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W3F1-2004-0089

Timothy G. Mitchell
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Waterford 3

October 29, 2004

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

SUBJECT: Supplement to Amendment Request NPF-38-249,
Extended Power Uprate
Waterford Steam Electric Station, Unit 3
Docket No. 50-382
License No. NPF-38

REFERENCES: 1. Entergy letter dated November 13, 2003, "License Amendment
Request NPF-38-249, Extended Power Uprate"
2. Entergy letter dated May 7, 2004, "Supplement to Amendment
Request NPF-38-249, Extended Power Uprate"

Dear Sir or Madam:

Pursuant to 10 CFR 50.90, Entergy Operations, Inc. (Entergy) hereby requests approval of the following supplement to the Extended Power Uprate (EPU) License Amendment Request for Waterford Steam Electric Station, Unit 3 (Waterford 3) (Reference 1). The proposed changes will revise the minimum fuel oil storage tank (FOST) volume included in Waterford 3 Technical Specifications (TS) 3.8.1.1 and 3.8.1.2

As committed to in Reference 1 and mentioned in Reference 2, Entergy performed confirmatory testing of the emergency diesel generator (DG) fuel oil consumption rate to validate the consumption rate assumed in the analysis supporting the EPU. During reviews of these test results, Entergy discovered that instrument uncertainties had not been adequately addressed in the supporting analysis and therefore the assumptions used in the EPU were non-conservative. This supplement provides a revised basis for showing that acceptable fuel oil inventories are available in support of the EPU. Attachment 1 includes a detailed description of the resulting change to the Waterford 3 TSs.

The proposed change has been evaluated in accordance with 10 CFR 50.91(a)(1) using criteria in 10 CFR 50.92(c) and it has been determined that this change involves no significant hazards consideration. The basis for these determinations is included in the attached submittal.

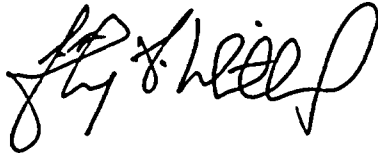
The proposed change includes new commitments.

A001

If you have any questions or require additional information, please contact Bryan Miller at 504-739-6692.

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 29, 2004.

Sincerely,

A handwritten signature in black ink, appearing to read "Bryan Miller", written in a cursive style.

TGM/DM/dbm

Attachments:

1. Analysis of Proposed Technical Specification Change
2. Proposed Technical Specification Changes (mark-up)
3. List of Regulatory Commitments

cc: Dr. Bruce S. Mallett
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Attachment 1 To

W3F1-2004-0089

Analysis of Proposed Technical Specification Change

1.0 DESCRIPTION

Pursuant to 10 CFR 50.90, Entergy Operations, Inc. (Entergy) hereby requests approval of the following supplement to the Extended Power Uprate (EPU) License Amendment Request for Waterford Steam Electric Station, Unit 3 (Waterford 3). The proposed changes will revise the minimum volume in the emergency Diesel Generator (DG) fuel oil storage tanks (FOST) required by Waterford 3 Technical Specification (TS) 3.8.1.1 and 3.8.1.2.

As committed to in Reference 1, Entergy performed confirmatory testing of the emergency DG fuel oil consumption rate to validate the consumption rate assumed in the analysis supporting the EPU. During reviews of these test results, it was discovered that instrument uncertainties had not been adequately addressed in the supporting analysis and therefore resulted in a non-conservative assumption for the EPU. The proposed change to the TS assures that sufficient fuel oil inventories are available to support the EPU consistent with the current licensing basis.

2.0 PROPOSED CHANGE

The FOST volume required by current TS 3.8.1.1 b.2 a. and b. and TS 3.8.1.2 b.2 a. and b. is:

- a. A minimum volume of 38,760 gallons of fuel, or
- b. A fuel oil volume less than 38,760 gallons and greater than 38,000 gallons of fuel for a period not to exceed 5 days (provided replacement fuel oil is onsite within the first 48 hours), and

The proposed change will modify the above to state:

- a. A minimum volume of 39,300 gallons of fuel, or
- b. A fuel oil volume less than 39,300 gallons and greater than 37,000 gallons of fuel for a period not to exceed 5 days (provided replacement fuel oil is onsite within the first 48 hours), and

The current TS volume of 38,760 gallons includes an unusable volume of 760 gallons and was based on a time dependent loading calculation. Therefore, the TS volume of 38,760 gallons (part b.2.a) correlates to a usable volume of 38,000 gallons.

The current TS volume of 38,000 gallons (part b.2.b) was based on a 5-day full load calculational method. Unusable volume of 760 gallons and other conservatisms were included in the 38,000 gallons. The analytical volume using the 5-day full load calculational method is 37,000 gallons. The full load calculation method results in a conservative estimate of the fuel needed in comparison to the actual time dependent loading requirements.

The proposed TS values (39,300 gallons and 37,000 gallons) are exclusive of instrument uncertainty, unusable tank volumes, and testing margin. These items will be controlled and accounted for in site procedures and calculations.

The following table provides a comparison of the current TS to the proposed TS in relationship to the actual TS values and unusable volumes.

	7-Day Time Dependent Loading Calc. Current TS (Gallons)	7-Day Time Dependent Loading Calc. Proposed TS (Gallons)	5- Day Full Load Calc. Current TS (Gallons)	5-Day Full Load Proposed TS (Gallons)
TS Value	38,760	39,300	38,000	37,000
Unusable Volume	760	N/A	760	N/A
TS Usable volume	38,000	39,300	37,240	37,000

A minor editorial change is proposed to TS 3.8.1.2 b.1 so that the wording in this limiting condition for operation (LCO) is consistent with the wording in the LCO for TS 3.8.1.1 b.1. The change will add the word "and" at the end of the phrase. This change is editorial and will not be discussed further.

To improve the fuel oil storage capability and provide a larger operational band, Waterford 3 commits to a design change to the onsite fuel oil storage system that will accommodate fuel oil storage volume equivalent to the fuel oil needed to run each DG for seven days based on calculational methods described in American National Standards Institute (ANSI) Standard N195-1976, *Fuel Oil Systems for Standby Diesel Generators*. The modification will be completed by December 31, 2006. Supporting TS changes will be submitted as needed to support the changes.

3.0 BACKGROUND

There are two DGs. Each diesel has a continuous rating of 4400 kW. The continuous rating of each DG is based on the total of all loads, Engineered Safety Feature (ESF) and non-ESF, that will be powered by the system under design basis accident (DBA) or safe shutdown conditions. The calculated load of each motor or heater is based on design calculations under expected flow and pressure conditions, or manufacturers' recommendations.

Fuel Oil Storage Tanks

There are two FOSTs, each with a maximum usable capacity of 40,747 gallons at overflow¹. The tanks are carbon steel and meet the requirements of ASME Section III, Class 3 (1974 edition, up to and including Summer 1974 addenda) (see Final Safety Analysis Report (FSAR) Table 9.5-1). In addition, the tanks are protected against the range of design basis natural phenomena, thus minimizing the probability of a fuel oil spill (FSAR Section 9.5.1.1.3). The tanks are located in two separate concrete vaults which are part of the Reactor Auxiliary Building (RAB) at the Wing Area Elevation - 35 feet mean sea level (MSL). The tanks are located on opposite sides of the RAB.

¹ It should be noted that the maximum usable volume in a single FOST that was referenced in Waterford 3's correspondence associated with the approval of Amendment 157 was specified as 40,959 gallons. The revised usable volume of 40,747 gallons accounts for the structural components in the tank and the unusable volume of eleven inches from the bottom of the tank to above the suction tap for the transfer pump vice ten inches which was previously assumed.

The storage tank is normally filled by trucks. An emergency fill connection is provided for use during flooding of the area and the tanks can be filled from a barge.

Fuel Oil Transfer Pumps

There are two fuel oil transfer pumps. Each is a horizontal-centrifugal pump with an electric motor and a capacity of 50 gallons per minute (gpm). The pumps meet the requirements of ASME Section III, Class 3 (1971 edition up and including winter 1972 addenda). Each pump is located in the room with its associated FOST.

Fuel Oil Feed Tank

There is a separate fuel oil feed tank for each DG. These vertical, cylindrical, carbon steel tanks are designed for 15 psig and 125°F. The capacity of a single tank is sufficient to support approximately two hours of operation at full load.

The DG fuel oil storage and transfer system is described in more detail in the Waterford 3 FSAR section 9.5.4.

Previous Technical Specification Amendments

Amendment 92 (March 16, 1994), in part, revised the FOST volume that allowed for a period of time not to exceed 5 days, provided replacement fuel oil is onsite within the first 48 hours. The Amendment approved the minimum required volume of 38,000 gallons, which includes 760 gallons of unusable fuel oil. The resulting 37,240 gallons was based on a full-load calculational method (i.e., the DG runs continuously at full rated capacity, 4400 kW) and assured 5-days of DG runtime. The Amendment was approved noting that the time period for restoration and having additional fuel oil onsite preserve the 7-day time-dependent supply in accordance with the recommendations of Regulatory Guide (RG) 1.137 (October 1979), *Fuel-Oil Systems for Standby Diesel Generators* and provides some degree of flexibility to replenish the supply before declaring a DG inoperable.

The current licensing basis was approved by the NRC with the issuance of Amendment No. 157 (February 15, 2000). The amendment consisted of changes to the FSAR to explicitly list the Waterford 3 deviations from ANSI N195-1976.

4.0 TECHNICAL ANALYSIS

Regulatory Guide (RG) 1.137, Revision 1, *Fuel-Oil Systems for Standby Diesel Generators*, endorses ANSI N195-1976. The ANSI standard includes two methods of calculating the fuel oil storage capacity requirements. One method is based upon the DG operating at the minimum required capacity for the plant condition which is most limiting for the calculation of such capacity. The time dependence of DG loads is taken into account to reflect increases or decreases of DG loads during the event. This method requires the addition of a minimum margin of 10%, as well as the inclusion of an explicit allowance for fuel consumption required by periodic testing and the fuel required for operation of the engine at the minimum loads specified by the engine manufacturer. This calculational method is currently used to define the volume specified in TS 3.8.1.1 b.2.a and 3.8.1.2 b.2.a and is based on exceptions approved by the issuance of Amendment No. 157.

The amendment consisted of changes to the FSAR to explicitly list the Waterford 3 deviations from ANSI Standard N195-1976. Based on NRC approval, the following exceptions to ANSI N195-1976 were adopted and included in FSAR Section 9.5.4, *Diesel Generator Fuel Oil Storage and Transfer Systems*:

- a) The Waterford 3 DG FOSTs contain a 7 day fuel oil supply using the load dependent method for calculating stored fuel oil. The Waterford 3 DG FOSTs do not contain an explicit allowance for margin.
- b) The Waterford 3 DG FOSTs do not contain an explicit allowance for fuel consumption required for periodic testing.
- c) The Waterford 3 DG fuel oil feed tank suction is located on the bottom of the feed tank.
- d) The Waterford 3 DG fuel oil feed tank overflow discharges to the sump pump system.
- e) The Waterford 3 DG fuel oil transfer system does not have a pressure indicator located at the discharge of the fuel oil transfer pumps.

As stated earlier and as committed to in Reference 1, Entergy performed confirmatory testing of the emergency DG fuel oil consumption rate to validate the consumption rate assumed in the analysis supporting the EPU. During reviews of these test results, it was discovered that instrument uncertainties had not been adequately addressed in the supporting analysis and therefore resulted in a non-conservative assumption for the EPU. The results of the revised calculations, using the vendor recommended consumption rate, which include the load increases associated with EPU, are as follows:

	7-day time dependent in full compliance with the ANSI (in gallons, usable volume)	7-day time dependent with exceptions allowed by Amendment 157 (in gallons, usable volume)	Current TS 3.8.1.1 b.2.a and 3.8.1.2 b.2.a (in gallons) (includes 760 gallons unusable volume)
DG "A"	44, 396	39,010	38,760
DG "B"	44, 425	39,037	38,760

The fixed size of a single FOST (maximum usable capacity of 40,747 gallons at overflow) will accommodate the needed volume to support 7 days of continued operation using the time dependent calculational method and taking the current exceptions allowed by Amendment 157. The tank is sized to accommodate the additional fuel oil needed to perform the monthly test, which is approximately 1350 gallons (i.e., "A" FOST would have to contain 40,360 usable gallons and "B" FOST would have to contain 40,387 usable gallons), however, this volume will not allow for instrument uncertainty. The proposed change to TS 3.8.1.1 b.2.a and TS 3.8.1.2 b.2.a will continue to apply the exceptions to the ANSI standard as approved by the NRC in Amendment No. 157. The proposed volume is 39,300 gallons (usable volume, which includes at least 263 gallons of conservatism).

In order to accommodate periodic DG testing, approximately 1350 gallons of fuel is consumed. If the FOST were maintained at the minimum volume (39,300 gallons, usable volume), then following the periodic test the minimum fuel oil volume would be approximately

37,950 gallons. As a result the lower volume listed in the TS becomes applicable, which allows 5 days to restore the fuel oil volume assuming that additional fuel oil is on site within 48 hours. Current TSs 3.8.1.1 b.2.b and 3.8.1.2 b.2.b were approved by the NRC with TS Amendment 92 to allow the flexibility of performing the periodic test without declaring the DG inoperable. The current value (38,000 gallons) in TSs 3.8.1.1 b.2.b and 3.8.1.2 b.2.b, which includes an unusable volume of 760 gallons and additional conservatism of 240 gallons, was based on the DG continuously running at full load (i.e., 4400 kW) for 5-days.

The proposed change to TS 3.8.1.1 b.2.b and TS 3.8.1.2 b.2.b is consistent with TS Amendment 92; however, it modifies the five day full load value to 37,000 gallons (usable volume) by removing the unusable volume and conservatism that are included in the current TS value. The new value is based on the following:

$$C' = (5.129 \text{ gpm}) (5 \text{ days}) (1440 \text{ min/day}) = 36,929 \text{ gallons}$$

The current fuel oil consumption rate (5.129 gpm) bounds the load increases associated with the EPU. The full load calculational method assumes the DG is continuously operating at 4400 kW, which conservatively bounds the kW loading that is expected. It should be noted that the minimum volume of fuel oil in the feed tank (339 gallons) is not included in these values, and allows for a minimum of one additional hour of runtime at full load.

In summary, the proposed change is consistent with the current licensing bases and the philosophy of current TS. The proposed upper TS limit of 39,300 gallons (usable volume) is based on a 7-day time dependent loading calculation and continues to apply the currently approved exceptions to ANSI N195-1976. The lower TS limit of 37,000 gallons (usable volume) is based on a 5-day full load calculational method which is consistent with the basis for the current TS value. Neither of these volumes includes instrument uncertainty, unusable tank volume, nor test volumes. Each of these items will be controlled in site procedures and calculations.

5.0 REGULATORY ANALYSIS

5.1 Applicable Regulatory Requirements/Criteria

The proposed changes have been evaluated to determine whether applicable regulations and requirements continue to be met. In accordance with the U.S. Nuclear Regulatory Commission (NRC) Standard Review Plan (SRP) for the Emergency Diesel Engine Fuel Oil Storage and Transfer System (SRP Section 9.5.4), the system should be designed to be in conformance with the requirements of General Design Criteria (GDC) 2, 4, 5, and 17. This change does not affect the Waterford 3 ability to continue to meet the requirements set forth in GDC 2, 4, or 17 (GDC 5 addresses sharing structures, systems, and components between nuclear units and therefore does not apply to Waterford 3).

GDC 2 – Design Bases for Protection against Natural Phenomena

The Waterford 3 emergency diesel generator (DG) system, which includes the fuel oil storage and transfer system, is designed in accordance with the requirements of GDC 2. Waterford 3 Final Safety Analysis Report (FSAR) Section 3.1.2 contains the information related to compliance with GDC 2.

GDC 4 – Environmental and dynamic effects design bases

Waterford 3 is designed in accordance with the requirements of GDC 4. Waterford 3 FSAR Section 3.1.4 provides information related to compliance with GDC 4.

GDC 17 – Electrical Power Systems

Waterford 3 is in compliance with GDC 17 as reflected in FSAR Section 3.1.13.

Entergy has determined that the proposed changes do not require any exemptions or relief from regulatory requirements, other than those currently approved, and do not affect conformance with any GDC differently than described in the FSAR.

5.2 No Significant Hazards Consideration

Entergy Operations, Inc. (Entergy) is proposing that the Waterford Steam Electric Station, Unit 3 (Waterford 3) operating license be amended to revise the minimum volume in the emergency diesel generator (DG) fuel oil storage tanks (FOSTs) required by Technical Specification (TS) 3.8.1.1 and 3.8.1.2. The current TSs include two minimum values for the fuel oil contained in the FOST. The proposed change utilizes the calculational methods associated with the current TS and results in fuel oil volumes of 39,300 gallons (usable volume) based on the seven day time dependent calculation and 37,000 gallons (usable volume) based on the five day full load calculation. Neither of the proposed volumes includes instrument uncertainty, unusable tank volume nor test volumes. The volumes are being modified to support the proposed extended power uprate (EPU).

Entergy 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, which accounts for the fuel oil consumption related to the EPU, will revise the minimum TS volumes associated with the DG FOST. The change continues to assure that each DG can provide on-site power in the event of an accident and thereby assist in the mitigation of the accident.

The proposed change to the five day full load fuel oil volume results in a usable volume 37,000 gallons of fuel oil. The proposed change removes the unusable volume (760 gallons) and other conservatism (240 gallons) that were included in the current TS. The fuel oil volume continues to allow for a runtime of 5 days at full load with the removal of this conservatism.

These changes will not affect the capability of the AC Sources to power the systems required to safely shutdown the plant. The proposed changes are not accident initiators nor do they adversely affect accident initiators or precursors. These changes

do not affect the mitigation of any accident nor do they adversely affect structures, systems, or components that are utilized for the mitigation of any analyzed events.

The proposed changes will have no effect on the radiological consequences of any accident. The proposed changes do not affect the source term, containment isolation, or radiological release assumptions used in the evaluation of radiological consequences.

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.

Fuel oil is not an accident initiator. Therefore, the possibility of a new or different kind of accident will not be created in relationship to the proposed changes to the TS. No modifications are proposed to the existing fuel oil storage system that would alter the design function or the ability of the DG to perform its safety function.

Therefore, the proposed change will 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 to the 7-day time dependent fuel oil volume results in an increase in volume to accommodate fuel oil consumption needed to support the EPU.

The reduced volume associated with the 5-day full load volume is equivalent to less than one hour of runtime and does not result in a significant reduction in a margin of safety because the calculational method results in a conservative estimate of the amount of fuel that would be needed during a design bases accident.

The proposed change does not result in a change of the design bases for the DG or its support systems. The system will continue to provide a reliable source of power for safe shutdown of the reactor, assuming the single failure of one of the DGs. Independence, redundancy, and testability are maintained such that the required safety function can be performed by either DG train.

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

Based on the above, Entergy concludes that the proposed amendment presents no 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.

5.3 Environmental Considerations

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. Entergy letter dated November 13, 2003, "License Amendment Request NPF-38-249, Extended Power Uprate"

Attachment 2

W3F1-2004-0089

Proposed Technical Specification Changes (mark-up)

3/4.8 ELECTRICAL POWER SYSTEMS

3/4.8.1 A.C. SOURCES

OPERATING

LIMITING CONDITION FOR OPERATION

3.8.1.1 As a minimum, the following A.C. electrical power sources shall be OPERABLE:

- a. Two physically independent circuits between the offsite transmission network and the onsite Class 1E distribution system, and
- b. Two separate and independent diesel generators, each with:
 1. Diesel oil feed tanks containing a minimum volume of 339 gallons of fuel, and
 2. A separate diesel generator fuel oil storage tank containing:
 - a. A minimum volume of ~~35,760~~ gallons of fuel, or 39,300
 - b. A fuel oil volume less than ~~38,760~~ gallons and greater than 37,000 ~~38,000~~ gallons of fuel for a period not to exceed 5 days (provided replacement fuel oil is onsite within the first 48 hours), and
 3. A separate fuel transfer pump.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

- a. With one offsite circuit of 3.8.1.1a inoperable, demonstrate the OPERABILITY of the remaining offsite A.C. circuit by performing Surveillance Requirement 4.8.1.1.1a within 1 hour and at least once per 8 hours thereafter. Restore the offsite A.C. circuit to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- b. With one diesel generator of 3.8.1.1b inoperable:
 - (1) Demonstrate the OPERABILITY of the remaining A.C. circuits by performing Surveillance Requirements 4.8.1.1.1a (separately for each offsite A.C. circuit) within 1 hour and at least once per 8 hours thereafter. If the diesel generator became inoperable due to any cause other than an inoperable support system, an independently testable component, or preplanned maintenance or testing, demonstrate the OPERABILITY of the remaining OPERABLE diesel generator (unless it has been successfully tested in the last 24 hours) by performing Surveillance Requirement 4.8.1.1.2a.4 within 8 hours unless the absence of any potential common mode failure for the remaining diesel generator is demonstrated.
 - (2) Restore the diesel generator to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours, unless the following condition exists:

ELECTRICAL POWER SYSTEMS

A.C. SOURCES

SHUTDOWN

LIMITING CONDITION FOR OPERATION

3.8.1.2 As a minimum, the following A.C. electrical power sources shall be OPERABLE:

- a. One circuit between the offsite transmission network and the onsite Class 1E distribution system, and
- b. One diesel generator with:
 1. A diesel oil feed tank containing a minimum volume of 339 gallons of fuel, and
 2. The diesel fuel oil storage tanks containing:
 - a. A minimum volume of ~~36,760~~ gallons of fuel, or 39,300
 - b. A fuel oil volume less than ~~36,760~~ gallons and greater than ~~38,000~~ 37,000 gallons of fuel for a period not to exceed 5 days (provided replacement fuel oil is onsite within the first 48 hours), and
 3. A fuel transfer pump.

APPLICABILITY: MODES 5 and 6.

ACTION:

With less than the above minimum required A.C. electrical power sources OPERABLE, immediately suspend all operations involving CORE ALTERATIONS, operations involving positive reactivity additions that could result in loss of required SHUTDOWN MARGIN or boron concentration, movement of irradiated fuel, or crane operation with loads over the fuel storage pool. In addition, when in MODE 5 with the reactor coolant loops not filled, or in MODE 6 with the water level less than 23 feet above the top of the fuel seated in the reactor pressure vessel, immediately initiate corrective action to restore the required sources to OPERABLE status.

SURVEILLANCE REQUIREMENTS

4.8.1.2 The above required A.C. electrical power sources shall be demonstrated OPERABLE by the performance of each of the Surveillance Requirements of 4.8.1.1.1 and 4.8.1.1.2 (except for Surveillance Requirement 4.8.1.1.2a.5.)

Attachment 3

W3F1-2004-0089

List of Regulatory Commitments

List of Regulatory Commitments

The following table identifies those actions committed to by Entergy in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

COMMITMENT	TYPE (Check one)		SCHEDULED COMPLETION DATE (If Required)
	ONE- TIME ACTION	CONTINUING COMPLIANCE	
To improve the fuel oil storage capability and provide a larger operational band, Waterford 3 commits to a design change to the onsite fuel oil storage system that will accommodate fuel oil storage volume equivalent to the fuel oil needed to run each DG for seven days based on calculational methods described in American National Standards Institute (ANSI) Standard N195-1976, <i>Fuel Oil Systems for Standby Diesel Generators</i> . The modification will be completed by December 31, 2006. Supporting TS changes will be submitted as needed to support the changes.	x		Dec. 31, 2006
The proposed Technical Specification (TS) values (39,300 and 37,000 gallons) are exclusive of instrument uncertainty, unusable tank volumes, and testing margin. These items will be controlled and accounted for in site procedures and calculations.		x	