



**DEC 1 2 2002**

SERIAL: BSEP 02-0200

~~U.S.~~ Nuclear Regulatory Commission  
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BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2  
DOCKET NOS. 50-325 AND 50-324/LICENSE NOS. DPR-71 AND DPR-62  
SUBMITTAL OF TECHNICAL SPECIFICATION BASES CHANGES FOR  
REVISIONS 29 (UNIT 1) AND 26 (UNIT 2)

Ladies and Gentlemen:

In accordance with Technical Specification (TS) 5.5.10 for the Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2, Carolina Power & Light (CP&L) Company is submitting Revisions 29 and 26 to the BSEP, Unit 1 and 2 TS Bases, respectively. Revisions 29 and 26 were implemented on November 21, 2002.

Please refer any questions regarding this submittal to Mr. Leonard R. Beller, Supervisor - Licensing/Regulatory Programs, at (910) 457-2073.

Sincerely,

Edward T. O'Neil  
Manager - Support Services  
Brunswick Steam Electric Plant

WRM/wrm

Enclosures:

1. Summary of Revisions to Technical Specification Bases
2. Technical Specification Bases Pages Replacement Instructions
3. Replacement Technical Specification Bases Pages - Units 1 and 2

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Document Control Desk  
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cc (with enclosures):

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Summary of Revisions to Technical Specification Bases

Revision	Affected Units	Date Implemented	Title/Description
29 26	Unit 1 Unit 2	November 21, 2002	<b>Title:</b> Provider of Diesel Fuel Testing Certificate of Compliance  <b>Description:</b> This change revises the Bases for Surveillance Requirement 3.8.3.2 by deleting reference to the diesel fuel oil supplier being the provider of the Certificate of Compliance for diesel fuel oil testing.

Technical Specification Bases Pages Replacement Instructions

<b>Unit 1 - Bases Book 1</b>	
<b>Remove</b>	<b>Insert</b>
Title Page - Revision 28	Title Page - Revision 29
LOEP-1, Revision 28	LOEP-1, Revision 29

<b>Unit 1 - Bases Book 2</b>	
<b>Remove</b>	<b>Insert</b>
LOEP-1, Revision 26	LOEP-1, Revision 29
LOEP-4, Revision 22	LOEP-4, Revision 29
B 3.8-47, Revision 6	B 3.8-47, Revision 29
B 3.8-48, Revision 6	B 3.8-48, Revision 29

<b>Unit 2 - Bases Book 1</b>	
<b>Remove</b>	<b>Insert</b>
Title Page - Revision 25	Title Page - Revision 26
LOEP-1, Revision 25	LOEP-1, Revision 26

<b>Unit 2 - Bases Book 2</b>	
<b>Remove</b>	<b>Insert</b>
LOEP-1, Revision 23	LOEP-1, Revision 26
LOEP-4, Revision 21	LOEP-4, Revision 26
B 3.8-47, Revision 6	B 3.3-47, Revision 26
B 3.8-48, Revision 6	B 3.3-48, Revision 26

BSEP 02-0200  
Enclosure 3

Replacement Technical Specification Bases Pages - Units 1 and 2

**BASES  
TO  
THE FACILITY OPERATING LICENSE DPR-71  
TECHNICAL SPECIFICATIONS  
FOR  
BRUNSWICK STEAM ELECTRIC PLANT  
UNIT 1  
CAROLINA POWER & LIGHT COMPANY**

**REVISION 29**

**Unit 1**  
**Bases Book 1 Replacement Pages**

LIST OF EFFECTIVE PAGES - BASES

<u>Page No.</u>	<u>Revision No.</u>	<u>Page No.</u>	<u>Revision No.</u>
Title Page	29	B 3.1-7	0
List of Effective Pages - Book 1		B 3.1-8	0
		B 3.1-9	0
		B 3.1-10	0
		B 3.1-11	0
LOEP-1	29	B 3.1-12	0
LOEP-2	25	B 3.1-13	0
LOEP-3	24	B 3.1-14	0
LOEP-4	27	B 3.1-15	0
i	21	B 3.1-16	0
ii	21	B 3.1-17	25
		B 3.1-18	25
B 2.0-1	0	B 3.1-19	0
B 2.0-2	0	B 3.1-20	0
B 2.0-3	25	B 3.1-21	0
B 2.0-4	24	B 3.1-22	0
B 2.0-5	24	B 3.1-23	0
B 2.0-6	24	B 3.1-24	23
B 2.0-7	24	B 3.1-25	0
B 2.0-8	0	B 3.1-26	23
		B 3.1-27	23
B 3.0-1	0	B 3.1-28	0
B 3.0-2	0	B 3.1-29	0
B 3.0-3	0	B 3.1-30	0
B 3.0-4	0	B 3.1-31	0
B 3.0-5	0	B 3.1-32	0
B 3.0-6	0	B 3.1-33	25
B 3.0-7	0	B 3.1-34	25
B 3.0-8	0	B 3.1-35	25
B 3.0-9	0	B 3.1-36	25
B 3.0-10	0	B 3.1-37	24
B 3.0-11	0	B 3.1-38	24
B 3.0-12	0	B 3.1-39	24
B 3.0-13	28	B 3.1-40	24
B 3.0-14	28	B 3.1-41	24
B 3.0-15	28	B 3.1-42	24
B 3.0-16	28	B 3.1-43	24
		B 3.1-44	24
B 3.1-1	0	B 3.1-45	0
B 3.1-2	0	B 3.1-46	0
B 3.1-3	0	B 3.1-47	0
B 3.1-4	0	B 3.1-48	24
B 3.1-5	0		
B 3.1-6	0		

(continued)



**Unit 1**  
**Bases Book 2 Replacement Pages**

LIST OF EFFECTIVE PAGES - BASES

<u>Page No.</u>	<u>Revision No.</u>	<u>Page No.</u>	<u>Revision No.</u>
List of Effective Pages - Book 2		B 3.4-33	0
LOEP-1	29	B 3.4-34	0
LOEP-2	26	B 3.4-35	0
LOEP-3	25	B 3.4-36	0
LOEP-4	29	B 3.4-37	0
LOEP-5	25	B 3.4-38	0
i	18	B 3.4-39	17
ii	7	B 3.4-40	17
B 3.4-1	0	B 3.4-41	17
B 3.4-2	0	B 3.4-42	17
B 3.4-3	25	B 3.4-43	17
B 3.4-4	21	B 3.4-44	17
B 3.4-5	1	B 3.4-45	17
B 3.4-6	21	B 3.4-46	17
B 3.4-7	0	B 3.4-47	17
B 3.4-8	0	B 3.4-48	0
B 3.4-9	0	B 3.4-49	0
B 3.4-10	0	B 3.5-1	0
B 3.4-11	0	B 3.5-2	0
B 3.4-12	0	B 3.5-3	0
B 3.4-13	0	B 3.5-4	0
B 3.4-14	9	B 3.5-5	0
B 3.4-15	0	B 3.5-6	0
B 3.4-16	0	B 3.5-7	0
B 3.4-17	0	B 3.5-8	0
B 3.4-18	0	B 3.5-9	0
B 3.4-19	0	B 3.5-10	0
B 3.4-20	19	B 3.5-11	0
B 3.4-21	19	B 3.5-12	0
B 3.4-22	19	B 3.5-13	0
B 3.4-23	19	B 3.5-14	0
B 3.4-24	19	B 3.5-15	0
B 3.4-25	24	B 3.5-16	9
B 3.4-26	24	B 3.5-17	0
B 3.4-27	24	B 3.5-18	0
B 3.4-28	24	B 3.5-19	0
B 3.4-29	0	B 3.5-20	0
B 3.4-30	0	B 3.5-21	0
B 3.4-31	0	B 3.5-22	0
B 3.4-32	0	B 3.5-23	0
		B 3.5-24	0
		B 3.5-25	0

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LIST OF EFFECTIVE PAGES - BASES (continued)

<u>Page No.</u>	<u>Revision No.</u>	<u>Page No.</u>	<u>Revision No.</u>
B 3.8-40	6	B 3.8-81	13
B 3.8-41	6	B 3.8-82	13
B 3.8-42	6	B 3.8-83	13
B 3.8-43	6	B 3.8-84	13
B 3.8-44	6	B 3.8-85	13
B 3.8-45	6	B 3.8-86	13
B 3.8-46	6	B 3.8-87	13
B 3.8-47	29	B 3.8-88	13
B 3.8-48	29	B 3.8-89	13
B 3.8-49	6	B 3.8-90	13
B 3.8-50	6	B 3.8-91	13
B 3.8-51	6	B 3.8-92	13
B 3.8-52	6		
B 3.8-53	6	B 3.9-1	0
B 3.8-54	6	B 3.9-2	0
B 3.8-55	6	B 3.9-3	0
B 3.8-56	6	B 3.9-4	0
B 3.8-57	6	B 3.9-5	0
B 3.8-58	6	B 3.9-6	0
B 3.8-59	6	B 3.9-7	0
B 3.8-60	6	B 3.9-8	0
B 3.8-61	13	B 3.9-9	0
B 3.8-62	13	B 3.9-10	0
B 3.8-63	13	B 3.9-11	0
B 3.8-64	13	B 3.9-12	0
B 3.8-65	13	B 3.9-13	0
B 3.8-66	13	B 3.9-14	0
B 3.8-67	13	B 3.9-15	0
B 3.8-68	13	B 3.9-16	0
B 3.8-69	13	B 3.9-17	0
B 3.8-70	13	B 3.9-18	0
B 3.8-71	13	B 3.9-19	22
B 3.8-72	13	B 3.9-20	0
B 3.8-73	13	B 3.9-21	22
B 3.8-74	13	B 3.9-22	0
B 3.8-75	13	B 3.9-23	0
B 3.8-76	13	B 3.9-24	0
B 3.8-77	13	B 3.9-25	0
B 3.8-78	13	B 3.9-26	0
B 3.8-79	13	B 3.9-27	0
B 3.8-80	13	B 3.9-28	0
		B 3.9-29	0

(continued)

BASES

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SURVEILLANCE  
REQUIREMENTS

SR 3.8.3.2

Once per 92 days, the stored fuel oil is sampled in accordance with ASTM D4057-88, (Ref. 7) and analyzed to establish that the viscosity limits specified in Table 1 of ASTM D975-88 (Ref. 7) are met for stored fuel oil. The 92 day period is acceptable because fuel oil viscosity, even if it was not within stated limits, would not have an immediate effect on DG operation. This Surveillance, in combination with the fuel oil delivery certificate of compliance, ensures the availability of high quality fuel oil for the DGs.

Fuel oil degradation during long term storage shows up as an increase in particulate, mostly due to oxidation. The presence of particulate does not mean that the fuel oil will not burn properly in a diesel engine. The particulate can cause fouling of filters and fuel oil injection equipment, however, which can cause engine failure.

Particulate concentrations should be determined in accordance with ASTM D2276-89 (Ref. 7), Method A3. This method involves a gravimetric determination of total particulate concentration in the fuel oil and has a limit of 10 mg/l. It is acceptable to obtain a field sample for subsequent laboratory testing in lieu of field testing. For the BNP design, the total volume of stored fuel oil is contained in more than two interconnected tanks. Therefore, each tank must be considered and tested separately.

The Frequency of this test takes into consideration fuel oil degradation trends that indicate that particulate concentration is unlikely to change significantly between Frequency intervals.

The acceptability of new diesel fuel oil is verified by the use of a certificate of compliance for each new fuel oil delivery. The certificate of compliance includes certification of each of the ASTM 2-D fuel oil properties included in Table 1 of ASTM D975-88 (Ref. 7) and API gravity are within required limits. Therefore, the acceptability of new fuel oil for use prior to addition to the storage tanks is determined by verifying that the new fuel oil has not become contaminated with other products during transit, thus altering the quality of the fuel oil. This ensures new fuel

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BASES

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SURVEILLANCE  
REQUIREMENTS

SR 3.8.3.2 (continued)

oil quality is maintained consistent with that identified in the certificate of compliance. Once the verification is satisfactorily completed, the fuel oil may be added to the storage tanks without concern for contaminating the entire volume of fuel oil in the storage tanks.

Failure to determine the acceptability of the new diesel fuel oil is cause for rejecting the new fuel oil, but does not represent a failure to meet the LCO since the fuel oil is not added to the storage tanks.

SR 3.8.3.3

Microbiological fouling is a major cause of fuel oil degradation. There are numerous bacteria that can grow in fuel oil and cause fouling, but all must have a water environment in order to survive. Removal of water from the fuel storage tanks once every 31 days eliminates the necessary environment for bacterial survival. This is the most effective means of controlling microbiological fouling. In addition, it eliminates the potential for water entrainment in the fuel oil during DG operation. Water may come from any of several sources, including condensation, ground water, rain water, contaminated fuel oil, and from breakdown of the fuel oil by bacteria. Frequent checking for and removal of accumulated water minimizes fouling and provides data regarding the watertight integrity of the fuel oil system. The Surveillance Frequency is established by Regulatory Guide 1.137 (Ref. 2). This SR is for preventive maintenance. The presence of water does not necessarily represent failure of this SR, provided the accumulated water is removed during performance of the Surveillance.

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REFERENCES

1. UFSAR, Section 8.3.1.1.6.2.8.
2. Regulatory Guide 1.137, January 1978.
3. UFSAR, Section 1.8.
4. UFSAR, Chapter 6.

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**Unit 2**  
**Bases Book 1 Replacement Pages**

**BASES  
TO  
THE FACILITY OPERATING LICENSE DPR-62  
TECHNICAL SPECIFICATIONS  
FOR  
BRUNSWICK STEAM ELECTRIC PLANT  
UNIT 2  
CAROLINA POWER & LIGHT COMPANY**

**REVISION 26**

LIST OF EFFECTIVE PAGES - BASES

<u>Page No.</u>	<u>Revision No.</u>	<u>Page No.</u>	<u>Revision No.</u>
Title Page	26	B 3.1-7	0
List of Effective Pages - Book 1		B 3.1-8	0
		B 3.1-9	0
		B 3.1-10	0
		B 3.1-11	0
LOEP-1	26	B 3.1-12	0
LOEP-2	3	B 3.1-13	0
LOEP-3	12	B 3.1-14	0
LOEP-4	24	B 3.1-15	0
i	0	B 3.1-16	0
ii	0	B 3.1-17	0
		B 3.1-18	0
B 2.0-1	0	B 3.1-19	0
B 2.0-2	0	B 3.1-20	0
B 2.0-3	0	B 3.1-21	0
B 2.0-4	0	B 3.1-22	0
B 2.0-5	0	B 3.1-23	0
B 2.0-6	0	B 3.1-24	22
B 2.0-7	0	B 3.1-25	0
B 2.0-8	0	B 3.1-26	22
		B 3.1-27	22
B 3.0-1	0	B 3.1-28	0
B 3.0-2	0	B 3.1-29	0
B 3.0-3	0	B 3.1-30	0
B 3.0-4	0	B 3.1-31	0
B 3.0-5	0	B 3.1-32	0
B 3.0-6	0	B 3.1-33	0
B 3.0-7	0	B 3.1-34	0
B 3.0-8	0	B 3.1-35	0
B 3.0-9	0	B 3.1-36	0
B 3.0-10	0	B 3.1-37	0
B 3.0-11	0	B 3.1-38	0
B 3.0-12	0	B 3.1-39	0
B 3.0-13	25	B 3.1-40	0
B 3.0-14	25	B 3.1-41	0
B 3.0-15	25	B 3.1-42	0
B 3.0-16	25	B 3.1-43	0
		B 3.1-44	0
B 3.1-1	0	B 3.1-45	0
B 3.1-2	0	B 3.1-46	0
B 3.1-3	0	B 3.1-47	0
B 3.1-4	0	B 3.1-48	0
B 3.1-5	0		
B 3.1-6	0		

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**Unit 2**  
**Bases Book 2 Replacement Pages**

LIST OF EFFECTIVE PAGES - BASES

<u>Page No.</u>	<u>Revision No.</u>	<u>Page No.</u>	<u>Revision No.</u>
Title Page	N/A	B 3.4-32	0
		B 3.4-33	0
List of Effective Pages - Book 2		B 3.4-34	0
		B 3.4-35	0
LOEP-1	26	B 3.4-36	0
LOEP-2	23	B 3.4-37	0
LOEP-3	21	B 3.4-38	0
LOEP-4	26	B 3.4-39	17
LOEP-5	6	B 3.4-40	17
		B 3.4-41	17
i	18	B 3.4-42	17
ii	7	B 3.4-43	17
		B 3.4-44	17
B 3.4-1	0	B 3.4-45	17
B 3.4-2	0	B 3.4-46	17
B 3.4-3	1	B 3.4-47	17
B 3.4-4	1	B 3.4-48	0
B 3.4-5	1	B 3.4-49	0
B 3.4-6	1		
B 3.4-7	0	B 3.5-1	0
B 3.4-8	0	B 3.5-2	0
B 3.4-9	0	B 3.5-3	0
B 3.4-10	0	B 3.5-4	0
B 3.4-11	0	B 3.5-5	0
B 3.4-12	0	B 3.5-6	0
B 3.4-13	0	B 3.5-7	0
B 3.4-14	10	B 3.5-8	0
B 3.4-15	0	B 3.5-9	0
B 3.4-16	0	B 3.5-10	0
B 3.4-17	0	B 3.5-11	0
B 3.4-18	0	B 3.5-12	0
B 3.4-19	0	B 3.5-13	0
B 3.4-20	19	B 3.5-14	0
B 3.4-21	19	B 3.5-15	0
B 3.4-22	19	B 3.5-16	10
B 3.4-23	19	B 3.5-17	0
B 3.4-24	19	B 3.5-18	0
B 3.4-25	0	B 3.5-19	0
B 3.4-26	0	B 3.5-20	0
B 3.4-27	0	B 3.5-21	0
B 3.4-28	0	B 3.5-22	0
B 3.4-29	0	B 3.5-23	0
B 3.4-30	0	B 3.5-24	0
B 3.4-31	0	B 3.5-25	0

(continued)

LIST OF EFFECTIVE PAGES - BASES (continued)

<u>Page No.</u>	<u>Revision No.</u>	<u>Page No.</u>	<u>Revision No.</u>
B 3.8-40	6	B 3.8-81	13
B 3.8-41	6	B 3.8-82	13
B 3.8-42	6	B 3.8-83	13
B 3.8-43	6	B 3.8-84	13
B 3.8-44	6	B 3.8-85	13
B 3.8-45	6	B 3.8-86	13
B 3.8-46	6	B 3.8-87	13
B 3.8-47	26	B 3.8-88	13
B 3.8-48	26	B 3.8-89	13
B 3.8-49	6	B 3.8-90	13
B 3.8-50	6	B 3.8-91	13
B 3.8-51	6	B 3.8-92	13
B 3.8-52	6		
B 3.8-53	6	B 3.9-1	0
B 3.8-54	6	B 3.9-2	0
B 3.8-55	6	B 3.9-3	0
B 3.8-56	6	B 3.9-4	0
B 3.8-57	6	B 3.9-5	0
B 3.8-58	6	B 3.9-6	0
B 3.8-59	6	B 3.9-7	0
B 3.8-60	6	B 3.9-8	0
B 3.8-61	13	B 3.9-9	0
B 3.8-62	13	B 3.9-10	0
B 3.8-63	13	B 3.9-11	0
B 3.8-64	13	B 3.9-12	0
B 3.8-65	13	B 3.9-13	0
B 3.8-66	13	B 3.9-14	0
B 3.8-67	13	B 3.9-15	0
B 3.8-68	13	B 3.9-16	0
B 3.8-69	13	B 3.9-17	0
B 3.8-70	13	B 3.9-18	0
B 3.8-71	13	B 3.9-19	21
B 3.8-72	13	B 3.9-20	0
B 3.8-73	13	B 3.9-21	21
B 3.8-74	13	B 3.9-22	0
B 3.8-75	13	B 3.9-23	0
B 3.8-76	13	B 3.9-24	0
B 3.8-77	13	B 3.9-25	0
B 3.8-78	13	B 3.9-26	0
B 3.8-79	13	B 3.9-27	0
B 3.8-80	13	B 3.9-28	0
		B 3.9-29	0

(continued)

BASES

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SURVEILLANCE  
REQUIREMENTS

SR 3.8.3.2

Once per 92 days, the stored fuel oil is sampled in accordance with ASTM D4057-88, (Ref. 7) and analyzed to establish that the viscosity limits specified in Table 1 of ASTM D975-88 (Ref. 7) are met for stored fuel oil. The 92 day period is acceptable because fuel oil viscosity, even if it was not within stated limits, would not have an immediate effect on DG operation. This Surveillance, in combination with the fuel oil delivery certificate of compliance, ensures the availability of high quality fuel oil for the DGs.

Fuel oil degradation during long term storage shows up as an increase in particulate, mostly due to oxidation. The presence of particulate does not mean that the fuel oil will not burn properly in a diesel engine. The particulate can cause fouling of filters and fuel oil injection equipment, however, which can cause engine failure.

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The Frequency of this test takes into consideration fuel oil degradation trends that indicate that particulate concentration is unlikely to change significantly between Frequency intervals.

The acceptability of new diesel fuel oil is verified by the use of a certificate of compliance for each new fuel oil delivery. The certificate of compliance includes certification of each of the ASTM 2-D fuel oil properties included in Table 1 of ASTM D975-88 (Ref. 7) and API gravity are within required limits. Therefore, the acceptability of new fuel oil for use prior to addition to the storage tanks is determined by verifying that the new fuel oil has not become contaminated with other products during transit, thus altering the quality of the fuel oil. This ensures new fuel

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BASES

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SURVEILLANCE  
REQUIREMENTS

SR 3.8.3.2 (continued)

oil quality is maintained consistent with that identified in the certificate of compliance. Once the verification is satisfactorily completed, the fuel oil may be added to the storage tanks without concern for contaminating the entire volume of fuel oil in the storage tanks.

Failure to determine the acceptability of the new diesel fuel oil is cause for rejecting the new fuel oil, but does not represent a failure to meet the LCO since the fuel oil is not added to the storage tanks.

SR 3.8.3.3

Microbiological fouling is a major cause of fuel oil degradation. There are numerous bacteria that can grow in fuel oil and cause fouling, but all must have a water environment in order to survive. Removal of water from the fuel storage tanks once every 31 days eliminates the necessary environment for bacterial survival. This is the most effective means of controlling microbiological fouling. In addition, it eliminates the potential for water entrainment in the fuel oil during DG operation. Water may come from any of several sources, including condensation, ground water, rain water, contaminated fuel oil, and from breakdown of the fuel oil by bacteria. Frequent checking for and removal of accumulated water minimizes fouling and provides data regarding the watertight integrity of the fuel oil system. The Surveillance Frequency is established by Regulatory Guide 1.137 (Ref. 2). This SR is for preventive maintenance. The presence of water does not necessarily represent failure of this SR, provided the accumulated water is removed during performance of the Surveillance.

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REFERENCES

1. UFSAR, Section 8.3.1.1.6.2.8.
2. Regulatory Guide 1.137, January 1978.
3. UFSAR, Section 1.8.
4. UFSAR, Chapter 6.

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