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Document Control Desk 10 CFR 50.63
U.S. NUCLEAR REGULATORY COMMISSION
Mail Station P1-137
Washington, D. C. 20555

Gentlemen:

DOCKETS 50-266 AND 50-301
SUPPLEMENT TO 10 CFR 50.63, TAC. NOS. M90613 AND M90614
LOSS OF ALL ALTERNATING CURRENT POWER
POINT BEACH NUCLEAR PLANTS, UNITS 1 AND 2

We are performing a modification that will install two additional emergency diesel generators (EDGs) and reconfigure portions of the 4160 Volt emergency electrical power system at our Point Beach Nuclear Plant. The design summary for this project was provided as an attachment to our letter dated September 24, 1993. The design summary was provided in support of our amendment request which we submitted on May 26, 1994.

The NRC Safety Evaluation Reports dated October 3, 1990 and March 22, 1991 for PBNP for the Station Blackout Rule stated that the coping duration and evaluation should be re-evaluated for the installation of additional EDGs. Our initial evaluation of how the installation of additional emergency diesel generators affects the Station Blackout Rule response for PBNP was provided as an attachment to a letter dated September 22, 1994. After further discussions with NRC-NRR staff reviewers in December 1994, it was decided that a revision to that evaluation was needed. This letter provides the revised station blackout evaluation for the installation of additional emergency diesel generators at PBNP.

Currently, compliance with the Station Blackout Rule for PBNP is based on the use of the on-site gas turbine generator (G-05) as an Alternate AC power source. The attached report concludes that the on-site gas turbine generator (G-05) can continue as an Alternate AC power source for PBNP and that the new emergency diesel generators provide additional flexibility for Alternate AC power and emergency AC power configuration.

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Also included as an attachment to this letter is a justification for changing the Severe Weather (SW) classification for PBNP from 4 to 2. This change reduces the required coping duration from 8 hours to 4 hours. This change does not affect the coping assessment because PBNP will continue to use an AAC coping methodology, except for evaluation of the equipment used during the AAC coping duration. For example, the fuel supply requirement for the alternate AC power source would be reduced by four hours.

We would be pleased to answer any questions you may have.

Sincerely,

G. M. Krieser
Manager-Industry and Regulatory Services
Nuclear Power Business Unit

CAC/kmc

Attachments

cc: Regional Administrator, Region III
NRC Resident Inspector

Installation of Additional Emergency Diesel Generators at Point Beach Nuclear Plant

This evaluation is based on the requirements of 10 CFR 50.63, correspondence with the NRC, Reg Guide 1.155, NUMARC 87-00, and the design information for the additional EDG modification.

A modification is being performed to install two additional EDGs at PBNP. This modification changes some of the features that can affect the coping duration and coping assessment for compliance with 10 CFR 50.63. The following information is a description of this modification and an evaluation of the way that this modification affects station blackout rule compliance.

The Additional EDG Modification

The new emergency diesel generator (EDG) configuration at PBNP will consist of four shared emergency diesel generators (see the attached figure "Electrical Distribution - Including DC"). Two train A and two train B EDGs will be normally available when this modification is complete. The two train A diesels will normally be aligned as standby emergency power, one to the Unit 1 train A 4160 volt bus (1A05) and one to the Unit 2 train A 4160 volt bus (2A05). The two train B EDGs will normally be aligned as standby emergency power, one to the Unit 1 train B 4160 volt bus (1A06) and one to the Unit 2 train B 4160 volt bus (2A06).

The two A train EDGs will be the original EDGs G-01 and G-02. G-01 will automatically provide power to 1A05 if power is lost on 1A05, G-02 will automatically provide power to 2A05 if power is lost on 2A05. G-01 will be manually connectable to provide power to 2A05, and G-02 will be manually connectable to provide power to 1A05. Additionally, if G-01 is out of service, G-02 may be placed in a mode that will allow it to automatically provide power to 1A05, 2A05, or both, if either or both buses lose power. G-01 will have the same capability in the A train. The new EDGs G-03 and G-04 will have the same capabilities in the B train.

The primary reason for this configuration is to allow both units to continue operating without being in a Technical Specification Limiting Condition for Operation (LCO) for the situation of an EDG in one train or two EDGs, one in each train, being out of service. Two EDGs out of service in the same train will be equivalent to one diesel out of service in the original emergency electrical power system configuration, that is, a 7-day LCO would apply to both units. With a third diesel out of service, a 7-day LCO would apply to both units. With four diesels out of service, LCO 15.3.0, "General Considerations," hot shutdown within 3 hours, would apply for both units.

Station Blackout Rule Compliance: Pre-Modification

Our April 17, 1989 submittal provided the coping duration determination and coping assessment for PBNP. Subsequent submittals and the NRC Safety Evaluations did not alter the coping duration or the coping assessment for PBNP. The original Station Blackout Rule compliance for PBNP was based on the use of the on-site gas turbine generator (G-05) as an Alternate AC power source.

Coping Duration

The coping duration determination for Station Blackout is based on the offsite power characteristics, the on-site emergency AC power configuration, and the emergency diesel generator target reliability. The offsite power characteristics are being changed due to the extremely severe weather classification being changed (as described in Attachment 3) from group 4 to group 2. The emergency diesel generator target reliability was originally selected to be 0.975 based on the reliability data for the EDGs that indicates EDG reliability in excess of this target and the fact that the emergency AC (EAC) power configuration for PBNP is "D," as described in Reg Guide 1.155.

The original coping duration determination for PBNP is based on EAC power configuration group "D," because there are two (2) emergency AC power supplies not credited as alternate AC power sources and only one (1) emergency AC power supply is necessary to operate following a loss of offsite power.

Coping Assessment

The coping assessment for PBNP is based on the use of the on-site gas turbine generator (G-05) as an Alternate AC power source after one hour of AC independent coping.

Station Blackout Compliance: Post Modification

The modification to install additional emergency diesel generators changes the EAC and AAC configuration for PBNP. As described previously, the purpose of this modification is to allow both units to continue operating without being in a Technical Specification Limiting Condition for Operation (LCO) for the situation of an EDG in one train or two EDGs, one in each train, being out of service. Therefore, the situations of four, three, and two operable EDGs are addressed:

Four Operable EDGs

The situation of four operable EDGs allows PBNP to utilize EAC power configuration Group "C" as a 1 out of 2, dedicated, or 1 out of 3, shared, EDG configuration (if one EDG is considered to be the AAC source), because only one emergency AC supply is necessary to operate safe shutdown equipment for both units following a loss of offsite power (as described in Reg Guide 1.155). Combining this with the other factors; extremely severe weather classification (ESW = 2), severe weather classification (SW = 2), and independence of offsite power group (I = 2), results in a 4 hour coping duration requirement for a 0.95 or 0.975 EDG reliability target (reference Reg. Guide 1.155).

The situation of four operable EDGs allows an EDG to be used as alternate AC power. This is based on the excess capacity of the EAC power configuration with four EDGs operable and only one emergency AC power supply is necessary to operate safe shutdown equipment for both units following a loss of offsite power.

Three Operable EDGs

The situation of three operable EDGs allows PBNP to utilize EAC power configuration Group "C" as a 1 out of 3, shared, EDG configuration, because only one emergency AC supply is necessary to operate safe shutdown equipment for both units following a loss of offsite power. Combining this with the other factors (ESW = 2, SW = 2, and I = 2) results in a 4 hour coping duration requirement for a 0.95 or 0.975 EDG reliability target (reference Reg. Guide 1.155).

The situation of three operable EDGs allows an EDG to be used as alternate AC power. This is based on the excess capacity of the EAC power configuration with three EDGs operable and only one emergency AC supply is necessary to operate safe shutdown equipment for both units following a loss of offsite power.

Two Operable EDGs

The situation of two operable EDGs (one for each Train) is identical to the original configuration at PBNP. Station Blackout Rule compliance is based on the use of the on-site gas turbine generator (G-05) as an Alternate AC power source for the situation of two operable EDGs, as evaluated in NRC Safety Evaluation Reports dated October 3, 1990 and March 22, 1991.

EDGs as Alternate AC Power

Any one EDG at PBNP has sufficient capacity to operate safe shutdown equipment for both units following a loss of offsite power. The capabilities of the EDGs are in accordance with the guidelines in Reg Guide 1.155, Position 3.3.5 and NUMARC 87-00, Appendix B, as described in attachment 2. Therefore, the EDGs can be used as alternate AC power sources.

The EDGs can be connected to the EAC power buses of either unit in a station blackout within 10 minutes. Therefore, no coping assessment is necessary for using the EDGs as AAC power.

Technical Specifications

The NRC SER for Station Blackout Rule (10 CFR 50.63) states that the NRC staff has not addressed how technical specifications for the station blackout equipment should be applied and that further guidance on this may be provided at a later date. Technical Specifications for Station Blackout Rule will be proposed for PBNP if such guidance becomes available.

Technical Specifications for the use of the new emergency diesel generators as EAC supplies have already been implemented.

Procedures and Training

The installation of two additional emergency diesel generators is taking place in phases, with the final phase completion expected during the Unit 1, spring refueling outage in 1996. As each phase of the modification is completed, the PBNP procedures are appropriately changed and operator training is provided.

The station blackout procedures continue to provide the appropriate steps for using either the gas turbine or non-blacked-out unit cross-tie for restoration of AC power and coping with a station blackout.

Conclusion

The original method of Station Blackout Rule compliance, using the gas turbine as an AAC power source, remains valid. The new emergency diesel generators provide additional flexibility for Alternate AC power and emergency AC power configuration for compliance with the Station Blackout Rule, 10 CFR 50.63, Loss of All Alternating Current Power.

COMPARISON OF THE MODIFIED EMERGENCY AC POWER CONFIGURATION TO THE GUIDANCE FOR ALTERNATE AC POWER

The following is a comparison of the modified PBNP emergency AC power configuration to the criteria for alternate AC power provided in Appendix B of NUMARC 87-00. Appendix B of NUMARC 87-00 is reproduced in it entirety, with the evaluation of the PBNP configuration provided in *italics* for each criterion.

APPENDIX B. ALTERNATE AC POWER CRITERIA

This appendix describes the criteria that must be met by a power supply in order to be classified as an Alternate AC power source. The criteria focus on ensuring that station blackout equipment is not unduly susceptible to dependent failure by establishing independence of the AC system from the emergency and non-Class 1E AC power systems.

AAC Power Source Criteria

B.1 The AAC system and its components need not be designed to meet Class 1E or safety system requirements. If a Class 1E EDG is used as an Alternate AC power source, this existing Class 1E EDG must continue to meet all applicable safety-related criteria.

The Class 1E EDGs at PBNP will continue to meet all applicable safety-related criteria.

B.2 Unless otherwise provided in this criteria, the AAC system need not be protected against the effects of:

1. failure or misoperation of mechanical equipment, including (i) fire, (ii) pipe whip, (iii) jet impingement, (iv) water spray, (v) flooding from a pipe break, (vi) radiation, pressurization, elevated temperature or humidity caused by high or medium energy pipe break, and (vii) missiles resulting from the failure of rotating equipment or high energy systems; or

2. seismic events.

The Class 1E EDGs are designed and protected against these events.

B.3 Components and subsystems shall be protected against the effects of likely weather-related events that may initiate the loss of off-site power event. Protection may be provided by enclosing AAC components within structures that conform with the Uniform Building Code, and burying exposed electrical

cable run between buildings (i.e., connections between the AAC power source and the shutdown busses).

The Class 1E EDGs are designed and protected against these events. (See B.8.e below).

B.4 Physical separation of AAC components from safety related components or equipment shall conform with the separation criteria applicable for the unit's licensing basis.

All physical separation of the modified Class 1E AC power system is being maintained, including separation between Train A and Train B portions of the system.

Connectability to AC Power Systems

B.5 Failure of AAC components shall not adversely affect Class 1E AC power systems.

The emergency diesel generators are part of the Class 1E AC power system. Appropriate separation and redundancy provides the assurance that failures will not propagate to the other parts of the Class 1E AC power system. Also, the failure of the other AAC power source, the gas turbine, would not affect the Class 1E AC power systems.

B.6 Electrical isolation of AAC power shall be provided through an appropriate isolation device. If the AAC source is connected to Class 1E buses, isolation shall be provided by two circuit breakers in series (one Class 1E breaker at the Class 1E bus and one non-Class 1E breaker to protect the source).

The emergency diesel generators are part of the Class 1E AC power system. Each EDG has 2 output breakers. Each output breaker connects the EDG to a Class 1E bus in one unit. This capability is as described in the design summary for the addition of emergency diesel generators at PBNP.

B.7 The AAC power source shall not normally be directly connected to the preferred or on-site emergency AC power system for the unit affected by the blackout. In addition, the AAC system shall not be capable of automatic loading of shutdown equipment from the blacked-out unit unless licensed with such capability.

The emergency diesel generators are not normally directly connected to the preferred or on-site emergency AC power system for the unit affected by the blackout. Each EDG has the capability to automatically load one or both units. The use of an EDG as AAC would require that at least 3 EDGs are operable, prior to the loss of offsite power. Power would be

restored to the blacked-out unit via unit cross-tie or directly from an operating EDG via the output breaker to that unit, by manually closing that output breaker.

Minimal Potential for Common Cause Failure

B.8 There shall be minimal potential for common cause failure of the AAC power source(s). The following system features provide assurance that the minimal potential for common cause failure has been adequately addressed.

a. The AAC power system shall be equipped with a DC power source that is electrically independent from the blacked-out unit's preferred and Class 1E power system.

Each of the four EDGs at PBNP are supplied by a separate DC power source. Each DC power source, which are the station batteries, can be charged via battery chargers powered from either unit. Therefore, any EDG being used as AAC power has a DC power source that is electrically independent from the blacked-out unit's preferred and Class 1E power system.

b. The AAC power system shall be equipped with an air start system, as applicable, that is independent of the preferred and the blacked-out unit's preferred and Class 1E power supply.

Each of the four EDGs at PBNP have an air start system that is independent of the preferred and the blacked-out unit's preferred and Class 1E power supply.

c. The AAC power system shall be provided with a fuel oil supply, as applicable, that is separate from the fuel oil supply for the onsite emergency AC power system. A separate day tank supplied from a common storage tank is acceptable provided the fuel oil is sampled and analyzed consistent with applicable standards prior to transfer to the day tank.

Each of the four EDGs at PBNP have a separate day tank. Two common storage tanks, one for each train, supply the day tanks for that train's EDGs. The fuel oil is sampled and analyzed in accordance with applicable standards. It is a normal practice to analyze the sample prior to transfer of any fuel to a day tank.

d. If the AAC power source is an identical machine to the emergency onsite AC power source, active failures of the emergency AC power source shall be evaluated for applicability and corrective action taken to reduce subsequent failures.

The two Train A EDGs (G-01 and G-02) are identical, and the two Train B EDGs (G-03 and G-04) are identical. Additionally, there is substantial similarity between all the EDG engines. The basis of Technical Specification section 15.3.7 requires that an evaluation for common cause failure be performed or the redundant EDGs must be started to prove that common cause failure does not exist.

e. No single point vulnerability shall exist whereby a likely weather-related event or single active failure could disable any portion of the onsite emergency AC power sources or the preferred power sources, and simultaneously fail the AAC power source(s).

The PBNP FSAR states that the design of the system is such that sufficient independence or isolation between various sources of electrical power is provided in order to guard against concurrent loss of all auxiliary power. Also, the PBNP FSAR references a general design criterion (GDC 2) that states: Those systems and components of reactor facilities which are essential to the prevention or to the mitigation of the consequences of nuclear accidents which could cause undue risk to the health and safety of the public shall be designed, fabricated, and erected to performance standards that will enable such systems and components to withstand, without undue risk to the health and safety of the public the forces that might reasonably be imposed by the occurrence of an extraordinary natural phenomenon such as earthquake, tornado, flooding condition, high wind or heavy ice. The design bases so established shall reflect: (a) appropriate consideration of the most severe of these natural phenomena that have been officially recorded for the site and the surrounding area; and (b) appropriate margin for withstanding forces greater than those recorded to reflect uncertainties about the historical data and their suitability as a basis for design.

These requirements were maintained for the installation of additional EDGs at PBNP.

f. The AAC power system shall be capable of operating during and after a station blackout without any support systems powered from the preferred power supply, or the blacked-out unit's Class 1E power sources affected by the event.

The EDGs at PBNP are designed to operate without any support systems powered from the preferred power supply. One possible situation of an EDG that requires a support system to be supplied by the blacked-out unit's Class 1E power source affected by the event exists. This situation is three operable EDGs where G-01 is in automatic mode to 1A05, G-02 is in automatic mode to 2A05, and G03 (or G-04) is in automatic

mode to both 1A06 and 2A06. Service water at PBNP is a shared system, with 3 pumps powered from each train. Two service water pumps must operate to provide adequate flow for service water loads. For the situation of three operable EDGs described above, the failure of G-01 and G-03 causes a Unit 1 station blackout. G-02 will automatically start and load safeguards bus 2A05, but only one service water pump will be operable. One service water pump would not provide sufficient flow for safe shutdown of both units and continuously cool EDG G-02. Sufficient service water flow could be restored by restoring power to the blacked-out unit and starting at least one service water pump.

Another possible situation of an EDG that requires a support system to be supplied by the blacked-out unit's Class 1E power source affected by the event is ventilation for EDG G-01. One of the two G-01 room exhaust fans is powered from the Unit 1 Train A Safeguards bus. The other exhaust fan is powered from the Unit 2 Train A Safeguards bus. EDG G-02 will normally be the standby emergency power supply for the Unit 2 Train A Safeguards bus.

The basis for Technical Specifications section 15.3.7 states that only one EDG G-01 exhaust fan is necessary for operability at ≤80°F. Therefore, this required support system component for EDG G-01 could potentially be powered from a Class 1E power source in blacked-out unit. Although, similar to the situation described above for service water cooling, if necessary, ventilation for EDG G-01 could be restored by restoring power to the blacked-out unit and starting the needed exhaust fan.

g. The portions of the AAC power system subjected to maintenance activities shall be tested prior to returning the AAC power system to service.

Although not specifically required by the PBNP Technical Specifications, the EDGs are tested as part of the process for returning them to service.

Availability After Onset of Station Blackout

B.9 The AAC power system shall be sized to carry the required shutdown loads for the required coping duration determined in Section 3.2.5, and be capable of maintaining voltage and frequency within limits consistent with established industry standards that will not degrade the performance of any shutdown system or component. At a multi-unit site, except for 1/2 Shared or 2/3 emergency AC power configurations, an adjacent unit's Class 1E power source may be used as an AAC

power source for the blacked out unit if it is capable of powering the required loads at both units.

The new EDG ratings are 2848 for 2000 hours and 2951 kw for 200 hours. The original EDG ratings are 2850 kw for 2000 hours and the 2963 for 200 hours. The following table is a summary of the loads that can be used for safe shutdown of both units:

Station Blackout Load List

Load	*HP*	*KW*	*Number*	*Total*
Service Water Pump	*300*	*239.3*	*2*	*478.6*
K2A/K2B Air Compressor	*100*	*93.0*	*1*	*93.0*
Containment Cooler	*150*	*45.0*	*2*	*90.0*
Shroud Fan W3A/B	*60*	*49.7*	*2*	*99.4*
Cavity Cooling Fan W4A/B	*40*	*33.2*	*2*	*66.4*
Cable Spreading Room Cooling	*15*	*12.4*	*2*	*24.8*
Control Room Cooling Fan	*15*	*12.4*	*2*	*24.8*
Boric Acid Transfer Pump	*7.5*	*6.2*	*2*	*12.4*
Computer Room Cooling Fan	*15*	*12.4*	*2*	*24.8*
Component Cooling Water Pump	*250*	*207.2*	*2*	*414.4*
Charging Pump	*100*	*91.0*	*2*	*182.0*
Emergency AC Lighting		*27.0*	*1*	*27.0*
Battery Charger D07/D08		*75.0*	*1*	*75.0*
Battery Charger D107/D108		*54.0*	*1*	*54.0*
Electric Aux Feedwater Pump	*250*	*207.2*	*1*	*207.2*
Emergency Diesel Auxiliaries		*131.0*	*1*	*131.0*
Battery Room Fan W-85 or W-86	*12.5*	*9.3*	*1*	*9.3*
			Total Load	*2014.1 KW*

The total load of 2014.1 KW is less than the 2000 hour rating for each EDG. Therefore, any EDG has sufficient capacity for safe shutdown of both units.

Capacity and Reliability

B.10 Unless otherwise governed by technical specifications, the AAC power source shall be started and brought to operating conditions that are consistent with its function as an AAC source at intervals not longer than three months, following manufacturer's recommendations or in accordance with plant-developed procedures. Once every refueling outage, a timed start (within the time period specified under blackout conditions) and rated load capacity test shall be performed.

The PBNP Technical Specification Section 15.4.6 requires monthly load testing of each diesel generator and emergency load testing each refueling outage. The emergency diesel

generators will continue to be tested in this manner. The required Technical Specification testing is sufficient to prove operability of the emergency diesel generators.

The use of an EDG as AAC is accomplished by manually closing the breakers to supply power to the blacked-out unit. It would be difficult to test this, because one unit is normally operating and interruption of power to the operating unit is not desirable. The unit cross-ties are on buses (A03 and A04 buses) that supply non-safeguards power during unit shutdowns. This would also make this testing difficult.

The PBNP simulator is a better method of performing the timing testing (timeline verification).

B.11 Unless otherwise governed by technical specifications, surveillance and maintenance procedures for the AAC system shall be implemented considering manufacturer's recommendations or in accordance with plant-developed procedures.

As stated in B.10, surveillance is governed by the PBNP Technical Specifications. Maintenance inspections are required by the PBNP Technical Specifications to be performed on each EDG in accordance with the manufacturer's recommendations for this class of stand-by service.

B.12 Unless otherwise governed by technical specifications, the AAC system shall be demonstrated by initial test to be capable of powering required shutdown equipment within one hour of a station blackout event.

As stated in B.10, blackout testing is not feasible because of possible problems for the operating unit. The A03 and A04 bus unit cross-ties have been used previously and are sized equivalently to the normal bus supply. Therefore, it is not necessary to perform a special test of the cross-tie capability.

It has been proposed that "time to restore power testing" would be best performed using the PBNP simulator.

B.13 The Non-Class 1E AAC system should attempt to meet the target reliability and availability goals specified below, depending on normal system state. In this context, reliability and availability goals apply to the overall AAC system rather than individual machines, where a system may comprise more than one AAC power source.

a. Systems Not Normally Operated (Standby Systems)

System reliability should be maintained at or above 0.95 per demand, as determined in accordance with NSAC-108 methodology (or equivalent).

A reliability program based on NSAC-108 methodology is currently in place for the EDGs at PBNP. The target reliability is 97.5% for each EDG. Current reliability for each EDG is ≥97.5%.

b. Systems Normally Operated (Online Systems)

Availability	AAC systems normally online should attempt to be available to its associated unit at least 95% of the time the reactor is operating.
Reliability	No reliability targets or standards are established for online systems.

The EDGs at PBNP are not normally operated (online systems). They provide standby service.

Extremely Severe Weather (ESW) Classification Change for Point Beach Nuclear Plant

The current PBNP Station Blackout Coping Duration assessment places PBNP into an eight-hour coping duration category. The guidance contained in NUMARC 87-00 encourages utilities to actively reduce the risk associated with station blackout. Section 3.2.6 of NUMARC 87-00 states:

> The following courses of action are available to reduce the assessed risk of station blackout:
>
> (1) Implement action to reduce the required coping duration to at least the four hour category by:
>
> (a) Reviewing Plant Specific Weather data;
>
> (b) modifying the switchyard to change the I-group; and/or,
>
> (c) modifying the plant to change the EDG configuration; and/or,
>
> (d) improving EDG reliability.
>
> (2) Install or utilize an existing alternate AC power source that meets the criteria in Appendix B (of NUMARC 87-00).

Previous 10 CFR 50.63 submittals for PBNP have established that utilization of an existing AAC power source (action 2 above) has been proposed and approved for PBNP. Subsequent communication with personnel implementing SBO rule requirements for the Wisconsin Public Service Corporation's Kewaunee Nuclear Power Plant has revealed that the extremely severe weather category for PBNP should be category 2 not category 4 as originally determined. This change reduces the required coping duration for PBNP to four hours.

The following evaluation justifies this change and describes the effect of this change on the coping duration assessment and the coping evaluation for PBNP.

In our April 17, 1989 letter to the NRC responding to 10 CFR 50.63, the extremely severe weather category for PBNP was listed as group 4. Communication with personnel associated with the Wisconsin Public Service (WPS) Kewaunee Nuclear Power Plant (KNPP) has revealed that a review of plant-specific weather data for KNPP has lead to an ESW group 2 category. KNPP is approximately 3 miles north of PBNP on the shore of Lake Michigan. The Wisconsin Electric review of this information finds that this information is

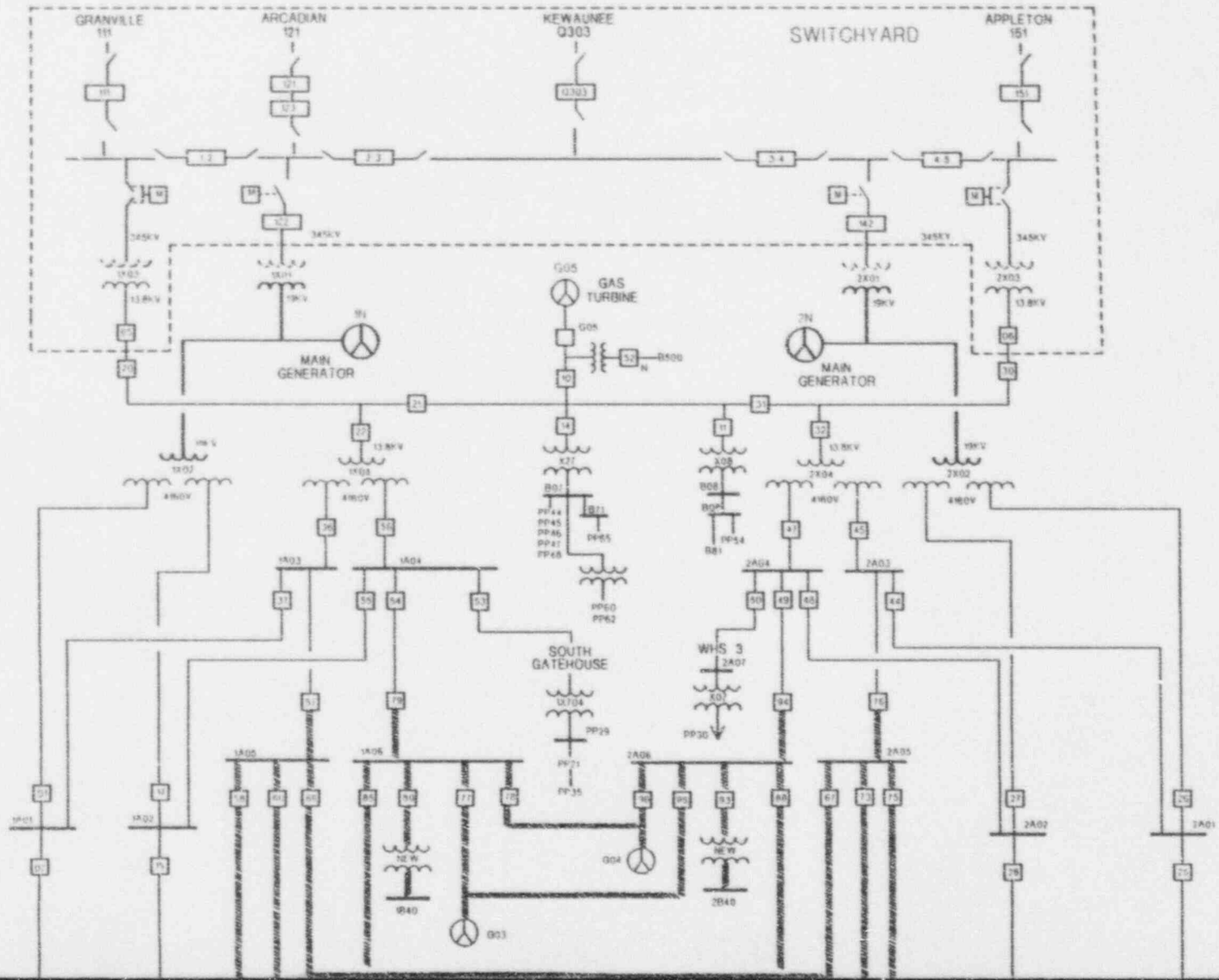
applicable to PBNP. Therefore, the group 2 category is correct for both KNPP and PBNP.

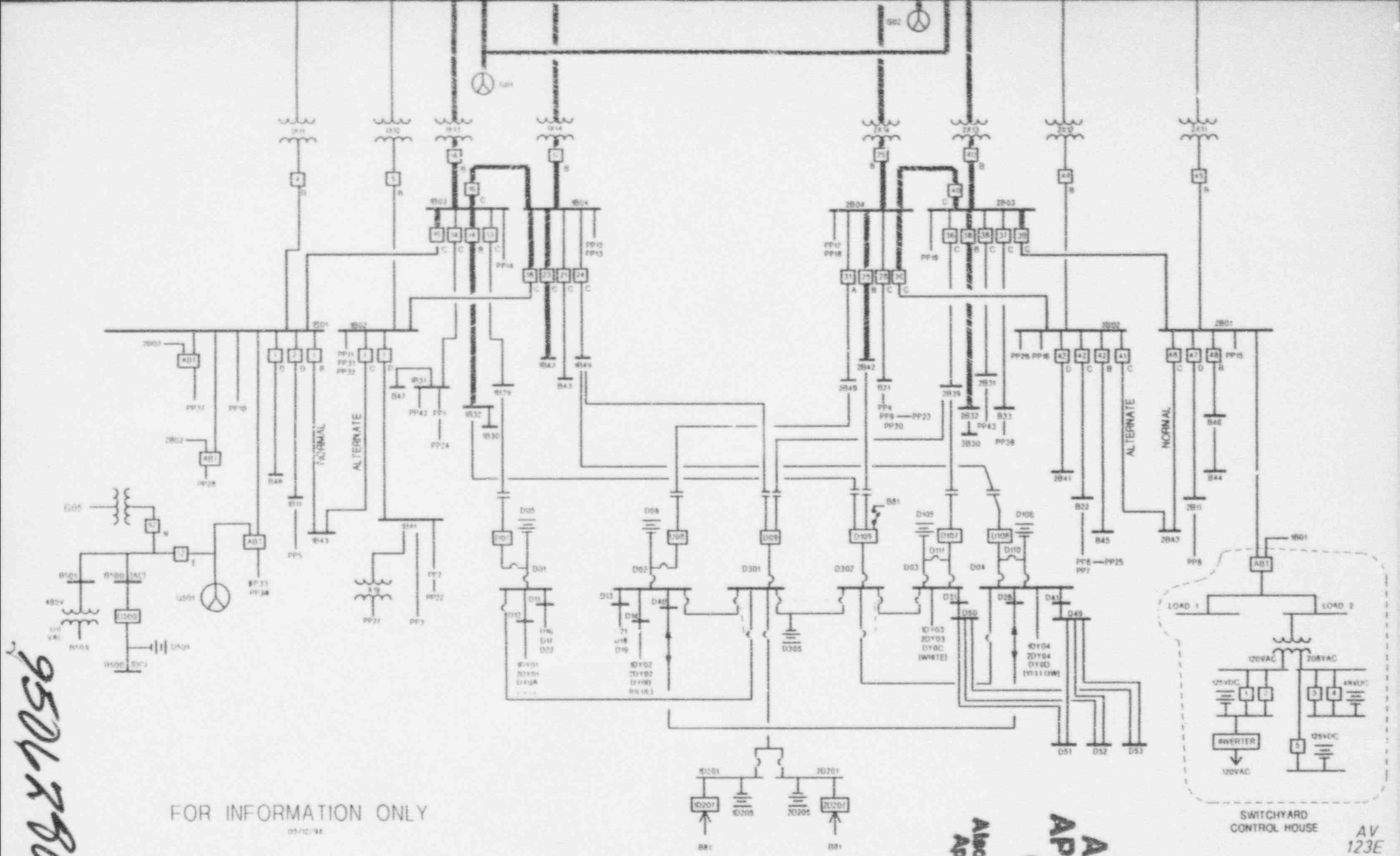
A letter detailing weather data review that justifies the ESW classification as group 2 for KNPP was provided in a letter from K. H. Evers, WPS to the USNRC Document Control Desk, dated November 14, 1989 (Docket No. 50-305, TAC No. 68558). The letter from M. J. Davis of the NRC to K. H. Evers of WPS dated April 4, 1990 provides the safety evaluation that concurred with the ESW classification as group 2 for KNPP.

This change places PBNP in the offsite power characteristic group P1 instead of the previously determined P2 group (reference Reg. Guide 1.155). The emergency AC power group is still D for PBNP. The target EDG reliability is still 0.975 for PBNP. The combination of these factors places PBNP in a 4 hour coping category instead of the previously determined 8 hour category.

The coping evaluations remain essentially the same for PBNP. The gas turbine is the AAC power source available within 1 hour. Therefore, the coping evaluations consist of the assessment of 1 hour without AC power and the subsequent recovery of AC power via the AAC power source within 1 hour for the rest of the station blackout duration.

ELECTRICAL DISTRIBUTION - INCLUDING DC





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