

been replaced with the requirement to perform Surveillance Requirement 4.8.1.1.2.a.2. for the remaining operable EDGs within 8 hours. These changes are consistent with Generic Letter 84-15 and the staff finds them acceptable.

Change 5: The current Specification 3.8.1.1. Action Statement "c" becomes Action Statement "d". In addition, the requirement to perform Surveillance Requirement 4.8.1.1.2.a.2. (EDG operability test) within 1 hour and at least once per 8 hours thereafter, has been replaced with the requirement to perform Surveillance Requirement 4.8.1.1.2.a.2. for all three EDGs within 8 hours. This change is consistent with Generic Letter 84-15 and the staff finds it acceptable.

Change 6: The current Specification 3.8.1.1. Action Statement "d" becomes Action Statement "e".

This change is editorial and is acceptable.

Change 7: The licensee has requested revisions to Specification 3.8.1.1., adding Action Statements 3.8.1.1.f. and 3.8.1.1.g., which specify the limiting conditions for operation (LCO) if a fuel oil transfer pump or storage tank is inoperable. This revision to the TS would allow the licensee time to correct a problem with the transfer pump or storage tank without declaring an EDG inoperable. The design of the fuel system enables the redundant fuel oil transfer pumps to transfer fuel oil to the EDG day tanks from four 30,000 gallon storage tanks (2 per unit) located in the auxiliary building. Each redundant transfer pump is capable of supplying fuel oil to all three EDGs at maximum rating. Therefore, the loss of one fuel oil transfer pump and/or fuel storage tank does not result in an inoperable EDG. The licensee, therefore, would not have to perform surveillance requirement 4.8.1.1.2.a.2. to demonstrate operability of the EDG each time a transfer pump or storage tank is lost. Using LCO time requirements consistent with one inoperable EDG, the licensee can either restore the transfer pump or storage tank to operable status within 72 hours or be in hot standby within the next 6 hours and cold shutdown within the following 30 hours. Since the LCO time requirements of the EDG and transfer pump/storage tank are identical, the plant would proceed to cold shutdown if the transfer pump/storage tank was not repaired and restored to operable status within the 72 hour action statement. We find that these changes do not alter the intent of on-site power requirements to safety systems given in General Design Criterion (GDC) 17 and meet the acceptance criteria of Standard Review Plan (SRP) 9.5.4. Therefore, the staff finds the proposed addition of Action Statements 3.8.1.1.f. and 3.8.1.1.g. acceptable.

Clarification Letter Dated April 4, 1994

frequency of the vital bus.

This change clarifies the condition of the EDG before performance of the start test and changes the Unit 1 TS to be consistent with the Unit 2 TS. The staff finds these changes acceptable.

For Unit 2, the licensee proposed to change "emergency busses" to "vital bus" and for Unit 1, change "vital busses" to "vital bus". These are editorial changes and are acceptable.

Change 24: The proposed change rewrites original Specification 4.8.1.1.2.b.3.c (Unit 1) and 4.8.1.1.2.c.6.c (Unit 2), now Specification 4.8.1.1.2.d.6.c to read as follows:
"Verifying that all nonessential automatic diesel generator trips (i.e., other than engine overspeed, lube oil pressure low, 4 KV Bus differential and generator differential) are automatically bypassed upon loss of voltage on the vital bus concurrent with a safety injection actuation signal."

This change is editorial in nature. It is intended to clarify the test used to verify that nonessential, automatic EDG trips are bypassed. It does not alter the original intent of the requirement. Therefore, the staff finds the change acceptable.

Change 25: The proposed change deletes original Specification 4.8.1.1.2.b.4. which is now included in Specification 4.8.1.1.2.a.2. and adds the 24-hour EDG endurance test as new Specification 4.8.1.1.2.d.7. (Unit 1 only).

These changes make the Unit 1 TS consistent with the revised Unit 2 Specification 4.8.1.1.2.d.7. The staff finds these changes acceptable, as discussed below.

The proposed change also modifies the original Unit 2 Specification 4.8.1.1.2.c.7. (now Specification 4.8.1.1.2.d.7.) text to read as follows: "Verifying the diesel generator operates for at least 24 hours. During the first 2 hours of this test, the diesel generator shall be loaded to 2760-2860 kw. During the remaining 22 hours of this test, the diesel generator shall be loaded to 2500-2600 kw. The steady state voltage and frequency shall be maintained at ≥ 3950 and ≤ 4580 volts and 60 ± 1.2 Hz during this test. Within 5 minutes after completing this 24-hour test, perform Specification 4.8.1.1.2.d.6.b."

The original specification identified the EDG loading condition for the first 2 hours of the test as equal to or greater than 2860 kw which is 110% of continuous duty rating of the EDG and for the remaining 22 hours at a loading condition of greater than or equal to 2600 kw which is the continuous duty rating. The licensee proposed to use a range of 2760-2860 kw (106% to 110% of the continuous duty rating) for the first two hours and a range of

is acceptable. For Unit 1, this reporting requirement is added as Specification 4.8.1.1.4. and is identical to the Unit 2 specification. This change makes the Unit 1 TS consistent with the Unit 2 TS. The staff finds this change acceptable.

Change 30: For Unit 2, Table 4.8-1 a footnote, denoted by **, to the 7-day test frequency for greater than one EDG failure in the last 20 valid tests has been added. The footnote requires that the associated test frequency be maintained until seven consecutive failure free demands have been performed and the number of failures in the last 20 valid demands has been reduced to less than or equal to one. Also, some editorial changes have been made to the table. The staff finds the revised Table 4.8-1 to be consistent with Generic Letter 84-15 and is acceptable. For Unit 1, Table 4.8-1 has been added and is identical to the Unit 2 table. This change makes the Unit 1 TS consistent with the Unit 2 TS. The staff finds this change acceptable.

Change 31: The proposed change inserts the phrase "(vital bus system)" between "system" and "and" in Specification 3.8.1.2.a.; inserts "separate and independent" between "Two" and "diesel" in Specification 3.8.1.2.b.; and adds "and" at the end of the sentence in Specification 3.8.1.2.b.1.

The above changes are editorial and do not alter the original intent of the requirement. Therefore, the staff finds the changes acceptable.

Change 32: The original surveillance requirement for diesel fuel oil testing in Specification 4.8.1.1.3.b. referenced ASTM standard ASTM D975-68 for the analysis of fuel oil samples. The licensee proposes to change the reference to ASTM D975-77. This change incorporates the same standard currently referenced in the STS and is currently used at the Hope Creek Nuclear Generating Station.

Also, the licensee committed to include a detailed description of the fuel oil testing program in the Salem Updated Final Safety Analysis Report (UFSAR). By letter dated December 19, 1991, the licensee provided the details of the fuel oil test program that is to be included in the UFSAR.

The staff finds the proposed change to be consistent with the STS and with previously approved Hope Creek requirements and is acceptable. The staff also agrees that the program for testing of the fuel oil samples to be added to the UFSAR is acceptable.

Change 33: Specification 4.8.1.2. The proposed change would require loading the EDG to demonstrate operability when in Mode 5 or 6. This will eliminate confusion associated with Mode-dependent monthly tests and will allow tests performed during shutdown to qualify as valid tests. Also, the Unit 1 TS are being changed to be consistent with the Unit 2 TS. The staff finds these changes acceptable.