December 13, 2007

Technical Specification Task Force (TSTF)
11921 Rockville Pike, Suite 100
Rockville, MD 20852

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING TSTF-501, REVISION 0, "RELOCATE STORED FUEL OIL AND LUBE OIL VALUES TO LICENSEE CONTROL"

Dear Members of the TSTF,

By letter dated July 20, 2007, the Boiling Water Reactors Owners Group (BWROG) and the Pressurized Water Reactors Owners Group (PWROG) submitted TSTF-501, Revision 0, "Relocate Stored Fuel Oil and Lube Oil Volume Values to Licensee Control." The Nuclear Regulatory Commission (NRC) staff has been reviewing the submittal and has determined that additional information is needed to complete its review. The specific questions are found in the enclosed Request for Additional Information (RAI). A response to this RAI is requested to be provided within 90 days.

Compared with the original Milestone Schedule, there were some delays in issuing the RAIs. As a result, the Milestone Schedule for TSTF-501, Revision 0, has been revised, and is enclosed for review. Please contact me with any questions or concerns.

Sincerely,

/RA/

Timothy Kobetz, Chief
Technical Specifications Branch
Division of Inspections & Regional Support
Office of Nuclear Reactor Regulation

Enclosures:
1. RAI
2. Revised Schedule

cc: See next page

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REQUEST FOR ADDITIONAL INFORMATION (RAI)

REGARDING TSTF-501, REVISION 0, "RELOCATE STORED FUEL OIL AND LUBE OIL VALUES TO LICENSEE CONTROL"

1. Discuss what effects a mixture of ULSD fuel and LSD fuel in the storage tank will have on the fuel consumption rate, in order to ensure that a [7] day supply is maintained, as required in the TS per Criterion 3 of 10 CFR 50.36(d)(2)(ii). (The discussion should include the fuel consumption rate calculations and the [7] day volume amount calculations, as well as the generic applicability of the calculations.)

   Background: Criterion 3 of 10 CFR 50.36(d)(2)(ii) states a TS must be established for "a structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier." Since diesel fuel oil, lube oil, and the air start subsystem support the operation of the standby AC power sources, they are required per Criterion 3 of 10 CFR 50.36(d)(2)(ii). The TSTF proposes to modify Condition A and SR 3.8.3.1 in LCO 3.8.3, "Diesel Fuel Oil, Lube Oil, and Starting Air," in NUREG 1430 – 1434, to restate the fuel oil storage tank requirements in terms of a [7] day supply, as opposed to the current quantitative gallon requirement. The formula for calculating the required fuel oil storage, and therefore the [7] day supply, which is found in Section 5.4 of American National Standard N 195-1976, requires that the fuel consumption rate for the emergency diesel generator be known. It is unclear what effects a mixture of ULSD fuel and LSD fuel in the storage tank will have on the fuel consumption rate. It is also unclear if the fuel consumption rate calculations and the [7] day volume calculations are generic in nature or if the calculations require plant specific information.

2. Discuss how storage tank sampling will be performed (including acceptance criteria), in order to verify that any assumptions used in the fuel consumption rate calculation are valid, thereby ensuring that a [7] day supply is maintained, as required in the TS per Criterion 3 of 10 CFR 50.36(d)(2)(ii). (The discussion should include how appropriate acceptance criteria will be developed considering transition from full LSD supply to full ULSD supply, including mixtures of the two, and steps to ensure proper mixing/homogeneity in the tank.)

   Background: Criterion 3 of 10 CFR 50.36(d)(2)(ii) states a TS must be established for "a structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier." Since diesel fuel oil, lube oil, and the air start subsystem support the operation of the standby AC power sources, they are required per Criterion 3 of 10 CFR 50.36(d)(2)(ii). The TSTF proposes to modify Condition A and SR 3.8.3.1 in LCO 3.8.3, "Diesel Fuel Oil, Lube Oil, and Starting Air," in NUREG 1430 – 1434, to restate the fuel oil storage tank requirements in terms of a [7] day supply, as opposed to the current quantitative gallon requirement. The formula for calculating the required fuel oil storage, and therefore the [7] day supply, which is found in Section 5.4 of American National Standard N195-1976, requires that the fuel consumption rate for the emergency diesel generator be known.

Given that it is unclear what effects a mixture of ULSD fuel and LSD fuel in the storage tank will have on the fuel consumption rate, it is also unclear how storage tank sampling will be performed in order to verify that any assumptions used in the fuel consumption rate calculation are valid.

3. Discuss the effects of deleting the reference to Appendix B in ANSI N195-1976 on the current acceptable basis for maintaining the quality of fuel oil, as required in the TS per Criterion 3 of 10 CFR 50.36(d)(2)(ii).

   Background: Criterion 3 of 10 CFR 50.36(d)(2)(ii) states a TS must be established for "a structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier." Since diesel fuel oil, lube oil, and the air start subsystem support the operation of the standby AC power sources, they are required per Criterion 3 of 10 CFR 50.36(d)(2)(ii). The TSTF proposes to modify Reference 3 in the Bases for LCO 3.8.3, "Diesel Fuel Oil, Lube Oil, and Starting Air," in NUREG 1430 – 1434, by deleting reference to Appendix B in ANSI N195-1976. As a result only ANSI N195-1976 will be referenced. As discussed in Regulatory Guide (RG) 1.137, "Fuel-Oil Systems for Standby Diesel Generators," Appendix B of ANSI N195-1976 currently serves as an acceptable basis for a program to maintain the quality of fuel oil. Both ANSI N195-1976 and RG 1.137 state that Appendix B is not a mandatory part of ANSI N195-1976. It is unclear why the reference to Appendix B is deleted, and how this will affect the current acceptable basis for maintaining the quality of fuel oil.

REVISED SCHEDULE FOR

TSTF-501, REVISION 0, "RELOCATE STORED FUEL OIL AND LUBE OIL VALUES TO LICENSEE CONTROL"

Milestone	Previous Milestone Date	New Milestone Date
RAI Issued	11/20/2007	12/20/2007
RAI Response	2/20/2008	3/20/2008
Fed Reg NFC	5/11/2008	6/11/2008
Fed Reg NOA	7/18/2008	8/18/2008
Close TAC	7/20/2008	8/20/2008