

PROPOSED TECHNICAL SPECIFICATION CHANGES

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ANO-1

BASES (continued)

initiated or that higher modes of operation are not entered when corrective action is being taken to obtain compliance with a Specification by restoring equipment to OPERABLE status or parameters to specified limits. Compliance with Action requirements that permit continued operation of the facility for an unlimited period of time provides an acceptable level of safety for continued operation without regard to the status of the plant before or after a mode change. Therefore, in this case, if the requirements for continued operation have been met in accordance with the requirements of the specification, then entry into that mode of operation is permissible. The provisions of this specification should not, however, be interpreted as endorsing the failure to exercise good practice in restoring systems or components to OPERABLE status before plant startup.

When a shutdown is required to comply with Action requirements, the provisions of Specification 3.0.4 do not apply because they would delay placing the facility in a lower mode of operation. For the purpose of compliance with this specification the term 'shutdown' is defined as a required reduction in the REACTOR OPERATING CONDITION.

3.0.5 Delineates what additional conditions must be satisfied to permit operation to continue when a normal or emergency power source is not OPERABLE. It specifically prohibits operation when one division is inoperable because its normal or emergency power source is inoperable and a system, subsystem, train, component or device in another division is inoperable for another reason.

The provisions of this specification permit the Limiting Condition for Operation statements associated with individual systems, subsystems, trains, components or devices to be consistent with the Limiting Condition for Operation statements of the associated electrical power source. It allows operation to be governed by the time limits of the Limiting Condition for Operation for the normal or emergency power source, not the individual Limiting Condition for Operation statements for each system, subsystem, train, component or device that is determined to be inoperable solely because of the inoperability of its normal or emergency power source.

For example, Specification 3.7.2.C provides an out-of-service time when one emergency diesel generator is not OPERABLE. If the definition of OPERABLE were applied without consideration of Specification 3.0.5, all systems, subsystems, trains, components and devices supplied by the inoperable emergency power source would also be inoperable. This would dictate invoking the applicable Action statements for each of the applicable Limiting Conditions for Operation. However, the provisions of Specification 3.0.5 permit the time limits for continued operation to

- 3.7.2 A. The specifications in 3.7.1 may be modified to allow one of the following conditions to exist after the reactor has been heated above 200F. Except as indicated in the following conditions, if any of these conditions are not met, a hot shutdown shall be initiated within 12 hours. If the condition is not cleared within 24 hours, the reactor shall be brought to cold shutdown within an additional 24 hours.
- B. In the event that one of the offsite power sources specified in 3.7.1.A (1 or 2) is inoperable, reactor operation may continue for up to 24 hours, after which Specification 3.7.2.A shall apply.
- C. Either one of the two diesel generators may be inoperable for up to 7 days¹ provided that the operability of the remaining diesel generator is demonstrated² within 8 hours, there are no inoperable ESF components associated with the operable diesel generator, and provided that the two sources of offsite power specified in 3.7.1.A(1) or 3.7.1.A(2) are available. If the diesel generator is not returned to service at the end of the 7 day¹ period, Specification 3.7.2.A shall apply.
- D. Any 4160V, 480V, or 120V switchgear, load center, motor control center, or distribution panel in one of the two ESF distribution systems may be inoperable for up to 8 hours, provided that the diesel generator associated with the operable ESF distribution system and all of the components of the operable distribution system are operable. If the ESF distribution system is not returned to service at the end of the 8 hour period, Specification 3.7.2.A shall apply.
- E. With no operable battery charger associated with one station battery, operation is allowed to continue for a period of 8 hours provided at least one battery charger is operable on the opposite train, after which Specification 3.7.2.A shall apply.
- F. One of the two station batteries and the associated distribution system may be inoperable for 8 hours provided that there are no inoperable safety related components associated with the remaining station battery which are redundant to the inoperable station battery. If the battery is not returned to service at the end of the 8 hour period, Specification 3.7.2.A shall apply.
- G. Two control power sources from the plant to the switchyard and the attendant distribution system may be inoperable for 8 hours, after which Specification 3.7.2.A shall apply.
- H. If the requirements of Specification 3.7.1.G cannot be met, either:
- (1) place all Startup Transformer No. 2 feeder breakers in "pull-to-lock" within 1 hour, restore the inoperable interlocks to operable status within 30 days, or submit within 30 days a Special Report pursuant to Specification 6.12.5 outlining the cause of the failure, proposed corrective action and schedule for implementation; or
 - (2) apply the action requirements of Table 3.5.1-1, Note 14.

¹ The allowable outage time for an inoperable diesel generator may be extended to 14 days for each diesel generator on a once per refueling cycle frequency.

² The operability of the remaining diesel generator can be demonstrated by either determining the diesel generator is not inoperable due to a common cause failure or by starting the diesel generator from the control room and verifying rated speed and voltage are achieved within 15 seconds.

ANO-2

BASES (Continued)

operation is not initiated or that higher modes of operation are not entered when corrective ACTION is being taken to obtain compliance with a specification by restoring equipment to OPERABLE status or parameter to specified limits. Compliance with ACTION requirements that permit continued operation of the facility for an unlimited period of time provides an acceptable level of safety for continued operation without regard to the status of the plant before or after a mode change. Therefore, in this case, if the requirements for continued operation have been met in accordance with the requirements of the specification, then entry into that mode of operation is permissible. The provision of this specification should not, however, be interpreted as endorsing the failure to exercise good practice in restoring systems or components to OPERABLE status before plant startup.

When a shutdown is required to comply with ACTION requirements, the provisions of Specification 3.0.4 do not apply because they would delay placing the facility in a lower mode of operation. For the purpose of compliance with this specification the term shutdown is defined as a required reduction in mode.

3.0.5 This specification delineates what additional conditions must be satisfied to permit operation to continue, consistent with the ACTION statements for power sources, when a normal or emergency power source is not OPERABLE. It specifically prohibits operation when one division is inoperable because its normal or emergency power source is inoperable and a system, subsystem, train, component or device in another division is inoperable for another reason.

The provisions of this specification permit the ACTION statements associated with individual systems, subsystems, trains, components, or devices to be consistent with the ACTION statements of the associated electrical power source. It allows operation to be governed by the time limits of the ACTION statement associated with the Limiting Condition for Operation for the normal or emergency power source, not the individual ACTION statements for each system, subsystem, train, component or device that is determined to be inoperable solely because of the inoperability of its normal or emergency power source.

For example, Specification 3.8.1.1 requires in part that two emergency diesel generators be OPERABLE. The ACTION statement provides an out-of-service time when one emergency diesel generator is not OPERABLE. If the definition of OPERABLE were applied without consideration of Specification 3.0.5, all systems, subsystems, trains, components, and devices supplied by the inoperable emergency power source would also be inoperable. This would dictate invoking the applicable ACTION statements for each of the applicable Limiting Conditions for Operation. However, the provisions of Specification 3.0.5 permit the time limits for continued operation to be consistent with the ACTION statement for the inoperable

REACTOR COOLANT SYSTEM

PRESSURIZER

LIMITING CONDITION FOR OPERATION

3.4.4 The pressurizer shall be OPERABLE with a water volume of ≤ 910 cubic feet (equivalent to $\leq 82\%$ of wide range indicated level) and both pressurizer proportional heater groups shall be OPERABLE.

APPLICABILITY: MODES 1, 2 and 3.

ACTION:

- (a) With the pressurizer inoperable due to water volume ≥ 910 cubic feet, be in at least HOT SHUTDOWN with the reactor trip breakers open within 12 hours.
- (b) With the pressurizer inoperable due to an inoperable proportional heater group, either restore the inoperable proportional heater group within 72 hours or be in at least HOT SHUTDOWN within 12 hours.

SURVEILLANCE REQUIREMENTS

4.4.4.1 The pressurizer water volume shall be determined to be within its limits at least once per 12 hours.

4.4.4.2 The pressurizer proportional heater groups shall be determined to be OPERABLE at least once per 18 months by verifying that the summed power consumption of the two proportional heater groups is ≥ 150 KW.

3/4.8 ELECTRICAL POWER SYSTEMS

3/4.8.1 A.C. SOURCES

LIMITING CONDITION FOR OPERATION

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 1E distribution system and
- b. Two separate and independent diesel generators each with:
 1. A day fuel tank containing a minimum volume of 280 gallons of fuel (equivalent to 50% of indicated tank volume),
 2. A separate fuel storage system containing a minimum volume of 22,500 gallons of fuel (equivalent to 100% of indicated tank level), and
 3. A separate fuel transfer pump.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

- a. With one offsite A.C. circuit of the above required A.C. electrical power sources inoperable, demonstrate the OPERABILITY of the remaining offsite A.C. circuit by performing Surveillance Requirement 4.8.1.1.1.a within 1 hour and at least once per 8 hours thereafter. Restore the offsite A.C. circuit 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.
- b. With one diesel generator of the above required A.C. electrical power source inoperable, demonstrate the OPERABILITY of both the offsite A.C. circuits by performing Surveillance Requirement 4.8.1.1.1.a within 1 hour and at least once per 8 hours thereafter. If the diesel generator became inoperable due to any cause other than preplanned preventive maintenance or testing, demonstrate the OPERABILITY of the remaining OPERABLE diesel generator (unless it has been successfully tested in the last 24 hours or is already operating) by performing Surveillance Requirement 4.8.1.1.2.a.4 within 24 hours. Restore the diesel generator to OPERABLE status within 7 days¹ or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

¹ The allowable outage time for an inoperable diesel generator may be extended to 14 days for each diesel generator on a once per refueling cycle frequency.

ELECTRICAL POWER SYSTEMS

ACTION (Continued)

- c. With one offsite A.C. circuit and one diesel generator of the above required A.C. electrical power sources inoperable, demonstrate the OPERABILITY of the remaining offsite A.C. circuit by performing Surveillance Requirement 4.8.1.1.1.a within 1 hour and at least once per 8 hours thereafter; and, if the diesel generator became inoperable due to any cause other than preplanned preventive maintenance or testing, demonstrate the OPERABILITY of the remaining OPERABLE diesel generator by performing Surveillance Requirement 4.8.1.1.2.a.4 within 8 hours (unless it is already operating or has been tested within the last 8 hours). Restore at least one of the inoperable sources to OPERABLE status within 12 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours. Restore both offsite circuits to OPERABLE status within 72 hours and both diesel generators to OPERABLE status within 7 days¹ of the initiating event or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- d. With two offsite A.C. circuits of the above required A.C. electrical power sources inoperable, restore one of the inoperable offsite A.C. circuits to OPERABLE status within 24 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours. Restore both A.C. circuits within 72 hours of the initiating event or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- e. With two diesel generators of the above required A.C. electrical power sources inoperable, demonstrate the OPERABILITY of the two offsite A.C. circuits by performing Surveillance Requirement 4.8.1.1.1.a within 1 hour and at least once per 8 hours thereafter. Restore one of the inoperable diesel generators to OPERABLE status within 2 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours. Restore both diesel generators to OPERABLE status within 7 days¹ of the initiating event or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

¹ The allowable outage time for an inoperable diesel generator may be extended to 14 days for each diesel generator on a once per refueling cycle frequency.

ELECTRICAL POWER SYSTEMS

SURVEILLANCE REQUIREMENTS

4.8.1.1.1 Each of the above required independent circuits between the offsite transmission network and the onsite Class 1E distribution system shall be:

- a. Determined OPERABLE at least once per 7 days by verifying correct breaker alignments, indicated power availability, and
- b. Demonstrated OPERABLE at least once per 18 months during shutdown by transferring (manually and automatically) unit power supply from the normal circuit to the alternate circuit.

4.8.1.1.2 Each diesel generator shall be demonstrated OPERABLE: (Note 1)

- 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 a standby condition and accelerates to at least 900 rpm in ≤ 15 seconds. (Note 2)
 5. Verifying the generator is synchronized, loaded to an indicated 2600 to 2850 Kw and operates for ≥ 60 minutes. (Notes 3 & 4)
 6. Verifying the diesel generator is aligned to provide standby power to the associated emergency busses.
- b. At least once per 92 days by verifying that a sample of diesel fuel from the fuel storage tank obtained in accordance with ASTM-D270-65, is within the acceptable limits specified in Table 1 of ASTM D975-74 when checked for viscosity, water and sediment.

Note 1

All planned diesel generator starts for the purposes of these surveillances may be preceded by prelube procedures.

Note 2

This diesel generator start from a standby condition in ≤ 15 sec. shall be accomplished at least once every 184 days. All other diesel generator starts for this surveillance may be in accordance with vendor recommendations.

Note 3

Diesel generator loading may be accomplished in accordance with vendor recommendations such as gradual loading.

Note 4

Momentary transients outside this load band due to changing loads will not invalidate the test. Load ranges are allowed to preclude overloading the diesel generators.

ELECTRICAL POWER SYSTEM

SURVEILLANCE REQUIREMENTS (Continued)

- c. At least once per 18 months 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.
 2. Verifying that the automatic sequence time delay relays are OPERABLE at their setpoint $\pm 10\%$ of the elapsed time for each load block.
 3. Verifying the generator capability to reject a load of ≥ 596 Kw and maintain voltage at 4160 ± 500 volts and frequency at 60 ± 3 Hz.
 4. Verifying the generator capability to reject a load of 2850 Kw without exceeding 75% of the difference between nominal speed and the overspeed trip setpoint, or 15% above nominal, whichever is lower.
 5. Simulating a loss of offsite power by itself, and:
 - a. Verifying de-energization of the emergency busses and load shedding from the emergency busses.
 - b. Verifying the diesel starts from a standby condition on the undervoltage auto-start signal, energizes the emergency busses with permanently connected loads, energizes the auto-connected shutdown loads through the time delay relays and operates for ≥ 5 minutes while its generator is loaded with the shutdown loads.
 6. Verifying that on a Safety Injection Actuation Signal (SIAS) actuation test signal (without loss of offsite power) the diesel generator starts on the auto-start signal and operates on standby for ≥ 5 minutes.

ELECTRICAL POWER SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

11. Verifying the diesel generator's capability to:
 - a) Synchronize with the offsite power source while the generator is loaded with its emergency loads upon a simulated restoration of offsite power,
 - b) Transfer its loads to the offsite power source, and
 - c) Proceed through its shutdown sequence.
12. Verifying that with the diesel generator operating in a test mode (connected to its bus), a simulated safety injection signal overrides the test mode by (1) returning the diesel generator to standby operation and (2) automatically energizes the auto-connected emergency (accident) loads with offsite power.
13. Verifying that the fuel transfer pump transfers fuel from each fuel storage tank to the day tank of each diesel via the installed cross connection lines.
- d. At least once per 10 years or after any modifications which could affect diesel generator interdependence by starting both diesel generators simultaneously, during shutdown, and verifying that both diesel generators accelerate to at least 900 rpm in ≤ 15 seconds.

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BASES

The OPERABILITY of the A.C. and D.C. power sources and associated distribution systems during operation ensures that sufficient power will be available to supply the safety-related equipment required for 1) the safe shutdown of the facility and 2) the mitigation and control of accident conditions within the facility. The minimum specified independent and redundant A.C. and D.C. power sources and distribution systems satisfy the requirements of General Design Criteria 17 of Appendix "A" to 10 CFR 50.

The ACTION requirements specified for the levels of degradation of the power sources provide restriction upon continued facility operation commensurate with the level of degradation. The OPERABILITY of the power sources are consistent with the initial condition assumptions of the accident analyses and are based upon maintaining at least one redundant set of onsite A.C. and D.C. power sources and associated distribution systems OPERABLE during accident conditions coincident with an assumed loss of offsite power and single failure of the other onsite A.C. source. ACTION requirements are consistent with Generic Letter 84-15, "Proposed Staff Actions to Improve and Maintain Diesel Generator Reliability."

The OPERABILITY of the minimum specified A.C. and D.C. power sources and associated distribution systems during shutdown and refueling ensures that 1) the facility can be maintained in the shutdown or refueling condition for extended time periods and 2) sufficient instrumentation and control capability is available for monitoring and maintaining the unit status.

The Surveillance Requirements for demonstrating the OPERABILITY of the diesel generators are in accordance with the recommendations of Regulatory Guides 1.9 "Selection of Diesel Generator Set Capacity for Standby Power Supplies", March 10, 1971, and 1.108 "Periodic Testing of Diesel Generator Units Used as Onsite Electric Power Systems at Nuclear Power Plants", Revision 1, August 1977 and Generic Letter 84-15. Load Ranges provided in surveillances are allowed to avoid routine overloading of diesel generators. Load in excess of these load ranges for special testing, momentary variation due to changing bus loads, or short term variations shall not invalidate surveillance tests. For the purpose of surveillance testing, the term "standby condition" is defined as the approximate temperature range of the jacket cooling water and engine lube oil sump normally maintained by the engine keep warm system. An exception to this definition is the engine conditions that exist when performing the hot restart test following the 24 hour EDG endurance run. When performing this test, the engine is near normal operating temperature when in a "standby condition". Additionally, this definition includes the allowance to perform engine prelubrication prior to all planned test starts.

ADMINISTRATIVE CONTROLS

ANNUAL REPORTS^{1/}

6.9.1.4 Annual reports covering the activities of the unit as described below for the previous calendar year shall be submitted prior to March 1 of each year. The initial report shall be submitted prior to March 1 of the year following initial criticality.

6.9.1.5. Reports required on an annual basis shall include:

- a. A tabulation on an annual basis for the number of station, utility and other personnel (including contractors) receiving exposures greater than 100 mrem/yr and their associated man rem exposure according to work and job functions,^{2/} e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling. The dose assignment to various duty functions may be estimates based on pocket dosimeter, TLD, or film badge measurements. Small exposures totalling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole body dose received from external sources shall be assigned to specific major work functions.
- b. The complete results of steam generator tube inservice inspections performed during the report period (reference Specification 4.4.5.5.b).
- c. Documentation of all challenges to the pressurizer safety valves.
- d. Deleted
- e. The results of specific activity analysis in which the primary coolant exceeded the limits of Specification 3.4.8. The following information shall be included: (1) Reactor power history starting 48 hours prior to the first sample in which the limit was exceeded; (2) Results of the last isotopic analysis for radioiodine performed prior to exceeding the limit, results of analysis while limit was exceeded the results of one analysis after the radioiodine activity was reduced to less than limit. Each result should include date and time of sampling and the radioiodine concentrations; (3) Clean-up system flow history

^{1/} A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station.

^{2/} This tabulation supplements the requirements of §20.407 of 10 CFR Part 20.

MARKUP OF CURRENT ANO-1 TECHNICAL SPECIFICATIONS

(FOR INFO ONLY)

BASES (continued)

initiated or that higher modes of operation are not entered when corrective action is being taken to obtain compliance with a Specification by restoring equipment to OPERABLE status or parameters to specified limits. Compliance with Action requirements that permit continued operation of the facility for an unlimited period of time provides an acceptable level of safety for continued operation without regard to the status of the plant before or after a mode change. Therefore, in this case, if the requirements for continued operation have been met in accordance with the requirements of the specification, then entry into that mode of operation is permissible. The provisions of this specification should not, however, be interpreted as endorsing the failure to exercise good practice in restoring systems or components to OPERABLE status before plant startup.

When a shutdown is required to comply with Action requirements, the provisions of Specification 3.0.4 do not apply because they would delay placing the facility in a lower mode of operation. For the purpose of compliance with this specification the term 'shutdown' is defined as a required reduction in the REACTOR OPERATING CONDITION.

3.0.5 Delineates what additional conditions must be satisfied to permit operation to continue when a normal or emergency power source is not OPERABLE. It specifically prohibits operation when one division is inoperable because its normal or emergency power source is inoperable and a system, subsystem, train, component or device in another division is inoperable for another reason.

The provisions of this specification permit the Limiting Condition for Operation statements associated with individual systems, subsystems, trains, components or devices to be consistent with the Limiting Condition for Operation statements of the associated electrical power source. It allows operation to be governed by the time limits of the Limiting Condition for Operation for the normal or emergency power source, not the individual Limiting Condition for Operation statements for each system, subsystem, train, component or device that is determined to be inoperable solely because of the inoperability of its normal or emergency power source.

For example, Specification 3.7.2.C provides ~~for an 7-day~~ out-of-service time when one emergency diesel generator is not OPERABLE. If the definition of OPERABLE were applied without consideration of Specification 3.0.5, all systems, subsystems, trains, components and devices supplied by the inoperable emergency power source would also be inoperable. This would dictate invoking the applicable Action statements for each of the applicable Limiting Conditions for Operation. However, the provisions of Specification 3.0.5 permit the time limits for continued operation to

- 3.7.2 A. The specifications in 3.7.1 may be modified to allow one of the following conditions to exist after the reactor has been heated above 200F. Except as indicated in the following conditions, if any of these conditions are not met, a hot shutdown shall be initiated within 12 hours. If the condition is not cleared within 24 hours, the reactor shall be brought to cold shutdown within an additional 24 hours.
- B. In the event that one of the offsite power sources specified in 3.7.1.A (1 or 2) is inoperable, reactor operation may continue for up to 24 hours ~~if the availability of the diesel generators is immediately verified,~~ after which Specification 3.7.2.A shall apply.
- C. Either one of the two diesel generators may be inoperable for up to 7 days¹ ~~in any month provided that during such 7 days the operability of the remaining diesel generator is demonstrated² immediately and daily thereafter~~ within 8 hours, there are no inoperable ESF components associated with the operable diesel generator, and provided that the two sources of offsite power specified in 3.7.1.A(1) or 3.7.1.A(2) are available. If the diesel generator is not returned to service at the end of the 7 day¹ period, Specification 3.7.2.A shall apply.
- D. Any 4160V, 480V, or 120V switchgear, load center, motor control center, or distribution panel in one of the two ESF distribution systems may be inoperable for up to 8 hours, provided that the ~~operability of the diesel generator associated with the operable ESF distribution system is demonstrated immediately~~ and all of the components of the operable distribution system are operable. If the ESF distribution system is not returned to service at the end of the 8 hour period, Specification 3.7.2.A shall apply.
- E. With no operable battery charger associated with one station battery, operation is allowed to continue for a period of 8 hours provided at least one battery charger is operable on the opposite train, after which Specification 3.7.2.A shall apply.
- F. One of the two station batteries and the associated distribution system may be inoperable for 8 hours provided that there are no inoperable safety related components associated with the remaining station battery which are redundant to the inoperable station battery ~~and the operability of the diesel generator is verified immediately.~~ If the battery is not returned to service at the end of the 8 hour period, Specification 3.7.2.A shall apply.
- G. Two control power sources from the plant to the switchyard and the attendant distribution system may be inoperable for 8 hours, after which Specification 3.7.2.A shall apply.
- H. If the requirements of Specification 3.7.1.G cannot be met, either:
- (1) place all Startup Transformer No. 2 feeder breakers in "pull-to-lock" within 1 hour, restore the inoperable interlocks to operable status within 30 days, or submit within 30 days a Special Report pursuant to Specification 6.12.5 outlining the cause of the failure, proposed corrective action and schedule for implementation; or
 - (2) apply the action requirements of Table 3.5.1-1, Note 14.

¹ The allowable outage time for an inoperable diesel generator may be extended to 14 days for each diesel generator on a once per refueling cycle frequency.

² The operability of the remaining diesel generator can be demonstrated by either determining the diesel generator is not inoperable due to a common cause failure or by starting the diesel generator from the control room and verifying rated speed and voltage are achieved within 15 seconds.

MARKUP OF CURRENT ANO-2 TECHNICAL SPECIFICATIONS

(FOR INFO ONLY)

BASES (Continued)

operation is not initiated or that higher modes of operation are not entered when corrective ACTION is being taken to obtain compliance with a specification by restoring equipment to OPERABLE status or parameter to specified limits. Compliance with ACTION requirements that permit continued operation of the facility for an unlimited period of time provides an acceptable level of safety for continued operation without regard to the status of the plant before or after a mode change. Therefore, in this case, if the requirements for continued operation have been met in accordance with the requirements of the specification, then entry into that mode of operation is permissible. The provision of this specification should not, however, be interpreted as endorsing the failure to exercise good practice in restoring systems or components to OPERABLE status before plant startup.

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For example, Specification 3.8.1.1 requires in part that two emergency diesel generators be OPERABLE. The ACTION statement provides ~~for an 72-hour~~ out-of-service time when one emergency diesel generator is not OPERABLE. If the definition of OPERABLE were applied without consideration of Specification 3.0.5, all systems, subsystems, trains, components, and devices supplied by the inoperable emergency power source would also be inoperable. This would dictate invoking the applicable ACTION statements for each of the applicable Limiting Conditions for Operation. However, the provisions of Specification 3.0.5 permit the time limits for continued operation to be consistent with the ACTION statement for the inoperable

REACTOR COOLANT SYSTEM

PRESSURIZER

LIMITING CONDITION FOR OPERATION

3.4.4 The pressurizer shall be OPERABLE with a water volume of ≤ 910 cubic feet (equivalent to $\leq 82\%$ of wide range indicated level) and both pressurizer proportional heater groups shall be OPERABLE.

APPLICABILITY: MODES 1, 2 and 3.

ACTION:

- (a) With the pressurizer inoperable due to water volume ≥ 910 cubic feet, be in at least HOT SHUTDOWN with the reactor trip breakers open within 12 hours.
- (b) With the pressurizer inoperable due to an inoperable ~~emergency power supply to the pressurizer heaters~~ proportional heater group, either restore the inoperable ~~emergency power supply~~ proportional heater group within 72 hours or be in at least HOT SHUTDOWN within 12 hours.

SURVEILLANCE REQUIREMENTS

4.4.4.1 The pressurizer water volume shall be determined to be within its limits at least once per 12 hours.

4.4.4.2 The pressurizer proportional heater groups shall be determined to be OPERABLE-

- ~~(a) At least once per 12 hours by verifying emergency power is available to the heater groups, and~~
- (b) At least once per 18 months by verifying that the summed power consumption of the two proportional heater groups is ≥ 150 KW.

3/4.8 ELECTRICAL POWER SYSTEMS

3/4.8.1 A.C. SOURCES

LIMITING CONDITION FOR OPERATION

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 1E distribution system and
- b. Two separate and independent diesel generators each with:
 1. A day fuel tank containing a minimum volume of 280 gallons of fuel (equivalent to 50% of indicated tank volume),
 2. A separate fuel storage system containing a minimum volume of 22,500 gallons of fuel (equivalent to 100% of indicated tank level), and
 3. A separate fuel transfer pump.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

- a. With one offsite A.C. circuit of the above required A.C. electrical power sources inoperable, demonstrate the OPERABILITY of the remaining offsite A.C. circuit by performing Surveillance Requirement 4.8.1.1.1.a within 1 hour and at least once per 8 hours thereafter. ~~If either diesel generator has not been successfully tested within the past 24 hours, demonstrate its OPERABILITY by performing Surveillance Requirement 4.8.1.1.2.a.4 separately for each diesel generator (unless it is already operating) within 24 hours.~~ Restore the offsite A.C. circuit 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.
- b. With one diesel generator of the above required A.C. electrical power source inoperable, demonstrate the OPERABILITY of both the offsite A.C. circuits by performing Surveillance Requirement 4.8.1.1.1.a within 1 hour and at least once per 8 hours thereafter. If the diesel generator became inoperable due to any cause other than preplanned preventive maintenance or testing, demonstrate the OPERABILITY of the remaining OPERABLE diesel generator (unless it has been successfully tested in the last 24 hours or is already operating) by performing Surveillance Requirement 4.8.1.1.2.a.4 within 24 hours. Restore the diesel generator to OPERABLE status within ~~72 hours~~ 7 days¹ or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

¹ The allowable outage time for an inoperable diesel generator may be extended to 14 days for each diesel generator on a once per refueling cycle frequency.

ELECTRICAL POWER SYSTEMS

ACTION (Continued)

- c. With one offsite A.C. circuit and one diesel generator of the above required A.C. electrical power sources inoperable, demonstrate the OPERABILITY of the remaining offsite A.C. circuit by performing Surveillance Requirement 4.8.1.1.1.a within 1 hour and at least once per 8 hours thereafter; and, if the diesel generator became inoperable due to any cause other than preplanned preventive maintenance or testing, demonstrate the OPERABILITY of the remaining OPERABLE diesel generator by performing Surveillance Requirement 4.8.1.1.2.a.4 within 8 hours (unless it is already operating or has been tested within the last 8 hours). Restore at least one of the inoperable sources to OPERABLE status within 12 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours. Restore both offsite circuits and both diesel generators to OPERABLE status within 72 hours and both diesel generators to OPERABLE status within 7 days¹ of the initiating event or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- d. With two offsite A.C. circuits of the above required A.C. electrical power sources inoperable ~~perform Surveillance Requirement 4.8.1.1.2.a.4 on the diesel generators within the next 8 hours (unless the diesel generators are already operating or have been successfully tested within the past 8 hours).~~ Restore one of the inoperable offsite A.C. circuits to OPERABLE status within 24 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours. Restore both A.C. circuits within 72 hours of the initiating event or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- e. With two diesel generators of the above required A.C. electrical power sources inoperable, demonstrate the OPERABILITY of the two offsite A.C. circuits by performing Surveillance Requirement 4.8.1.1.1.a within 1 hour and at least once per 8 hours thereafter. Restore one of the inoperable diesel generators to OPERABLE status within 2 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours. Restore both diesel generators to OPERABLE status within 72 hours 7 days¹ of the initiating event or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

¹ The allowable outage time for an inoperable diesel generator may be extended to 14 days for each diesel generator on a once per refueling cycle frequency.

ELECTRICAL POWER SYSTEMS

SURVEILLANCE REQUIREMENTS

4.8.1.1.1 Each of the above required independent circuits between the offsite transmission network and the onsite Class 1E distribution system shall be:

- a. Determined OPERABLE at least once per 7 days by verifying correct breaker alignments, indicated power availability, and
- b. Demonstrated OPERABLE at least once per 18 months during shutdown by transferring (manually and automatically) unit power supply from the normal circuit to the alternate circuit.

4.8.1.1.2 Each diesel generator shall be demonstrated OPERABLE: (Note 1)

- a. ~~In accordance with the frequency specified in Table 4.8-1~~ 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 a standby condition and accelerates to at least 900 rpm in ≤ 15 seconds. (Note 2)
 5. Verifying the generator is synchronized, loaded to an indicated 2600 to 2850 Kw and operates for ≥ 60 minutes. (Notes 3 & 4)
 6. Verifying the diesel generator is aligned to provide standby power to the associated emergency busses.
- b. At least once per 92 days by verifying that a sample of diesel fuel from the fuel storage tank obtained in accordance with ASTM-D270-65, is within the acceptable limits specified in Table 1 of ASTM D975-74 when checked for viscosity, water and sediment.

Note 1

All planned diesel generator starts for the purposes of these surveillances may be preceded by prelube procedures.

Note 2

This diesel generator start from a standby condition in ≤ 15 sec. shall be accomplished at least once every 184 days. All other diesel generator starts for this surveillance may be in accordance with vendor recommendations.

Note 3

Diesel generator loading may be accomplished in accordance with vendor recommendations such as gradual loading.

Note 4

Momentary transients outside this load band due to changing loads will not invalidate the test. Load ranges are allowed to preclude overloading the diesel generators.

ELECTRICAL POWER SYSTEM

SURVEILLANCE REQUIREMENTS (Continued)

- 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.
 2. Verifying that the automatic sequence time delay relays are OPERABLE at their setpoint $\pm 10\%$ of the elapsed time for each load block.
 3. Verifying the generator capability to reject a load of ≥ 596 Kw and maintain voltage at 4160 ± 500 volts and frequency at 60 ± 3 Hz.
 4. Verifying the generator capability to reject a load of 2850 Kw without exceeding 75% of the difference between nominal speed and the overspeed trip setpoint, or 15% above nominal, whichever is lower.
 5. Simulating a loss of offsite power by itself, and:
 - a. Verifying de-energization of the emergency busses and load shedding from the emergency busses.
 - b. Verifying the diesel starts from a standby condition on the undervoltage auto-start signal, energizes the emergency busses with permanently connected loads, energizes the auto-connected shutdown loads through the time delay relays and operates for ≥ 5 minutes while its generator is loaded with the shutdown loads.
 6. Verifying that on a Safety Injection Actuation Signal (SIAS) actuation test signal (without loss of offsite power) the diesel generator starts on the auto-start signal and operates on standby for ≥ 5 minutes.

ELECTRICAL POWER SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

11. Verifying the diesel generator's capability to:
 - a) Synchronize with the offsite power source while the generator is loaded with its emergency loads upon a simulated restoration of offsite power,
 - b) Transfer its loads to the offsite power source, and
 - c) Proceed through its shutdown sequence.
12. Verifying that with the diesel generator operating in a test mode (connected to its bus), a simulated safety injection signal overrides the test mode by (1) returning the diesel generator to standby operation and (2) automatically energizes the auto-connected emergency (accident) loads with offsite power.
13. Verifying that the fuel transfer pump transfers fuel from each fuel storage tank to the day tank of each diesel via the installed cross connection lines.
 - d. At least once per 10 years or after any modifications which could affect diesel generator interdependence by starting both diesel generators simultaneously, during shutdown, and verifying that both diesel generators accelerate to at least 900 rpm in ≤ 15 seconds.

~~4.8.1.1.3 Reports - See Specification 6.9.1.5.d.~~

TABLE 4.8-1

DIESEL GENERATOR TEST SCHEDULE

| <u>Number of Failures In</u> <u>Last 20 Valid Tests*</u> | <u>Number of Failures In</u> <u>Last 100 Valid Tests*</u> | <u>Test Frequency</u> |
|---|--|----------------------------|
| <u>1</u> | <u>4</u> | At least once per 31 days |
| <u>2</u> | <u>5</u> | At least once per 7 days** |

*Criteria for determining number of failures and number of valid tests shall be in accordance with Regulatory Guide 1.108, where the last 20/100 tests are determined on a diesel generator unit basis.

**This test frequency shall 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 one or less and the number of failures in the last 100 valid demands has been reduced to four or less.

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BASES

The OPERABILITY of the A.C. and D.C. power sources and associated distribution systems during operation ensures that sufficient power will be available to supply the safety-related equipment required for 1) the safe shutdown of the facility and 2) the mitigation and control of accident conditions within the facility. The minimum specified independent and redundant A.C. and D.C. power sources and distribution systems satisfy the requirements of General Design Criteria 17 of Appendix "A" to 10 CFR 50.

The ACTION requirements specified for the levels of degradation of the power sources provide restriction upon continued facility operation commensurate with the level of degradation. The OPERABILITY of the power sources are consistent with the initial condition assumptions of the accident analyses and are based upon maintaining at least one redundant set of onsite A.C. and D.C. power sources and associated distribution systems OPERABLE during accident conditions coincident with an assumed loss of offsite power and single failure of the other onsite A.C. source. ACTION requirements are consistent with Generic Letter 84-15, "Proposed Staff Actions to Improve and Maintain Diesel Generator Reliability."

The OPERABILITY of the minimum specified A.C. and D.C. power sources and associated distribution systems during shutdown and refueling ensures that 1) the facility can be maintained in the shutdown or refueling condition for extended time periods and 2) sufficient instrumentation and control capability is available for monitoring and maintaining the unit status.

The Surveillance Requirements for demonstrating the OPERABILITY of the diesel generators are in accordance with the recommendations of Regulatory Guides 1.9 "Selection of Diesel Generator Set Capacity for Standby Power Supplies", March 10, 1971, and 1.108 "Periodic Testing of Diesel Generator Units Used as Onsite Electric Power Systems at Nuclear Power Plants", Revision 1, August 1977 and Generic Letter 84-15. Load Ranges provided in surveillances are allowed to avoid routine overloading of diesel generators. Load in excess of these load ranges for special testing, momentary variation due to changing bus loads, or short term variations shall not invalidate surveillance tests. For the purpose of surveillance testing, the term "standby condition" is defined as the approximate temperature range of the jacket cooling water and engine lube oil sump normally maintained by the engine keep warm system. An exception to this definition is the engine conditions that exist when performing the hot restart test following the 24 hour EDG endurance run. When performing this test, the engine is near normal operating temperature when in a "standby condition". Additionally, this definition includes the allowance to perform engine prelubrication prior to all planned test starts.

~~The Diesel Generator Test Schedule, Table 4.8-1 has been developed for the purpose of determining testing requirements based on the number of failures and valid tests using the example provided in Generic Letter 84-15 using a per diesel generator unit basis. The criteria of R.C.1.108 position C.2.e is used for criterial determination.~~

ADMINISTRATIVE CONTROLS

ANNUAL REPORTS^{1/}

6.9.1.4 Annual reports covering the activities of the unit as described below for the previous calendar year shall be submitted prior to March 1 of each year. The initial report shall be submitted prior to March 1 of the year following initial criticality.

6.9.1.5. Reports required on an annual basis shall include:

- a. A tabulation on an annual basis for the number of station, utility and other personnel (including contractors) receiving exposures greater than 100 mrem/yr and their associated man rem exposure according to work and job functions,^{2/} e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling. The dose assignment to various duty functions may be estimates based on pocket dosimeter, TLD, or film badge measurements. Small exposures totalling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole body dose received from external sources shall be assigned to specific major work functions.
- b. The complete results of steam generator tube inservice inspections performed during the report period (reference Specification 4.4.5.5.b).
- c. Documentation of all challenges to the pressurizer safety valves.
- d. ~~A diesel generator data report which provides the number of valid tests and the number of valid failures for each diesel generator.~~ Deleted
- e. The results of specific activity analysis in which the primary coolant exceeded the limits of Specification 3.4.8. The following information shall be included: (1) Reactor power history starting 48 hours prior to the first sample in which the limit was exceeded; (2) Results of the last isotopic analysis for radioiodine performed prior to exceeding the limit, results of analysis while limit was exceeded the results of one analysis after the radioiodine activity was reduced to less than limit. Each result should include date and time of sampling and the radioiodine concentrations; (3) Clean-up system flow history

^{1/} A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station.

^{2/} This tabulation supplements the requirements of §20.407 of 10 CFR Part 20.