

CLEAR REGULATORY COMMISSION

Docket No. 01-791-01 Official Ex. No. TVA 145
In the matter of TVA
Staff _____ RECEIVED _____
Applicant _____ RECEIVED _____
Intervenor _____ RECEIVED _____
Other _____ WITHDRAWN _____
DATE 9-9-02 Address Burzynski
Clerk R. Davis

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Unit: Waterford 3 SES
Docket No: 50-382
NSSS/AE: CE/EBASCO
Rating: 1104 NMWe
Date Of Event: 26 April 1989
Date Of Commercial Operation: September 1985

EVENT DESCRIPTION

A recent assessment of chemistry activities identified a discrepancy between the method used to sample oil stored in the Emergency Diesel Generator Fuel Oil Storage Tanks (FOST) and the methods specified by Technical Specifications.

EVENT ANALYSIS

Technical Specifications require utilization of methods specified in ASTM-D270-1975. The ASTM specifies using the bottle sampling or tap sampling methods when sampling the subject tanks. Bottle sampling requires taking multiple samples from different levels within the tank. Tap sampling requires drawing samples from taps located in at least 3 different levels on the tank.

Sampling of the FOST has been accomplished in the past by drawing a sample from the recirc header of the fuel oil transfer pump.

The bottle sampling method is not preferred due to the potential for introducing foreign material into the tank interior. The tap method is not possible because no taps are installed on the tanks. Additionally, chemistry supervision feels that the ASTM is written for use by a buyer/seller to standardize the process of sampling and to provide a means of ensuring a representative product during transport and receipt. The Tech Spec is written for use by a storer/user to confirm oil quality has not deteriorated during storage to the point where the generator will not operate.

Although sampling from the recirc line is more likely to detect the presence of water, biological growth and sedimentation, the intent of the ASTM method is to obtain a representative sample. Sampling from the bottom does not meet this intent.

CORRECTIVE ACTION

An engineering evaluation was performed where a sample drawn from the recirc line was compared with a sample drawn by the bottle method collected using a sampling thief analyzed by an independent laboratory. Results of this comparison indicated that the samples were similar.

A tech spec change is being sought to allow samples to be collected from the recirc line of the fuel oil transfer pump.

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Until a determination is made on the tech spec change, samples of the FOST are collected in accordance with the ASTM bottle method using a sampling thief.

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