

ATTACHMENT 1

TECHNICAL SPECIFICATION PAGE MARKUPS

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. Required Action and Associated Completion Time not met.	B.1 Be in MODE 3.	6 hours
	<u>AND</u> B.2 Be in MODE 4.	12 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.19.1	Verify the isolation time of each automatic SSIV is within limits.	In accordance with the Inservice Testing Program
SR 3.7.19.2	Verify each automatic SSIV in the flow path actuates to the isolation position on an actual or simulated actuation signal.	18 months

→ INSERT NEW TS 3.7.20

3.7 PLANT SYSTEMS

3.7.20 Class 1E Electrical Equipment Air Conditioning (A/C) System

LCO 3.7.20 Two Class 1E Electrical Equipment A/C trains shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, 4, 5, and 6,
During movement of irradiated fuel assemblies.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One Class 1E Electrical Equipment A/C train inoperable.	A.1 Initiate action to implement mitigating actions.	Immediately
	<u>AND</u>	
	A.2 Verify mitigating actions are complete.	8 hours
	<u>AND</u>	
	A.3 Restore Class 1E Electrical Equipment A/C train to OPERABLE status.	7 days
B. Required Action and associated Completion Time of Condition A not met in MODE 1, 2, 3, or 4.	B.1 Be in MODE 3.	6 hours
	<u>AND</u>	
	B.2 Be in MODE 5.	36 hours

(continued)

ACTIONS (continued)

<p>C. Required Action and associated Completion Time of Condition A not met in MODE 5 or 6, or during movement of irradiated fuel assemblies.</p>	<p>C.1</p>	<p>Place OPERABLE Class 1E Electrical Equipment A/C train in operation.</p>	<p>Immediately</p>
	<p><u>OR</u></p>		
	<p>C.2.1</p>	<p>Suspend CORE ALTERATIONS.</p>	<p>Immediately</p>
	<p><u>AND</u></p>		
	<p>C.2.2</p>	<p>Suspend movement of irradiated fuel assemblies.</p>	<p>Immediately</p>
	<p><u>AND</u></p>		
	<p>C.2.3</p>	<p>Suspend operations involving positive reactivity additions that could result in loss of required SDM or boron concentration.</p>	<p>Immediately</p>
<p>D. Two Class 1E Electrical Equipment A/C trains inoperable in MODE 5 or 6, or during movement of irradiated fuel assemblies.</p>	<p>D.1</p>	<p>Suspend CORE ALTERATIONS.</p>	<p>Immediately</p>
	<p><u>AND</u></p>		
	<p>D.2</p>	<p>Suspend movement of irradiated fuel assemblies.</p>	<p>Immediately</p>
	<p><u>AND</u></p>		
	<p>D.3</p>	<p>Suspend operations involving positive reactivity additions that could result in loss of required SDM or boron concentration.</p>	<p>Immediately</p>

(continued)

ACTIONS (continued)

E. Two Class 1E Electrical Equipment A/C trains inoperable in MODE 1, 2, 3, or 4.	E.1 Enter LCO 3.0.3.	Immediately
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SURVEILLANCE REQUIREMENTS

SURVEILLANCE	SURVEILLANCE	FREQUENCY
SR 3.7.20.1	Verify each Class 1E Electrical Equipment A/C train actuates on an actual or simulated actuation signal.	In accordance with the Surveillance Frequency Control Program
SR 3.7.20.2	Verify each Class 1E Electrical Equipment A/C train has the capability to remove the assumed heat load.	In accordance with the Surveillance Frequency Control Program

ATTACHMENT 2

TECHNICAL SPECIFICATION BASES PAGE MARKUPS
(for information only)

B 3.7 PLANT SYSTEMS

B 3.7.20 Class 1E Electrical Equipment Air Conditioning (A/C) System

BASES

BACKGROUND The Class 1E Electrical Equipment air-conditioning (A/C) trains provide a suitable environment for the Class 1E electrical equipment. These air conditioning trains provide temperature control for the Engineered Safety Features (ESF) switchgear room components, DC switchgear room components, and NK battery room components. The specific rooms supplied by the Class 1E Electrical Equipment A/C trains are:

SGK05A	SGK05B
SWGR RM NO. 1 (3408)	SWGR RM NO. 4 (3404)
SWGR RM NO. 3 (3413)	SWGR RM NO. 2 (3410)
Battery RM NO. 1 (3407)	Battery RM NO. 4 (3405)
Battery RM NO. 3 (3414)	Battery RM NO. 2 (3411)
ESF SWGR RM NO. 1 (3301)	ESF SWGR RM NO. 2 (3302)

The Class 1E Electrical Equipment A/C trains are independent trains such that each train provides cooling of recirculated air in the rooms associated with that train. Each train consists of a high efficiency prefilter, a self-contained refrigeration system (using normal service water or essential service water (ESW) as a heat sink), a centrifugal fan and electric motor driver, and instrumentation and controls to provide for electrical equipment room temperature control.

The Class 1E Electrical Equipment A/C trains have emergency operation functions and also operate during normal unit operation. Each train is normally aligned to cool only the equipment associated with its emergency load group. The Class 1E Electrical Equipment A/C trains are operated in a continuous recirculation mode to maintain the ESF switchgear room, the battery rooms, and the DC switchgear rooms to a temperature of $\leq 90^{\circ}\text{F}$ (Ref. 1). However, a single train is capable of cooling the equipment of both its associated train and the opposite train while maintaining room temperatures of $\leq 137^{\circ}\text{F}$ under both normal and accident conditions. The 90°F design temperature limit is reduced to 87°F in Reference 2 to allow for instrument error.

(continued)

BASES (continued)

APPLICABLE
SAFETY
ANALYSES

The design basis of the Class 1E Electrical Equipment A/C system is to maintain temperature in the Class 1E electrical equipment rooms to assure OPERABILITY of associated electrical equipment. The Class 1E Electrical Equipment A/C system is designed so that the single failure of an active component will not prevent systems powered by the Class 1E electrical equipment from fulfilling their specified safety functions.

During normal or emergency operations, each Class 1E Electrical Equipment A/C train maintains the temperature in its associated electrical equipment rooms at a temperature $\leq 90^{\circ}\text{F}$. Analyses have shown that one Class 1E Electrical Equipment A/C train is capable of cooling the electrical equipment in both redundant load groups provided compensatory measures are taken (Ref. 3). The Class 1E Electrical Equipment A/C trains are designed in accordance with Seismic Category I requirements.

The Class 1E Electrical Equipment A/C trains satisfy Criterion 3 of 10 CFR 50.36(c)(2)(ii).

LCO

Two independent Class 1E Electrical Equipment A/C trains are required to be OPERABLE to ensure adequate cooling of all the associated electrical equipment rooms during normal operation. Each Class 1E Electrical Equipment A/C train is considered to be OPERABLE when the individual components necessary to maintain associated electrical equipment room temperatures within acceptable limits are OPERABLE. These components include the refrigeration compressors, heat exchangers, cooling coils, ESW or normal service water flow, fans, and associated temperature control instrumentation.

APPLICABILITY

In MODES 1, 2, 3, 4, 5, and 6, and during movement of irradiated fuel assemblies, the Class 1E Electrical Equipment A/C trains must be OPERABLE to ensure that the temperature in the protected rooms will not exceed equipment operational requirements.

(continued)

BASES (continued)

ACTIONS

A.1, A.2, and A.3

With one Class 1E Electrical Equipment A/C train inoperable, action must be taken to restore OPERABLE status within 7 days. In this condition, and with the actions taken as specified in Required Actions A.1 and A.2, the remaining OPERABLE Class 1E Electrical Equipment A/C train is adequate to maintain the affected electrical equipment room temperatures within limits. However, the overall reliability of the cooling function is reduced and physical separation for the redundant electrical equipment is impaired. During this time the remaining train can provide the required cooling function if mitigating actions are taken.

Pursuant to Required Actions A.1 and A.2, action must be initiated immediately to implement the following mitigating actions and to assure the mitigating actions have been taken within 8 hours per Reference 3:

- On the 2000 ft elevation, doors 33023 and 33011 are opened. A continuous fire watch is established due to the breached fire barriers.
- On the 2016 ft elevation, doors 34041, 34042, 34051, 34052, 34101, 34111, 34081, 34082, 34072, 34141, 34071 and 34131 are opened. An hourly fire watch is established.
- Transformers XNN05 (480/120 V instrument transformer in Room 3408) and XNN06 (480/120 V instrument transformer in Room 3404) are verified to be de-energized in order to reduce heat loads in the affected rooms.
- The thermostat on the OPERABLE Class 1E Equipment A/C train is set below 80°F.
- At least one of the Class 1E Equipment A/C trains is OPERABLE and capable of operating at full capacity.

The acceptability of opening doors between the Class 1E electrical equipment rooms is supported by the posting of fire watches. De-energizing XNN05 and XNN06 is acceptable because these voltage regulating transformers are the backup

(continued)

BASES

ACTIONS

A.1, A.2, and A.3 (continued)

power sources for the vital AC buses (NN01, NN02, NN03, and NN04) and can be removed from service without rendering the associated AC vital bus subsystem inoperable as specified in LCO 3.8.9, "Distribution Systems – Operating," and in LCO 3.8.10, "Distribution Systems – Shutdown," as long as those buses are energized to the proper voltage as discussed in the LCO Bases of those Technical Specifications. The other mitigating actions are assumptions used in Reference 3.

If any of the mitigating actions cannot be completed within 8 hours, or if the inoperable Class 1E Equipment A/C train cannot be restored to OPERABLE status within 7 days, Condition B or Condition C (based on the applicable unit conditions) must be entered. The 8-hour Completion Time of Required Action A.2 is acceptable considering the results of the analysis in Reference 3 which confirm that acceptable equipment performance is assured as long as the compensatory actions are completed in the required time frame. The 7-day Completion Time of Required Action A.3 is based on the low probability of an event requiring electrical equipment operation or an event that would adversely affect both electrical equipment trains due to the compromised room separation, as well as the ability of the remaining A/C train to provide the required cooling capability.

B.1 and B.2

In MODE 1, 2, 3, or 4, when the Required Actions of Condition A cannot be completed within the required Completion Times, the unit must be placed in a MODE that minimizes accident risk. To achieve this status, the unit must be placed in MODE 3 within 6 hours and in MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems.

C.1, C.2.1, C.2.2, and C.2.3

In MODE 5 or 6, or during movement of irradiated fuel, when the Required Actions of Condition A cannot be completed within the required Completion Times, the OPERABLE Class 1E Electrical Equipment A/C train must be placed in operation immediately.

(continued)

BASES

ACTIONS

C.1, C.2.1, C.2.2, and C.2.3 (continued)

This action ensures that the remaining train is OPERABLE, that no failures preventing automatic actuation will occur, and that active failures will be readily detected.

An alternative to Required Action C.1 is to immediately suspend CORE ALTERATIONS, movement of irradiated fuel assemblies, and operations involving positive reactivity additions that could result in loss of required SDM (MODE 5) or boron concentration (MODE 6). Suspending positive reactivity additions that could result in failure to meet the minimum SDM or boron concentration limit is required to assure continued safe operation. Introduction of coolant inventory must be from sources that have a boron concentration greater than that required in the RCS for minimum SDM or refueling boron concentration. This may result in an overall reduction in RCS boron concentration, but provides acceptable margin to maintaining subcritical operation. Introduction of temperature changes, including temperature increases when operating with a positive MTC, must also be evaluated to ensure they do not result in a loss of required SDM. Suspension of these activities shall not preclude completion of actions to establish a safe conservative condition. These actions minimize the probability of the occurrence of postulated events.

The Completion Time of immediately is consistent with the required times for actions requiring prompt attention.

D.1, D.2, and D.3

In MODE 5 or 6, or during movement of irradiated fuel assemblies, with both Class 1E Electrical Equipment A/C trains inoperable, action must be taken immediately to suspend CORE ALTERATIONS, movement of irradiated fuel assemblies, and operations involving positive reactivity additions that could result in loss of required SDM (MODE 5) or boron concentration (MODE 6). Suspending positive reactivity additions that could result in failure to meet the minimum SDM or boron concentration limit is required to assure continued safe operation. Introduction of coolant inventory must be from sources that have a boron concentration greater than that required in the RCS for minimum SDM or refueling boron concentration. This may result in an overall reduction in RCS boron concentration, but provides

(continued)

BASES

ACTIONS

D.1, D.2, and D.3 (continued)

acceptable margin to maintaining subcritical operation. Introduction of temperature changes, including temperature increases when operating with a positive MTC, must also be evaluated to ensure they do not result in a loss of required SDM. Suspension of these activities shall not preclude completion of actions to establish a safe conservative condition. These actions minimize the probability of the occurrence of postulated events.

The Completion Time of immediately is consistent with the required times for actions requiring prompt attention.

E.1

If both Class 1E Electrical Equipment A/C trains are inoperable in MODE 1, 2, 3, or 4, LCO 3.0.3 must be entered immediately.

SURVEILLANCE
REQUIREMENTS

SR 3.7.20.1

This SR verifies that each Class 1E Electrical Equipment train starts and operates on an actual or simulated actuation signal. The actuation signals include the control room ventilation isolation signal (CRVIS) and actuations driven by the LOCA (in conjunction with a CRVIS) and shutdown sequencers. A CRVIS is generated by the inputs discussed in the LCO Bases for TS 3.3.7, "CREVS Actuation Instrumentation." Surveillance Requirements 3.7.10.3, 3.8.1.11, 3.8.1.12, and 3.8.1.19 verify that a CRVIS will be received by the LOCA and shutdown sequencers to enable an automatic start of the loads that are associated with a CRVIS. Those Surveillance Requirements also verify that these loads will start and operate at the appropriate step in the LOCA and shutdown load sequencing.

The Surveillance Frequency is based on operating experience, equipment reliability, and plant risk and is controlled under the Surveillance Frequency Control Program.

SR 3.7.20.2

This SR verifies that the heat removal capability of the Class 1E Electrical Equipment A/C trains is adequate to remove the heat load assumed during design basis accidents. This SR consists of

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BASES

SR 3.7.20.2 (continued)

verifying the heat removal capability of the condenser heat exchanger (either through performance testing or inspection), ensuring the proper operation of major components in the refrigeration cycle and verification of unit air flow capacity. The Surveillance Frequency is based on operating experience, equipment reliability, and plant risk and is controlled under the Surveillance Frequency Control Program.

REFERENCES

1. FSAR, Section 9.4.1, Control Building HVAC.
 2. FSAR Table 16.7-2.
 3. Calculation GK-19, Revision 0, Addendum 3.
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ATTACHMENT 3

RETYPE TECHNICAL SPECIFICATION PAGES

SEE ATTACHMENT 1

(FINAL CLEAN RETYPED PAGES WILL BE PROVIDED JUST
PRIOR TO AMENDMENT ISSUANCE)

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3.7 PLANT SYSTEMS

3.7.20 Class 1E Electrical Equipment Air Conditioning (A/C) System

LCO 3.7.20 Two Class 1E Electrical Equipment A/C trains shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, 4, 5, and 6,
During movement of irradiated fuel assemblies.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One Class 1E Electrical Equipment A/C train inoperable.	A.1 Initiate action to implement mitigating actions.	Immediately
	<u>AND</u>	
	A.2 Verify mitigating actions are complete.	8 hours
	<u>AND</u>	
	A.3 Restore Class 1E Electrical Equipment A/C train to OPERABLE status.	7 days
B. Required Action and associated Completion Time of Condition A not met in MODE 1, 2, 3, or 4.	B.1 Be in MODE 3.	6 hours
	<u>AND</u>	
	B.2 Be in MODE 5.	36 hours

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>C. Required Action and associated Completion Time of Condition A not met in MODE 5 or 6, or during movement of irradiated fuel assemblies.</p>	<p>C.1 Place OPERABLE Class 1E Electrical Equipment A/C train in operation.</p>	<p>Immediately</p>
	<p><u>OR</u></p>	
	<p>C.2.1 Suspend CORE ALTERATIONS.</p>	<p>Immediately</p>
	<p><u>AND</u></p>	
	<p>C.2.2 Suspend movement of irradiated fuel assemblies.</p>	<p>Immediately</p>
	<p><u>AND</u></p>	
	<p>C.2.3 Suspend operations involving positive reactivity additions that could result in loss of required SDM or boron concentration.</p>	<p>Immediately</p>

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. Two Class 1E Electrical Equipment A/C trains inoperable in MODE 5 or 6, or during movement of irradiated fuel assemblies.	D.1 Suspend CORE ALTERATIONS.	Immediately
	<u>AND</u>	
	D.2 Suspend movement of irradiated fuel assemblies.	Immediately
	<u>AND</u>	
	D.3 Suspend operations involving positive reactivity additions that could result in loss of required SDM or boron concentration.	Immediately
E. Two Class 1E Electrical Equipment A/C trains inoperable in MODE 1, 2, 3, or 4.	E.1 Enter LCO 3.0.3.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.20.1	Verify each Class 1E Electrical Equipment A/C train actuates on an actual or simulated actuation signal.	In accordance with the Surveillance Frequency Control Program
SR 3.7.20.2	Verify each Class 1E Electrical Equipment A/C train has the capability to remove the assumed heat load.	In accordance with the Surveillance Frequency Control Program

ATTACHMENT 4

PROPOSED FSAR CHANGES
(for information only)

*No changes - See
Table 16.7-2*

16.7.4 AREA TEMPERATURE MONITORING

16.7.4.1 LIMITING CONDITION FOR OPERATION

The temperature limit of each area given in Table 16.7-2 shall not be exceeded.

APPLICABILITY: Whenever the equipment in an affected area is required to be OPERABLE.

ACTION:

- a. With one or more areas exceeding the temperature limit(s) shown in Table 16.7-2, enter the Corrective Action Program to document the condition and determine whether or not a degraded or non-conforming condition exists. If equipment in the affected area(s) is degraded or non-conforming, identify and apply compensatory measures as necessary. This includes determining the functionality/operability of equipment in the affected area(s), as applicable, by evaluating the effects of the out-of-limit temperature(s) on the equipment.

16.7.4.1.1 SURVEILLANCE REQUIREMENTS

The temperature in each of the areas shown in Table 16.7-2 shall be determined to be within its limit at least once per 12 hours.

16.7.4.1.2 BASES

The area temperature limitations ensure that safety-related equipment will not be subjected to temperatures in excess of the environmental qualification temperatures for the equipment. Exposure to excessive temperatures may degrade equipment and can cause a loss of its OPERABILITY. The temperature limits include an allowance for instrument error of $\pm 3^{\circ}\text{F}$, except for Electrical Penetration Rooms A and B. These rooms have an alarm at $\leq 103^{\circ}\text{F}$ with a maximum room temperature of 106°F .

CALLAWAY - SP

TABLE 16.7-2 AREA TEMPERATURE MONITORING

	<u>AREA</u>	<u>MAXIMUM TEMPERATURE LIMIT (°F)</u>
1.	ESW Pump Room A	119
2.	ESW Pump Room B	119
3.	Auxiliary Feedwater Pump Room A	119
4.	Auxiliary Feedwater Pump Room B	119
5.	Turbine-Driven Auxiliary Feedwater Pump Room ^(1, 2)	120
6.	ESF Switchgear Room I	87
7.	ESF Switchgear Room II	87
8.	RHR Pump Room A	119
9.	RHR Pump Room B	119
10.	CTMT Spray Pump Room A	119
11.	CTMT Spray Pump Room B	119
12.	Safety Injection Pump Room A	119
13.	Safety Injection Pump Room B	119
14.	Centrifugal Charging Pump Room A	119
15.	Centrifugal Charging Pump Room B	119
16.	Electrical Penetration Room A	106
17.	Electrical Penetration Room B	106
18.	Component Cooling Water Room A	119
19.	Component Cooling Water Room B	119
20.	Diesel Generator Room A	119
21.	Diesel Generator Room B	119
22.	Control Room ⁽¹⁾	84

→ INSERT 16.7-2

INSERT 16.7-2

<u>AREA</u>	<u>MAXIMUM TEMPERATURE LIMIT (°F)</u>
23. DC Switchgear Room No. 1	87
24. DC Switchgear Room No. 2	87
25. DC Switchgear Room No. 3	87
26. DC Switchgear Room No. 4	87

16.7.13 ~~CLASS 1E ELECTRICAL EQUIPMENT AIR CONDITIONING (A/C)~~ Deleted.

~~16.7.13.1 LIMITING CONDITION FOR OPERATION~~

~~Two Class 1E Electrical Equipment A/C trains shall be OPERABLE.~~

~~APPLICABILITY:~~

~~Whenever the equipment in an affected area is required to be OPERABLE.~~

~~ACTIONS:~~

~~a. ----- NOTE -----~~

~~The following conditions do not have to be met if the Class 1E A/C Unit is inoperable only due to ESW being inoperable as long as normal service water is available.~~

~~If the associated Class 1E A/C Unit (SGK05A/B) is inoperable, the ESF switchgear and vital batterieschargers may be considered OPERABLE for up to 7 days provided the following conditions are met:~~

- ~~1) All doors between both trains of vital batterieschargers (2016') and ESF switchgear (2000') are open.
 - ~~a) Establish appropriate firewatches for open doors.

Open ESF switchgear doors require a continuous firewatch due to INOPERABLE halon system. The ESF switchgear doors are 33023 and 33011.

Open vital battery/charger doors require an hourly firewatch. The vital battery/charger doors are 34041, 34042, 34051, 34052, 34101, 34111, 34081, 34082, 34072, 34141, 34071, and 34131.~~~~
- ~~2) Transformers XNN05 and XNN06 are de-energized.~~
- ~~3) The thermostat on the OPERABLE Class 1E A/C Unit is set below 80 degrees F.~~
- ~~4) At least one of the Class 1E A/C Units (SGK05A/B) is OPERABLE and is capable of operating at full capacity.~~

CALLAWAY - SP

- b. IF ACTION A cannot be met, declare affected equipment inoperable and enter Conditions of applicable TS LCOs (including LCOs 3.8.4, 3.8.7, and 3.8.9).
- c. With two trains of Class 1E A/C Units inoperable, within 1 hour the Shift Manager must initiate plans to perform an orderly plant shutdown:
 - a) place the unit in HOT STANDBY within the next 6 hours, and
 - b) COLD SHUTDOWN within the following 30 hours.

16.7.13.1.1 SURVEILLANCE REQUIREMENTS

See Section 16.7.4.1.1 for ESF Switchgear Rooms I and II.

16.7.13.1.2 BASES

The evaluation in RFR 8932A shows that the ESF switchgear, batteries and chargers should perform their intended function with an inoperable Class 1E air conditioner. An OPERABLE Class 1E A/C Unit is defined as no known defects in the unit which would limit its capacity, such as broken or frayed belts, inadequate Freon charge, heat exchanger/compressor unavailability, and other work requests which might limit capacity. A failed A/C capacity control valve, expansion valve, or solenoid valve alone does not render the A/C unit inoperable. However, the failure of one or more of these components would render it incapable of meeting the requirements for one A/C train operation to cool both trains of rooms. Multiple failures of these components that affect more than 1 of 4 cooling circuits makes the A/C unit inoperable.

References include: RFR-000552A,B; RFR-003334A; RFR-006039A; RFR-008932A; RFR-007198B; RFR-004272D; RFR-016444A; ELO-516, ELOJ-533, and RFR-002852A.