

RS-15-297

10 CFR 50.90

December 14, 2015

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001

Dresden Nuclear Power Station, Units 2 and 3
Renewed Facility Operating License Nos. DPR-19 and DPR-25
NRC Docket Nos. 50-237 and 50-249

Subject: Request for License Amendment to Dresden Nuclear Power Station Technical Specification 3.8.1, "AC Sources - Operating"

In accordance with 10 CFR 50.90, "Application for amendment of license or construction permit," Exelon Generation Company, LLC (EGC) is requesting a change to the Technical Specifications (TS) of Facility Operating License Nos. DPR-19 and DPR-25 for Dresden Nuclear Power Station (DNPS), Units 2 and 3. The proposed amendment seeks to correct a non-conservative TS by revising Surveillance Requirement (SR) 3.8.1.4 to increase the minimum required fuel oil in each standby diesel generator (DG) fuel oil day tank from greater than or equal to (\geq) 205 gallons to \geq 245 gallons. EGC recently determined that the existing requirement did not provide one hour of fuel for each DG operating at full load plus 10 percent (%) at the maximum frequency allowed by TS 3.8.1, "AC Sources – Operating." Administrative controls are currently in place in accordance with NRC Administrative Letter (AL) 98-10, "Dispositioning of Technical Specifications That are Insufficient to Assure Plant Safety."

In accordance with the guidance in AL 98-10, this license amendment request is required to resolve a non-conservative TS and is not a voluntary request to change the DNPS, Units 2 and 3 licensing basis. Therefore, this request is not subject to "forward fit" considerations as discussed in a letter from S. G. Burns (U. S. NRC) to E. C. Ginsberg (Nuclear Energy Institute), dated July 14, 2010 (ADAMS Accession Number ML01960180).

The proposed change has been reviewed and recommended for approval by the DNPS Plant Operations Review Committee and approved by the Nuclear Safety Review Board in accordance with the EGC Quality Assurance Program.

EGC requests approval of this proposed change by December 14, 2016, with the amendment being implemented within 60 days of approval.

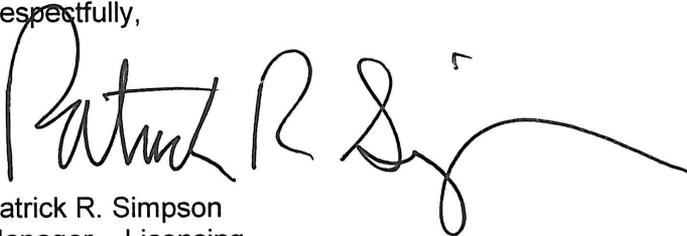
EGC is notifying the State of Illinois of this application for a change to the TS by sending a copy of this letter and its attachments to the designated State Official in accordance with 10 CFR 50.91, "Notice for public comment; State consultation," paragraph (b).

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There are no regulatory commitments contained within this letter. Should you have any questions concerning this letter, please contact Mr. Mitchel A. Mathews at (630) 657-2819.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 14th day of December 2015.

Respectfully,

A handwritten signature in black ink, appearing to read "Patrick R. Simpson", with a long horizontal flourish extending to the right.

Patrick R. Simpson
Manager – Licensing
Exelon Generation Company, LLC

Attachments: 1. Evaluation of Proposed Change
2. Mark-up of Proposed Technical Specifications Page

**ATTACHMENT 1
EVALUATION OF PROPOSED CHANGE**

Subject: Request for License Amendment to Dresden Nuclear Power Station Technical Specification 3.8.1, "AC Sources – Operating"

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**ATTACHMENT 1
EVALUATION OF PROPOSED CHANGE**

1.0 SUMMARY DESCRIPTION

Exelon Generation Company, LLC (EGC) proposes a change to the Dresden Nuclear Power Station (DNPS), Units 2 and 3 standby diesel generator (DG) fuel oil day tank volume as described in Technical Specification 3.81, "AC Sources - Operating," Surveillance Requirement (SR) 3.8.1.4 from greater than or equal to (\geq) 205 gallons to \geq 245 gallons. Raising the DG fuel oil day tank volume requirement will assure that each DG can operate for one hour. This issue has been identified as a non-conservative Technical Specification and administrative controls are currently in-place to assure sufficient fuel oil is available in each fuel oil day tank.

2.0 DETAILED DESCRIPTION

Based on the calculated DG fuel consumption rate of 211 gallons per hour, the current TS 3.8.1 has been determined to be non-conservative. The current TS SR 3.8.1.4 fuel volume requirement of \geq 205 gallons is inadequate to provide one hour of DG operation at 110% of full load at a frequency of 61.2 Hz.

The proposed amendment seeks to correct this non-conservative Technical Specifications (TS) SR by revising SR 3.8.1.4 to increase the minimum required amount of fuel oil in the day tank to approximately 245 gallons.

A markup of the proposed change to DNPS, Units 2 and 3 TS SR 3.8.1.4 is shown in Figure 1 below.

SR 3.8.1.4	Verify each day tank contains \geq 205 gal of fuel oil and each bulk fuel storage tank contains \geq 10,000 gal of fuel oil.	In accordance with the Surveillance Frequency Control Program
		

Figure 1: Proposed Revision to the Minimum Fuel Oil Volume in Each Fuel Oil Day Tank

3.0 TECHNICAL EVALUATION

The DNPS, Units 2 and 3 onsite alternating current (AC) power system consists of two main generators, two main step-up transformers, two unit auxiliary transformers (UATs), two reserve auxiliary transformers (RATs) one 345/138 kilovolt (kV) auto transformer, distribution buses, and three DGs (i.e., two unit DGs and a shared DG).

The standby diesel generator system produces AC power at a voltage and frequency compatible with normal bus requirements. Each unit has its own DG sized to carry the emergency core cooling system (ECCS) power requirements on one unit or supply that power necessary for safe shutdown of the unit. Another DG is shared by DNPS, Units 2 and 3. In addition, the system is of sufficient capacity to start all loads it is expected to drive.

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The primary basis for using a DG system is to provide an independent source of onsite electric power for the station auxiliaries. The standby diesel generator system is provided to guard against the contingency of the concurrent forced outage of all normal sources of power.

A separate, safety-related and seismically qualified fuel oil storage and transfer system is provided for each DG. Each storage and transfer system includes a 15,000-gallon underground diesel fuel oil storage tank and a 750-gallon diesel oil day tank. The day tank and the piping and equipment downstream of the day tank are also classified as safety-related.

Fuel is transferred from the 15,000-gallon diesel fuel oil storage tanks to the 750-gallon diesel oil day tanks with the diesel oil transfer pumps. Transfer is accomplished automatically by level switches on the associated day tanks.

Each day tank contains sufficient fuel to sustain DG operation for one hour of operation at rated load. The configuration of the system is such that the minimum normal operating level in the day tank is above the low level alarm setpoint. The low level alarm setpoint is maintained above the minimum required one-hour fuel storage level. This ensures that the day tank provides a minimum one hour of fuel for operation of the diesel generator at 10 percent (%) above rated load. The fuel oil transfer system, which is safety-related and seismically qualified, ensures the delivery of fuel for diesel generator operation beyond the one-hour supply of the day tank.

The auxiliary power system provides adequate power to operate all auxiliary loads necessary for station operation. Auxiliary power is provided by the UATs connected to the unit generator isolated-phase bus and the RATs connected to the 345-kV switchyard. The UATs and RATs supply power to the equipment used to maintain a safe and operable plant. The station auxiliary buses can also be connected, by appropriate switching sequences, to the DGs which provide power in the event that the 345-kV switchyard and the unit generator are incapacitated. Thus, the DGs provide another independent source of auxiliary power to the station.

For DNPS, Units 2 and 3, three standby DGs provide an independent and redundant source of on-site AC power supply. Each DG (i.e., the Unit 2, Unit 3, or shared Unit 2/3 DG) is capable of supplying the loads required for accident conditions and for safe shutdown conditions on the affected unit. Each DG has a continuous rating of 2600 kilowatts (kW) (i.e., full loading), and a 2000 hour rating of 2860 kW (i.e., 110% of full load).

The diesel generator fuel oil storage and transfer system supports the operation of the DGs. A separate 15,000 gallon fuel oil storage tank and a 750 gallon fuel oil day tank provide the fuel supply for each DG. Fuel is transferred from the fuel oil storage tank to the day tank with the diesel fuel oil transfer pump. Fuel from the day tank is supplied through a strainer and filter to the associated DG fuel injectors via an electrically driven fuel oil priming pump (i.e., upon DG start) or the engine driven fuel oil pump once the DG achieves a speed of 200 rpm.

The fuel oil volumes specified in the TS SR are necessary to ensure that an adequate quantity of fuel oil is contained in the day tank for a minimum of one hour of DG operation at 110% of its full load. Additionally, SR 3.8.1.4 contains fuel oil volume requirements to assure that there is adequate inventory in each of the fuel oil storage tanks to support its associated DG's operation for approximately two days at full load. The two day period is sufficient to place the unit in a safe shutdown condition and to bring in replenishment fuel from an offsite location.

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The 205 gallon requirement specified in TS SR 3.8.1.4 is based on the fuel consumption rate curve provided by the DG vendor. At a DG output power of 2860 kW (i.e., 110% of the continuous rating), the fuel consumption was determined to be 205 gallons per hour. It has been demonstrated through performance of surveillance testing that the fuel oil consumption rate specified on the manufacturer's curve bounds the actual fuel consumption rates for all three DNPS DGs. Moreover, Ultra Low Sulfur Fuel Oil (ULSD) has been in use at DNPS since 2007; therefore, this confirmation of fuel oil consumption rates also accounts for the use of ULSD.

Additionally, the effect of the range of American Petroleum Institute (API) gravity values allowed by the DNPS DG Fuel Oil Testing Program has been addressed in the proposed change. Specifically, the DNPS Diesel Fuel Oil Testing Program specifies the acceptance criteria for API gravity of fuel oil as ≥ 27 and less than or equal to (\leq) 39 at 60 degrees Fahrenheit ($^{\circ}$ F). New fuel is required to be tested prior to addition to the DG fuel storage tanks, and fuel oil stored in the DG fuel storage tanks is tested every 31 days during the performance of monthly DG surveillance testing. API gravity test results since 2007 have shown the API gravity of the fuel oil in the storage tanks to range between 32 and 34 at 60 $^{\circ}$ F.

In accordance with SR 3.8.1.6, the diesel fuel oil transfer pump is tested every two years for each of the three DGs to verify the pump operates automatically to transfer fuel oil from the storage tank to the day tank. During this surveillance, a fuel consumption test is also performed to verify the actual consumption rate is below the values specified on the engine manufacturer's fuel consumption curve. Test results from 2008 to the present time (i.e., those tests that were performed utilizing ULSD with API gravity at 60 $^{\circ}$ F of 32 – 34) have shown the fuel consumption rates for Unit 2 and Unit 3 DG at 95% of the rate specified on the DG manufacturer's fuel oil consumption curve, while the Unit 2/3 DG at 97% of the manufacturer's specified rate.

According to industry accepted data provided for the typical gross heat content of diesel fuel as found in the Bureau of Standards, Miscellaneous Publication No 97, "Thermal Properties of Petroleum Products," dated April 28, 1933, the heat content per gallon of fuel oil is inversely related to API gravity. Table 1 below demonstrates the relationship of volumetric gross heat value (i.e., British Thermal Units (BTU) of energy per gallon of fuel oil) to API gravity.

Table 1: Comparison of Volumetric Gross Heat Content at API Gravities of 32 and 39

API Gravity at 60 $^{\circ}$ F	Gross Heat Value (Btu/gallon)
32	140,600
39	136,400

To account for the range of API gravities allowed by the DNPS DG Fuel Oil Test Program, the fuel oil consumption test results were adjusted to an API gravity value of 39. This is due to the fact that fuel oil with this API gravity has the lowest energy content per gallon allowed by the DNPS Fuel Oil Test Program. More fuel is required to obtain the same total energy for fuel with a lower volumetric gross heat content. Accordingly, the DNPS fuel oil consumption rate test results which utilized fuel oil with a maximum volumetric heat content based on a minimum API gravity of 32 were adjusted to account for the lowest volumetric gross heat content allowed by

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the DNPS DG Fuel Oil Test Program. The Unit 2/3 DG average fuel consumption rate is about 97% of the manufacture curve utilizing fuel oil with an API Gravity of 32 or higher at 60°F. Assuming fuel with API Gravity at 60°F of 39, the DNPS Unit 2/3 D/G fuel consumption rate would be at 97% x 1.031 or 100% of the fuel consumption rate specified on the engine manufacturer's fuel oil consumption curve. Hence, the fuel oil consumption rate curve provided by the DG engine manufacturer adequately covers the fuel consumption for the Unit 2, Unit 3, and Unit 2/3 DGs over the range of API gravity values allowed by the Dresden Diesel Fuel Oil Testing Program.

Additionally, the DGs are required to maintain proper voltage and frequency during steady state operation. Currently TS SR 3.8.1.2 states:

Verify each DG starts from standby conditions and achieves steady state voltage ≥ 3952 volts (V) and ≤ 4368 V and frequency ≥ 58.8 Hertz (Hz) and ≤ 61.2 Hz.

The TS SR frequency band represents a tolerance of plus or minus (\pm)2% from the base frequency of 60 Hz. At frequencies above 60 Hz, the DG output will increase. Based on the pump affinity law that shows that power is proportional to the cube of the speed, the DG loading increases by a factor of $(1.02)^3$ with a 2% increase in frequency (i.e., at 61.2 Hz).

Assuming that the DG is operating at the extreme margin of allowable operating conditions at 110% above its rated loading and at frequency at 61.2 Hz, the DG day tank minimum fuel volume of 205 gallons, as currently specified in TS SR 3.8.1.4, is determined to be insufficient to support the DG operation for one hour. This is based on an engineering evaluation that determined that when the DG output is determined to be 3035 kW and the corresponding fuel oil consumption rate at 211 gallons per hour versus 205 gallons per hour. However, the evaluation also determined that the stored fuel oil volume requirements for the fuel oil storage tanks are adequate to support the DG operation.

Based on the calculated DG fuel consumption rate of 211 gallons per hour, the current TS 3.8.1 has been determined to be non-conservative. The current TS SR 3.8.1.4 fuel volume requirement of ≥ 205 gallons is inadequate to provide one hour of DG operation at 110% of full load at a frequency of 61.2 Hz.

Although the current TS SR 3.8.1.4 fuel oil day tank volume requirement has been determined to be insufficient based on the worst-case fuel consumption rate of 211 gallons per hour, the DGs remain Operable based on the following administrative controls which provide considerable margins to the worst-case one-hour consumption rate:

- The surveillance procedure for diesel fuel oil transfer pump operation and the fuel oil consumption test has an acceptance criterion to ensure greater than or equal to 350 gallons of fuel oil remain in the day tank when the fuel day tank low level alarm is received. Specifically, fuel oil transfer from the fuel oil storage tank to the day tanks is initiated automatically by level switches on the day tanks. For the Unit 2 and Unit 3 DGs, the nominal fuel oil transfer pump start setpoint is based on day tank level and is set at 31.5 inches of fuel oil in the fuel oil day tank. This level switch has a ± 2.0 inch setpoint settling tolerance to account for fuel volume changes due to temperature variations within the DG room (i.e., between 80°F and 120°F). For the Unit 2/3 DG, the nominal fuel oil

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transfer pump start setpoint is set at 30.0 inches of fuel oil in the day tank with a ± 1.5 inch setpoint settling tolerance. These fuel oil transfer pump start setpoints result in minimum usable fuel oil volume of 509 gallons for the Unit 2 and Unit 3 DGs, and 488 gallons for the Unit 2/3 DG.

- The DNPS Diesel Generator Surveillance Test procedure specifies acceptance criteria for SR 3.8.1.4. The acceptance criteria for the diesel fuel oil day tank level is greater than ($>$)29.5 inches for the Unit 2 and Unit 3 DGs and >28.5 inches for the Unit 2/3 DG. This parameter is read on a sightglass that is local to each fuel oil day tank. The sight glasses read in one inch increments. In the range of interest each one inch increment corresponds to approximately 20 gallons of fuel oil; therefore, based on a resolution that corresponds to one half of one increment on the sightglass, these acceptance criteria assure at least 499 gallons of fuel oil in the Unit 2 and Unit 3 DG and 478 gallons in the Unit 2/3 DG.
- A second level switch is utilized to trigger the High and Low fuel level alarms for the associated DG fuel oil day tank. Fuel level alarms are provided locally and in the Control Room. For the Unit 2 and Unit 3 DGs, the nominal fuel oil day tank "LO ALARM" setpoint is provided at 26.0 inches of fuel oil in the associated day tank with a ± 2.0 inch setpoint settling tolerance. For the Unit 2/3 DG, the nominal "LO ALARM" setpoint is provided at 25.5 inches of fuel oil in the day tank with a ± 1.5 inch setpoint settling tolerance. These "LO ALARM" setpoints assure a minimum usable fuel oil volume of 393 gallons and a maximum usable volume of 457 gallons of fuel oil for the Unit 2, Unit 3, and Unit 2/3 DGs. Station test procedure for diesel fuel consumption testing includes a step to verify that upon receipt of the fuel oil day tank "LO ALARM," the fuel oil volume in the day tank is ≥ 350 gallons as indicated on the day tank sightglass. Actual test results have shown that the fuel oil day tank level "LO ALARM" typically actuates with approximately 457 gallons of fuel oil in the associated fuel oil day tank.

The proposed value of 245 gallons is based on the calculated fuel oil consumption rate of 211 gallons per hour plus an additional 16%. The 16% is added as margin to address any future changes, such as the use of bio-diesel, that have the potential to adversely affect the DG fuel oil consumption rates.

The day tank minimum volume of 205 gallons, as currently specified in TS SR 3.8.1.4, has been determined to be inadequate to provide approximately 60 minutes of DG operation at 110% of full load. This matter was evaluated under EGC's Corrective Action Program. As a result, DNPS, Units 2 and 3 have been operating under an Operable but Degraded/Non-conforming (OBDN) condition with more conservative administrative limits established for DG fuel oil day tank volume. Although a non-conservative TS SR exists, as discussed above, the low level alarm and the automatic fuel transfer pump operation would have occurred prior to the day tank level descending below the 60 minute supply. Plant operators would have been alerted of any unplanned drop in day tank level and could initiate an orderly shutdown of the DG, if necessary. Thus, compliance with the current TS and the licensing basis has been maintained.

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4.0 REGULATORY EVALUATION

4.1 Applicable Regulatory Requirements/Criteria

As required by 10 CFR 50, Appendix A, "General Design Criteria," (GDC) 17, "Electric Power Systems," an onsite electric power system shall be provided to permit functioning of structures, systems and components important to safety. The DGs satisfy the requirements of GDC 17. The Fuel Oil System supplies fuel oil to the DGs. The fuel oil day tank supplies sufficient capacity to successfully start the DG and allow for the orderly shutdown of the DG in the event of a loss of fuel from the fuel oil storage tank or a fuel oil transfer pump problem. The proposed change to SR 3.8.1.4 is conservative in nature and has been determined to have no adverse impact on the DGs ability to fulfill their design basis function as required by GDC-17.

4.2 No Significant Hazards Determination

In accordance with 10 CFR 50.90, "Application for amendment of license, construction permit, or early site permit," Exelon Generation Company, LLC (EGC) requests an amendment to Facility Operating License Nos. DPR-19 and DPR-25 for Dresden Nuclear Power Station (DNPS), Units 2 and 3. The proposed amendment seeks to correct a non-conservative Technical Specifications (TS) Surveillance Requirement (SR) by revising DNPS, Units 2 and 3 TS SR 3.8.1.4 to increase the minimum required amount of fuel oil for the standby diesel generator (DG) fuel oil day tanks from greater than or equal to (\geq) 205 gallons to \geq 245 gallons of fuel oil.

EGC has concluded that operation of DNPS, Units 2 and 3, in accordance with the proposed changes to the TS does not involve a significant hazards consideration. EGC's conclusion is based on its evaluation, in accordance with 10 CFR 50.91 (a)(1), of the three standards set forth in 10 CFR 50.92(c) as discussed below: According to 10 CFR 50.92, "Issuance of amendment," Paragraph (c), a proposed amendment to an operating license involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not:

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated; or
- (2) Create the possibility of a new or different kind of accident from any accident previously evaluated; or
- (3) Involve a significant reduction in a margin of safety.

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EGC has evaluated the proposed change for DNPS, Units 2 and 3 using the criteria in 10 CFR 50.92, and has determined that the proposed change does not involve a significant hazards consideration. The following information is provided to support a finding of no significant hazards consideration.

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The proposed change does not increase the probability or the consequences of an accident previously evaluated. The DGs and their associated emergency buses function to mitigate accidents. The proposed change does not involve a change in the operational limits or the design of the electrical power systems, change the function or operation of plant equipment, or affect the response of that equipment when called upon to operate.

The proposed change to TS SR 3.8.1.4 confirms the minimum supply of fuel oil in each DG fuel oil day tank. The minimum value for the affected parameter is being increased in the conservative direction and assures the DGs' ability to fulfill their safety function.

Therefore, based on the discussion above, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

The proposed change does not involve a change in the operational limits or the design capabilities of the electrical power systems. The proposed change does not alter the function or operation of plant equipment or introduce any new failure mechanisms. The evaluation that supports this request included a review of the DG fuel oil system to which this parameter applies. Therefore, this change will not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

Response: No.

Margins of safety are related to the confidence in the ability of the fission product barriers to perform their design functions during and following an accident. These barriers include the fuel cladding, the reactor coolant system, and the containment systems. Since the proposed change does not adversely affect the operation of any plant equipment, including equipment credited in protecting the fission product

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barriers, operation in the proposed manner will not involve a significant reduction in a margin of safety.

4.3 Conclusions

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by the operation of DNPS, Units 2 and 3 in the proposed manner, (2) such activities will be conducted in compliance with the NRC's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or the health and safety of the public.

5.0 ENVIRONMENTAL CONSIDERATION

EGC has evaluated the proposed amendment for environmental considerations. The review has resulted in the determination that the proposed amendment would change requirements with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or would change an inspection or surveillance requirement. However, the proposed amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22, paragraph (b), no environmental impact statement or environmental assessment needs to be prepared in connection with the proposed amendment.

Dresden Nuclear Power Station, Units 2 and 3
Facility Operating License Nos. DPR-19 and DPR-25

Attachment 2

Mark-up of Proposed Technical Specifications Page

3.8.1-7

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.8.1.3 -----NOTES-----</p> <ol style="list-style-type: none"> 1. DG loadings may include gradual loading as recommended by the manufacturer. 2. Momentary transients outside the load range do not invalidate this test. 3. This Surveillance shall be conducted on only one DG at a time. 4. This SR shall be preceded by and immediately follow, without shutdown, a successful performance of SR 3.8.1.2 or SR 3.8.1.8. 5. A single test of the common DG at the specified Frequency will satisfy the Surveillance for both units. <p>-----</p> <p>Verify each DG is synchronized and loaded and operates for ≥ 60 minutes at a load ≥ 2340 kW and ≤ 2600 kW.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>
<p>SR 3.8.1.4 Verify each day tank contains ≥ 205 gal of fuel oil and each bulk fuel storage tank contains $\geq 10,000$ gal of fuel oil.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>
<p>SR 3.8.1.5 Remove accumulated water from each day tank.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>

(continued)