

May 5, 2008

Technical Specification Task Force
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 staff has determined that additional information is needed to complete the review. Enclosure 1 is the staff's Request for Additional Information (RAI). A response to this RAI is requested to be provided within 90 days.

Compared with the Milestone Schedule published in the NRC RAI letter published December 13, 2007, the schedule for TSTF-501, Revision 0, has been revised to take into account the additional time needed to disposition the new RAI. The revised schedule is enclosed for review. Receiving a RAI response prior to 90 days can result in accelerating the revised schedule. Please contact me with any questions or concerns.

Sincerely,

/RA/

Robert B. Elliott, Chief
Technical Specifications Branch
Division of Inspections & Regional Support
Office of Nuclear Reactor Regulation

Enclosures:

1. RAI
2. Revised Schedule

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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 how a "Diesel Fuel Oil, Lube Oil, and Starting Air" TS that allows less than a 7 day fuel-oil storage requirement without requiring operator actions is in accordance with GDC 17 of Appendix A to 10 CFR 50.

Background: General Design Criterion (GDC) 17, "Electric Power Systems," of Appendix A, "General Design Criteria for Nuclear Power Plants," to 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities," requires that an onsite electric power system and an offsite electric power system be provided to permit functioning of structures, systems, and components important to safety. In addition, Criterion 17 contains requirements concerning system capacity, capability, independence, redundancy, availability, testability, and reliability. NRC Regulatory Guide (RG) 1.137 describes methods acceptable to the NRC staff for complying with GDC 17 of Appendix A to 10 CFR 50 regarding fuel oil systems for standby diesel generators. Regulatory position 1.c of RG 1.137 states:

Section 5.4, "Calculation of Fuel Oil Storage Requirements," of *ANSI N195-1976* sets forth two methods for the calculation of fuel-oil storage requirements. These two methods are (1) calculations based on the assumption that the diesel generator operates continuously for 7 days at its rated capacity, and (2) calculations based on the time-dependent loads of the diesel generator. For the time-dependent load method, the minimum required capacity should include the capacity to power the engineered safety features.

The two calculation methods found in Section 5.4 of ANSI N195-1976 are based on meeting the requirements as found in Section 5.2 and 5.3 of ANSI N195-1976. Section 5.2 and 5.3 of ANSI N195-1976 state:

The on-site oil storage shall be sufficient to operate the minimum number of diesel-generators following the limiting design basis accident for either seven (7) days, or the time required to replenish the oil from sources outside the plant site following any limiting design-basis event without interrupting the operation of the diesel, whichever is longer.

The use of the bracketed term, [7] days, in TSTF-501 for the "Diesel Fuel Oil, Lube Oil, and Starting Air" TS, would change the STS NUREGs to reflect that the fuel-oil storage requirement is a plant specific value. As a result, licensees may attempt to adopt TSTF-501, without technical branch review under the CLIP process, even if they have less than a 7 day fuel-oil storage requirement. It is the NRC staff's position, as documented in RG 1.137, that 7 days is the minimum requirement for fuel-oil storage requirements in order to meet GDC 17 of Appendix A to 10 CFR 50. As such, the staff believes that the fuel-oil storage requirements in "Diesel Fuel Oil, Lube Oil, and Starting Air" TS, should be an un-bracketed term of 7 days.

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	12/20/2007	5/2/2008
RAI Response	3/20/2008	8/1/2008
Fed Reg NFC	6/11/2008	10/1/2008
Fed Reg NOA	8/18/2008	12/1/2008
Close TAC	8/20/2008	12/3/2008