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 MURLEY, T.E. Office of Nuclear Reactor Regulation, Director (Post 870411) R

SUBJECT: Advises that fuel oil testing program will be revised to provide option of filtering fuel oil in lieu of replacement if results of accelerated stability test exceed limits in ANSI N195-1976 (2 mg insolubles per 100 ml). I
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Iowa Electric Light and Power Company

January 24, 1992
NG-92-0290

Dr. Thomas E. Murley
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, DC 20555

Subject: Duane Arnold Energy Center
Docket No: 50-331
Op. License No: DPR-49
Diesel Fuel Oil Testing Program
Reference: 1) Letter, L. D. Root to Darrell G. Eisenhut,
"Quality Assurance Requirements Regarding
Diesel Generator Fuel Oil", LDR-80-111,
April 21, 1980.
2) Letter, W. C. Rothert to Dr. Murley,
"Quality Assurance Requirements Regarding
Diesel Generator Fuel Oil", NG-88-2051,
September 13, 1988.
File: A-106, R-43

Dear Dr. Murley:

In References 1 and 2, we provided the Staff with a description of our program to ensure the quality of fuel oil for standby diesel generators. The purpose of this letter is to notify the Staff that we are revising our fuel oil testing program to provide the option of filtering the fuel oil in lieu of replacement if results of the accelerated stability test exceed the limits of ANSI N195-1976 (2 mg insolubles per 100 ml).

On December 13, 1991, our fuel oil testing laboratory notified us that the results of the quarterly accelerated stability test were unsatisfactory (3.29 mg/100 ml). The results of the additional, confirmatory test received on December 27, 1991 were also unsatisfactory (2.7 mg/100 ml). Our present fuel oil testing program requires that the fuel oil be replaced within 30 days of the second-test failure (Reference 2).

We have recently identified a vendor-supplied filtration methodology which uses a clay filter medium to reduce the insoluble levels of fuel oil. The fuel oil was filtered on January 8-9, 1992 using this specialized filtration process. The accelerated stability test results for a sample taken on January 10, 1992, were 1.29 mg/100 ml. On the basis of these test results, the fuel oil was determined to be acceptable and we no longer plan to replace it. We are revising the diesel fuel oil surveillance test procedures to state that if the fuel oil fails the confirmatory accelerated stability test, fuel oil filtration is an acceptable alternative to replacement. In addition, we are currently reviewing the information provided in NRC Information Notice 91-46, "Degradation of Emergency Diesel Generator Fuel Oil Delivery Systems", to determine the acceptability of

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Dr. Thomas E. Murley
January 24, 1992
NG-92-0290
Page 2

performing the particulate contamination test described in ASTM-2276 in lieu of the accelerated stability test.

We believe this modification of our fuel oil testing program meets the intent of RG 1.137, "Fuel Oil Systems for Diesel Generators" and ensures the continuing quality of diesel fuel oil.

Please contact this office if you require further information.

Very truly yours,



John F. Franz, Jr.
Vice President, Nuclear

JFF/PMB/pjv

cc: P. Bessette
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