

11. Markup of Proposed Changes

See attached markup of proposed changes to Technical Specifications.

A.C. SOURCES

OPERATING

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 (manually and automatically) unit power supply from the normal circuit to the alternate circuit.

4.8.1.2 Each diesel generator shall be demonstrated OPERABLE: *

- a. In accordance with the frequency specified in Table 4.8-1 on a STAGGERED TEST BASIS by:
 - 1) Verifying the fuel level in the day fuel tank;
 - 2) Verifying the fuel level in the fuel storage tank;
 - 3) Verifying the fuel transfer pump starts and transfers fuel from the storage system to the day tank;
 - 4) Verifying the lubricating oil inventory in storage;
 - 5) Verifying the diesel starts from ^{standby} ~~ambient~~ condition and accelerates to at least 514 rpm in less than or equal to 10 seconds. The generator voltage and frequency shall be 4160 ± 420 volts and 60 ± 1.2 Hz within 10 seconds 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

*All diesel generator starts for the purpose of this surveillance test may be preceded by an engine prelube period. Further, all surveillance tests and all other engine starts for the purpose of this surveillance testing, with the exception of once per 184 days, may also be preceded by warmup procedures (e.g., gradual acceleration and/or gradual loading greater than 60 seconds) as recommended by the manufacturer so that the mechanical stress and wear on the diesel engine is minimized.

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* All planned starts for the purpose of these surveillances may be preceded by an engine prelube period.

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4.8.1.1.2 (Continued)

c) Simulated loss-of-offsite power in conjunction with an SI Actuation test signal, or

d) An SI Actuation test signal by itself.

Add Insert 1

6) Verifying the generator is synchronized, loaded to greater than or equal to 6083 kW in less than or equal to 120 seconds*, and operates with a load greater than or equal to 6083 kW for at least 60 minutes; and

7) Verifying the 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 the day fuel tank;

c. At least once per 31 days by checking for and removing accumulated water from the fuel oil storage tanks;

d. By sampling new fuel oil in accordance with ASTM-D4057-81 prior to addition to storage tanks; and:

1) By verifying in accordance with the tests specified in ASTM-D975-81 prior to addition to the storage tanks that the sample has:

a) An API Gravity of within 0.3 degree at 60°F, or a specific gravity of within 0.0016 at 60/60°F, when compared to the supplier's certificate, or an absolute specific gravity at 60/60°F of greater than or equal to 0.81 but less than or equal to 0.89, or an API gravity of greater than or equal to 28 degrees but less than or equal to 42 degrees;

Add Insert 2

*All diesel generator starts for the purpose of this surveillance test may be preceded by an engine pre-lube period. Further, all surveillance tests and all other engine starts for the purpose of this surveillance testing, with the exception of once per 184 days, may also be preceded by warmup procedures (e.g., gradual acceleration and/or gradual loading greater than 60 seconds) as recommended by the manufacturer so that the mechanical stress and wear on the diesel engine is minimized.

Insert 1.

Verifying the generator is synchronized, loaded to greater than or equal to 5600 kW and less than or equal to 6100 kW**, and operates with a load greater than or equal to 5600 kW and less than or equal to 6100 kW for at least 60 minutes; and

Insert 2.

**Diesel generator loading may be in accordance with manufacturers recommendations, including a warmup period. The load range is provided to preclude routine overloading of the diesel generator. Momentary transients outside the load range, due to changing bus conditions, do not invalidate the test

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4.8.1.1.2 (Continued)

- a) Verifying deenergization of the emergency busses and load shedding from the emergency busses, and
 - b) Verifying the diesel starts ^{from standby conditions,} on the loss of offsite power signal, energizes the emergency busses with permanently connected loads within 12 seconds, energizes the autoconnected shutdown loads through the emergency power sequencer and operates for greater than or equal to 5 minutes while its generator is loaded with the shutdown loads. After energization, the steady-state voltage and frequency of the emergency busses shall be maintained at 4160 ± 420 volts and 60 ± 1.2 Hz during this test.
- 5) Verifying that on an SI actuation test signal, ^{from standby conditions,} without loss-of-offsite power, the diesel generator starts on the auto-start signal and operates on standby for greater than or equal to 5 minutes. The generator voltage and frequency shall be 4160 ± 420 volts and 60 ± 1.2 Hz within 10 seconds after the auto-start signal; the steady-state generator voltage and frequency shall be maintained within these limits during this test;
- 6) Simulating a loss-of-offsite power in conjunction with an SI actuation test signal; and
- a) Verifying deenergization of the emergency busses and load shedding from the emergency busses;
 - b) Verifying the diesel starts ^{from standby conditions,} on the auto-start signal, energizes the emergency busses with permanently connected loads within 10 seconds, energizes the auto-connected emergency (accident) loads through the emergency power sequencer and operates for greater than or equal to 5 minutes while its generator is loaded with the emergency loads. After energization, the steady-state voltage and frequency of the emergency busses shall be maintained at 4160 ± 420 volts and 60 ± 1.2 Hz during this test; and
 - c) Verifying that all automatic diesel generator trips, except engine overspeed, low lube oil pressure, 4160-volt bus fault, and generator differential, are automatically bypassed upon loss of voltage on the emergency bus concurrent with a Safety Injection actuation signal.

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4.8.1.1.2 (Continued)

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- 7) Verifying the diesel generator operates for at least 24 hours. During the first 2 hours of this test, the diesel generator shall be loaded to greater than or equal to 6697 kW and during the remaining 22 hours of this test, the diesel generator shall be loaded to greater than or equal to 6083 kW. The generator voltage and frequency shall be 4160 ± 420 volts, and 60 ± 1.2 Hz within 10 seconds after the start signal; the steady-state generator voltage and frequency shall be maintained within these limits during this test. Within 5 minutes after completing this 24-hour test, perform Specification 4.8.1.1.2f.6)b);*
- 8) Verifying that the auto-connected loads to each diesel generator do not exceed the short time rating of 6697 kW;
- 9) Verifying the diesel generator's capability to:
 - a) Synchronize with the offsite power source while the generator is loaded with its emergency loads upon a simulated restoration of offsite power,
 - b) Transfer its loads to the offsite power source, and
 - c) Be restored to its standby status.
- 10) Verifying that with the diesel generator operating in a test mode, connected to its bus, a simulated Safety Injection signal overrides the test mode by: (1) returning the diesel generator to standby operation, and (2) automatically energizing the emergency loads with offsite power;
- 11) Verifying that the fuel transfer pump transfers fuel from each fuel storage tank to the day tank of each diesel via the installed cross-connection lines;
- 12) Verifying that the emergency power sequence timer is OPERABLE with the interval between each load block within $\pm 10\%$ of its design interval;

Add Insert 4
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*If Specification 4.8.1.1.2f.6)b) is not satisfactorily completed, it is not necessary to repeat the preceding 24-hour test. Instead, the diesel generator may be operated at 6083 kW for 1 hour or until operating temperature has stabilized.

Insert 3.

- 7) Verifying the diesel generator operates for at least 24 hours. During the first 2 hours of this test, the diesel generator shall be loaded to greater than or equal to 6300 kW and less than or equal to 6700 kW.** During the remaining 22 hours of this test, the diesel generator shall be loaded to greater than or equal to 5600 kW and less than or equal to 6100 kW. The generator voltage and frequency shall be 4160 ± 420 volts and 60 ± 1.2 Hz within 10 seconds after the start signal; the steady-state generator voltage and frequency shall be maintained within these limits during this test. Within 5 minutes after completing this 24-hour test, verify that the diesel generator starts on a manual or auto start signal, attains generator voltage and frequency of 4160 ± 420 volts and 60 ± 1.2 Hz within 10 seconds, and operates for longer than 5 minutes.***

Insert 4.

**Diesel generator loading may be in accordance with manufacturers recommendations, including a warmup period. The load range is provided to preclude routine overloading of the diesel generator. Momentary transients outside the load range, due to changing bus conditions, do not invalidate the test

***If the diesel generator fails to start during this test, then it is not necessary to repeat the preceding 24 hour test. Instead, the diesel generator may be operated at greater than or equal to 5600 kW and less than or equal to 6100 kW for 2 hours or until operating temperature has stabilized. The load range is provided to preclude routine overloading of the diesel generator. Momentary transients outside the load range, due to changing bus conditions, do not invalidate the test.

III. Retype of Proposed Changes

See attached retype of proposed changes to Technical Specifications. The attached retype reflects the currently issued version of Technical Specifications. Pending Technical Specification changes or Technical Specification changes issued subsequent to this submittal are not reflected in the enclosed retype. The enclosed retype should be checked for continuity with Technical Specifications prior to issuance.

Revision bars are provided in the right hand margin to indicate a revision to text. No revision bars are utilized when the page is changed solely to accommodate the shifting of text due to additions or deletions.

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 - 2) Verifying the fuel level in the fuel storage tank;
 - 3) Verifying the fuel transfer pump starts and transfers fuel from the storage system to the day tank;
 - 4) Verifying the lubricating oil inventory in storage;
 - 5) Verifying the diesel starts from standby conditions and accelerates to at least 514 rpm in less than or equal to 10 seconds. The generator voltage and frequency shall be 4160 ± 420 volts and 60 ± 1.2 Hz within 10 seconds 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

*All planned starts for the purpose of these surveillances may be preceded by an engine prelube period.

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4.8.1.1.2 (Continued)

- c) Simulated loss-of-offsite power in conjunction with an SI Actuation test signal, or
 - d) An SI Actuation test signal by itself.
- 6) Verifying the generator is synchronized, loaded to greater than or equal to 5600 kW and less than or equal to 6100 kW**, and operates with a load greater than or equal to 5600 kW and less than or equal to 6100 kW for at least 60 minutes; and
- 7) Verifying the 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 the day fuel tank;
- c. At least once per 31 days by checking for and removing accumulated water from the fuel oil storage tanks;
- d. By sampling new fuel oil in accordance with ASTM-D4057-81 prior to addition to storage tanks and:
 - 1) By verifying in accordance with the tests specified in ASTM-D975-81 prior to addition to the storage tanks that the sample has:
 - a) An API Gravity of within 0.3 degree at 60°F, or a specific gravity of within 0.0016 at 60/60°F, when compared to the supplier's certificate, or an absolute specific gravity at 60/60°F of greater than or equal to 0.81 but less than or equal to 0.89, or an API gravity of greater than or equal to 28 degrees but less than or equal to 42 degrees;

**Diesel generator loading may be in accordance with manufacturers recommendations, including a warmup period. The load range is provided to preclude routine overloading of the diesel generator. Momentary transients outside the load range, due to changing bus conditions, do not invalidate the test.

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4.8.1.1.2 (Continued)

- a) Verifying deenergization of the emergency busses and load shedding from the emergency busses, and
 - b) Verifying the diesel starts from standby conditions, on the loss of offsite power signal, energizes the emergency busses with permanently connected loads within 12 seconds, energizes the autoconnected shutdown loads through the emergency power sequencer and operates for greater than or equal to 5 minutes while its generator is loaded with the shutdown loads. After energization, the steady-state voltage and frequency of the emergency busses shall be maintained at 4160 ± 420 volts and 60 ± 1.2 Hz during this test.
- 5) Verifying that on an SI actuation test signal, without loss-of-offsite power, the diesel generator starts from standby conditions, on the auto start signal and operates on standby for greater than or equal to 5 minutes. The generator voltage and frequency shall be 4160 ± 420 volts and 60 ± 1.2 Hz within 10 seconds after the auto-start signal; the steady-state generator voltage and frequency shall be maintained within these limits during this test;
- 6) Simulating a loss-of-offsite power in conjunction with an SI actuation test signal; and
- a) Verifying deenergization of the emergency busses and load shedding from the emergency busses;
 - b) Verifying the diesel starts from standby conditions, on the auto-start signal, energizes the emergency busses with permanently connected loads within 10 seconds, energizes the auto-connected emergency (accident) loads through the emergency power sequencer and operates for greater than or equal to 5 minutes while its generator is loaded with the emergency loads. After energization, the steady-state voltage and frequency of the emergency busses shall be maintained at 4160 ± 420 volts and 60 ± 1.2 Hz during this test; and
 - c) Verifying that all automatic diesel generator trips, except engine overspeed, low lube oil pressure, 4160-volt bus fault, and generator differential, are automatically bypassed upon loss of voltage on the emergency bus concurrent with a Safety Injection actuation signal.

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4.8.1.1.2 (Continued)

- 7) Verifying the diesel generator operates for at least 24 hours. During the first 2 hours of this test, the diesel generator shall be loaded to greater than or equal to 6300 kW and less than or equal to 6700 kW.** During the remaining 22 hours of this test, the diesel generator shall be loaded to greater than or equal to 5600 kW and less than or equal to 6100 kW. The generator voltage and frequency shall be 4160 ± 420 volts and 60 ± 1.2 Hz within 10 seconds after the start signal; the steady-state generator voltage and frequency shall be maintained within these limits during this test. Within 5 minutes after completing this 24-hour test, verify that the diesel generator starts on a manual or auto start signal, attains generator voltage and frequency of 4160 ± 420 volts and 60 ± 1.2 Hz within 10 seconds, and operates for longer than 5 minutes.***
- 8) Verifying that the auto-connected loads to each diesel generator do not exceed the short time rating of 6697 kW;
- 9) Verifying the diesel generator's capability to:
 - a) Synchronize with the offsite power source while the generator is loaded with its emergency loads upon a simulated restoration of offsite power,
 - b) Transfer its loads to the offsite power source, and
 - c) Be restored to its standby status.
- 10) Verifying that with the diesel generator operating in a test mode, connected to its bus, a simulated Safety Injection signal overrides the test mode by: (1) returning the diesel generator to standby operation, and (2) automatically energizing the emergency loads with offsite power;
- 11) Verifying that the fuel transfer pump transfers fuel from each fuel storage tank to the day tank of each diesel via the installed cross-connection lines;
- 12) Verifying that the emergency power sequence timer is OPERABLE with the interval between each load block within $\pm 10\%$ of its design interval;

**Diesel generator loading may be in accordance with manufacturers recommendations, including a prelude period. The load range is provided to preclude routine overloading of the diesel generator. Momentary transients outside the load range, due to changing bus conditions, do not invalidate the test.

***If the diesel generator fails to start during this test, then it is not necessary to repeat the preceding 24-hour test. Instead, the diesel generator may be operated at greater than or equal to 5600 kW and less than or equal to 6100 kW for 2 hours or until operating temperature has stabilized. The load range is provided to preclude routine overloading of the diesel generator. Momentary transients outside the load range, due to changing bus conditions, do not invalidate the test.

IV. Safety Evaluation of License Amendment Request 91-10 Supplement 1 Proposed Changes

As presently written Technical Specification 4.8.1.1.2f.7 requires diesel generator hot restart capability to be demonstrated by initiating a LOP/SI test within 5 minutes of completing the 24 hour diesel generator run. This requirement is derived from Regulatory Guide 1.108 Periodic Testing of Diesel Generator Units Used as Onsite Electric Power Systems at Nuclear Power Plants. The current Technical Specification requirement creates significant scheduling demands during an outage by reducing schedule flexibility and imposing unnecessary operational burdens. The requirement to sequence on the LOP/SI loads does not contribute to verifying the ability of the diesel generator to start from normal operating temperature. New Hampshire Yankee (NHY) believes that the proposed Technical Specification change satisfies the intent of Regulatory Guide 1.108 as discussed below.

Regulatory Guide 1.108 Position C.2.a(5), which is the basis for the requirement to perform the LOP/SI test immediately after the 24 hour test states that the purpose of the requirement is to: "demonstrate functional capability at full load temperature conditions". Functional capability, i.e. the ability of the diesel generator to start from normal operating temperature, can be adequately demonstrated by either manually or automatically starting the diesel generator from normal operating temperature. As stated earlier, sequencing on the LOP/SI loads does not contribute to verifying that the diesel generator will start from normal operating temperature.

Demonstrating diesel generator hot restart capability without loading the engine with LOP/SI loads does not invalidate or reduce the effectiveness of either test, provided normal operating temperature conditions are achieved prior to demonstrating hot restart capability. Normal operating temperature conditions will be assured by performing the test within 5 minutes of completing the 24 hour diesel generator run. If for some reason the surveillance cannot be conducted within the 5 minute time period, the engine may be brought to operating temperature conditions by operating at a load of greater than or equal to 5600 kW and less than or equal to 6100 kW for 2 hours or until operating temperature has stabilized.

The proposed changes to footnotes clarify the existing footnotes by separating the information items contained in one footnote into individual items and applying the separate information items to the applicable Surveillance Requirement. Additional information regarding the performance of SURVEILLANCE REQUIREMENTS is being added. This information will enhance Technical Specifications by improving the clarity of the requirements.

Replacing the term "ambient condition" with "standby conditions" and inserting the term "standby condition" will improve the clarity of Technical Specifications. The latter term more accurately describes the conditions which the diesels are maintained as it recognizes the fact that the diesels are maintained prelubed and warm by the cooling water and lube oil systems.

A load range is being provided where applicable to preclude routine overload of the diesel generator. As presently written, during surveillance testing which requires loading of the diesel generator, the operator must maintain load greater than the

continuous diesel generator load rating of 6083 kW. This is to prevent grid induced transients, specifically changes in VARS, from lowering the output of the diesel generator to less than the surveillance required load of 6083 kW. Thus, providing a load range of greater than or equal to 5600 kW and less than or equal to 6100 kW will preclude routine exceedences of the diesel generator continuous load rating. Similarly, the 2 hour rating of the diesel generator is tested by operating at a load of greater than or equal to 6697 kW. This requirement is revised to incorporate a range of greater than or equal to 6300 kW and less than or equal to 6700 kW. Loading the diesel generators to the specified ranges will continue to verify that the diesel generators are capable of supporting operation of the emergency busses but will significantly reduce the times that the load ratings of the diesel generator are exceeded.

Surveillance Requirement 4.8.1.1.2a.6) specifies in part that at least once per 184 days that the diesel generator be rapidly loaded to greater than or equal to 6083 kW in less than or equal to 120 seconds. Rapid loading of the diesel generator in this manner introduces mechanical stresses and engine wear. The purpose of this test is to demonstrate that the diesel generator is capable of accepting load by simulating the loading rate of the emergency power sequencer. This test does not validate any operational requirement which is not demonstrated by performance of Surveillance Requirements 4.8.1.1.2f.4) and 6). These tests are the Loss of Offsite Power and Loss of Offsite Power/Safety Injection tests. Performance of these tests demonstrate that the diesel generators are capable of accepting load as it is sequenced by the emergency power sequencer.

Therefore, eliminating the requirement to rapidly load the diesel generator at least once per 184 days will reduce the mechanical stress and wear to which the diesel generator is subjected. The diesel generator will still be verified to be OPERABLE, specifically, the ability of the diesel generator to accept load from the emergency power sequencer will continue to be demonstrated.

In conclusion, since the proposed revision to the diesel generator Surveillance Requirements will continue to verify that the diesel generators are OPERABLE and since these revisions continue to meet the intent of Regulatory Guide 1.108, there is no increase in the safety consequences associated with the requested amendment.

V. Determination of Significant Hazards for License Amendment Request 91-10
Supplement 1 Proposed Changes

The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed revisions to the diesel generator Surveillance Requirements do not change the function or operation of any plant equipment or affect the response of that equipment if it is called upon to operate. The diesel generators will be tested with a LOP/SI start from standby conditions and be rapidly loaded by the emergency power sequencer. Diesel Generator hot restart capability will continue to be verified as will be the ability of the diesel generators to carry load. The tests being performed are not new or unique and the hot restart test is similar to the monthly surveillances. The response of the diesel generators and the electrical system as described in UFSAR Section 15.2.6, Loss of Nonemergency AC Power to The Plant Auxiliaries (Loss of Offsite Power) will remain unchanged. Therefore, since the emergency diesel generators are designed to respond to the loss of voltage on the emergency busses they will function as designed with no adverse affect from the changes and there will be no increase in the probability of an accident previously evaluated in the UFSAR.

The proposed revision of the diesel generator Surveillance Requirements will not increase the probability of an accident and it will not change the response of the diesel generators to a loss of power on the emergency busses. The revision of the diesel generator Surveillance Requirements does not alter the operation of the diesel generators or the associated response circuitry, but it does verify that the diesel generator will respond to a loss of power and will supply the emergency busses. Therefore, the accident analysis of Chapter 15 is unchanged and in particular the statement in the UFSAR Section 15.2.6.1.d remains true and in an accident scenario "[t]he emergency diesel generators, started on loss of voltage on the plant emergency busses, begin to supply plant vital loads". Since the plant response to an accident will not change there is no change in the potential for an increase in the release of radiation to the public from the revision of the diesel generator Surveillance Requirements. Therefore, it follows that the consequences of an accident, as measured in terms of dose, will not increase due to the revision of the diesel generator Surveillance Requirements.

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

The proposed revision of the diesel generator Surveillance Requirements does not affect the operation or response of any plant equipment or introduce any new failure mechanisms. The revisions do not affect the test results and the diesel generators will still be verified to be OPERABLE and their response to a LOP will be unchanged. The plant equipment will respond per the design and analyses and there will not be a malfunction of a new or any type introduced by the revision to the diesel generator Surveillance Requirements. Therefore, the previous accident analyses are unchanged and bound all expected plant transients and there are no new or different accident scenarios introduced.

3. The proposed changes do not result in a significant reduction in the margin of safety.

The bases of the Technical Specification 3/4.8, Electrical Power Systems, state that the operability of the AC and DC power systems and associated distribution systems ensure that sufficient power will be available to supply the safety-related equipment required for safe shut down and mitigation and control of accident conditions. The bases also state that the surveillance requirements for determining the OPERABILITY of the diesel generators are in accordance with the recommendations of Regulatory Guide 1.108, Revision 1. The revision of Surveillance Requirements establishes tests that will continue to verify that the diesel generators are OPERABLE and the testing will still meet the intent of Regulatory Guide 1.108, Revision 1. OPERABLE diesel generators ensure that the assumptions in the bases of the Technical Specifications are not affected and ensure that the margin of safety is not reduced. Therefore, the assumptions in the Bases of Technical Specifications are not affected and this change does not result in a significant reduction in the margin of safety.

3. The proposed changes do not result in a significant reduction in the margin of safety.

The bases of the Technical Specification 3/4.8, Electrical Power Systems, state that the operability of the AC and DC power systems and associated distribution systems ensure that sufficient power will be available to supply the safety-related equipment required for safe shut down and mitigation and control of accident conditions. The bases also state that the surveillance requirements for determining the OPERABILITY of the diesel generators are in accordance with the recommendations of Regulatory Guide 1.108, Revision 1. The revision of Surveillance Requirements establishes tests that will continue to verify that the diesel generators are OPERABLE and the testing will still meet the intent of Regulatory Guide 1.108, Revision 1. OPERABLE diesel generators ensure that the assumptions in the bases of the Technical Specifications are not affected and ensure that the margin of safety is not reduced. Therefore, the assumptions in the Bases of Technical Specifications are not affected and this change does not result in a significant reduction in the margin of safety.

VI. Proposed Schedule for License Amendment Issuance and Effectiveness

New Hampshire Yankee requests NRC review of Supplement 1 to License Amendment Request 91-10 and issuance of a license amendment having immediate effectiveness by August 15, 1992.

The Technical Specification changes proposed herein will enhance the safe operation of the plant and remove unnecessary operational burdens during the upcoming refueling outage which is scheduled to begin on September 7, 1992.

VII. Environmental Impact Assessment

New Hampshire Yankee (NHY) has reviewed the proposed license amendment against the criteria of 10CFR51.22 for environmental considerations. The proposed changes do not involve a significant hazards consideration, nor increase the types and amounts of effluent that may be released offsite, nor significantly increase individual or cumulative occupational radiation exposures. Based on the foregoing, NHY concludes that the proposed change meets the criteria delineated in 10CFR51.22(c)(9) for a categorical exclusion from the requirements for an Environmental Impact Statement.