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Constellation Energy Group

December 5, 2003

U. S. Nuclear Regulatory Commission
Washington, DC 20555

ATTENTION: Document Control Desk

SUBJECT: Calvert Cliffs Nuclear Power Plant
Unit Nos. 1 & 2; Docket Nos. 50-317 & 50-318
Response to Request for Additional Information Concerning the License Amendment Request: Extension of Diesel Generator Required Action Completion Time

REFERENCES:

(a) Letter from Mr. P. E. Katz (CCNPP) to NRC Document Control Desk, dated May 12, 2003, License Amendment Request: Extension of Diesel Generator Required Action Completion Time

(b) Letter from Mr. G. S. Vissing (NRC) to Mr. P. E. Katz (CCNPP), dated August 8, 2003, Request for Additional Information, Technical Specification Change to Extend the Diesel Generator Required Action Completion Time for Calvert Cliffs Nuclear Power Plant, Units 1 and 2 (TAC Nos. MB8976 and MB8977)

(c) Telephone Conference between Ms. D. J. Mitchell, et.al. (CCNPP) and Mr. G. S. Vissing, et.al. (NRC), on November 7, 2003, same subject

In our letter dated May 12, 2003 (Reference a), we requested a License Amendment that would extend several Required Action Completion Times for inoperable Diesel Generators. Attachment (1) to this letter contains the information requested in References (b) and (c). The information provided in Attachment (1) supports and/or clarifies the information provided in Reference (a). This information does not affect the No Significant Hazards Consideration Determination or the Environmental Impact Review of Reference (a).

The original marked-up Technical Specification pages (Insert 5) is incorrect as written. Attachment (2) contains the revised Insert 5 and this revised Insert 5 supercedes the original insert. Attachment (3) contains a new final page for 3.8.1-9 that reflects the revised Insert 5.

A001

Should you have questions regarding this matter, we will be pleased to discuss them with you.

Very truly yours,

STATE OF MARYLAND :
: **TO WIT:**
COUNTY OF CALVERT :

I, George Vanderheyden, being duly sworn, state that I am Vice President - Calvert Cliffs Nuclear Power Plant, Inc. (CCNPP), and that I am duly authorized to execute and file this License Amendment Request on behalf of CCNPP. To the best of my knowledge and belief, the statements contained in this document are true and correct. To the extent that these statements are not based on my personal knowledge, they are based upon information provided by other CCNPP employees and/or consultants. Such information has been reviewed in accordance with company practice and I believe it to be reliable.

Subscribed and sworn before me, a Notary Public in and for the State of Maryland and County of St. Mary's, this 5th day of December, 2003.

WITNESS my Hand and Notarial Seal:

Notary Public

My Commission Expires: March 25, 2007
Date

GV/DJM/bjd

Attachments: (1) Response to Request for Additional Information; License Amendment Request: Extension of Diesel Generator Required Action Completion Times
(2) Revised Marked-up Technical Specification Page
(3) Revised Final Technical Specification Page

cc: J. Petro, Esquire
J. E. Silberg, Esquire
Director, Project Directorate I-1, NRC
G. S. Vissing, NRC
H. J. Miller, NRC
Resident Inspector, NRC
R. I. McLean, DNR

ATTACHMENT (1)

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION; LICENSE AMENDMENT REQUEST: EXTENSION OF DIESEL GENERATOR REQUIRED ACTION COMPLETION TIMES

Calvert Cliffs Nuclear Power Plant, Inc.
December 5, 2003

ATTACHMENT (1)

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION;
LICENSE AMENDMENT REQUEST: EXTENSION OF DIESEL GENERATOR
REQUIRED ACTION COMPLETION TIMES

REQUESTED INFORMATION

By letter dated May 12, 2003, the licensee proposed changes to Calvert Cliffs Nuclear Power Plant Unit 1 and 2 Technical Specifications (TS) for extending the allowed outage time (AOT) up to 14 days for emergency diesel generators (DG) to perform a preventive or a corrective maintenance during plant operation. In order for the staff to proceed with its review of the proposed change, the following information is needed:

1. *It is the staff's understanding that the purpose of the requested amendment is to allow an increased outage time during plant power operation for performing DG inspection, maintenance, and overhaul, which would include disassembly of the DG. DG operability verification after a major maintenance or overhaul may require a full load rejection test. If a full load rejection test is performed at power, please address the following:*

   a. *What would be the typical and worse case voltage transients on the 4160-V safety buses as a result of a full-load rejection?*

   b. *If a full-load rejection test is used to test the DG governor after maintenance, what assurance would there be that an unsafe transient condition on the safety bus (i.e., load swing or voltage transient) due to improperly performed maintenance or repair of a governor would not occur?*

   c. *Using maintenance and testing experience on the DG, identify possible transient conditions caused by improperly performed maintenance on the DG governor and voltage regulator. Discuss the electrical system response to these transients.*

   d. *Provide the tests to be performed after the overhaul to declare the DG operable and provide justification of performing those tests at power.*

CCNPP Response

Diesel generator components can fail at any time. Repairs and associated post-maintenance testing are risk assessed in accordance with Calvert Cliffs Nuclear Power Plant's (CCNPP's) procedures. This risk assessment process will evaluate any repairs and associated testing to prevent unacceptable plant risk whether the repairs and testing are performed due to equipment failure or planned maintenance.

As required by Technical Specifications, CCNPP monthly starts and loads its DGs. Since the engines are loaded to between 90% and 100% of the continuous rating, problems resulting in engine shutdowns or breaker trips would result in similar electrical transient as a full load reject test. Therefore, performing full load reject tests at power does not create a new plant risk.

Calvert Cliffs Nuclear Power Plant's Technical Specifications do not require full load reject testing. This test is rarely performed at CCNPP. Although CCNPP's Technical Specifications do not include a full load reject test, CCNPP has performed a full load reject test during the commissioning of the Societe Alsacienne De Constructions Mecaniques De Mulhouse (SACM) engines and following a major modification of the Fairbanks Morse engines. Prior to performing a full load reject test, Design Engineering had considered the possibility of tripping the 4 kV bus feeder breaker. Their analysis and test performance has confirmed the 4 kV bus feeder breaker does not trip when a full load reject is performed. Experience has indicated that these tests do not affect the electrical equipment connected to the 4 kV bus. These loads are connected to the 4 kV bus regardless of plant mode.

For the Fairbanks Morse engines, the typical testing performed after engine inspections includes a slow start followed by an overspeed test (not connected to the 4 kV bus) and a timed, fast start followed by a four-hour loaded run.

For the SACM engines, the typical testing performed after engine inspections includes a timed, fast start followed by a four-hour loaded run. For engine overhauls, which are currently performed about every eight years, the post-maintenance testing includes 15 hours of loaded operation.

Therefore, the post-maintenance tests are the same tests performed at power as required by CCNPP's Technical Specifications with the exception of the additional loaded time.

REQUESTED INFORMATION

2. *What type of communication has been established between the control room operator of Calvert Cliffs station and the System Load Dispatcher? Is the System Load Dispatcher notified in advance that the DG is going to be out for extended period of time?*

CCNPP Response

Prior to removing a DG from service, plant procedures direct that the System Operations & Maintenance Department (SOMD) Outage Scheduler or the SOMD System Operator – Bulk Power be notified of our plans to remove a safety-related DG from service.

REQUESTED INFORMATION

3. *It is stated that 0C DG can be aligned to any of the four ESF busses and is capable of supplying the same emergency plant loads as the other DGs in the event of a station blackout. In this regard provide the following information:*

   a. *How long does it take to accomplish this connection and can this connection be accomplished from the control room?*

CCNPP Response

Operation's response time is dependent on the specific scenario. For the case of a total loss of AC power to a unit (Loss of Off Site Power while one DG is out-of-service and failure of the redundant DG), we estimate the 0C DG would be connected to its pre-aligned 4 kV bus in 3 to 5 minutes. All actions required to start and connect the 0C DG to its pre-aligned 4 kV bus (start 0C DG by depressing a Control Room pushbutton, place one hand switch in Pull-To-Lock, and close two 4 kV breakers using control room hand switches) can be accomplished from the Control Room. We estimate the 0C DG could be disconnected and then connected to one of the other safety-related 4 kV busses in 10 to 15 minutes if conditions required such actions.

REQUESTED INFORMATION

   b. *What is the current reliability of 0C DG and how often is it tested?*

CCNPP Response

The 0C DG is started approximately once a month except during plant outages. During long plant outages, the 0C DG is started at least once per quarter.

To address current 0C DG performance, records were reviewed from a variety of sources covering two time periods (three years and two years). Both periods were reviewed as both periods are commonly used throughout a variety of industry programs and the shorter period, (two years) reflects ongoing improvements in maintenance practices and equipment performance associated with 0C DG. The time periods reviewed were July 1, 2000 to June 30, 2003, (three years) and July 1, 2001 to June 30, 2003, (two years)

Reliability

Data sources used are the site's Equipment History Database (EHD) and records retained as part of the site's DG Reliability Program which was initiated to address Station Blackout requirements.

There have been no failures of 0C DG during either the two or three year period covered. The last failure of 0C DG occurred on June 03, 2000 when a fuse blew while an operator was replacing a burned out bulb on the 0C DG control panel which resulted in a loss of 125 VDC to 0C DG. This prevented 0C DG from being able to meet its Maintenance Rule function to start and provide power.

# of demands:	
Two year period:	21 starts
Three year period:	33 starts

Unavailability:

Unavailability records were obtained from the site's EHD.

Two year period: 5 occurrences, total unavailable hours: 213.1 hours

Unavailability: = 213.1 hours/ (8760 hrs/yr * 2 years) = 1.2%

Three year period: 10 occurrences, total unavailable hours: 530.0 hours

Unavailability: = 530.0 hours/ (8760 hrs/yr * 3 years) = 2.0%

As can be seen in Reference (1), Attachment (1), Table 4, there has been a steady improvement in the availability of the 0C DG.

REQUESTED INFORMATION

4. *Table 4 of the submittal shows unavailabilities for all DGs. The unavailability of 0C DG is listed to be less than 800 hours as compared to other DGs. What is the basis for setting such a low goal for the 0C DG?*

CCNPP Response

There are several reasons for the low unavailability goal for the 0C DG versus the safety-related DGs. The following were considered when establishing the 0C DG unavailability goal:

- The 0C DG can be connected to either CCNPP unit. Since CCNPP does not perform dual unit shutdowns, the 0C DG is always supporting at least one unit. Therefore, work on 0C DG can not be performed without incurring unavailability (all 0C DG work results in unavailability). For the safety-

related DGs, unavailability is not incurred during the associated unit shutdown provided the redundant DG is operable.

- The Maintenance Rule Program has no exclusions for infrequent, planned maintenance evolutions. For example, although the Maintenance Rule cycle is a two-year cycle, planned maintenance which is performed much less frequently (i.e., 5 or 10 years) still incurs unavailability. Therefore, the 0C DG goal also includes margin for the engine overhauls. (Since these are performed on the safety-related DGs during plant outages, safety-related engine overhauls do not impact the unavailability of the safety-related DGs).
- The 0C DG is an SACM DG, which was installed at CCNPP in 1995. Due to the newness of the design and manufacturer, the System Manager concluded that several Preventive Maintenance (PM) cycles (two year cycles) would be required to determine which PMs were effective. The System Manager also expected to improve the efficiency of PM Program implementation as experience was gained. Improvements in the scope and implementation of the 0C DG PM Program have contributed to a steady reduction in 0C DG unavailability.

2662 hours	1997
992 hours	1998
291 hours	1999
442 hours	2000
415 hours	2001
259 hours	2002
213 hours	through the end of 3rd quarter 2003

- The SACM DG design includes more components and more inspections than the Fairbanks Morse design. Also, SACM's PM recommendations tend to be more conservative than Fairbanks Morse's PM recommendations. To complete the recommended inspections to the increased number of components requires additional unavailability time.

Reference (1), Attachment (1), Table 4 contains the maintenance rule performance criteria. When the 0C DG is credited in the Technical Specifications to extend the required action completion times, the 0C DG maintenance rule criteria will be the same as the 1A DG [Reference (1), Attachment (1), Table 5].

Maintenance rule criteria is established using a Maintenance Rule Expert Panel. The panel balances the risk associated with removal of equipment from service against the maintenance needs of the equipment removed from service. When the 0C DG was installed, the maintenance requirements were quite large and the benefit of the 0C DG was not as large. Today maintenance practices are more streamlined and the benefit of the 0C DG is larger. The increased benefit of the 0C DG is due to procedural enhancements and the proposed increased seismic ruggedness of the 0C DG ventilation system.

The proposed post-extension maintenance rule performance criteria listed in Reference (1), Attachment (1), Table 5 will cause a risk increase of less than 1E-6 [Reference (1), Attachment (1), Section 6.1.1.1 Discussion].

REQUESTED INFORMATION

5. *Please provide justification for increasing Limiting Condition for Operation (LCO) from 2 hours to 12 hours when two DGs are inoperable keeping in mind that it is more critical to lose 1A and 1B than 1A and 2B.*

CCNPP Response

Reference (1), Attachment (1), Table 11 displays the risk impact associated with the removal of multiple DGs from service. The minimum time for two DGs out-of-service to reach a 5E-7 increase in core damage frequency (CDF) is 2.1 days. The large early release frequency impact is bounded by the CDF impact [Reference (1), Attachment (1), Table 10]. The 12 hour Completion Time is only allowed when the 0C DG is available and two other safety-related DGs are operable.

Due to the cross-connected nature of the Calvert Cliffs electrical and auxiliary feedwater (AFW) systems, the risk impacts of multiple DGs out-of-service are not obvious. The loss of both DGs on Unit 1 (1A and 1B) will take 2.6 days to cause a CDF risk increase of 5E-7. The loss of both DGs that support the motor-driven AFW pumps will take 2.1 to 2.8 days depending on the alignment of the 0C DG to cause a CDF increase of 5E-7. From the Unit 2 perspective, it is better to have the 2A and 2B DGs out-of-service than the 1A and 2B DGs. This is primarily due to the independent nature of the 1A and 0C DGs.

The key plant challenges mitigated by the DGs are associated with decay heat removal and inventory control challenges. The AFW motor-driven pumps are able to provide decay heat removal to either unit. For example, when the 1A DG fails, the 2B DG can support AFW Pump 23, which can support Unit 1. Further, the 125 VDC system is cross-connected across the units. Either the 1A DG or the 2A DG can provide power to the two 'A' facility 125 VDC Buses (one bus per unit). Likewise, either the 1B DG or the 2B DG can provide power to the two 'B' facility 125 VDC Buses (one bus per unit). In addition, the 0C DG can support any of the 4 kV safety-related buses. It is the importance of decay heat removal that drives the importance of the 1A, 2B, and 0C DGs regardless of the unit being considered.

Since inventory control is Unit specific, we must consider that the loss of both DGs on a given Unit poses a large risk. During a loss-of-coolant accident (LOCA) with both safety-related DGs out-of-service on a Unit (e.g., 1A and 1B), core damage will ensue without the alignment of the 0C DG. The amount of time available to align the 0C DG is directly related to the size of the LOCA. However, with a DG out-of-service for planned maintenance, the 0C DG is pre-aligned to the out-of-service DGs safety-related 4 kV Bus. In this case, operators can start and load the 0C DG on the pre-aligned bus from the Control Room. With a pre-aligned 0C DG, the vast majority of LOCAs can be mitigated. Even without the 0C DG pre-aligned, most of the consequential LOCAs and some of the smaller diameter piping ruptures can be mitigated. The consequential LOCAs that can be mitigated are: one primary safety relief valve stuck open, one or two power-operated relief valves stuck open, reactor coolant pump seal LOCAs, and piping ruptures less than 0.02 sq. ft.

REQUESTED INFORMATION

6. *It is stated on page 2, second sentence that "the first.....a single inoperable safety-related DG to 14 days, provided that the 0C DG is available and the other three safety-related DGs are operable." However, the proposed Action B1 requires verification that both DGs on the other unit operable and 0C DG available. Please remove the cited discrepancy. Please note that Action C may also have to be revised, if applicable.*

CCNPP Response

Condition B is entered when one of the two safety-related DGs for the affected Unit is inoperable. Required Action B.4.1 or B.4.2 verifies the other safety-related DG for the affected Unit is operable.

Required Action B.1 was added to require the additional step of verifying that both DGs on the other unit are operable and 0C DG is available. Therefore, the combination of B.1 and B.4 verifies that the 0C DG is available and the other three safety-related DGs are operable, which is consistent with the statement on page 2 of the letter. If both safety-related DGs for the affected Unit are inoperable, Condition I would be entered instead of Condition B.

REQUESTED INFORMATION

7. *Other licensees who requested for DG AOT extension provided the following Regulatory Commitments in their requests:*

   a. *Weather conditions will be evaluated prior to entering the extended DG AOT for voluntary planned maintenance. An extended DG AOT will not be entered for voluntary planned maintenance purposes if official weather forecasts are predicting severe conditions (tornado or thunderstorm warnings).*

   b. *The condition of the offsite power supply and switchyard will be evaluated prior to entering the extended AOT.*

   c. *No discretionary switchyard maintenance will be allowed. In addition, no discretionary maintenance will be allowed on the main, auxiliary or startup transformers associated with the unit.*

   d. *No maintenance or testing that affects the reliability of the train associated with the OPERABLE DG will be scheduled during the extended AOT. If any testing and maintenance activities must be performed while the extended AOT is in effect, a 10 CFR 50.65(a)(4) evaluation will be performed.*

   e. *The personnel will be notified to ensure no elective maintenance will be scheduled on the alternate AC source and will be made aware of the dedication of the alternate AC source to the affected unit.*

   f. *The steam driven emergency feedwater pump will not be taken out of service for planned maintenance activities and will be treated as protected equipment.*

   g. *The system dispatcher will be contacted once per day and informed of the EDG status along with the power needs of the facility.*

   h. *Should a tornado or thunderstorm warning be issued for the local area, an operator will be available should local operation of the alternate AC source be required as a result of on-site weather-related damage.*

   i. *The on-shift Operations crews will discuss and review appropriate normal and emergency operating procedures upon or prior to assuming the watch for the first time after having scheduled days off while the AOT is in effect.*

   j. *The Operations crews will be briefed concerning the unit activities, including compensatory measures established and the importance of promptly starting and aligning the alternate AC source following instruction of the Shift Manager upon the loss of power event. This briefing will be performed upon or prior to assuming the watch for the first time after having scheduled days off while the AOT is in effect.*

Please provide the provisions, limitations and compensatory actions that you will be implementing to assure adequate defense in depth during the extended DG AOT.

CCNPP Response

In addition to utilizing CCNPP's processes for evaluating risk, including NO-1-117, Integrated Risk Management, Calvert Cliffs will perform the following when utilizing the 14-day DG Completion Time provision:

A. Weather conditions will be evaluated prior to entering the extended DG Completion Time for elective maintenance. An extended DG Completion Time will not be entered for elective maintenance purposes if official weather forecasts are predicting severe conditions (tornado or thunderstorm warnings).

B. The condition of the off-site power supply will be evaluated prior to entering the extended Completion Time.

C. No elective maintenance will be performed in the switchyard, on the 4 kV Distribution System, or on the 13 kV Distribution System during the extended Completion Time.

D. No maintenance or testing that affects the reliability of the train associated with the operable DG on the affected unit will be scheduled during the extended Completion Time. If any testing or maintenance activities, which affects the train reliability, must be performed while the extended Completion Time is in effect, a 10 CFR 50.65(a)(4) evaluation will be performed.

E. Elective maintenance will not be performed on the alternate AC power source (0C DG). Personnel will be made aware of the dedication of the alternate AC source to the affected Unit.

F. Planned maintenance will not be performed on the AFW System.

G. The system dispatcher (System Operations and Maintenance Department) will be contacted prior to removing the DG from service and after it has been returned to service.

H. The operations crews will be briefed concerning the unit activities, including compensatory measures established and the importance of promptly starting and aligning the alternate AC source (0C DG).

I. The on-shift operations crew will discuss and review the appropriate normal and emergency operating procedures prior to or shortly after assuming the watch for the first time after having scheduled days off while the extended Completion Time is in effect.

J. Since CCNPP's alternate AC design does not require a local operator to start or load, dedicating an operator to the alternate AC power supply is not required during the extended Completion Time.

REQUESTED INFORMATION

8. *The proposed change to 3.8.1.c Required Action D.4 from 72 hours to 21 days is not clear to the staff. The current 72 hour Completion Time of the LCO was based on the fact that the DG Completion Time for an inoperable DG LCO is currently 72 hours. Since the proposed request is to increase LCO of one inoperable DG from the current 72 hours to 14 days, the completion time for Required Action D.4 should correspondingly be 14 days not 21 days. Please explain.*

CCNPP Response

The longer 21-day Completion Time only applies to the Unit not directly supported by the DG (e.g., 1A DG on Unit 2). For example, the risk impact of removing the 2B DG for 14 days causes a

incremental conditional core damage probability of 2.8E-07 on Unit 2 and an incremental conditional core damage probability of 1.2E-07 on Unit 1 [Reference (1), Attachment (1), Tables 9 and 10]. Since the risk impact to the opposite Unit is lower than the risk impact to the primary Unit, it is reasonable to allow a longer Completion Time. The 21-day Completion Time is requested to support the ten-year maintenance requirement [Reference (1), Attachment (1), Section 4.4].

The current vendor recommendations for the ten-year maintenance would require the engines for the 1A DG to be replaced. It is our current estimate that this work would require a minimum of three weeks to complete. The 21-day Completion Time will minimize the need to request additional one-time extensions to support continual operations of the other unit. In order to reduce confusion and minimize the potential for human errors, the proposed change makes the Completion Times consistent for both units.

Listed below are past one-time extension for the other units DG (the 3.8.1.c DG) that have been requested and approved. These extension were requested to support both planned maintenance and corrective maintenance that exceeded the current Completion Times.

- Amendment No. 202 for Unit 1 and Amendment No. 180 for Unit 2 approved our request submitted on September 23, 1994 to allow a one-time increase in the Unit 2 allowed outage time (AOT) from 7 to 14 days for a dedicated Class 1E emergency power system and a one-time increase in the Unit 1 control room emergency ventilation system (CREVS) AOT from 7 to 30 days (for loss of emergency power only).
- Amendment No. 205 for Unit 1 approved our request submitted April 28, 1995, to extend the one-time increase in the AOT for the CREVS (loss of emergency power only) from the 30 days previously approved, to 45 days.
- Amendment No. 187 for Unit 2 approved our request submitted October 2, 1995 to extend the AOT for one train of the CREVS from 7 days to 30 days on a one-time basis (for the loss of the emergency power supply only).
- Amendment No. 223 for Unit 2 approved our request submitted November 19, 2001 to extend the AOT for one train of the CREVS from 10 to 14 days (for the loss of the emergency power supply only).
- Amendment No. 227 for Unit 2 approved our request submitted on April 1, 2002 to extend the one-time increase in the Completion Times for the CREVS (loss of emergency power only) from the 14 days previously approved, to 21 days.

REQUESTED INFORMATION

9. *By letter dated May 12, 2003, the licensee committed to modifying the 0C DG ventilation system to improve the seismic response. Provide a description of these modifications.*

CCNPP Response

Prior evaluations performed in support of Integrated Plant Evaluation for External Events efforts at Calvert Cliffs determined that the mountings for two air handling units and one compressor for the 0C DG ventilation system would not screen out at the requisite 0.3g ground motion input level. The subject mountings have since been modified to restrict the relative motion of the items with respect to their foundations during a seismic event. The modifications consist of base restraints that ensure the

components do not fall off their original spring mounts. The modifications were designed based on a ground motion input of 0.3g.

REFERENCE

1. Letter from Mr. P. E. Katz (CCNPP) to Document Control Desk (NRC), dated May 12, 2003, License Amendment Request: Extension of Diesel Generator Required Action Completion Time

ATTACHMENT (2)

REVISED MARKED-UP TECHNICAL SPECIFICATION PAGE

INSERT 4

CONDITION	REQUIRED ACTION	COMPLETION TIME
F. Required Action and associated Completion Time of Required Action E.1 not met.	F.1.1 Restore both LCO 3.8.1.b DGs and other unit's DG to OPERABLE status and 0C DG to available status. OR F.1.2 Restore DG to OPERABLE status.	72 hours

INSERT 5

CONDITION	REQUIRED ACTION	COMPLETION TIME
	I.1 Verify 0C DG available and two other DGs OPERABLE. AND	1 hour

INSERT 6

CONDITION	REQUIRED ACTION	COMPLETION TIME
J. Required Action and associated Completion Time of Required Action I.1 not met.	J.1.1 Restore 0C DG to available status and one other DG to OPERABLE status. OR J.1.2 Restore one DG to OPERABLE status.	2 hours

ATTACHMENT (3)

REVISED TECHNICAL SPECIFICATION PAGE

3.8.1-9

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
I. Two LCO 3.8.1.b DGs inoperable. OR LCO 3.8.1.b DG that provides power to the CREVS, CRETS, and H_2 Analyzer inoperable and LCO 3.8.1.c DG inoperable.	I.1 Verify OC DG available and two other DGs OPERABLE. AND I.2 Restore one DG to OPERABLE status.	1 hour 12 hours
J. Required Action and associated Completion Time of Required Action I.1 not met.	J.1.1 Restore OC DG to available status and one other DG to OPERABLE status. OR J.1.2 Restore one DG to OPERABLE status.	2 hours
K. Required Action and associated Completion Time of Condition A, B, C, E, F, G, H, I, or J not met.	K.1 Be in MODE 3. AND K.2 Be in MODE 5.	6 hours 36 hours
L. Three or more required LCO 3.8.1.a and LCO 3.8.1.b AC sources inoperable.	L.1 Enter LCO 3.0.3.	Immediately