

December 3, 2015

U.S. Nuclear Regulatory Commission
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Peach Bottom Atomic Power Station, Units 2 and 3
Renewed Facility Operating License Nos. DPR-44 and DPR-56
NRC Docket Nos. 50-277 and 50-278

Subject: License Amendment Request to Revise Surveillance Requirement 3.8.1.6
Involving EDG Fuel Oil Transfer

In accordance with 10 CFR 50.90, "Application for amendment of license, construction permit, or early site permit," Exelon Generation Company, LLC (EGC) requests an amendment to the Technical Specifications (TS) for Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3, respectively.

The proposed amendment will revise Surveillance Requirement (SR) 3.8.1.6 to provide a note in TS to allow for procedurally controlled simple manual actions associated with the fuel oil transfer system without having to declare the Emergency Diesel Generator inoperable. Attachment 1 provides a description of the proposed change. Attachment 2 provides the existing TS page marked up to show the proposed change. Additionally, marked up TS Bases pages are provided in Attachment 3 for information only.

There are no regulatory commitments contained in this submittal.

The proposed change has been reviewed by the PBAPS Plant Operations Review Committee and approved by the Nuclear Safety Review Board in accordance with the requirements of the Exelon Quality Assurance Program.

EGC requests approval of the proposed amendment by December 3, 2016. Once approved, the amendment shall be implemented within 60 days of issuance.

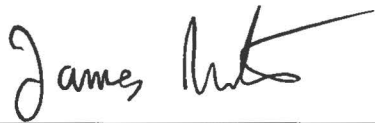
U.S. Nuclear Regulatory Commission
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In accordance with 10 CFR 50.91, "Notice for public comment; State consultation," paragraph (b), EGC is notifying the Commonwealth of Pennsylvania of this application for license amendment by transmitting a copy of this letter and its attachments to the designated State Official.

If you have any questions or require additional information, please contact Stephanie J. Hanson at (610) 765-5143.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 3rd day of December 2015.

Respectfully,



James Barstow
Director, Licensing and Regulatory Affairs
Exelon Generation Company, LLC

Attachments: 1. Evaluation of Proposed Changes
2. Markup of Technical Specifications Pages
3. Markup of Technical Specifications Bases Pages (Information Only)

cc: USNRC Region I, Regional Administrator
USNRC Project Manager, PBAPS
USNRC Senior Resident Inspector, PBAPS
R. R. Janati, Bureau of Radiation Protection
S. T. Gray, State of Maryland

ATTACHMENT 1

EVALUATION OF PROPOSED CHANGE

Peach Bottom Atomic Power Station, Units 2 and 3

Renewed Facility Operating License Nos. DPR-44 and DPR-56

Docket Nos. 50-277 and 50-278

Subject: License Amendment Request to Revise SR 3.8.1.6 Involving EDG Fuel Oil Transfer

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1.0 SUMMARY DESCRIPTION

In accordance with 10 CFR 50.90, "Application for amendment of license or construction permit," Exelon Generation Company, LLC (EGC) is requesting an amendment to Renewed Facility Operating License Nos. DPR-44 and DPR-56 for Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3, respectively.

The proposed amendment will revise Surveillance Requirement (SR) 3.8.1.6 to provide a note in Technical Specifications (TS) to allow for procedurally controlled simple manual actions associated with the fuel oil transfer system without having to declare the Emergency Diesel Generator (EDG) inoperable.

2.0 DETAILED DESCRIPTION

The proposed change to the PBAPS, Units 2 and 3, TS is summarized below:

1. SR 3.8.1.6, on TS Page 3.8-9, pertaining to the automatic transfer of fuel oil from the storage tank to the day tank, will be revised to add the following note:

"Procedurally controlled simple manual actions may be credited for EDG fuel oil transfer without having to declare the EDG inoperable."

A markup of the proposed TS change is provided in Attachment 2. Additionally, marked up TS Bases pages for PBAPS, Units 2 and 3, are provided in Attachment 3 for information only.

3.0 TECHNICAL EVALUATION

As a result of questions raised by the PBAPS NRC Resident Inspectors in March 2013, a concern was identified regarding crediting manual operator actions in lieu of automatic actions for the transfer of fuel oil from the EDG storage tank to the EDG day tank. This concern involved the non-declaration of EDG inoperability when the associated EDG fuel oil transfer pump control switch was placed in the 'off' position even though an Equipment Operator was stationed at the switch. It was determined that this practice was contrary to the literal wording in SR 3.8.1.6 which requires that this pump be able to automatically transfer fuel oil from the storage tank to the EDG day tank (i.e., without the use of manual operator actions). If automatic capability does not exist, the SR should have been declared not met. In accordance with SR 3.0.1, the associated EDG should have been declared inoperable due to the associated SR not being met. Once this issue was identified, prompt actions were put in place to ensure that the associated EDG was declared inoperable if the EDG fuel oil transfer pump was placed in the 'off' position.

The onsite standby power source for the four 4 kV emergency buses in each unit consists of four EDGs. The four EDGs provide onsite standby power for both Unit 2 and Unit 3. Each EDG provides standby power to two 4 kV emergency buses — one associated with Unit 2 and one associated with Unit 3. Each EDG starts automatically on a loss of coolant accident (LOCA) signal (i.e., low reactor water level signal or high drywell pressure signal) from either Unit 2 or

Unit 3 or on an emergency bus degraded voltage or under voltage signal. After each EDG has started, it automatically ties to its respective bus after offsite power is tripped as a consequence of emergency bus under voltage or degraded voltage, independent of or coincident with a LOCA signal. The EDGs also start and operate in the standby mode without tying to the emergency bus on a LOCA signal alone. Following the trip of offsite power, all loads are stripped from the emergency bus. When an EDG is tied to the emergency bus, loads are then sequentially connected to the respective emergency bus by individual timers associated with each auto-connected load following a permissive from a voltage relay monitoring each emergency bus.

Each of the four EDGs are provided with an associated storage tank which collectively have a fuel oil capacity sufficient to operate all four EDGs for a period of 7 days while the EDGs are supplying maximum post-LOCA load demand as discussed in UFSAR Section 8.5.2 (Reference 1). The maximum load demand is calculated using the time dependent loading of each EDG and the assumption that all four EDGs are available. This onsite fuel oil capacity is sufficient to operate the EDGs for longer than the time needed to replenish the onsite supply from outside sources. Post-accident electrical loading and fuel consumption is not equally shared among the EDGs. Therefore, it may be necessary to transfer post-accident loads between EDGs or to transfer fuel oil between storage tanks to achieve 7 days of post-accident operation for all four EDGs. Each storage tank contains sufficient fuel to support the operation of the EDG with the heaviest load (with four EDGs available) for greater than 6 days with 33,000 gallons initially in each tank. Each EDG is equipped with a day tank and an associated fuel transfer pump that will automatically transfer oil from a fuel storage tank to the day tank of the associated EDG when actuated by a float switch in the day tank. Additionally, the capability exists to transfer fuel oil between storage tanks. Redundancy of pumps and piping precludes the failure of one pump, or the rupture of any pipe, valve, or tank from resulting in the loss of more than one EDG. All outside tanks and piping are located underground.

When PBAPS implemented the Improved Technical Specifications in January 1996, the word 'automatically' was added to the TS and TS Bases to reflect PBAPS specific design, Licensing Basis, and/or nomenclature. Once implemented, a revision was made to the TS Bases SR using 10 CFR 50.59 that allowed for manual operator action to be used for limited cases for the purpose of maintaining operability of the EDG fuel oil transfer system. This TS Bases change added a paragraph to the TS Bases which allowed use of manual operator actions during SR surveillances in lieu of automatic action to maintain the EDG operable. After further review in March of 2013, this TS Bases change was viewed as changing the intent of the literal TS SR 3.8.1.6 words that require that there be automatic action to transfer fuel from the EDG storage tank to the day tank in order for the SR requirement to be met. This TS Bases change has since been removed. As discussed in the PBAPS TS Bases, the purpose of the surveillance is to demonstrate that each required fuel oil transfer pump operates and transfers fuel oil from its associated storage tank to its associated day tank. It is required to support continuous operation of standby power sources. The surveillance provides assurance that the fuel oil transfer pump is OPERABLE, the fuel oil piping system is intact, the fuel delivery piping is not obstructed, and the controls and control systems for automatic fuel transfer systems are OPERABLE.

During the time period (1996-2013) that credit was being taken for manual operator action to maintain the associated EDG fuel oil transfer system operable, this credit was only taken for very short periods of time. This credit was taken for operational conditions where it was desirable to transfer fuel oil between EDG underground fuel oil storage tanks, filling of EDG day

tanks with the associated EDG fuel oil transfer pump out-of-service, filling the day tank from another EDG fuel oil storage tank, performing In-Service Testing (IST) for the fuel oil transfer pump and associated suction check valve, or performing chemistry sampling activities.

Analysis of Effect of Manual Operator Actions on Capacity of Fuel in EDG Day Tanks:

In order to assess the effect of the proposed simple manual actions on the capacity of fuel oil in the EDG day tanks, Engineering performed a worst-case scenario of how much time is acceptable before needing replenishment of the worst-case EDG day tank. It was determined that for the worst-case fuel usage of an EDG day tank, 56 minutes would exist prior to reaching a fuel oil level that would affect EDG operability. Additionally, Operations personnel performed a worst-case scenario of the time that would be required to restore the automatic transfer of fuel oil to the associated EDG day tank. Two separate Equipment Operators were used for this analysis. The worst-case time was 4 minutes and 35 seconds. Therefore, if simple manual actions were required to restore the automatic feature of the EDG day tank fill, more than 50 minutes of time margin would exist to ensure that EDG operability would not be adversely affected.

Details of Engineering Analysis of Worst-Case EDG Day Tank Fuel Usage:

Engineering analysis was conducted consisting of the worst case scenario concerning the time needed to restore the EDG fuel oil transfer system back to an automatic status using the following parameters:

- Worst case EDG loading for LOCA event is E-2 at 3229 KW, resulting in 42.71 gallons used within the first 10 minutes; within 10-60 minutes at 3000 KW an additional 193.42 gallons will be consumed.
- Worst case assumes one other EDG fails to start, load or run
- Fuel oil consumption is analyzed at the worst case EDG loading

The engineering analysis provided the following results:

- Within the first 10 minutes approximately 4.271 gal/min will be consumed
- Between 10-60 minutes approximately 3.868 gal/min will be consumed

Using low level instrument worst-case in-calibration setting, TS require 250 gallons in each fuel oil day tank; however, there is an unusable volume of 27 gallons. Therefore, there is 223 gallons of usable fuel. Using the above fuel consumption values, it has been determined that it will take approximately 56 minutes before the first EDG would run out of fuel.

Details of Operations Assessment of Worst-Case Restoration Time for Automatic EDG Fuel Oil Transfer Function:

A simulated assessment was conducted using two separate Equipment Operators to measure the time that would be required to restore EDG fuel oil transfer to an automatic status. Each Equipment Operator performed the task associated with transferring diesel fuel oil between storage tanks as described in the required operating procedure. The simulation was performed using the worst-case scenario which involved the longest

travel path. This worst-case scenario was to restore the E-4 EDG fuel oil transfer system to automatic during makeup to the E-1 storage tank from the E-4 storage tank.

The simulation started with the Equipment Operator in the E-1 EDG Bay, where the Equipment Operator would be monitoring the E-1 storage tank level during makeup. The evolution proceeded as follows (all actions were simulated with the exception of entering/exiting areas):

- Start in E-1 EDG Bay.
- Notified of the event and the need to restore system to automatic status
- Exit E-1 EDG Bay
- Enter EDG Cardox Room
- Re-close E-1 EDG day tank transfer valve
- Re-close EDG fuel oil header line valve
- Exit EDG Cardox Room
- Enter E-4 EDG Bay
- Remove grating to access valves
- Re-close and lock E-4 EDG day tank transfer valve
- Re-open and lock E-4 EDG day tank transfer pump discharge valve
- Restore grating
- Restore E-4 EDG day tank transfer pump control switch to automatic

The first Equipment Operator took 4 minutes 35 seconds to complete the simulation.
The second Equipment Operator took 4 minutes 1 second to complete the simulation.

Because the manual actions necessary to restore the EDG fuel oil system to an automatic status involve simple, straight-forward actions, it is desirable to revise the TS to allow for this credit to maintain the EDG fuel oil systems (and the EDGs) operable during very infrequent occasions when fuel oil management activities are being performed. The actions that will be procedurally in place to ensure manual actions will maintain the EDG operable include:

- Constant communication with the Main Control Room (MCR)
- No other collateral duties by the qualified individual in charge of placing the EDG fuel oil transfer pump switch from the 'off' to the 'auto' position and restoring manual valve positions
- Briefing of the qualified individual that their actions are credited for maintaining the transfer of fuel oil from the underground storage tank to the day tank to ensure TS operability.
- Clear procedural direction and control that the EDG fuel oil transfer valves and pump control switch will be restored to the 'auto' position if there is:
 - An automatic start of an EDG
 - Notification by licensed MCR personnel that the EDG is required to operate
 - A receipt of the associated day tank low level alarm

The above actions will be proceduralized and will provide assurance of operability.

NUREG-1433, Standard Technical Specifications for General Electric BWR 4 Plants, contains the automatic feature of fuel oil transfer from the storage to the day tank in SR 3.8.1.6 as 'bracketed' information. Further, NUREG 1433, Standard Technical Specifications Bases - General Electric BWR/4 Plants states that the design of fuel transfer systems is such that pumps operate automatically or must be started manually in order to maintain an adequate volume of fuel oil in the day and engine mounted tanks during or following EDG testing. Therefore, NUREG-1433 already allows for the possibility of crediting manual actions to start the EDG fuel oil transfer system.

Therefore, it is proposed to amend the TS to revise Surveillance Requirement (SR) 3.8.1.6 to provide a note in TS to allow for procedurally controlled simple manual actions associated with the fuel oil transfer system without having to declare the EDG inoperable under administrative control.

4.0 REGULATORY EVALUATION

4.1 Applicable Regulatory Requirements / Criteria

The information that must be included in each station's TS is described in detail in 10 CFR 50.36. The purpose of this amendment request is to revise the Surveillance Requirement to allow for procedurally controlled simple manual actions associated with the fuel oil transfer system without having to declare the EDG inoperable. The proposed change has no impact on current Safety Limits, Limiting Safety System Settings, Limiting Control Settings, Limiting Conditions for Operation, Surveillance Requirements, Design Features, or Administrative Controls. Therefore, EGC concludes that the methods used to comply with 10 CFR 50.36 are not modified by the proposed change, and the requirements continue to be met.

The proposed change does not involve any physical changes to the structures, systems, or components (SSCs) in the plant. Further the proposed change does not alter or prevent the ability of SSCs from performing their intended function to mitigate the consequences of an event.

4.2 Precedence

The proposed change is consistent with the improved Standard Technical Specifications approved by the NRC in NUREG-1433, Standard Technical Specifications - General Electric BWR/4 Plants, in that the word 'automatically' is bracketed (i.e., optional or as required by plant design).

Additionally, Edwin I. Hatch Nuclear Plant, Units 1 and 2, TS have both the manual and automatic transfer options. TS for Brunswick Steam Electric Plant, Units 1 and 2, Duane Arnold Energy Center, and Monticello Nuclear Generating Plant, Unit 1, do not use the word 'automatically' as part of the SR relating to the fuel oil transfer system.

4.3 No Significant Hazards Consideration

In accordance with 10 CFR 50.90, "Application for amendment of license or construction permit," Exelon Generation Company, LLC (EGC) is requesting an amendment to Renewed

Facility Operating License Nos. DPR-44 and DPR-56 for Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3, respectively.

The proposed amendment will revise Surveillance Requirement (SR) 3.8.1.6 to provide a note in TS to allow for procedurally controlled simple manual actions associated with the fuel oil transfer system without having to declare the Emergency Diesel Generator (EDG) inoperable.

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

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

Response: No.

The proposed change will revise SR 3.8.1.6 by adding a note to allow for procedurally controlled simple manual actions associated with the fuel oil transfer system without having to declare the EDG inoperable under administrative control. The fuel oil transfer system is required to support continuous operation of standby power sources. The surveillance provides assurance that the fuel oil transfer system is OPERABLE. The fuel oil transfer system is not an initiator of any event previously evaluated. Therefore, the probability of any accident previously evaluated is not increased.

In the event of an accident, if simple manual actions were necessary to restore the automatic feature of the EDG day tank fill, analysis shows that significant margin exists to ensure that EDG operability would not be adversely affected. Although the proposed change to allow simple manual actions could introduce additional potential malfunctions, such that human error could result in the potential to improperly realign the fuel oil transfer system during a DBA, the improper realignment would be detected when the transfer of fuel oil from the storage tank to the day tank did not occur as expected and the error would be corrected prior to having a significant impact.

The proposed change does not involve any physical changes to the structures, systems, or components (SSCs) in the plant. Further the proposed change does not alter or prevent the ability of SSCs from performing their intended function to mitigate the consequences of an event.

The proposed change is consistent with NRC regulatory requirements regarding the content of plant TS as identified in 10 CFR 50.36. Additionally, the proposed change is consistent with NUREG-1433, "Standard Technical Specifications General Electric BWR/4 Plants," in that the word 'automatically' is bracketed (i.e., optional or as required by plant design).

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

Response: No.

The proposed change does not alter the physical design, safety limits, or safety analysis assumptions associated with the operation of the plant. Accordingly, the change does not introduce any new accident initiators, nor does it reduce or adversely affect the capabilities of any plant structure, system, or component to perform their safety function. Consequently, there are no new initiators that could result in a new or different kind of accident.

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

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

Response: No.

The proposed change conforms to NRC regulatory guidance regarding the content of plant Technical Specifications. The proposed change does not alter the physical design, safety limits, or safety analysis assumptions associated with the operation of the plant. The proposed change has no adverse impact on current Safety Limits, Limiting Safety System Settings, Limiting Control Settings, Limiting Conditions for Operation, Surveillance Requirements, Design Features, or Administrative Controls.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, EGC concludes that the proposed amendment does not involve a significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of no significant hazards consideration is justified.

4.4 Conclusions

In conclusion, based on the considerations discussed above: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or the health and safety of the public.

5.0 ENVIRONMENTAL CONSIDERATION

A review has determined that the proposed amendment would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or would change an inspection or surveillance requirement. However, the proposed amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure.

Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

6.0 REFERENCES

1. Peach Bottom Atomic Power Station, Updated Final Safety Analysis Report, Revision 25.
2. U.S. Nuclear Regulatory Commission, Office of Nuclear Reactor Regulation, NUREG-1433, Revision 4, "Standard Technical Specifications - General Electric BWR/4 Plants," dated April 2012.
3. U.S. Nuclear Regulatory Commission, Office of Nuclear Reactor Regulation, NUREG-1433, Revision 4, "Standard Technical Specifications Bases - General Electric BWR/4 Plants," dated April 2012.
4. 10 CFR 50.36, Technical specifications.

ATTACHMENT 2

Markup of Technical Specifications Pages

**Peach Bottom Atomic Power Station Units 2 and 3
Renewed Facility Operating License Nos. DPR-44 and DPR-56
Docket Nos. 50-277 and 50-278**

**License Amendment Request to
Revise Surveillance Requirement 3.8.1.6 Involving EDG Fuel Oil Transfer**

Unit 2 TS Page

3.8-9

Unit 3 TS Page

3.8-9

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p style="text-align: center;">Add Note</p> <p>SR 3.8.1.6 Verify the fuel oil transfer system operates to automatically transfer fuel oil from storage tank to the day tank.</p> <p style="text-align: center;">-----NOTE-----</p> <p>Procedurally controlled simple manual actions may be credited for EDG fuel oil transfer without having to declare the EDG inoperable.</p>	<p>In accordance with the Surveillance Frequency Control Program.</p>
<p>SR 3.8.1.7 -----NOTES-----</p> <ol style="list-style-type: none"> 1. All DG starts may be preceded by an engine prelube period. 2. A single test at the specified Frequency will satisfy this Surveillance for both units. <p>-----</p> <p>Verify each DG starts from standby condition and achieves, in ≤ 10 seconds, voltage ≥ 4160 V and frequency ≥ 58.8 Hz, and after steady state conditions are reached, maintains voltage ≥ 4160 V and ≤ 4400 V and frequency ≥ 58.8 Hz and ≤ 61.2 Hz.</p>	<p>In accordance with the Surveillance Frequency Control Program.</p>
<p>SR 3.8.1.8 -----NOTE-----</p> <p>This Surveillance shall not be performed in MODE 1 or 2. However, credit may be taken for unplanned events that satisfy this SR.</p> <p>-----</p> <p>Verify automatic and manual transfer of the unit power supply from the normal offsite circuit to the alternate offsite circuit.</p>	<p>In accordance with the Surveillance Frequency Control Program.</p>

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p style="text-align: center;">Add Note</p> <p>SR 3.8.1.6 Verify the fuel oil transfer system operates to automatically transfer fuel oil from storage tank to the day tank.</p> <div style="border: 1px solid red; padding: 5px; margin-top: 10px;"> <p style="text-align: center;">-----NOTE-----</p> <p>Procedurally controlled simple manual actions may be credited for EDG fuel oil transfer without having to declare the EDG inoperable.</p> </div>	<p>In accordance with the Surveillance Frequency Control Program.</p>
<p>SR 3.8.1.7 -----NOTES-----</p> <ol style="list-style-type: none"> 1. All DG starts may be preceded by an engine prelube period. 2. A single test at the specified Frequency will satisfy this Surveillance for both units. <p>-----</p> <p>Verify each DG starts from standby condition and achieves, in ≤ 10 seconds, voltage ≥ 4160 V and frequency ≥ 58.8 Hz, and after steady state conditions are reached, maintains voltage ≥ 4160 V and ≤ 4400 V and frequency ≥ 58.8 Hz and ≤ 61.2 Hz.</p>	<p>In accordance with the Surveillance Frequency Control Program.</p>
<p>SR 3.8.1.8 -----NOTE-----</p> <p>This Surveillance shall not be performed in MODE 1 or 2. However, credit may be taken for unplanned events that satisfy this SR.</p> <p>-----</p> <p>Verify automatic and manual transfer of the unit power supply from the normal offsite circuit to the alternate offsite circuit.</p>	<p>In accordance with the Surveillance Frequency Control Program.</p>

(continued)

ATTACHMENT 3

Markup of Technical Specifications Bases Pages
(Information Only)

Peach Bottom Atomic Power Station Units 2 and 3
Renewed Facility Operating License Nos. DPR-44 and DPR-56
Docket Nos. 50-277 and 50-278

License Amendment Request to
Revise Surveillance Requirement 3.8.1.6 Involving EDG Fuel Oil Transfer

Unit 2 TS Bases Page

B 3.8-24

Unit 3 TS Bases Page

B 3.8-24

BASES

SURVEILLANCE
REQUIREMENTS

SR 3.8.1.6 (continued)

the fuel oil transfer pump is OPERABLE, the fuel oil piping system is intact, the fuel delivery piping is not obstructed, and the controls and control systems for automatic fuel transfer systems are OPERABLE.

Add Insert

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

SR 3.8.1.8

Transfer of each 4 kV emergency bus power supply from the normal offsite circuit to the alternate offsite circuit demonstrates the OPERABILITY of the alternate circuit distribution network to power the shutdown loads. The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

This SR is modified by a Note. The reason for the Note is that, during operation with the reactor critical, performance of this SR could cause perturbations to the electrical distribution systems that could challenge continued steady state operation and, as a result, plant safety systems. This Surveillance tests the applicable logic associated with Unit 2. The comparable test specified in Unit 3 Technical Specifications tests the applicable logic associated with Unit 3. Consequently, a test must be performed within the specified Frequency for each unit. As the Surveillance represents separate tests, the Note

(continued)

This SR is modified by a Note. The note recognizes that for brief periods of time, manual actions may be taken to restore the EDG fuel oil system to an automatic status since the actions are simple and straight-forward. These actions are procedurally controlled and include a dedicated qualified individual.

BASES

SURVEILLANCE
REQUIREMENTS

SR 3.8.1.6 (continued)

the fuel oil transfer pump is OPERABLE, the fuel oil piping system is intact, the fuel delivery piping is not obstructed, and the controls and control systems for automatic fuel transfer systems are OPERABLE.

Add Insert

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

SR 3.8.1.8

Transfer of each 4 kV emergency bus power supply from the normal offsite circuit to the alternate offsite circuit demonstrates the OPERABILITY of the alternate circuit distribution network to power the shutdown loads. The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

This SR is modified by a Note. The reason for the Note is that, during operation with the reactor critical, performance of this SR could cause perturbations to the electrical distribution systems that could challenge continued steady state operation and, as a result, plant safety systems. This Surveillance tests the applicable logic associated with Unit 3. The comparable test specified in Unit 2 Technical Specifications tests the applicable logic associated with Unit 2. Consequently, a test must be performed within the specified Frequency for each unit. As the Surveillance represents separate tests, the Note

(continued)

This SR is modified by a Note. The note recognizes that for brief periods of time, manual actions may be taken to restore the EDG fuel oil system to an automatic status since the actions are simple and straight-forward. These actions are procedurally controlled and include a dedicated qualified individual.