

From: D. Ashley
To: George Beck
Date: 03/14/2006 1:44:35 PM
Subject: Oyster Creek - Draft RAI - AMP B.1.39

This is the draft question:

The Lubricating Oil Analysis Program - FRCT (OCGS AMP B.1.39) takes exception to the GALL Report requirement to monitor flash point. .

The basis provided for exceptions to GALL, Element 3 (Parameters Monitored or Inspected) is not valid since the Flash Point of an industrial lubricant is an important test to determine if light-end hydrocarbons are getting into the oil through seal leaks or other means. It is an effective way to monitor seal performance in light end hydro-carbon compressors. Low Flash Points pose a safety hazard in the event of component failure that can generate heat above the flash point of the oil, such as bearing failure.

Please justify the reason for not monitoring the flash point of lubricating oil at the FRCT and why this exception is acceptable to manage the effects of aging for which it is credited.

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regards,

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