV emergency buses, as well as control power for

(continued)