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

Edwin I. Hatch Nuclear Plant
Technical Specifications Revision to
Add a 72 Hour Completion Time for an Inoperable Swing Diesel Generator

Ladies and Gentlemen:

Pursuant to 10 CFR 50.90, Southern Nuclear Operating Company (SNC) hereby requests a revision to the Plant Hatch Units 1 and 2 Technical Specifications (TS), Appendices A to Operating Licenses DPF-57 and NPF-5, respectively.

The proposed amendment would add a 72 hour Completion Time (CT) for an inoperable swing diesel generator. Currently, the TS provide a 14 day CT which may be used provided that planned maintenance on certain plant components is restricted prior to entering, and for the duration of, the 14 day CT. The 72 hour CT and the 14 day CT are explicitly addressed in the TS LCO for four of the five emergency diesel generators. In addition, the 14 day CT is explicitly addressed in the TS LCO for the fifth diesel generator, the swing diesel generator. Further, the existing 14 day CT and the proposed 72 hour CT are currently described in the TS Bases for LCO 3.8.1. This proposed change will provide an explicit reference to the 72 hour CT in the actual TS for the swing diesel.

Enclosure 1 provides the basis for the proposed change, including the significant hazards and environmental assessments. Enclosure 2 provides the markup of the existing TS and Bases pages. Enclosure 3 provides the clean typed pages.

Approval of the proposed amendment is requested by October 30, 2008. The proposed change would be implemented within 60 days of issuance.

(Affirmation and signature are provided on the following page.)

Mr. L. M. Stinson states he is a Vice President of Southern Nuclear Operating Company, is authorized to execute this oath on behalf of Southern Nuclear Operating Company and to the best of his knowledge and belief, the facts set forth in this letter are true.

This letter contains no NRC commitments. If you have any questions, please advise.

Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY



L. M. Stinson
Vice President Fleet Operations Support

Sworn to and subscribed before me this 3rd day of October, 2007.


Notary Public

My commission expires: July 5, 2010

LMS/OCV/daj

Enclosures: 1. Basis for Proposed Change
2. Technical Specifications Markup Pages
3. Technical Specifications Clean Typed Pages

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**Edwin I. Hatch Nuclear Plant
Addition of 72 Hour Completion Time for Inoperable Swing Diesel Generator**

Enclosure 1

Basis for Proposed Change

**Edwin I. Hatch Nuclear Plant
Addition of 72 Hour Completion Time for Inoperable Swing Diesel Generator**

Enclosure 1

Basis for Proposed Change

Table of Contents

1.0 Summary Description

2.0 Detailed Description

3.0 Technical Evaluation

4.0 Regulatory Evaluation

4.1 Significant Hazards Consideration

4.2 Applicable Regulatory Requirements/Criteria

4.3 Precedent

4.4 Conclusions

5.0 Environmental Consideration

6.0 References

Enclosure 1

Basis for Proposed Change

1.0 Summary Description

This evaluation supports a request to amend Appendix A of Operating Licenses DPF-57 and NPF-5 for Plant Hatch Unit 1 and Unit 2, respectively.

The proposed change would revise the Technical Specifications to add a 72 hour Completion Time (CT) for an inoperable swing diesel generator (DG), to complement the existing 14 day CT. The 72 hour CT will ensure that certain restrictions, with respect to planned maintenance, on key important to safety systems are in place prior to entering the 14 day CT for the swing DG.

2.0 Detailed Description

LCO 3.8.1 of the Unit 1 and 2 Hatch Technical Specifications (TS) contains the operating Limiting Condition for Operation (LCO), Conditions, and Required Actions for the AC electrical system including the emergency DGs. Plant Hatch has a total of six safety related 4 kV emergency electrical busses and five DGs which supply those busses with emergency power. The busses are normally supplied from off-site power via two start-up transformers, one normally in service and the other a back-up. Two DGs are dedicated to each unit and one DG can "swing" to either unit. The primary focus of this TS change request is the swing DG, designated as the '1B' emergency DG.

Under the present LCO 3.8.1 requirements, an inoperable DG is subjected to a Completion Time (CT) of 72 hours or 14 days. However, the 14 day CT may only be used if certain conditions are met. Specifically, if a dedicated DG is out of service, the swing DG must be inhibited from automatically aligning to the other unit. In other words, the swing DG must be locked to the unit with the inoperable dedicated DG. This ensures two DGs are available to each unit when one dedicated DG is out of service, under all circumstances. Additionally, there are restrictions which must be met concerning the performance of planned maintenance on certain key systems that are important to safety. For example, planned maintenance on the High Pressure Injection (HPCI) or Plant Service Water (PSW) systems cannot be started while using the 14 day CT. These restrictions apply to all five DGs, but they are not explicitly listed in the TS. The requirement to lock the swing DG to the unit with the inoperable dedicated DG is listed in the TS, but this of course only applies to the dedicated DGs (with the swing DG out of service, each unit already has two dedicated DGs). Therefore, the 72 hour CT is explicitly mentioned for the dedicated DGs, but not for the swing DG. The restrictions on planned maintenance are not listed in the TS for any DG. Instead they are described in the LCO 3.8.1 Bases and the applicable systems are listed in detail in the plant procedure used to schedule maintenance work activities.

Accordingly, there are situations in which the 72 hour CT would be applicable for each DG, including the swing DG. However, with respect to the swing DG, the current LCO 3.8.1 only lists the 14 day CT. The 72 hour CT for the swing DG is cited in the Bases and is currently applied by the operating staff when the '1B' DG is out of service until it can be verified that the additional maintenance restrictions are being fulfilled. This submittal requests that the 72 hour CT for the swing diesel be explicitly listed in the TS.

Enclosure 1

Basis for Proposed Change

This TS change request proposes to add the 72 hour CT for the swing DG in the appropriate "Completion Time" column of LCO 3.8.1. As proposed, the "Completion Time" column will indicate that the 72 hour CT is appropriate if the planned maintenance restrictions have not been met and that the 14 day CT is appropriate if the restrictions have been met. To avoid confusion and for consistency, mention of the planned maintenance restrictions are being added to the "Completion Time" column for the dedicated DGs as well.

This proposed revision will not result in differences with respect to the current handling of inoperable DGs in the TS. Currently, the Operations staff ensures that the planned maintenance restrictions are met for the swing DG, as well as the dedicated DGs, before taking credit for the 14 day CT. The only difference is that, under this proposed change, the 72 hour CT will be explicitly listed in the TS for the swing DG.

3.0 Technical Evaluation

The proposed amendment will not affect the safety function of the swing diesel generator or any of the dedicated diesels. No changes are proposed to, nor does the amendment otherwise affect, the accident response of the diesel generators. For example, the amendment does not propose changes to the regulatory requirements with respect to diesel generator safety analyses assumptions or diesel generator accident load calculations. In short, the diesel generators will continue to function as assumed in the accident analysis for an accident condition.

The proposed amendment simply requests a more restrictive 72 hour CT be added for the swing diesel generator. Explicitly referencing the more restrictive CT in the TS will ensure that the risk informed basis of the 14 day CT is maintained. As mentioned in Section 2, Operations staff currently make sure that planned maintenance restrictions are met prior to using the 14 day CT on the swing diesel. Nevertheless, the 72 hour CT should be explicitly listed for the swing DG.

4.0 Regulatory Evaluation

4.1 Significant Hazards Consideration

LCO 3.8.1, "AC Sources – Operating" is being revised to add a 72 hour CT into the Unit 1 and 2 Technical Specifications (TS) "Completion Time" column for the swing diesel generator. The proposed CT will complement the existing 14 day CT for the swing DG and will ensure that planned maintenance restrictions are in place prior to using the 14 day CT. Additionally, mention of the planned restrictions is being added to the "Completion Time" column for the dedicated DGs, for consistency and to avoid potential confusion.

Southern Nuclear Operating Company has evaluated whether or not a significant hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of Amendment," as discussed below:

Enclosure 1

Basis for Proposed Change

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

The proposed change will explicitly add, to the Technical Specifications (TS), a 72 hour CT for the swing diesel generator in addition to the 14 day CT already listed. The 72 hour CT is currently imposed on the swing DG until it can be verified that planned maintenance restrictions are in place. Mention of the planned restrictions is also being added to the specifications for the dedicated DGs for consistency. This TS change does not propose any physical changes to systems or components that are important to safety, including those systems that are designed to prevent previously evaluated accidents, or to mitigate the consequences of those accidents.

Additionally, this proposed TS change does not change any safety analyses for LOCA/LOSP with respect to diesel generator availability or capabilities. This change does not request an increase to the diesel generator out of service CT, in fact, it acts to enforce a 72 hour CT for the swing diesel.

Consequently, this TS change does not significantly increase the probability or consequences of a previously evaluated accident.

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

This proposed TS change explicitly adds a 72 hour CT to the swing diesel generator "Completion Time" column of LCO 3.8.1, and adds mention of the planned maintenance restrictions to the same column for the dedicated DGs as well. These TS changes will reflect the current practices of the operating staff with respect to the handling of inoperable diesel generators. No requests are being made to increase the CTs for the diesel generators; instead, the more restrictive 72 hour CT for the swing diesel is being explicitly added to the TS, which currently only includes the 14 day CT.

No changes are being made to the operations, maintenance, or testing of plant equipment. No new modes of operation are proposed and therefore, no new failure modes are introduced.

Consequently, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

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

This TS change will include a more restrictive 72 hour CT for the swing diesel generator in addition to the 14 day CT currently listed in the TS. The 72 hour CT will reflect that planned maintenance restrictions must be in place before using the 14 day CT on the swing DG. For consistency, mention of the maintenance restrictions is being added to the CT for the dedicated DGs as well.

Enclosure 1

Basis for Proposed Change

These changes are more restrictive than what is currently included in the TS.

Accordingly, the changes do not involve a significant reduction in the margin of safety.

4.2 Applicable Regulatory Requirements/Criteria

The requirements of General Design Criteria 17, "Electric Power Systems" are applicable to the diesel generators.

The following Regulatory Guides are applicable:

Reg Guide 1.6, "Independence between Redundant Standby (Onsite) Power Supplies and Between Their Distribution Systems."

Reg Guide 1.9, "Selection of Diesel Generator Set Capacity for Standby Power Supplies."

Reg Guide 1.30, "Quality Assurance Requirements for the Installation, Inspection, and Testing of Instrumentation and Electric Equipment."

Reg Guide 1.32, "Use of IEEE Standard 308-1971, Criteria for Class 1E Electrical Systems for Nuclear Power Generating Stations."

Reg Guide 1.81, "Shared Emergency and Shutdown Electric Systems for Multi-Unit Nuclear Plants."

Reg Guide 1.89, "Qualification of Class 1E Equipment for Nuclear Power Plants."

4.3 Precedent

Southern Nuclear/Plant Hatch has previously requested a 14 day CT for the diesel generators (Reference 1) and that request was approved by NRC. Similar 14 day CT amendments for diesel generators have been approved for other utilities as well. For example, the 14 day CT was previously approved for the Perry Nuclear Plant and the Byron and Braidwood plants. However, due to the distinctive nature of the emergency power configurations throughout the industry, each of these amendments is unique. This amendment is being requested to ensure the validity of the Regulatory Guide 1.174 and 1.177 analyses performed in support of the Hatch 14 day CT TS change.

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 the operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of this amendment will not

Enclosure 1

Basis for Proposed Change

be inimical to the common defense and security or to the health and safety of the public.

5.0 Environmental Consideration

10 CFR 51.22(c)(9) provides criteria for the categorical exclusion from performing an environmental assessment. A proposed amendment to an operating license for a facility requires no environmental assessment if operation of the facility in accordance with the proposed license amendment will not:

1. Involve a significant hazards consideration;
2. Result in a significant change in the types, or a significant increase in the amounts of any effluents that may be released off-site, or;
3. Result in a significant increase in individual or cumulative occupational radiation exposure.

Southern Nuclear has evaluated the proposed changes and determined that the changes do not involve (1) a significant hazards consideration as detailed in Section 4.1 of this proposal, (2) a significant change in the types or significant increase in the amounts of any effluents that may be released off-site, or (3) a significant increase in the individual or cumulative occupational exposure. This amendment clarifies and enhances the diesel generator specifications. It does not affect offsite effluent releases and it does not result in changes to operating or maintenance practices that could potentially increase occupational exposure to radiation. Accordingly, the proposed changes meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9), and an environmental assessment of the proposed change is not required.

6.0 References

1. "Request to Revise Technical Specifications: "Extension of Completion Times for Inoperable Emergency Diesel Generators," HL-6080, August 31, 2001.
2. Plant Hatch Procedure "Scheduling Maintenance, 90AC-OAM-002-0."
3. Plant Hatch, Unit 1 FSAR Section 8.4, "Standby AC Power," Unit 2 FSAR Section 8.3.1, "Onsite AC Power."

**Edwin I. Hatch Nuclear Plant
Addition of 72 Hour Completion Time for Inoperable Swing Diesel Generator**

Enclosure 2

Technical Specifications and Bases Markup Pages

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. (continued)	B.2 Declare required feature(s), supported by the inoperable DG, inoperable when the redundant required feature(s) are inoperable.	4 hours from discovery of Condition B concurrent with inoperability of redundant required feature(s)
	<u>AND</u>	
	B.3.1 Determine OPERABLE DG(s) are not inoperable due to common cause failure.	24 hours
	<u>OR</u>	
	B.3.2 Perform SR 3.8.1.2.a for OPERABLE DG(s).	24 hours
	<u>AND</u>	
	B.4 Restore DG to OPERABLE status.	72 hours for a Unit 1 DG with the swing DG not inhibited
		<u>AND</u>
		14 days for a Unit 1 DG with the swing DG inhibited from automatically aligning to Unit 2
		<u>AND</u>
		14 days for the swing DG
		<u>AND</u>
		(continued)

Insert 1

Insert 2

Insert 3

Insert 4

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. (continued)	B.4 (continued)	17 days from discovery of failure to meet LCO 3.8.1.a, b, or c
C. One required Unit 2 DG inoperable	C.1 Perform SR 3.8.1.1 for OPERABLE required offsite circuit(s).	1 hour <u>AND</u> Once per 8 hours thereafter
	<u>AND</u>	
	C.2 Declare required feature(s), supported by the inoperable DG, inoperable when the redundant required feature(s) are inoperable.	4 hours from discovery of Condition C concurrent with inoperability of redundant required feature(s)
	<u>AND</u>	
	C.3.1 Determine OPERABLE DG(s) are not inoperable due to common cause failure.	24 hours
	<u>OR</u>	
	C.3.2 Perform SR 3.8.1.2.a for OPERABLE DG(s).	24 hours
	<u>AND</u>	
	C.4 Restore required DG to OPERABLE status.	7 days with the swing DG not inhibited <u>AND</u>
		(continued)

Insert 1

Insert 2

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. (continued)	C.4 (continued)	14 days with the swing DG inhibited from automatically aligning to Unit 1
D. Two or more required offsite circuits inoperable.	<p>D.1 Declare required feature(s) with no offsite power available inoperable when the redundant required feature(s) are inoperable.</p> <p><u>AND</u></p> <p>D.2 Restore all but one required offsite circuit to OPERABLE status.</p>	<p>12 hours from discovery of Condition D concurrent with inoperability of redundant required feature(s)</p> <p>24 hours</p>
<p>E. One required offsite circuit inoperable.</p> <p><u>AND</u></p> <p>One required DG inoperable.</p>	<p>-----NOTE----- Enter applicable Conditions and Required Actions of LCO 3.8.7, "Distribution Systems - Operating," when Condition E is entered with no AC power source to one 4160 V ESF bus. -----</p> <p>E.1 Restore required offsite circuit to OPERABLE status.</p> <p><u>OR</u></p> <p>E.2 Restore required DG to OPERABLE status.</p>	<p>12 hours</p> <p>12 hours</p>
F. Two or more (Unit 1 and swing) DGs inoperable.	F.1 Restore all but one Unit 1 and swing DGs to OPERABLE status.	2 hours

(continued)

INSERT 1

...or maintenance restrictions not met.

INSERT 2

...and maintenance restrictions met.

INSERT 3

72 hours for the swing diesel with maintenance restrictions not met

INSERT 4

AND

14 days for the swing diesel with maintenance restrictions met.

BASES

ACTIONS

B.4

Regulatory Guide 1.93 (Ref. 6) provides guidance that operation in Condition B may continue for 72 hours. A risk-informed, deterministic evaluation performed for Plant Hatch justifies operation in Condition B for 14 days, provided action is taken to ensure two DGs are dedicated to each Hatch unit. This is accomplished for an inoperable A or C DG by inhibiting the automatic alignment (on a LOCA or LOSP signal) of the swing DG to the other unit. If the inoperable DG is the swing DG, each unit has two dedicated DGs. For an inoperable swing DG, a 72 hour Completion Time applies unless the restrictions specified following this paragraph are satisfied. In Condition B for each defined OPERABLE DGs and offsite circuits are adequate to supply electrical power to the onsite Unit 1 Class 1E Distribution System. The Completion Times take into account the capacity and capability of the remaining AC sources, reasonable time for maintenance, and low probability of a DBA occurring during this period. Use of the 14 day

Replace with
Insert B



Completion Time subject to additional restrictions controlled by 90AC-QAM-002-0 is permitted as follows:

- For the Unit 1 DGs:

Once per DG per operating cycle for performing major overhaul of a DG.

As needed to complete unplanned maintenance. This time shall be minimized.

- For the swing DG:

The additional restrictions apply prior to using a Completion Time of greater than 72 hours.

The 14 day Completion Time may be used once per Unit 1 operating cycle for performing a major overhaul of the swing DG.

The time may be used as needed to complete unplanned maintenance. This time shall be minimized.

- As needed for the swing DG when it is inhibited from automatically aligning to Unit 1 in order for the 14 day Completion Time to be used for a Unit 2 DG.

(continued)

INSERT B

The 14 day Completion Time is also subject to additional restrictions for planned maintenance on other plant systems; these are controlled by 90AC-OAM-002-0. Use of the 14 day Completion Time is permitted as follows:

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. (continued)	B.2 Declare required feature(s), supported by the inoperable DG, inoperable when the redundant required feature(s) are inoperable.	4 hours from discovery of Condition B concurrent with inoperability of redundant required feature(s)
	<u>AND</u>	
	B.3.1 Determine OPERABLE DG(s) are not inoperable due to common cause failure.	24 hours
	<u>OR</u>	
	B.3.2 Perform SR 3.8.1.2.a for OPERABLE DG(s)	24 hours
	<u>AND</u>	
	B.4 Restore DG to OPERABLE status.	72 hours for a Unit 2 DG with the swing DG not inhibited
		<u>AND</u>
	Insert 3	14 days for a Unit 2 DG with the swing DG inhibited from automatically aligning to Unit 1
	Insert 4	<u>AND</u>
		14 days for the swing DG
		<u>AND</u>
		(continued)

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. (continued)	B.4 (continued)	17 days from discovery of failure to meet LCO 3.8.1.a, b, or c
C. One required Unit 1 DG inoperable.	C.1 Perform SR 3.8.1.1 for OPERABLE required offsite circuit(s).	1 hour <u>AND</u> Once per 8 hours thereafter
	<u>AND</u>	
	C.2 Declare required feature(s), supported by the inoperable DG, inoperable when the redundant required feature(s) are inoperable.	4 hours from discovery of Condition C concurrent with inoperability of redundant required feature(s)
	<u>AND</u>	
	C.3.1 Determine OPERABLE DG(s) are not inoperable due to common cause failure.	24 hours
	<u>OR</u>	
	C.3.2 Perform SR 3.8.1.2.a for OPERABLE DG(s).	24 hours
	<u>AND</u>	
	C.4 Restore required DG to OPERABLE status.	7 days with the swing DG not inhibited <u>AND</u>
		(continued)

Insert 1

Insert 2

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. (continued)	C.4 (continued)	14 days with the swing DG inhibited from automatically aligning to Unit 2
D. Two or more required offsite circuits inoperable.	D.1 Declare required feature(s) with no offsite power available inoperable when the redundant required feature(s) are inoperable. <u>AND</u> D.2 Restore all but one required offsite circuit to OPERABLE status.	12 hours from discovery of Condition D concurrent with inoperability of redundant required feature(s) 24 hours
E. One required offsite circuit inoperable. <u>AND</u> One required DG inoperable.	-----NOTE----- Enter applicable Conditions and Required Actions of LCO 3.8.7, "Distribution Systems - Operating," when Condition E is entered with no AC power source to one 4160 V ESF bus. ----- E.1 Restore required offsite circuit to OPERABLE status. <u>OR</u> E.2 Restore required DG to OPERABLE status.	12 hours 12 hours
F. Two or more (Unit 2 and swing) DGs inoperable.	F.1 Restore all but one Unit 2 and swing DGs to OPERABLE status.	2 hours

(continued)

INSERT 1

...or maintenance restrictions not met.

INSERT 2

...and maintenance restrictions met.

INSERT 3

72 hours for the swing diesel with maintenance restrictions not met

INSERT 4

AND

14 days for the swing diesel with maintenance restrictions met.

BASES

ACTIONS (continued)

B.4

Regulatory Guide 1.93 (Ref. 6), provides guidance that operation in Condition B may continue for 72 hours. A risk-informed, deterministic evaluation performed for Plant Hatch justifies operation in Condition B for 14 days, provided action is taken to ensure two DGs are dedicated to each Hatch unit. This is accomplished for an inoperable A or C DG by inhibiting the automatic alignment (on a LOCA or LOSEP signal) of the swing DG to the other unit. If the inoperable DG is the swing DG, each unit has two dedicated DGs. For an inoperable swing DG, a 72 hour Completion Time applies unless the restrictions specified following this paragraph are satisfied. In Condition B for each defined Completion Time and restriction (if applicable), the remaining OPERABLE DGs and offsite circuits are adequate to supply electrical power to the onsite Unit 2 Class 1E Distribution System. The Completion Times take into account the capacity and capability of the remaining AC sources, reasonable time for maintenance, and low probability of a DBA occurring during this period. Use of the 14 day

Replace with
Insert B

~~Completion Time subject to additional restrictions controlled by 90AC-OAM-002-0 is permitted as follows:~~

- For the Unit 2 DGs:

Once per DG per operating cycle for performing major overhaul of a DG.

As needed to complete unplanned maintenance. This time shall be minimized.

- For the swing DG:

The additional restrictions apply prior to using a Completion Time of greater than 72 hours.

The 14 day Completion Time may be used once per Unit 1 operating cycle for performing a major overhaul of the swing DG.

The time may be used as needed to complete unplanned maintenance. This time shall be minimized.

- As needed for the swing DG when it is inhibited from automatically aligning to Unit 2 in order for the 14 day Completion Time to be used for a Unit 1 DG.

(continued)

INSERT B

The 14 day Completion Time is also subject to additional restrictions for planned maintenance on other plant systems; these are controlled by 90AC-OAM-002-0. Use of the 14 day Completion Time is permitted as follows:

**Edwin I. Hatch Nuclear Plant
Addition of 72 Hour Completion Time for Inoperable Swing Diesel Generator**

Enclosure 3

Technical Specifications and Bases Clean Typed Pages

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. (continued)	B.2 Declare required feature(s), supported by the inoperable DG, inoperable when the redundant required feature(s) are inoperable.	4 hours from discovery of Condition B concurrent with inoperability of redundant required feature(s)
	<u>AND</u>	
	B.3.1 Determine OPERABLE DG(s) are not inoperable due to common cause failure.	24 hours
	<u>OR</u>	
	B.3.2 Perform SR 3.8.1.2.a for OPERABLE DG(s).	24 hours
	<u>AND</u>	
	B.4 Restore DG to OPERABLE status.	72 hours for a Unit 1 DG with the swing DG not inhibited or maintenance restrictions not met
		<u>AND</u>
		14 days for a Unit 1 DG with the swing DG inhibited from automatically aligning to Unit 2 and maintenance restrictions met
		<u>AND</u>
		72 hours for the swing diesel with maintenance restrictions not met
		(continued)

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. (continued)	B.4 (continued)	<p><u>AND</u></p> <p>14 days for the swing diesel with maintenance restrictions met</p> <p><u>AND</u></p> <p>17 days from discovery of failure to meet LCO 3.8.1.a, b, or c</p>
C. One required Unit 2 DG inoperable	<p>C.1 Perform SR 3.8.1.1 for OPERABLE required offsite circuit(s).</p> <p><u>AND</u></p> <p>C.2 Declare required feature(s), supported by the inoperable DG, inoperable when the redundant required feature(s) are inoperable.</p> <p><u>AND</u></p> <p>C.3.1 Determine OPERABLE DG(s) are not inoperable due to common cause failure.</p> <p><u>OR</u></p> <p>C.3.2 Perform SR 3.8.1.2.a for OPERABLE DG(s).</p>	<p>1 hour</p> <p><u>AND</u></p> <p>Once per 8 hours thereafter</p> <p>4 hours from discovery of Condition C concurrent with inoperability of redundant required feature(s)</p> <p>24 hours</p> <p>24 hours</p>
(continued)		

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. (continued)	<p><u>AND</u></p> <p>C.4 Restore required DG to OPERABLE status.</p>	<p>7 days with the swing DG not inhibited or maintenance restrictions not met</p> <p><u>AND</u></p> <p>14 days with the swing DG inhibited from automatically aligning to Unit 1 and maintenance restrictions met</p>
D. Two or more required offsite circuits inoperable.	<p>D.1 Declare required feature(s) with no offsite power available inoperable when the redundant required feature(s) are inoperable.</p> <p><u>AND</u></p> <p>D.2 Restore all but one required offsite circuit to OPERABLE status.</p>	<p>12 hours from discovery of Condition D concurrent with inoperability of redundant required feature(s)</p> <p>24 hours</p>
<p>E. One required offsite circuit inoperable.</p> <p><u>AND</u></p> <p>One required DG inoperable.</p>	<p>-----NOTE-----</p> <p>Enter applicable Conditions and Required Actions of LCO 3.8.7, "Distribution Systems - Operating," when Condition E is entered with no AC power source to one 4160 V ESF bus.</p> <p>-----</p> <p>E.1 Restore required offsite circuit to OPERABLE status.</p>	<p>12 hours</p>

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
E. (continued)	<u>OR</u> E.2 Restore required DG to OPERABLE status.	12 hours
F. Two or more (Unit 1 and swing) DGs inoperable.	F.1 Restore all but one Unit 1 and swing DGs to OPERABLE status	2 hours
G. No DGs capable of supplying power to any Unit 1 LPCI valve load center.	G.1 Restore one DG capable of supplying power to Unit 1 LPCI valve load center to OPERABLE status.	2 hours
H. Required Action and Associated Completion Time of Condition A, B, C, D, E, F, or G not met.	H.1 Be in MODE 3. <u>AND</u> H.2 Be in MODE 4.	12 hours 36 hours
I. One or more required offsite circuits and two or more required DGs inoperable. <u>OR</u> Two or more required offsite circuits and one required DG inoperable.	I.1 Enter LCO 3.0.3.	Immediately

BASES

ACTIONS

B.4

Regulatory Guide 1.93 (Ref. 6) provides guidance that operation in Condition B may continue for 72 hours. A risk-informed, deterministic evaluation performed for Plant Hatch justifies operation in Condition B for 14 days, provided action is taken to ensure two DGs are dedicated to each Hatch unit. This is accomplished for an inoperable A or C DG by inhibiting the automatic alignment (on a LOCA or LOSP signal) of the swing DG to the other unit. If the inoperable DG is the swing DG, each unit has two dedicated DGs. For an inoperable swing DG, a 72 hour Completion Time applies unless the restrictions specified following this paragraph are satisfied. In Condition B for each defined Completion Time and restriction (if applicable), the remaining OPERABLE DGs and offsite circuits are adequate to supply electrical power to the onsite Unit 1 Class 1E Distribution System. The Completion Times take into account the capacity and capability of the remaining AC sources, reasonable time for maintenance, and low probability of a DBA occurring during this period. The 14 day Completion Time is also subject to additional restrictions for planned maintenance on other plant systems; these are controlled by 90AC-OAM-002-0. Use of the 14 day Completion time is permitted as follows :

- For the Unit 1 DGs:

Once per DG per operating cycle for performing major overhaul of a DG.

As needed to complete unplanned maintenance. This time shall be minimized.

- For the swing DG:

The additional restrictions apply prior to using a Completion Time of greater than 72 hours.

The 14 day Completion Time may be used once per Unit 1 operating cycle for performing a major overhaul of the swing DG.

The time may be used as needed to complete unplanned maintenance. This time shall be minimized.

- As needed for the swing DG when it is inhibited from automatically aligning to Unit 1 in order for the 14 day Completion Time to be used for a Unit 2 DG.

(continued)

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. (continued)	B.2 Declare required feature(s), supported by the inoperable DG, inoperable when the redundant required feature(s) are inoperable.	4 hours from discovery of Condition B concurrent with inoperability of redundant required feature(s)
	<u>AND</u>	
	B.3.1 Determine OPERABLE DG(s) are not inoperable due to common cause failure.	24 hours
	<u>OR</u>	
	B.3.2 Perform SR 3.8.1.2.a for OPERABLE DG(s)	24 hours
	<u>AND</u>	
	B.4 Restore DG to OPERABLE status.	72 hours for a Unit 2 DG with the swing DG not inhibited or maintenance restrictions not met
		<u>AND</u>
		14 days for a Unit 2 DG with the swing DG inhibited from automatically aligning to Unit 1 and maintenance restrictions met
		<u>AND</u>
		72 hours for the swing diesel with maintenance restrictions not met
		(continued)

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. (continued)	B.4 (continued)	<u>AND</u> 14 days for the swing diesel with maintenance restrictions met <u>AND</u> 17 days from discovery of failure to meet LCO 3.8.1.a, b, or c
C. One required Unit 1 DG inoperable.	C.1 Perform SR 3.8.1.1 for OPERABLE required offsite circuit(s). <u>AND</u> C.2 Declare required feature(s), supported by the inoperable DG, inoperable when the redundant required feature(s) are inoperable. <u>AND</u> C.3.1 Determine OPERABLE DG(s) are not inoperable due to common cause failure. <u>OR</u> C.3.2 Perform SR 3.8.1.2.a for OPERABLE DG(s).	1 hour <u>AND</u> Once per 8 hours thereafter 4 hours from discovery of Condition C concurrent with inoperability of redundant required feature(s) 24 hours 24 hours
		(continued)

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. (continued)	<p><u>AND</u></p> <p>C.4 Restore required DG to OPERABLE status.</p>	<p>7 days with the swing DG not inhibited or maintenance restrictions not met</p> <p><u>AND</u></p> <p>14 days with the swing DG inhibited from automatically aligning to Unit 2 and maintenance restrictions met</p>
D. Two or more required offsite circuits inoperable.	<p>D.1 Declare required feature(s) with no offsite power available inoperable when the redundant required feature(s) are inoperable.</p> <p><u>AND</u></p> <p>D.2 Restore all but one required offsite circuit to OPERABLE status.</p>	<p>12 hours from discovery of Condition D concurrent with inoperability of redundant required feature(s)</p> <p>24 hours</p>
E. One required offsite circuit inoperable.	<p>-----NOTE-----</p> <p>Enter applicable Conditions and Required Actions of LCO 3.8.7, "Distribution Systems - Operating," when Condition E is entered with no AC power source to one 4160 V ESF bus.</p> <p>-----</p> <p>E.1 Restore required offsite circuit to OPERABLE status.</p>	<p>12 hours</p>
<u>AND</u> One required DG inoperable.		

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
E. (continued)	<u>OR</u> E.2 Restore required DG to	12 hours
F. Two or more (Unit 2 and swing) DGs inoperable.	F.1 Restore all but one Unit 2 and swing DGs to OPERABLE status.	2 hours
G. No DGs capable of supplying power to any Unit 2 LPCI valve load center.	G.1 Restore one DG capable of supplying power to Unit 2 LPCI valve load center to OPERABLE status.	2 hours
H. Required Action and Associated Completion Time of Condition A, B, C, D, E, F, or G not met.	H.1 Be in MODE 3.	12 hours
	<u>AND</u> H.2 Be in MODE 4.	36 hours
I. One or more required offsite circuits and two or more required DGs inoperable. <u>OR</u> Two or more required offsite circuits and one required DG inoperable.	I.1 Enter LCO 3.0.3.	Immediately

BASES

ACTIONS (continued)

B.4

Regulatory Guide 1.93 (Ref. 6), provides guidance that operation in Condition B may continue for 72 hours. A risk-informed, deterministic evaluation performed for Plant Hatch justifies operation in Condition B for 14 days, provided action is taken to ensure two DGs are dedicated to each Hatch unit. This is accomplished for an inoperable A or C DG by inhibiting the automatic alignment (on a LOCA or LOSP signal) of the swing DG to the other unit. If the inoperable DG is the swing DG, each unit has two dedicated DGs. For an inoperable swing DG, a 72 hour Completion Time applies unless the restrictions specified following this paragraph are satisfied. In Condition B for each defined Completion Time and restriction (if applicable), the remaining OPERABLE DGs and offsite circuits are adequate to supply electrical power to the onsite Unit 2 Class 1E Distribution System. The Completion Times take into account the capacity and capability of the remaining AC sources, reasonable time for maintenance, and low probability of a DBA occurring during this period. The 14 day Completion Time is also subject to additional restrictions for planned maintenance on other plant systems; these are controlled by 90AC-OAM-002-0. Use of the 14 day Completion time is permitted as follows:

- For the Unit 2 DGs:

Once per DG per operating cycle for performing major overhaul of a DG.

As needed to complete unplanned maintenance. This time shall be minimized.

- For the swing DG:

The additional restrictions apply prior to using a Completion Time of greater than 72 hours.

The 14 day Completion Time may be used once per Unit 1 operating cycle for performing a major overhaul of the swing DG.

The time may be used as needed to complete unplanned maintenance. This time shall be minimized.

- As needed for the swing DG when it is inhibited from automatically aligning to Unit 2 in order for the 14 day Completion Time to be used for a Unit 1 DG.

(continued)