

Technical Specification Change Request No. 8

Replace pages 3/4 8-4 and 3/4 8-5 with the attached replacement pages 3/4 8-4 and 3/4 8-5.

Reasons for Proposed Change

In recent discussions with personnel from NRC, Region II during an on-site visit, the interpretation was given that the 18 month time interval for certain surveillance functions began when the initial test or surveillance function was performed. We had previously been advised that the time interval began with receipt of the operating license. As a result of this new interpretation by Region II, we performed an audit of surveillance requirements. On August 2, 1977, we discovered that as of July 4, 1977, the 18 month plus 25% time interval had expired for Technical Specification 4.8.1.1.2.C.4 surveillance requirement. NRC Region II personnel were notified.

Crystal River Unit 3 is an integral part of Florida Power Corporation's generating capability. It is currently contributing about 500 MW(e) to our system. Our load demand forecast for August 4, 1977, is about 3300 MW(e), depending on weather conditions. Without the Crystal River Unit 3 contribution of 500 MW(e), our net capability, including 50 MW(e) of firm purchased power, would be 2950 MW(e). Thus we would be about 350 MW(e) deficient. There is no additional firm purchased power available at this time. Therefore, we do not feel that shutting down Crystal River Unit 3 at this time to perform the surveillance requirements of technical specification 4.8.1.1.2.C.4 would be in the best interests of the public. We expect that by August 22, 1977, our Bartow Unit No. 3 plant will be available for service following its current maintenance outage. At that time we would have sufficient generating capacity to remove Crystal River Unit 3 from service.

Safety Analysis Justifying Proposed Change

This proposed change would extend the allowable interval between the surveillance testing from approximately 90 weeks to approximately 97 weeks, which is about a 7.8% increase. We do not feel that this slight increase would represent a loss in safety or public protection as the surveillance requirement of section 4.8.1.1.2.a.5 is currently being performed which requires that the generator be loaded to ≥ 1500 kw and operated for ≥ 60 minutes every 31 days. Our procedure for performing this surveillance requires that the diesel generator be loaded to 2750 kw.

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ELECTRICAL POWER SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

4. At least once per 18 months, by verifying that the battery capacity is adequate to supply and maintain in OPERABLE status all of the actual emergency loads for 1 hour when the battery is subjected to a battery service test.
5. At least once per 60 months, by verifying that the battery capacity is at least 80% of the manufacturer's rating when subjected to a performance discharge test. This performance discharge test shall be performed subsequent to the satisfactory completion of the required battery service test.

4.8.1.1.2 Each diesel generator shall be demonstrated OPERABLE:

- a. At least once per 31 days on a STAGGERED TEST BASIS by:
 1. Verifying the fuel level in the day fuel tank,
 2. Verifying the fuel level in the fuel storage tank,
 3. Verifying the fuel transfer pump can be started and transfers fuel from the storage system to the day tank,
 4. Verifying the diesel starts from ambient condition and accelerates to at least 900 rpm in ≤ 10 seconds,
 5. Verifying the generator is synchronized, loaded to ≥ 1500 kw, and operates for ≥ 60 minutes, and
 6. Verifying the diesel generator is aligned to provide standby power to the associated emergency busses.
- b. At least once each 92 days by verifying that a sample of diesel fuel from the fuel storage tank is within the acceptable limits specified in Table 1 of ASTM D975-68 when checked for viscosity, water and sediment.
- c. At least once per 18 months^{*} during shutdown by:
 1. Subjecting the diesel to an inspection in accordance with procedures prepared in conjunction with its manufacturer's recommendations for this class of standby service,

ELECTRICAL POWER SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

2. Verifying the generator capability to reject a load of ≥ 515 kw without tripping,
3. Simulating a loss of offsite power in conjunction with reactor building high pressure and reactor building high-high pressure test signals, and;
 - a) Verifying de-energization of the emergency buses and load shedding from the emergency busses,
 - b) Verifying that the 4160 v. emergency bus tie breakers open.
 - c) Verifying the diesel starts from ambient condition on the auto-start signal, energizes the emergency busses with permanently connected loads, energizes the auto-connected emergency loads through the load sequencer and operates for ≥ 5 minutes while its generator is loaded with the emergency loads.
4. Verifying the diesel generator operates for ≥ 60 minutes while loaded to ≥ 3000 kw,
5. Verifying that the auto-connected loads to each diesel generator do not exceed the 2000 hour rating of 3000 kw, and
6. Verifying that the automatic load sequence timers are OPERABLE with each load sequence time within $\pm 10\%$.

*For the first surveillance demonstration following the initial performance of the surveillance requirements of Section 4.8.1.1.2.c.4, this interval, including the maximum allowable extension of 25% of the interval, may be extended to the next shutdown but no later than midnight, August 22, 1977.