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10 CFR 50.90

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
DOCKET NO. 50-261 / RENEWED LICENSE NO. DPR-23

**SUBJECT: Remove 4.160 kilovolt Bus 2 from Surveillance Requirement 3.8.1.16  
(Automatic Transfer Capability from Unit Auxiliary Transformer to Startup  
Transformer)**

Ladies and Gentlemen:

Pursuant to 10 CFR 50.90, Duke Energy Progress, LLC (Duke Energy) is submitting a request for an amendment to the Technical Specifications (TS) for H. B. Robinson Steam Electric Plant (RNP), Unit No. 2. The proposed amendment would revise a Surveillance Requirement (SR) for TS 3.8.1, "AC Sources – Operating." Specifically, SR 3.8.1.16 would be revised to remove 4.160 kilovolt (kV) bus 2 from the requirement to verify automatic transfer capability from the unit auxiliary transformer to a startup transformer.

On March 30, 2022 Duke Energy and Nuclear Regulatory Commission (NRC) staff participated in a pre-submittal meeting regarding the proposed change to SR 3.8.1.16.

The Enclosure to this letter provides an evaluation of the proposed change. Attachments 1 and 2 provide the existing TS and TS Bases pages, respectively, marked to show the proposed change. The marked-up TS Bases pages are provided for information only.

The proposed change has been evaluated in accordance with 10 CFR 50.91(a)(1) using criteria in 10 CFR 50.92(c), and it has been determined that the proposed change involves no significant hazards consideration. The basis for this determination is included in the Enclosure.

Duke Energy requests approval of the proposed license amendments within one year of completion of the NRC's acceptance review. Once approved, Duke Energy will implement the amendment within 120 days.

This submittal contains no new regulatory commitments.

In accordance with 10 CFR 50.91, Duke Energy is notifying the state of South Carolina of this license amendment request by transmitting a copy of this letter to the designated state officials.

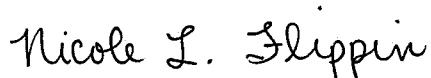
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Should you have any questions concerning this letter, or require additional information, please contact Lee Grzeck, Manager (Acting) – Nuclear Fleet Licensing, at 980-373-1530.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 28, 2022.

Sincerely,



Nicole L. Flippin  
Site Vice President

Enclosure:  
Evaluation of the Proposed Change

Attachments:  
1. Marked-Up Technical Specifications Pages  
2. Marked-Up Technical Specifications Bases Pages (For Information Only)

cc: (all with Enclosure/Attachments)

L. Dudes, Regional Administrator USNRC Region II  
M. Fannon, NRC Senior Resident Inspector  
T. Hood, NRR Project Manager

A. Wilson, Attorney General (SC)  
A. Nair, Director, Division of Environmental Response (SC)  
L. Garner, Manager, Radioactive and Infectious Waste Management Section (SC)

**Enclosure**

**EVALUATION OF THE PROPOSED CHANGE**

- 1.0 SUMMARY DESCRIPTION
- 2.0 DETAILED DESCRIPTION
  - 2.1 System Design and Operation
  - 2.2 Current Technical Specifications Requirements
  - 2.3 Reason for the Proposed Change
  - 2.4 Description of the Proposed Change
- 3.0 TECHNICAL EVALUATION
- 4.0 REGULATORY EVALUATION
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- 5.0 ENVIRONMENTAL CONSIDERATION
- 6.0 REFERENCES

## 1.0 SUMMARY DESCRIPTION

Duke Energy Progress, LLC (Duke Energy) proposes to amend the Technical Specifications (TS) for H. B. Robinson Steam Electric Plant (RNP), Unit No. 2. The proposed amendment would revise a Surveillance Requirement (SR) for TS 3.8.1, "AC Sources – Operating." Specifically, SR 3.8.1.16 would be revised to remove 4.160 kilovolt (kV) bus 2 from the requirement to verify automatic transfer capability from the unit auxiliary transformer (UAT) to a startup transformer (SUT).

## 2.0 DETAILED DESCRIPTION

### 2.1 System Design and Operation

The RNP Unit 2 AC Electrical Power Distribution System AC sources consist of the offsite power sources (preferred power sources), and the onsite standby power sources (Train A and Train B diesel generators (DGs)). As required by RNP design criteria, the design of the AC electrical power system provides independence and redundancy to ensure an available source of power to the Engineered Safety Feature (ESF) systems.

The onsite emergency AC Distribution System is divided into redundant load groups (trains) so that the loss of any one group does not prevent the minimum safety functions from being performed. Each train has connections to two preferred offsite power sources and a single DG.

Offsite power is supplied to the unit switchyard(s) from the transmission network by multiple transmission lines. From the switchyard(s), two electrically and physically separated circuits provide AC power, through two dedicated SUTs, to the 480 V ESF buses E1 and E2 (i.e. 480 V Emergency bus 1 and 480 V Emergency bus 2). Both SUTs are provided with a load tap changer. These load tap changers provide voltage regulation in the event of changing switchyard system voltage. Both load tap changers can be operated in manual or automatic modes.

The 480 V Emergency bus 1 is normally powered from the 115 kV switchyard through the dedicated 115 kV SUT, 4.160 kV bus 6 and station service transformer (SST) 2F. The 480 V Emergency bus 2 is normally powered from the dedicated 230 kV SUT, 4.160 kV bus 9 and SST 2G. The 4.160 kV buses 1, 2, 4 and 5 are normally powered from the main generator via the UAT and 4.160 kV bus 3 is normally powered from the 115 kV SUT via 4.160 kV bus 8. Following a generator lockout, 4.160 kV buses 1 and 2 would automatically transfer to the 230 kV SUT via 4.160 kV bus 7 and 4.160 kV buses 4 and 5 would automatically transfer to the 115 kV SUT via 4.160 kV buses 8 and 3.

Upon a loss of either SUT, 480 V Emergency bus 1 would be powered from the main generator through the UAT and 4.160 kV bus 2 via a manual transfer. Upon a loss of the 230 kV SUT, 480 V Emergency bus 2 would be manually transferred to the 115 kV SUT via 4.160 kV bus 3. A detailed description of the offsite power network and the circuits to the ESF buses is found in the RNP Update Final Safety Analysis Report (UFSAR), Chapter 8. UFSAR Figure 8.1.2-1A, "One Line Diagram Unit 2 Auxiliary Distribution System," is provided in Section 3 for reference.

During the SR 3.8.1.16 automatic transfer, the 480 V Emergency bus 1 power source is transferred from the UAT to either available SUT. This is accomplished by the opening of breakers 52/20 and 52/7 and the closing of breakers 52/12 and 52/19. As mentioned above, if a single SUT is out of service, the 480 V Emergency bus 1 would be powered from the UAT and the 480 V Emergency bus 2 would be powered from the remaining in-service SUT. Therefore,

availability of the automatic transfer function is only needed in the electrical lineups where either SUT is out of service (and the UAT is in-service). If both SUTs were out of service, transfer from the UAT to an SUT would serve no purpose.

An offsite circuit consists of all breakers, transformers, switches, interrupting devices, cabling, and controls required to transmit power from the offsite transmission network to the onsite ESF buses. In the normal operating lineup, this includes the circuit path from the 115 kV switchyard up to and including the feeder breaker to 480 V Emergency bus 1 via the 115 kV SUT and SST 2F and the circuit path from the 230 kV switchyard up to and including the feeder breaker to 480 V Emergency bus 2 via the 230 kV SUT and SST 2G.

## 2.2 Current Technical Specifications Requirements

TS 3.8.1, "AC Sources – Operating," specifies that the following AC electrical sources shall be OPERABLE in MODES 1 through 4:

- a. Two qualified circuits between the offsite transmission network and the onsite emergency AC Electrical Power Distribution System; and
- b. Two diesel generators (DGs) capable of supplying the onsite emergency power distribution subsystem(s).

SR 3.8.1.16 verifies automatic transfer capability from the UAT to a SUT. Specifically, SR 3.8.1.16 states the following is to be performed with a frequency in accordance with the Surveillance Frequency Control Program:

Verify automatic transfer capability of the 4.160 kV bus 2 and the 480 V Emergency bus 1 loads from the Unit auxiliary transformer to a start up transformer.

Additionally, SR 3.8.1.16 is modified by the following two notes:

1. This Surveillance shall not be performed in MODE 1 or 2.
2. SR 3.8.1.16 is not required to be met if 4.160 kV bus 2 and 480 V Emergency Bus 1 power supply is from a start up transformer.

## 2.3 Reason for the Proposed Change

The current SR 3.8.1.16 requires automatic transfer capability of both the 4.160 kV bus 2 and 480 V Emergency bus 1 from the UAT to a SUT. However, normal electrical lineups exist such that 480 V Emergency bus 1 is already aligned to a SUT when 4.160 kV bus 2 is not. In this configuration, if equipment is taken out of service for maintenance that removes automatic transfer capability of 4.160 kV bus 2, the current SR 3.8.1.16 would not be met. SR 3.0.1 states that a failure to meet a SR is a failure to meet the LCO. However, LCO 3.8.1 would be met in this scenario because there are two operable qualified offsite circuits, one of which would continue to provide power to 480 V Emergency bus 1. There is no applicable Condition in TS 3.8.1 for this scenario. In addition, Note 2 of SR 3.8.1.16 does not alleviate this situation because it only provides an exception in the case that both 4.160 kV bus 2 and 480 V Emergency bus 1 are aligned to a SUT.

#### 2.4 Description of the Proposed Change

The proposed change removes mention of 4.160 kV bus 2 from SR 3.8.1.16. An additional editorial change (“bus” in lower case in Note 2) is made for consistency. See Attachment 1 for a markup of the TS pages.

Specifically, SR 3.8.1.16 is proposed to state the following:

Verify automatic transfer capability of the 480 V Emergency bus 1 loads from the Unit auxiliary transformer to a start up transformer.

SR 3.8.1.16 Note 2 is proposed to state the following:

2. SR 3.8.1.16 is not required to be met if the 480 V Emergency bus 1 power supply is from a start up transformer.

The proposed change only removes 4.160 kV bus 2 from the requirements of the SR. No change is proposed to the breakers that actuate as part of automatic transfer. Although removed from the SR, transfer of the 4.160 kV bus 2 power source will continue to occur as needed to support the automatic transfer of 480 V Emergency bus 1.

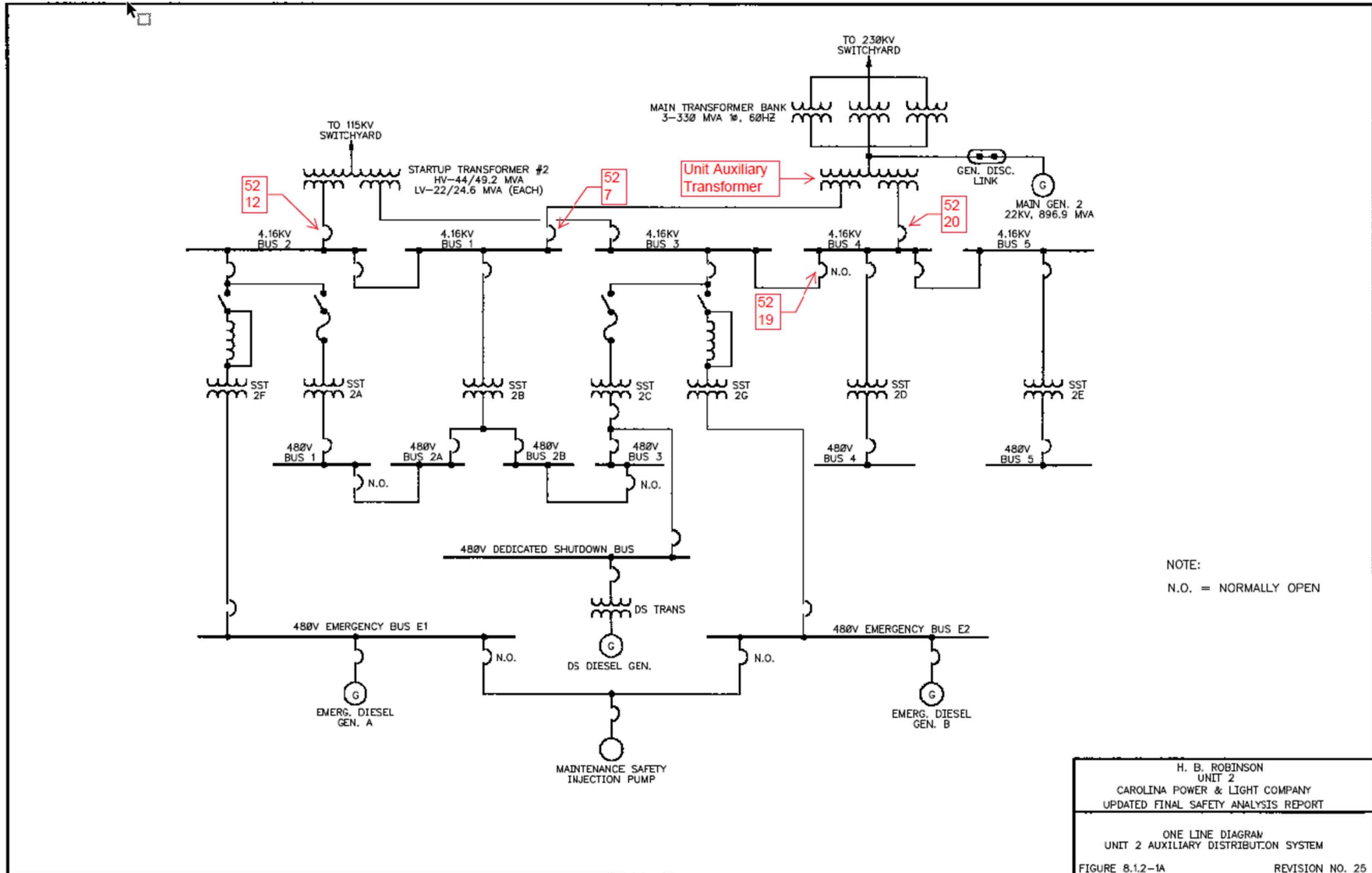
### 3.0 TECHNICAL EVALUATION

The design of the AC electrical power system ensures an available source of power to the ESF systems. An offsite circuit consists of all breakers, transformers, switches, interrupting devices, cabling, and controls required to transmit power from the offsite transmission network to the onsite ESF buses. In the normal operating lineup, this includes the circuit path from the 115 kV switchyard up to and including the feeder breaker to 480 V Emergency bus 1 via the 115 kV SUT and SST 2F and the circuit path from the 230 kV switchyard up to and including the feeder breaker to 480 V Emergency bus 2 via the 230 kV SUT and SST 2G. All safety related loads are supplied power from 480 V Emergency buses 1 and 2. The 4.160 kV buses provide the electrical flow path from the preferred offsite power source to the emergency buses; however, no safety related loads are supplied power directly from the 4.160 kV buses.

SR 3.8.1.16 was first added to the RNP TS under Amendment 176 (Reference 1), which converted the RNP TS to improved Standard TS (STS). This original SR 3.8.1.16 wording did include 4.160 kV bus 2. Justification in the STS conversion package stated that SR 3.8.1.16 was being “added to verify the automatic transfer of the emergency bus E1 loads from the unit auxiliary transformer to the startup transformer.” Note that 4.160 kV bus 2 is not mentioned in this justification.

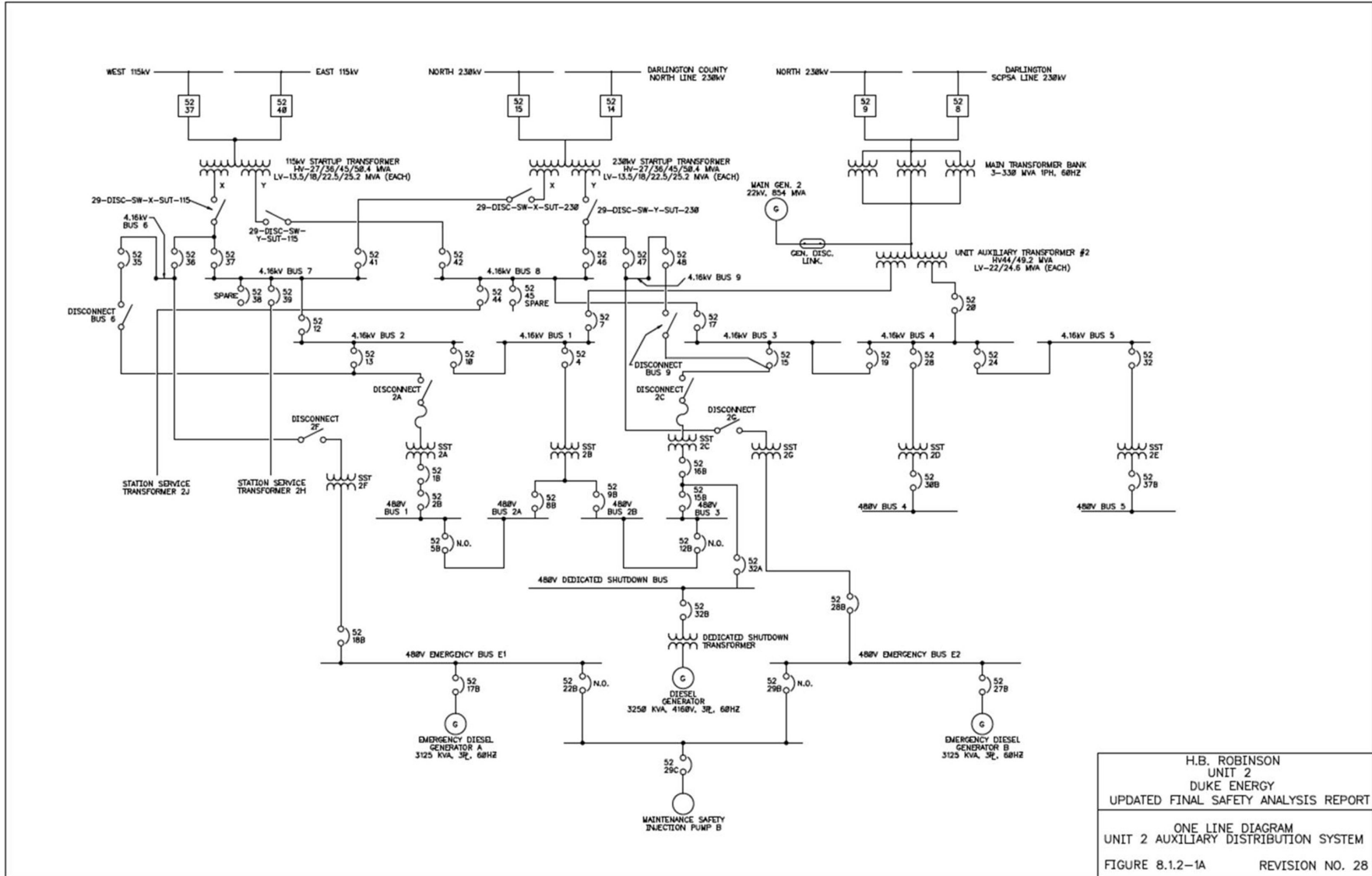
TS Amendment 261 (Reference 2), issued on September 10, 2018, added a second qualified offsite power circuit via a new 230 kV SUT as well as four new 4.160 kV buses (buses 6, 7, 8, and 9). RNP UFSAR Figure 8.1.2-1A, “One Line Diagram Unit 2 Auxiliary Distribution System,” is shown on the following pages, both before and after TS Amendment 261. As shown on the first figure depicting the electrical configuration prior to TS Amendment 261, the direct feed of 4.160 kV power to 480 V Emergency bus 1 was 4.160 kV bus 2, such that power to 480 V Emergency bus 1 would always flow through 4.160 kV bus 2. Therefore, inclusion of 4.160 kV bus 2 in SR 3.8.1.16 did not create an issue prior to Amendment 261; if 480 V Emergency bus 1 incurred an automatic transfer from the UAT to SUT, this would have included an automatic transfer of 4.160 kV bus 2 from the UAT to SUT. As a result of TS Amendment 261, the direct feed of 4.160 kV power to 480 V Emergency bus 1 was changed from 4.160 kV bus 2 to 4.160 kV bus 6. The required safety related loads that must have power available to them for the qualified offsite circuits to be considered operable and for the LCO to be met are supplied by the ESF buses. SR 3.8.1.16 is specifically associated with ESF bus E1 (i.e., 480 V Emergency bus 1). In order to focus the SR 3.8.1.16 on the required loads to ensure that the LCO is met (i.e., the purpose of SRs), this amendment request proposes to remove 4.160 kV bus 2, rather than replace it with 4.160 kV bus 6. This will result in TS that continue to protect the health and safety of the public per the provisions of 10 CFR 50.36 for content of TS.

RNP UFSAR Figure 8.1.2-1A (before TS Amendment 261) (labels added)





RNP UFSAR Figure 8.1.2-1A (after TS Amendment 261)



H.B. ROBINSON  
 UNIT 2  
 DUKE ENERGY  
 UPDATED FINAL SAFETY ANALYSIS REPORT

ONE LINE DIAGRAM  
 UNIT 2 AUXILIARY DISTRIBUTION SYSTEM  
 FIGURE 8.1.2-1A REVISION NO. 28

#### 4.0 REGULATORY EVALUATION

##### 4.1 Applicable Regulatory Requirements/Criteria

10 CFR 50.36(c)(2), "Limiting conditions for operation" states the following, in part:

Limiting conditions for operation are the lowest functional capability or performance levels of equipment required for safe operation of the facility. When a limiting condition for operation of a nuclear reactor is not met, the licensee shall shut down the reactor or follow any remedial action permitted by the technical specifications until the condition can be met.

10 CFR 50.36(c)(3), "Surveillance requirements" states the following:

Surveillance requirements are requirements relating to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions for operation will be met.

The General Design Criteria (GDC) in existence at the time RNP was licensed for operation (July 1970) were contained in Proposed Appendix A to 10 CFR 50, "General Design Criteria for Nuclear Power Plants," published in the Federal Register on July 11, 1967.

RNP UFSAR Section 3.1.2.39, "Emergency Power," describes the plant's compliance with the applicable July 1967 GDC 39, as stated:

An emergency power source shall be provided and designed with adequate independency, redundancy, capacity, and testability to permit the functioning of the engineered safety features and protection systems required to avoid undue risk to the health and safety of the public. This power source shall provide this capacity assuming a failure of a single active component. (GDC 39)

Independent alternate power systems are provided with adequate capacity and testability to supply the required engineered safety features and protection systems. The plant is supplied with normal, standby and emergency power sources as follows:

1. The normal source of auxiliary power during plant operation is the generator. Power is supplied via the unit auxiliary transformer which is connected to the main leads of the generator.
2. Power required during plant startup, shutdown, and after reactor trip is supplied from the 115 kV and 230kV startup transformers connected to the plant switchyard.
3. Two diesel generator sets are connected to the emergency buses to supply power in the event of loss to all other AC auxiliary buses.
4. A dedicated shutdown system exists which will bring the plant to a safe shutdown condition in the event of a fire (10CFR50.48(c), NFPA 805) or Station Blackout (10CFR50.63).
5. Emergency power supply for vital instruments, control, and some emergency lighting is supplied from two 125 V DC station batteries.

The proposed change removes 4.160 kV bus 2 from SR 3.8.1.16. However, SR 3.8.1.16 will continue to ensure that the LCO for TS 3.8.1 is met by verifying the automatic transfer capability of the 480 V Emergency bus 1 from the UAT to a SUT. Specifically, the automatic transfer capability demonstrates the operability of the offsite circuit network to power the ESF loads of 480 V Emergency bus 1.

This change does not affect plant compliance with any of the above regulations or guidance and will ensure that the lowest functional capabilities or performance levels of equipment required for safe operation are met.

#### 4.2 Precedent

No direct precedent was identified.

#### 4.3 No Significant Hazards Consideration Determination

In accordance with the provisions of 10 CFR 50.90, Duke Energy Progress, LLC (Duke Energy) is submitting a request for an amendment to the Technical Specifications (TS) for H. B. Robinson Steam Electric Plant (RNP), Unit No. 2. The proposed amendment would revise a Surveillance Requirement (SR) for TS 3.8.1, "AC Sources – Operating." Specifically, SR 3.8.1.16 would be revised to remove 4.160 kilovolt (kV) bus 2 from the requirement to verify automatic transfer capability from the unit auxiliary transformer to a startup transformer.

Duke Energy has evaluated whether or not a significant hazards consideration is involved with the proposed amendment(s) by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The proposed change removes 4.160 kV bus 2 from SR 3.8.1.16 but maintains the automatic transfer capability to demonstrate the operability of the offsite circuit network to power the required Engineered Safety Feature (ESF) loads of 480 V Emergency bus 1. The proposed change does not alter the design, configuration, operation, or function of any plant structure, system, or component. In addition, there is no change to any equipment response or accident mitigation scenario, and consequently no additional challenges to fission product barrier integrity. As a result, the outcomes of previously evaluated accidents are unaffected. There is no impact on the source term or pathways assumed in accidents previously assumed. No analysis assumptions are violated and there are no adverse effects on the factors that contribute to offsite or onsite dose as the result of an accident.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

The proposed change removes 4.160 kV bus 2 from SR 3.8.1.16 but maintains the automatic transfer capability to demonstrate the operability of the offsite circuit network to power the required ESF loads of 480 V Emergency bus 1. No new accident scenarios, failure mechanisms, or limiting single failures are introduced as a result of the proposed change. The proposed change does not challenge the performance or integrity of any safety related system. The proposed change neither installs nor removes any

plant equipment, nor alters the design, physical configuration, or mode of operation of any plant structure, system, or component. No physical changes are being made to the plant, so no new accident causal mechanisms are being introduced.

Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

Response: No.

Margin of safety is related to the confidence in the ability of the fission product barriers to perform their design functions during and following an accident. These barriers include the fuel cladding, the reactor coolant system boundary, and the containment system. The proposed change removes 4.160 kV bus 2 from SR 3.8.1.16 but maintains the automatic transfer capability to demonstrate the operability of the offsite circuit network to power the required ESF loads of 480 V Emergency bus 1. The proposed change will have no effect on the availability, operability, or performance of the safety related systems and components. The proposed change does not alter the design, configuration, operation, or function of any plant structure, system, or component. The ability of any operable structure, system, or component to perform its designated safety function is unaffected by the proposed change. There is no impact on the fission product barriers or parameters associated with licensed safety limits.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, Duke Energy concludes that the proposed changes present no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

#### 4.4 Conclusions

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

#### 5.0 ENVIRONMENTAL CONSIDERATION

The proposed changes would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or would change an inspection or surveillance requirement. However, the proposed changes do not involve (i) a significant hazards consideration, (ii) a significant change in the types or a significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed changes meet the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed change.

## 6.0 REFERENCES

1. NRC letter, *Issuance of Amendment No. 176 to Facility Operating License No. DPR-23 Regarding Conversion to Improved Standard Technical Specifications – H. B. Robinson Steam Electric Plant, Unit No. 2 (TAC No. M96440)*, dated October 24, 1997 (ADAMS Accession Nos. ML020560172, ML14175A922, and ML14175A924)
2. NRC letter, *H. B. Robinson Steam Electric Plant, Unit No. 2 – Issuance of Amendment No. 261 to add a Second Qualified Offsite Circuit and for Automatic Operation of Load Tap Changers (CAC No. MG0276; EPID L-2017-LLA-0308)*, dated September 10, 2018 (ADAMS Accession No. ML18228A584)

Attachment 1  
RA-21-0183

**Attachment 1**  
**Marked-Up Technical Specifications Pages**  
**(1 Page Follows)**

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.8.1.15 (continued)</p> <p>5. supplies permanently connected and auto connected emergency loads for <math>\geq 5</math> minutes.</p>	
<p>SR 3.8.1.16</p> <p>-----NOTE-----</p> <p>1. This Surveillance shall not be performed in MODE 1 or 2.</p> <p>2. SR 3.8.1.16 is not required to be met if <del>4.160 kV bus 2 and</del> 480 V Emergency Bus 1 power supply is from a start up transformer.</p> <p>-----</p> <p>Verify automatic transfer capability of the <del>4.160 kV bus 2 and the</del> 480 V Emergency bus 1 loads from the Unit auxiliary transformer to a start up transformer.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>
<p>SR 3.8.1.17</p> <p>-----NOTE-----</p> <p>All DG starts may be preceded by an engine prelube period.</p> <p>-----</p> <p>Verify when started simultaneously from standby condition, each DG achieves, in <math>\leq 10</math> seconds, voltage <math>\geq 467</math> V and frequency <math>\geq 58.8</math> Hz, and after steady state conditions are reached, maintains voltage <math>\geq 467</math> V and <math>\leq 493</math> V and frequency <math>\geq 58.8</math> Hz and <math>\leq 61.2</math> Hz.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>
<p>SR 3.8.1.18</p> <p>-----NOTE-----</p> <p>This Surveillance shall not be performed in MODE 1 or 2.</p> <p>-----</p> <p>Verify manual transfer of AC power sources from the normal offsite circuit to each alternate offsite circuit.</p>	<p>24 months</p>

Attachment 2  
RA-21-0183

**Attachment 2**

**Marked-Up Technical Specification Bases Pages (For Information Only)**

**(1 Page Follows)**



BASES

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SURVEILLANCE  
REQUIREMENTS  
(continued)

SR 3.8.1.16

480 V Emergency bus 1

Transfer of the ~~4.160 kV bus 2~~ power supply from the auxiliary transformer to the start up transformer demonstrates the OPERABILITY of the offsite circuit network to power the shutdown loads. In lieu of actually initiating a circuit transfer, testing that adequately shows the capability of the transfer is acceptable. This transfer testing may include any sequence of sequential, overlapping, or total steps so that the entire transfer sequence is verified. The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

This SR is modified by two Notes. The reason for Note 1 is that, during operation with the reactor critical, performance of this SR could cause perturbations to the electrical distribution systems that could challenge continued steady state operation and, as a result, unit safety systems. As stated in Note 2, automatic transfer capability to the SUT is not required to be met when ~~the associated 4.160 kV bus and Emergency Bus are~~ powered from the SUT. This is acceptable since the automatic transfer capability function has been satisfied in this condition.

480 V Emergency bus 1 is

SR 3.8.1.17

This Surveillance demonstrates that the DG starting independence has not been compromised. Also, this Surveillance demonstrates that each engine can achieve proper speed within the specified time when the DGs are started simultaneously. Stable operation at the nominal voltage and frequency values is also essential to establishing DG OPERABILITY, but a time constraint is not imposed. This is because a typical DG will experience a period of voltage and frequency oscillations prior to reaching steady state operation if these oscillations are not damped out by load application. This period may extend beyond the 10 second acceptance criteria and could be a cause for failing the SR. In lieu of a time constraint in the SR, HBRSEP Unit No. 2 will monitor and trend the actual time to reach steady state operation as a means of assuring there is no voltage regulator or governor degradation which could cause a DG to become inoperable.

(continued)