REQUEST FOR ADDITIONAL INFORMATION

CRYSTAL RIVER NUCLEAR PLANT, UNIT 3

AMENDMENT REQUEST REGARDING THE ADOPTION OF TSTF-374,
"REVISION TO TS 5.5.13 AND ASSOCIATED BASES FOR DIESEL FUEL OIL," REVISION 0

DOCKET NO. 50-302

Explain why the proposed license amendment requires deviation and variance from Technical Specification Task Force (TSTF) TSTF-374, "Revision to TS 5.5.13 and Associated Bases for Diesel Fuel Oil, Revision 0," as published for availability in the *Federal Register* on April 21, 2006 as part of the Consolidated Line Item Improvement Process (CLIIP).

As background, the U.S. Nuclear Regulatory Commission (NRC) approved TSTF-374 allows relocation of American Society for Testing and Materials (ASTM) references from the Technical Specifications (TS) to licensee-controlled documents, and adds alternate criteria to the "clear and bright" criteria acceptance test for new fuel. NRC approval of TSTF-374 was based, in part, on justification of the change as identified in TSTF-374 which states:

> Implementing the required testing specified in the Diesel Fuel Oil Program and the proposed TS and Bases changes will continue to ensure the use of current applicable ASTM Standards to evaluate the quality of both new fuel oil and stored fuel oil designated for use in the DGs [Diesel Generators]. The TS will continue to assure that the applicable ASTM Standards are used.
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> The proposed TS and Bases changes will continue to ensure the quality of both new fuel oil and stored fuel oil designated for use in the DGs. Therefore, the OPERABILITY of the DGs is unaffected.

The Crystal River Nuclear Plant, Unit 3 (CR-3) License Amendment Request (LAR) states that the changes are consistent with the NRC approved TSTF-374, Revision 0. Additionally, the LAR states: "Florida Power Corporation (FPC) has reviewed TSTF-374 and the NRC model safety evaluation (SE) as part of the CLIIP. FPC has concluded that the information in TSTF-374, as well as the SE prepared by the NRC, are applicable to CR-3 and justify this amendment for incorporation of the changes to the CR-3 Improved Technical Specifications."

Please provide a detailed explanation for the following and all other deviations and variations from TSTF-374:

1. Reference to ASTM D975, concerning Specific Gravity API [American Petroleum Institute], remains in the proposed CR-3 TS 5.6.2.14.a. The TSTF-374 justification states: "the Bases for SR 3.8.3.3 are clarified to indicate that the API gravity is tested in accordance with ASTM D1298 since ASTM D975 does not specifically address API gravity testing." Standard Technical Specifications (STS) Section 5.5.13, "Diesel Fuel Oil Testing Program," which incorporates TSTF-374 changes, does not reference ASTM D975; it states that "the program shall include sampling and testing requirements, and acceptance criteria, all in accordance with applicable ASTM Standards."

2. CR-3 TS 5.6.2.14.b and c maintain a 92 day testing frequency. However, the STS and TSTF-374 testing frequency is 31 days.

3. The CR-3 Bases currently contain the reference to a “clear and bright appearance with proper color” as identified in the submittal. However, this criteria is not included in CR-3 TS 5.6.2.14 as it appears in TSTF-374.

4. Per the LAR, a CR-3 Bases reference to ASTM D1552 and ASTM D2622 was not included because sulfur content is controlled by the CR-3 station procurement “specifications.” This is contrary to TSTF-374 and the STS Bases, which identify ASTM D1552, ASTM D2622, and ASTM D4294 as acceptable ASTM standards for diesel fuel oil sulfur testing.

5. The CR-3 TS Bases maintain a reference to ASTM D2276. TSTF-374 revises the STS Bases to change the ASTM reference from ASTM D2276 to ASTM D5452 because ASTM D5452 supersedes ASTM D2276.

6. CR-3 Bases 3.8.3.3.c states API specific gravity testing is to be verified “in accordance with the test specified in ASTM D287-92(2000).” This standard is not referenced in TSTF-374 or in the STS Bases. This is a deviation from the TSTF-374 use of ASTM D1298 [ ] for API specific gravity testing.