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DENTON,H.R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Forwards supplemental info to 850130 License Amend Request 85-01 re Tech Spec changes concerning diesel fuel oil sampling. Info responds to NRC questions re groundwater level & water removal capability.

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JAMES D. SHIFFER
VICE PRESIDENT
NUCLEAR POWER GENERATION

March 13, 1985

PGandE Letter No.: DCL-85-110

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Docket No. 50-275, OL-DPR-80
Diablo Canyon Unit 1
Supplemental Information to License Amendment Request 85-01

Dear Mr. Denton:

On January 30, 1985, PGandE submitted License Amendment Request (LAR) 85-01, "Technical Specification Changes," containing 22 attachments. Attachment 15 provided proposed changes to Technical Specification 4.8.1.1.3, relating to diesel fuel oil sampling.

Enclosed is additional information to supplement that provided in Attachment 15 to LAR 85-01. This information responds to NRC questions related to (1) ground water level, (2) details of water removal capability, (3) qualification of technicians performing surveillance tests, and (4) time required for checking and removing water from fuel oil storage tanks.

Kindly acknowledge receipt of this material on the enclosed copy of this letter and return it in the enclosed addressed envelope.

Sincerely,

J C Carroll for

J. D. Shiffer

Enclosure

cc: J. B. Martin
H. E. Schierling
Service List

A001
1/1

ENCLOSURE

SUPPLEMENTAL INFORMATION TO LAR 85-01
ATTACHMENT 15, DIESEL FUEL OIL SPECIFICATION

1. Ground Water Level

Section 9.5.4.3, "Safety Evaluation," of the DCPP Units 1 and 2 FSAR Update outlines the design considerations to prevent either water from flooding or groundwater from entering the fuel oil storage tanks, concrete vaults, and pipe trenches. The risk of surface water flooding at this site is essentially zero. No groundwater has been encountered at or below the buried tanks, pump vaults, or pipe trenches. Therefore, the potential for water flooding the fuel oil system from this source is also negligible. In addition, the below-ground portion of the fuel oil system is completely sealed with the vent extended above ground.

2. Water Removal Capabilities

The fuel oil storage tank is designed with a horizontal sparger pipe along the bottom, with a termination at the top of the tanks for connection to a portable centrifuge for water removal. The sparger is an 8-foot long, 1-inch diameter pipe attached to the bottom of the tank and, therefore, capable of removing essentially all water from the tank during the water removal process. The tank is inclined with the sparger located at the low end of the tank. This arrangement is shown schematically in FSAR Update Figure 3.2-21 (Sheet 1 of 10), "Piping Schematic Diesel Engine - Generator Systems" (Attachment 1).

3. Qualification of Technicians

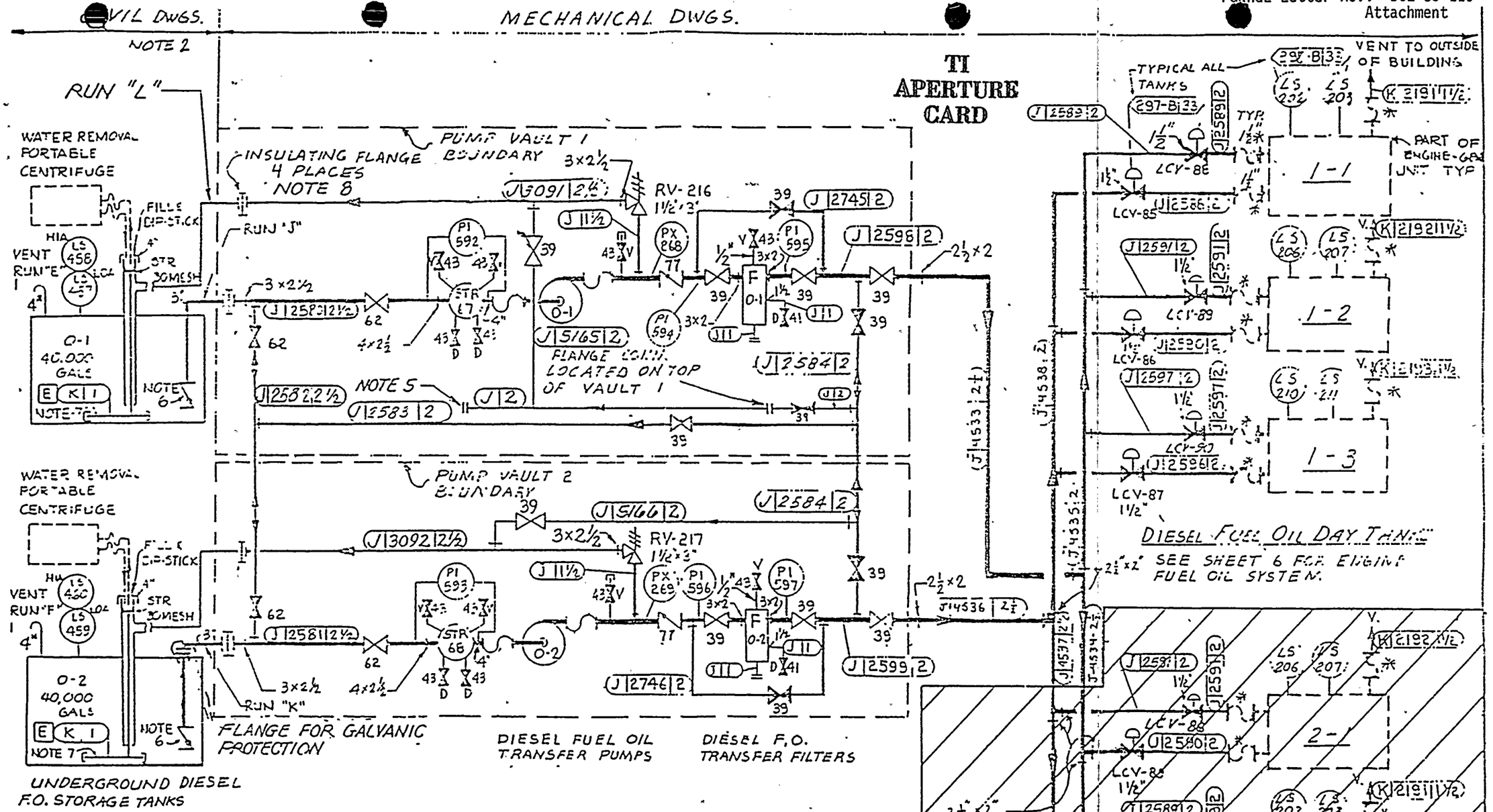
DCPP has a highly skilled and well trained staff of Chemical and Radiation Protection Technicians. The screening program for recruiting technicians includes a qualifying test covering math, chemistry and physics. Some technicians have college degrees in the physical sciences and most have had either some college background or nuclear navy training and experience. The additional chemical tests for diesel fuel oil identified in the proposed change to Technical Specification Surveillance Requirement 4.8.1.1.3 are no more technically demanding than other chemical analyses which are presently routinely performed by Chemical and Radiation Protection Technicians. Procedures related to the chemical tests identified in the proposed Technical Specification change are prepared and ready for final approval and will be implemented at the time the Technical Specification is changed. The technicians will be trained to perform the tests and the tests will be included in the retraining program as new procedures.

4. Time Required for Checking and Removing Water from Fuel Oil Storage Tanks

The DCPP site has been shown to be very dry in terms of surface flooding and groundwater. Because of this lack of water sources to contaminate the fuel oil, coupled with the design of the fuel oil storage tanks, PGandE feels that the DCPP site easily meets the conditions outlined by the NRC in Section C.2.d of Regulatory Guide 1.137 to justify the time period of 92 days for checking for and removing water from the fuel oil storage tank.

This position is also consistent with Draft Revision 5 of the Standard Technical Specifications.

Attachment



DIESEL FUEL OIL SYSTEM

NOTES:

1. ALL PIPING ON THIS SYSTEM SHALL BE PG&E CLASS C, EXCEPT AS NOTED.
2. CIVIL PIPING, SHOWN ON DWGS. 438IGF, GG & 438134 (REF. RUN E,F,J,K) (20/21-E)
3. ALL VALVE ON THIS SHEET WITH PG&E ITEM NOS. SHALL BE UNDER SPEC. 8729 UNLESS NOTED.
4. DELETED
5. BLIND FLANGE CONN. FOR PUMP CUT & PRIMING (24-D)
6. FOOT VALVE IN SUCTION LINE INSIDE TANK. (21-B/D)
7. HORIZONTAL SPARGER.
8. INSULATED BLANKS TO BE INSTALLED TO PROVIDE ISOLATION OF UNDERGROUND STG. TK. WHEN REQUIRED (21-E), TYPICAL.

Also Available On Aperture Card

8503190504-01

FSAR UPDATE
UNIT 1 DIABLO CANYON SITE
FIGURE 3.2-21 (Sheet 1 of 16) PIPING SCHEMATIC DIESEL ENGINE-GENERATOR SYSTEMS