

5.5 Programs and Manuals

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5.5.12 Explosive Gas and Storage Tank Radioactivity Monitoring Program (continued)

- b. A surveillance program to ensure that the quantity of radioactivity contained in each gas storage tank or connected gas storage tanks and fed into the offgas treatment system is less than the amount that would result in a Deep Dose Equivalent of  $\geq 0.5$  rem to any individual in an unrestricted area, in the event of an uncontrolled release of the tanks' contents; and
- c. A surveillance program to ensure that the quantity of radioactivity contained in all outdoor liquid radwaste tanks that are not surrounded by liners, dikes, or walls, capable of holding the tanks' contents and that do not have tank overflows and surrounding area drains connected to the Liquid Radwaste Treatment System is less than the amount that would result in concentrations exceeding the limits of 10 CFR 20, Appendix B, Table 2, Column 2, at the nearest potable water supply and the nearest surface water supply in an unrestricted area, in the event of an uncontrolled release of the tanks' contents.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Explosive Gas and Storage Tank Radioactivity Monitoring Program surveillance frequencies.

5.5.13 Diesel Fuel Oil Testing Program

A diesel fuel oil testing program to implement required testing of both new fuel oil and stored fuel oil shall be established. The program shall include sampling and testing requirements, and acceptance criteria, all in accordance with applicable ASTM Standards. The purpose of the program is to establish the following:

- a. Acceptability of new fuel oil for use prior to addition to storage tanks by determining that the fuel oil has:
  - 1. an API gravity or an absolute specific gravity within limits,
  - 2. a flash point and kinematic viscosity within limits for ASTM 2D fuel oil, and
  - 3. a clear and bright appearance with proper color or a water and sediment content within limits;
- b. Other properties for ASTM 2D fuel oil are within limits within 31 days following sampling and addition to storage tanks; and

(continued)

5.5 Programs and Manuals

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5.5.13 Diesel Fuel Oil Testing Program (continued)

- c. Total particulate concentration of the fuel oil is  $\leq 10$  mg/l when tested every 31 days.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Diesel Fuel Oil Testing Program test frequencies.

5.5.14 Technical Specifications (TS) Bases Control Program

This program provides a means for processing changes to the Bases of these Technical Specifications.

- a. Changes to the Bases of the TS shall be made under appropriate administrative controls and reviews.
- b. Licensees may make changes to Bases without prior NRC approval provided the changes do not require either of the following:
  - 1. A change in the TS incorporated in the license; or
  - 2. A change to the updated FSAR or Bases that requires NRC approval pursuant to 10 CFR 50.59.
- c. The Bases Control Program shall contain provisions to ensure that the Bases are maintained consistent with the UFSAR.
- d. Proposed changes that meet the criteria of Specification 5.5.14.b.1 or 5.5.14.b.2 above shall be reviewed and approved by the NRC prior to implementation. Changes to the Bases implemented without prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 50.71(e).

5.5.15 Safety Function Determination Program (SFDP)

This program ensures loss of safety function is detected and appropriate actions taken. Upon entry into LCO 3.0.6, an evaluation shall be made to determine if loss of safety function exists. Additionally, other appropriate actions may be taken as a result of the support system inoperability and corresponding exception to entering supported system Condition and Required Actions. This program implements the requirements of LCO 3.0.6. The SFDP shall contain the following:

(continued)

**SURVEILLANCE REQUIREMENTS**

SURVEILLANCE	FREQUENCY
SR 3.8.3.1 Verify the fuel oil storage system contains $\geq 39,500$ gal of fuel for each DG.	31 days
SR 3.8.3.2 Verify fuel oil properties of new and stored fuel oil are tested in accordance with, and maintained within the limits of, the Diesel Fuel Oil Testing Program.	In accordance with the Diesel Fuel Oil Testing Program
SR 3.8.3.3 Verify each DG air start receiver pressure is $\geq 210$ psig.	31 days
SR 3.8.3.4 Check for and remove accumulated water from the fuel oil storage tank.	31 days

**BASES**

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**ACTIONS (continued)**

restored to the required limit. A period of 48 hours is considered sufficient to complete restoration to the required pressure prior to declaring the DG inoperable. This period is acceptable based on the remaining air start capacity, the fact that most DG starts are accomplished on the first attempt, and the low probability of an event during this period.

**E.1**

With a Required Action and associated Completion Time not met, or one or more DG's fuel oil or starting air subsystem not within limits for reasons other than addressed by Conditions A through D, the associated DG may be incapable of performing its intended function and must be immediately declared inoperable.

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**SURVEILLANCE  
REQUIREMENTS**

**SR 3.8.3.1**

This SR provides verification that there is an adequate inventory of fuel oil in the storage tanks to support each DG's operation for 5 days at full load. The 4 day period is sufficient time to place the unit in a safe shutdown condition and to bring in replenishment fuel from an offsite location.

The 31 day Frequency is adequate to ensure that a sufficient supply of fuel oil is available, since low level alarms are provided and unit operators would be aware of any large uses of fuel oil during this period.

**SR 3.8.3.2**

The tests listed below are a means of determining whether new fuel oil is of the appropriate grade and has not been contaminated with substances that would have an immediate, detrimental impact on diesel engine combustion. If results from these tests are within acceptable limits, the fuel oil may be added to the storage tanks without concern for contaminating the entire volume of fuel oil in the storage tanks. These tests are to be conducted prior to adding the new fuel to the storage tank(s). The tests, limits, and applicable ASTM Standards are as follows:

- a. Sample the new fuel oil in accordance with ASTM D4057 (Ref. 7);
- b. Verify in accordance with the tests specified in ASTM D975 that the sample has a kinematic viscosity at 40°C of  $\geq 1.9$  centistokes and  $\leq 4.1$  centistokes, and a flash point of  $\geq 125^\circ\text{F}$ ; and

**BASES**

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**SURVEILLANCE REQUIREMENTS (continued)**

- c. Verify that the new fuel oil has a clear and bright appearance with proper color when tested in accordance with ASTM D4176 (Ref. 7) or a water and sediment content within limits when tested in accordance with ASTM D2709 or D1796 (Ref. 7); and
- d. Verify that the new fuel oil has an absolute specific gravity at 60 / 60°F of  $\geq 0.83$  and  $\leq 0.89$  when tested in accordance with ASTM D1298 or an API gravity at 60°F of  $\geq 27^\circ$  and  $\leq 39^\circ$  when tested in accordance with ASTM D287 (Ref.7).

Failure to meet any of the above limits, except for clear and bright, is cause for rejecting the fuel oil, but does not represent a failure to meet the LCO concern since the fuel oil is not added to the storage tanks. If the fuel oil fails on clear and bright, it may be accepted if it passes water and sediment. The specifications for water and sediment recognize that a small amount of water and sediment is acceptable. Thus, this test may be used after a clear and bright test to provide a more quantitative result.

Within 31 days following the initial new fuel oil sample, the fuel oil is analyzed to establish that the other properties specified in Table 1 of ASTM D975 (Ref. 7) are met for new fuel oil when tested in accordance with ASTM D975 (Ref. 7), except that the analysis for sulfur may be performed in accordance with ASTM D1552 (Ref. 7), D4294 (Ref. 7) or ASTM D2622 (Ref. 7). The 31 day period is acceptable because the fuel oil properties of interest, even if they were not within stated limits, would not have an immediate effect on DG operation. This Surveillance 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, due mostly to oxidation. The presence of particulate does not mean 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 based on ASTM D6217 (Ref. 7). This test method is used for assessing the mass quantity of particulates in middle distillate fuels, which includes 2-D diesel fuel. This method involves a gravimetric determination of total particulate concentration in the fuel oil and has a limit of 10 mg/l. For those designs in which the total stored fuel oil volume is contained in two or more interconnected tanks, 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.

BASES

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**SURVEILLANCE REQUIREMENTS (continued)**

**SR 3.8.3.3**

This Surveillance ensures that, without the aid of the refill compressor, sufficient air start capacity for each DG is available. The system design requirements provide for a minimum of five engine start cycles without recharging. A start cycle is defined as the period of time required to reach 95% speed from standby prelubed condition. The pressure specified in this SR is intended to reflect a conservative value at which a single fast start and five total starts can be accomplished.

The 31 day Frequency takes into account the capacity, capability, redundancy, and diversity of the AC sources and other indications available in the control room, including alarms, to alert the operator to below normal air start pressure.

**SR 3.8.3.4**

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, and 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 Frequencies are 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.

**BASES**

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**REFERENCES**

1. UFSAR, Section 8.3.1.1.7.
2. Regulatory Guide 1.137.
3. ANSI N195-1976, Appendix B.
4. UFSAR, Chapter 6.
5. UFSAR, Chapter 15.
6. 10 CFR 50.36, Technical Specifications, (c)(2)(ii).
7. ASTM Standards: D4057; D975; D1298; D4176; D2709; D4294; D6217; D1552; D2622; D1796; and D287.