

## 3/4.8 ELECTRICAL POWER SYSTEMS

### 3/4.8.1 A.C. SOURCES

#### OPERATING

#### LIMITING CONDITION FOR OPERATION

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3.8.1.1 As a minimum, the following A.C. electrical power sources shall be OPERABLE:

- a. Two physically independent circuits between the offsite transmission network and the onsite Class IE distribution system, and
- b. Two separate and independent diesel generators:
  - 1. Each with a separate day tank containing a minimum of 750 gallons of fuel, and
  - 2. A fuel storage system consisting of two underground storage tanks each containing a minimum of 45,000 gallons of fuel (This is a shared system with Unit 2), and
  - 3. A separate fuel transfer system

APPLICABILITY: MODES 1, 2, 3 and 4

#### ACTION

- a. With one offsite circuit of 3.8.1.1.a inoperable, demonstrate the OPERABILITY of the remaining A.C. sources by performing Surveillance Requirement 4.8.1.1.1.a within 1 hour and at least once per 8 hours thereafter. Restore the offsite circuit 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.
- b. With one diesel generator of 3.8.1.1.b inoperable, demonstrate the OPERABILITY of the A.C. offsite power sources by performing Surveillance Requirement 4.8.1.1.1.a within 1 hour and at least once per 8 hours thereafter. If the EDG became inoperable due to any cause other than an inoperable support system, an independently testable component, or preplanned preventative maintenance or testing, demonstrate the OPERABILITY of the remaining OPERABLE EDG by performing Surveillance Requirement 4.8.1.1.2.a.4 within 24 hours\*, unless the absence of any potential common mode failure for the remaining diesel generator is demonstrated. Restore the diesel generator to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

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\*This action is required to be completed regardless of when the inoperable EDG is restored to OPERABILITY.

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##### ACTION

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- b With one diesel generator of 3.8.1.1.b inoperable, demonstrate the OPERABILITY of the A.C. offsite power sources by performing Surveillance Requirement 4.8.1.1.1.a within 1 hour and at least once per 8 hours thereafter. If the EDG became inoperable due to any cause other than an inoperable support system, an independently testable component, or preplanned preventative maintenance or testing, demonstrate the OPERABILITY of the remaining OPERABLE EDG by performing Surveillance Requirement 4.8.1.1.2.a.4 within 24 hours\*, unless the absence of any potential common mode failure for the remaining diesel generator is demonstrated. Restore the diesel generator to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

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**Attachment 3**

**Significant Hazards Consideration**

## SIGNIFICANT HAZARDS CONSIDERATION

This supplemental change does not change the conclusions of the significant hazards consideration that was submitted with the proposed Technical Specifications changes in our March 1, 1994 letter. A copy of the significant hazards consideration analysis from our March 1, 1994 letter is attached.

The significant hazards consideration analysis in our March 1, 1994 letter remains valid. We have also reviewed the NRC's proposed finding of no significant hazards published in the March 30, 1994 Federal Register (59FR14899). This proposed supplemental Technical Specifications change does not alter any of the facts or conclusions in the Federal Register notice.

## SIGNIFICANT HAZARDS CONSIDERATION (March 1, 1994)

The NRC has completed a comprehensive examination of surveillance requirements in Technical Specifications that require testing at power. The evaluation is documented in NUREG-1366, "Improvements to Technical Specification Surveillance Requirements," dated December 1992. The NRC staff found, that while the majority of testing at power is important, safety can be improved, equipment degradation decreased, and an unnecessary burden on personnel resources eliminated by reducing the amount of testing at power that is required by Technical Specifications. Based on the results of the evaluations documented in NUREG-1366, the NRC issued Generic Letter 93-05, "Line-Item Technical Specifications Improvements to Reduce Surveillance Requirements for Testing During Power Operation," dated September 27, 1993.

The safety function of the Emergency Diesel Generators (EDG's) is to supply AC electrical power to plant safety systems whenever the preferred AC power supply is unavailable. Consistent with Generic Letter 93-05, Item 10.1 and NUREG-1366, we are requesting a change to the testing requirements of an operable EDG when the alternate safety buses' EDG is inoperable or an offsite circuit is inoperable, the separation of the hot restart test of an EDG from the 24 hour loaded run, and the elimination of fast loading of EDG's except for the 18 month surveillance test of the Loss of Offsite Power (LOOP) capability.

Virginia Electric and Power Company has reviewed the proposed changes against the criteria of 10 CFR 50.92 and has concluded that the changes as proposed do not pose a significant hazards consideration. Specifically, operation of North Anna Power Station in accordance with the proposed Technical Specifications changes will not:

1. Involve a significant increase in the probability of occurrence or consequences of an accident previously evaluated.

Modifying the operability testing requirements for an inoperable EDG or inoperable offsite AC source(s), gradual loading of EDGs during surveillance testing, and separating the hot restart test of an EDG from the 24 hour load run test of EDGs does not affect the probability of occurrence or consequences of any previously evaluated accidents. Surveillance testing of the EDG in accordance with Revision 2 of Regulatory Guide 1.9 (December 1979) will continue to ensure that the EDGs will be capable of performing their intended safety functions. Therefore, modifying the operability testing requirements for an inoperable EDG or inoperable offsite AC source(s), gradual loading of EDGs during surveillance testing, and separating the hot restart test of an EDG from the 24 hour load run test of EDGs does not affect the probability or consequences of any previously analyzed accident.

2. Create the possibility of a new or different kind of accident from any accident previously evaluated.

Modifying the operability testing requirements for an inoperable EDG or inoperable offsite AC source(s), gradual loading of EDGs during surveillance testing, and separating the hot restart test of an EDG from the 24 hour load run test of EDGs does not involve any physical modifications of the plant or result in a change in a method of operation. Surveillance testing of the EDG in accordance with Revision 2 of Regulatory Guide 1.9 (December 1979) will continue to ensure that the EDGs will be capable of performing their intended safety functions. Therefore, a new or different type of accident is not made possible.

3. Involve a significant reduction in a margin of safety.

Modifying the operability testing requirements for an inoperable EDG or inoperable offsite AC source(s), gradual loading of EDGs during surveillance testing, and separating the hot restart test of an EDG from the 24 hour load run test of EDGs does not affect any safety limits or limiting safety system settings. System operating parameters are unaffected. The availability of equipment required to mitigate or assess the consequence of an accident is not reduced. Surveillance testing of the EDG in accordance with Revision 2 of Regulatory Guide 1.9 (December 1979) will continue to assure that the EDGs will be capable of performing their intended safety functions. Safety margins are, therefore, not decreased.