

ATTACHMENT 3

MARKED UP PAGES FOR PROPOSED CHANGES TO TECHNICAL SPECIFICATIONS

PLANT SYSTEMS

3/4.7.4 ESSENTIAL COOLING WATER SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.4⁽¹⁾ At least three independent essential cooling water loops shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

With only two essential cooling water loops OPERABLE, restore at least three loops to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.7.4 At least three essential cooling water loops shall be demonstrated OPERABLE:

- a. At least once per 31 days by verifying that each valve (manual, power-operated, or automatic) servicing safety-related equipment that is not locked, sealed, or otherwise secured in position is in its correct position;
- b. At least once per 18 months during shutdown, by verifying that:
 - 1) Each automatic valve servicing safety-related equipment actuates to its correct position on a Safety Injection, ECW pump start, screen wash booster pump start and essential chiller start test signals, as applicable,
 - 2) Each Essential Cooling Water pump starts automatically on a Safety Injection or a Loss of Offsite Power test signal, and
 - 3) Each screen wash booster pump and the traveling screen start automatically on a Safety Injection test signal.

⁽¹⁾ See Special Test Exception 3.10.8

3/4.8 ELECTRICAL POWER SYSTEMS

3/4.8.1 A.C. SOURCES

OPERATING

LIMITING CONDITION FOR OPERATION

3.8.1.1⁽¹⁾ As a minimum, the following A.C. electrical power sources shall be OPERABLE:

- a. Two physically independent circuits between the offsite transmission network and the onsite Class 1E Distribution System⁽¹⁾, and
- b. Three separate and independent standby diesel generators, each with a separate fuel tank containing a minimum volume of 60,500 gallons of fuel.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

- a. With one offsite circuit of the above-required A.C. electrical power sources inoperable, demonstrate the OPERABILITY of the remaining A.C. sources by performing Surveillance Requirement 4.8.1.1.1.a within 1 hour and at least once per 8 hours thereafter. Restore the offsite circuit to OPERABLE status within 72 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.
- b. With a standby diesel generator inoperable, demonstrate the OPERABILITY of the above-required A.C. offsite sources by performing Surveillance Requirement 4.8.1.1.1.a within 1 hour and at least once per 8 hours thereafter. If the standby diesel generator became inoperable due to any cause other than an inoperable support system, an independently testable component or preplanned preventive maintenance or testing, demonstrate the OPERABILITY of the remaining OPERABLE standby diesel generators by performing Surveillance Requirement 4.8.1.1.2.a.2) for each such standby diesel generator, separately, within 8 hours, unless it can be demonstrated there is no common mode failure for the remaining diesel generator(s). Restore the inoperable standby diesel generator to OPERABLE status within 72 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.
- c. With one offsite circuit of the above-required A.C. electrical power sources and one standby diesel generator inoperable, demonstrate the OPERABILITY of the remaining A.C. sources by performing Specification 4.8.1.1.1a. within 1 hour and at least once per 8 hours thereafter; and if the standby diesel generator became inoperable due to any cause other than an inoperable support system, an independently testable component or preplanned preventive

ELECTRICAL POWER SYSTEMS

LIMITING CONDITION FOR OPERATION

ACTION (Continued)

maintenance or testing, demonstrate the OPERABILITY of the remaining OPERABLE standby diesel generators by performing Surveillance Requirement 4.8.1.1.2a.2) within 8 hours, unless it can be demonstrated there is no common mode failure for the remaining diesel generator(s); restore at least one of the inoperable sources to OPERABLE status within 12 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours. Restore at least two offsite circuits and three standby diesel generators OPERABLE status within 72 hours from the time of initial loss or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

- d. With one standby diesel generator inoperable in addition to ACTION b. or c. above, verify that:
 1. All required systems, subsystems, trains, components, and devices that depend on the remaining OPERABLE diesel generator as a source of emergency power are also OPERABLE, and
 2. When in MODE 1, 2, or 3, the steam-driven auxiliary feedwater pump is OPERABLE.

If these conditions are not satisfied within 2 hours be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

- e. With two of the above required offsite A.C. circuits inoperable, restore at least one of the inoperable offsite sources to OPERABLE status within 24 hours or be in at least HOT STANDBY within the next 6 hours. With only one offsite source restored, restore at least two offsite circuits to OPERABLE status within 72 hours from time of initial loss or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- f. With two or three of the above required standby diesel generators inoperable, demonstrate the OPERABILITY of two offsite A.C. circuits by performing the requirements of Specification 4.8.1.1.1a. within 1 hour and at least once per 8 hours thereafter; restore at least two standby diesel generators to OPERABLE status within 2 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours. Restore at least three standby diesel generators to OPERABLE status within 72 hours from time of initial loss or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

ELECTRICAL POWER SYSTEMS

SURVEILLANCE REQUIREMENTS

- 4.8.1.1.1 Each of the above required independent circuits between the offsite transmission network and the Onsite Class 1E Distribution System shall be:
- a. Determined OPERABLE at least once per 7 days by verifying correct breaker alignments, indicated power availability, and
 - b. Demonstrated OPERABLE at least once per 18 months during shutdown by transferring the unit power supply from the normal circuit to each of the alternate circuits.
- 4.8.1.1.2 Each standby diesel generator shall be demonstrated OPERABLE.^{(2) (3)}
- a. In accordance with the frequency specified in Table 4.8-1 on a STAGGERED TEST BASIS by:
 - 1) Verifying the fuel level in its associated fuel tank,
 - 2) Verifying the diesel starts from standby condition and accelerates to 600 rpm (nominal) in less than or equal to 10 seconds.⁽³⁾ The generator voltage and frequency shall be 4160 ± 416 volts and 60 ± 1.2 Hz within 10 seconds ⁽³⁾ after the start signal. The diesel generator shall be started for this test by using one of the following signals:
 - a) Manual, or
 - b) Simulated loss-of-offsite power by itself, or
 - c) Simulated loss-of-offsite power in conjunction with a Safety Injection test signal, or
 - d) A Safety Injection test signal by itself.
 - 3) Verifying the generator is synchronized, loaded to 5000 to 5500 kW, and operates with a load of 5000 to 5500 kW for at least 60 minutes, ⁽⁴⁾⁽⁶⁾ and
 - 4) Verifying the standby diesel generator is aligned to provide standby power to the associated emergency busses.
 - b. At least once per 31 days and after each operation of the diesel where the period of operation was greater than or equal to 1 hour by checking for and removing accumulated water from its associated fuel tank;
 - c. Maintain properties of new and stored fuel oil in accordance with the Fuel Oil Monitoring Program.

SPECIFICATION NOTATIONS (Continued)

4.8.1.1.2a.2 and 4.8.1.1.2a.3 and four tests in accordance with the 184-day testing requirements of Surveillance Requirements 4.8.1.1.2a.2 and 4.8.1.1.2a.3. If this criterion is not satisfied during the first series of tests, any alternate criterion to be used to transvalue the failure count to zero requires NRC approval.

- (9) The associated test frequency shall be maintained until seven consecutive failure free demands have been performed and the number of failures in the last 20 valid demands has been reduced to one.
- (10) Credit may be taken for events that satisfy any of these Surveillance Requirements.
- (11) See Special Test Exception 3.10.8

3/4.10 SPECIAL TEST EXCEPTIONS

3/4.10.8 DIESEL OPERABILITY EXCEPTION - MODES 1, 2, 3 & 4

LIMITING CONDITION FOR OPERATION (LCO)

- 3.10.8 The requirements of Specification 3/4.7.4 and LCOs supported by this Specification may be suspended for 7 days/train/cycle AND Specification 3/4.8.1.1 may be suspended for 21 days/train/cycle provided:
- a. The requirements for two (2) of the onsite power sources specified in Specification 3.8.1.1.b AND the two (2) supporting ECW loops specified in Specification 3.7.4 are OPERABLE.
 - b. The circuits required by Specification 3.8.1.1.a are OPERABLE.
 - c. The equipment specified in ACTION 3.8.1.1.d is OPERABLE.
 - d. The circuit between the 138 kV offsite transmission network, via the Emergency Transformer, and the onsite Class 1E Distribution System shall be functional and available.
 - e. The technical support center diesel generator and the positive displacement pump are functional and available.
 - f. Planned maintenance on the equipment specified in ACTION 3.8.1.1.d is suspended.
 - g. Maintenance in the switchyard will be controlled.
 - h. The provisions of Specification 3.0.4 are not applicable.

APPLICABILITY: MODES 1, 2, 3, and 4.

DIESEL OPERABILITY EXCEPTION - MODES 1, 2, 3 & 4

LIMITING CONDITION FOR OPERATION (LCO)

ACTION:

- a. With any specified condition(s) not met, then restore the specified condition(s) within 24 hours or place the unit in the following MODE, as applicable:
 - a. At least HOT STANDBY within the next 6 hours.
 - b. At least HOT SHUTDOWN within the next 6 hours, and
 - c. At least COLD SHUTDOWN within the next 24 hours.

OR

- b. With any specified condition(s) not met, then exit this Special Test Exception and enter the appropriate Technical Specification Action Statement.

SURVEILLANCE REQUIREMENTS

- 4.10.8.1 Perform Surveillance Requirements 4.8.1.1.1.a for the Standby and Auxiliary Transformers at least once per 8 hours.
- 4.10.8.2 Verify Emergency Transformer breaker alignment correct and indicated power available at least once per 8 hours.

3/4.10 SPECIAL TEST EXCEPTIONS

BASES

3/4.10.8 DIESEL OPERABILITY EXCEPTION - MODES 1, 2, 3 & 4

This special test exception permits an Essential Cooling Water loop to be inoperable for a cumulative 7 days per train per fuel cycle. It also permits a standby diesel generator to be inoperable for a cumulative 21 days per train per fuel cycle. In both cases it is intended that if the essential cooling water is inoperable, the associated standby diesel generator is also inoperable. This exception is to be used for the cumulative number of days specified per train per fuel cycle and for planned maintenance and testing. This exception is permitted only if all of the necessary compensatory actions are in place. If any condition of the LCO is not met during the time a standby diesel generator and/or the essential cooling water is inoperable under this special test exception, 24 hours would be permitted to restore the condition before a plant shutdown or exiting the special test exception is required. The intention of this action is to allow a component in one of the other two trains to be inoperable for 24 hours during this special test exception. If unable to return the inoperable equipment to operable status within the 24 hour time limit, the following actions must be taken:

- a. Place the Unit in the applicable mode within the required time.

Since conditions may exist that would make it more desirable to enter the normal Technical Specification Action Statement for the equipment that is inoperable, a second Action statement is available. If inoperable equipment could be returned to service in the time allowed in the normal Technical Specification Allowed Outage Time, but not in the 24 hours allowed by Action a, and if all of the equipment out of service can be returned to OPERABLE status within the time remaining under the normal Allowed Outage Time, the Special Test Exception may be exited under action b.

The purpose of this exception is to allow pre-planned testing and maintenance of the Standby Diesel Generator and the Essential Cooling Water and to allow performance of surveillances prescribed in SR 4.8.1.1.2 in Modes 1, 2, 3 and 4. The Emergency Transformer will be administratively dedicated to the ESF buss with the inoperable Standby Diesel Generator. This means that the breaker alignment will enable the Emergency Transformer to supply power to the effected bus if a loss of offsite power were to occur. It is also intended to allow the use of the Emergency Transformer to supply any ESF buss during a loss of offsite power if the Shift Supervisor determines this is necessary. No pre-planned maintenance will be performed on the Technical Support Center diesel, the positive displacement pump or the Emergency Transformer during the use of this Special Test Exception. In addition the Shift Supervisor will control all work that is performed in the switchyard in accordance with established station procedures.

ATTACHMENT 4

EVALUATION OF THE PROPOSED SPECIAL TEST EXCEPTION FOR DIESEL GENERATOR AND ESSENTIAL COOLING WATER MAINTENANCE