## 2.0 LIMITING CONDITIONS FOR OPERATION

## 2.9 <u>Electrical Systems</u> (Continued)

from either one of two diesel generators and off-site standby power via the unit auxiliary transformers.(1)

The two emergency diesel generators on site do not require outside power for start up or operation.

Upon loss of normal and standby power sources, the 4.16 kV buses 1A3 and 1A4 are energized from the diesel generators. Bus load shedding, transfer to the diesel generator and pickup of critical loads are carried out automatically. (2)

When the turbine generator is out of service for an extended period, the generator can be isolated by opening motor operated disconnect switch DS-T1 in the bus between the generator and the main transformer, allowing the main transformer and the unit auxiliary power transformers to 1.4 returned to service.(3)

Equipment served by 4.16 kV and 480 V auxiliary buses and MCC's is arranged so that loss of an entire 4.16 kV bus does not compromise safety of the plant during DBA conditions. For example, if 4.16 kV bus 1A3 is lost, two raw water pumps, one low pressure safety injection pump, one high pressure safety injection pump, one auxiliary feedwater pump, two component cooling water pumps, two containment spray pumps and two containment air fans are lost. This leaves two raw water pumps, one low pressure safety injection pump, two high pressure safety injection pumps, one component cooling water pump, one containment spray pump and two containment air fans which is more than sufficient to control containment pressure below the design value during the DBA.

The total fuel oil engine base tank capacity of 550 gallons on each diesel is considered more than adequate since approximately a hours running time (worst case loading) is available before transfer of fuel oil from the 18,000 gallon underground storage tanks is mandatory. Two 13 gpm diesel oil transfer pumps per diesel, with each being fed from the diesel it is associated with, are available for transferring fuel oil from the storage tank to the day tanks. The 16,000 gallons in the storage tank in addition to the day tanks will provide diesel operation under the required loading conditions for a minimum period of 7 days should only one diesel be in operation. It is considered incredible not to be able to secure fuel oil from one of several sources in the vicinity of Omaha in less than three days under the worst of weather conditions.

One battery charger on each battery shall be operating so that the batteries will always be at full charge; this ensures that adequate i-c power will be avilable for all emergency uses. Each battery has one battery charger permanently connected with a third charger sapable of being connected to either battery bus. The chargers are each rated

Amendment No. 76

ADOCK 05000285

PNU

809150179 8809

## NO SIGNIFICANT HAZARDS CONSIDERATION

During the recently completed calculations performed to verify the .dequacy of the onsite fuel oil storage capacity of 16,000 gallons as required in Technical Specification 2.7, it was determined that the fuel requirements appeared to exceed this amount. These calculations were performed as a part of the Omaha Public Power District Design Basis Reconstitution Effort.

The calculations indicate that the Technical Specification onsite fuel available gives a capacity of approximately 6 days of operation for one diesel generator. This was contrary to the basis statement that the capacity was sufficient for 7 days. The station staff was informed of this conclusion, and a reportability determination was made. Based on the conflicting information, a 10 CFR 50.72 telephone notification was made to the NRC on September 2, 1988. Additionally, the approach to resolve the situation was discussed, and Region IV was amenable to revising the basis to Technical Specification 2.7 to reflect the results of the calculations.

 WILL THE CHANGE INVOLVE A SIGNIFICANT INCREASE IN THE PROBABILITY OR CONSEQUENCES OF AN ACCIDENT PREVIOUS'Y EVALUATED?

No, the changes to the basis of Technical Specification 2.7 corrects errors in calculations and takes into account additional electrical loadings, which affect the amount of time the emergency diesel generator can run on only its full base tank fuel oil supply. The change is from 5 hour to 3.5 hours before the fuel oil transfer pumps are required. Also, the amount of time one emergency diesel generator can run on its full base tank fuel oil supply and 16,000 gallons in the underground storage tank, after a DBA and the required loading conditions, changes from 7 days to 6 days.

This change will not involve a significant increase in the probability or consequence of an accident previously evaluated because the 550 gallon emergency diesel generator base tank has an additional 300 gallon wall mounted auxiliary day tank which gravity feeds the base tank.

The level in the Auxiliary Fuel Oil Tank is maintained by automatic operation of the fuel oil transfer pumps in response to low and high level signals which are alarmed in the Control Room. This : 'itional tank extends the available time before the fuel oil transi. pumps would be required to keep the emergency diese' generator's base tank full.

The change from 7 days to 6 days of technical specified underground storage tank fuel oil capacity for one emergency diesel running does not involve a significant increase in the probability or consequence of an accident previously evaluated because it is considered incredible not to be able to secure additional fuel oil for the underground storage tank within 3 days. Additional fuel oil is available from our fuel oil distributer within 3 days of request for delivery, even for the most severe weather conditions. WILL THE CHANGE CREATE THE POSSIBILITY OF A NEW OR DIFFERENT KIND OF ACCIDENT FROM ANY ACCIDENT PREVIOUSLY EVALUATED?

No, the 550 gallon emergency diesel generator base tank, has an additional 300 gallon wall mounted auxiliary day tank which gravity feeds the base tank. The level in the auxiliary fuel oil tank is maintained automatically by the operation of the fuel oil transfer pumps. Power is supplied to the two fuel oil transfer pumps via a 480 volt, 3-phase transfer switch. In the event that both the normal and emergency power supplies are not available to the transfer switch when the engine is running, a manually interlocked breaker will supply power to the pumps from a transformer connected to the diesel generator output. The loss of power is annunciated in the Control Room. This ensures fuel oil will be transferred to the base tank from the underground storage tank.

The Technical Specification for underground storage capacity of 16,000 gallons is sufficient to supply post-accident requirements for 6 days. It is considered incredible to not be able to receive additional fuel oil within 3 days. Fuel oil is available from our fuel oil distributor within 3 days of request for delivery, even for the most severe weather conditions.

3.

## WILL THE CHANGE INVOLVE A SIGNIFICANT REDUCTION IN A MARGIN OF SAFETY?

No, the run time change based on the emergency diesel generator base tank does not significantly reduce the margin of safety for the plant because the 550 gallon base tank has an additional 300 gallon wall mounted auxiliary day tank that gravity feeds the base tank. The auxiliary day tank's level is maintained automatically by two fuel oil transfer pumps with normal and emergency sources of power, also the diesel generator's electrical output can be used as a source of power.

The Technical Specification for underground storage capacity of 16,000 gallons is sufficient to supply post-accident, one diesel generator, requirements for 6 days. It is considered incredible not to be able to receive additional fuel oil within 3 days. Fuel oil is available from our fuel oil distributor within 3 days of request for delivery, even for the most severe weather conditions.

A change to the USAR describing the capacities of the Emergency Diesel Generator base tank and underground fuel oil storage will be submitted upon approval of this request.

For the above reasons, the Omaha Public Power District does not believe the proposed change constitutes a significant hazards considerations.

2.