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10 CFR 50.90

U.S. Nuclear Regulatory Commission
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Subject: Brunswick Steam Electric Plant, Unit Nos. 1 and 2
Renewed Facility Operating License Nos. DPR-71 and DPR-62
Docket Nos. 50-325 and 50-324
Request for License Amendment
Technical Specification 3.8.3, *Diesel Fuel Oil*, One-Time Extension of Main Fuel
Oil Storage Tank Completion Time

Ladies and Gentlemen:

Pursuant to 10 CFR 50.90, Duke Energy Progress, LLC (Duke Energy), is requesting a one-time amendment associated with Technical Specification (TS) 3.8.3, *Diesel Fuel Oil*, for the Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2. The proposed change revises an existing Note to allow, on a one-time basis, the main fuel oil storage tank to be inoperable for up to 14 days for the purpose of performing required inspection, cleaning, and any necessary repair activities.

The Enclosure provides a description and assessment of the proposed change. Attachments 1 and 2 to the enclosure provide the existing TS pages, for Units 1 and 2, marked-up to show the proposed change. Attachments 3 and 4 provide revised (i.e., typed) TS pages. There are no TS Bases revisions necessary to support the proposed changes.

Approval of the proposed amendment is requested by May 1, 2019. Once approved, the amendment shall be implemented within 120 days.

In accordance with 10 CFR 50.91, Duke Energy is providing a copy of the proposed license amendment to the designated representative for the State of North Carolina.

This document contains no new regulatory commitments.

I declare, under penalty of perjury, that the foregoing is true and correct. Executed on April 25, 2018.

Sincerely,

William R. Gideon

MAT/mat

Enclosure:

Description and Assessment of the Proposed Change

- Attachment 1: Proposed Technical Specification Changes (Mark-Up) - Unit 1
- Attachment 2: Proposed Technical Specification Changes (Mark-Up) - Unit 2
- Attachment 3: Revised (Typed) Technical Specification Pages - Unit 1
- Attachment 4: Revised (Typed) Technical Specification Pages - Unit 2

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Description and Assessment of the Proposed Change

Subject: Request for License Amendment
Technical Specification 3.8.3, *Diesel Fuel Oil*, One-Time Extension of Main Fuel
Oil Storage Tank Completion Time

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3. Revised (Typed) Technical Specification Pages - Unit 1
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1. SUMMARY DESCRIPTION

Pursuant to 10 CFR 50.90, Duke Energy Progress, LLC (Duke Energy), is requesting a one-time amendment associated with Technical Specification (TS) 3.8.3, *Diesel Fuel Oil*, for the Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2. The proposed change revises an existing Note to allow, on a one-time basis, the main fuel oil storage tank to be inoperable for up to 14 days for the purpose of performing required inspection, cleaning, and any necessary repair activities.

2. DETAILED DESCRIPTION

2.1 System Design and Operation

The Emergency Diesel Generators (EDGs) comprise a major part of emergency power supply when off site power is lost or a major accident occurs. There are four EDGs which supply power to 4160, 480 and 120 VAC loads. EDG 1 and EDG 2 supply emergency buses E1 and E2, respectively, and are assigned to BSEP Unit 1. EDG 3 and EDG 4 supply emergency buses E3 and E4, respectively, and are assigned to BSEP Unit 2. However, certain Unit 1 loads are supplied by emergency buses E3 and E4 and certain Unit 2 loads are supplied by emergency buses E1 and E2. As such, operability of a single EDG affects both Units 1 and 2.

The Diesel Fuel Oil system supplies each EDG with fuel oil capacity sufficient to operate that EDG for a period of approximately seven days while the EDG is operating at rated load. The Diesel Fuel Oil system consists, in part, of:

- One main fuel oil storage tank, which contains sufficient capacity (i.e., 225,000 gallons) to provide for approximately three days of operation for each of four EDGs at rated load. The main fuel oil storage tank is seismically designed but not seismically qualified.
- Four Seismic Class I day fuel oil storage tanks (i.e., 23,300 gallons per tank), one per EDG, each located in its own vault. The day fuel oil storage tanks, in combination with the engine mounted fuel tanks, provide approximately four days of diesel generator operation at rated load. The day fuel oil storage tanks are known as the 4-day tanks, each in its own vault.
- Four Seismic Class I engine mounted fuel tanks (i.e., 550 gallons per tank), one attached to each EDG.

Gravity fill is used to maintain fuel oil level in the 4-day tanks. Two redundant transfer pumps between each 4-day and engine mounted fuel tanks maintain fuel oil level in the engine mounted fuel tanks. Automatic makeup to the engine mounted fuel tanks occurs upon low level.

In addition to supplying the four EDGs, the main fuel oil storage tank also supplies the 550 gallon Standby Diesel Fire Pump fuel oil tank. The tank is filled by gravity through a 1.50 inch line off the bottom of the main fuel oil storage tank. Two manual isolation valves on this line are locked closed at all times except when filling the Standby Diesel Fire Pump fuel oil tank. The Standby Diesel Fire Pump fuel oil tank provides sufficient fuel to operate the pump for approximately eight hours.

2.2 Current Technical Specification Requirements

Currently, TS 3.8.3, Conditions A and B contain provisions which require the fuel oil level in the main fuel oil storage tank to be greater than 20,850 gallons per required EDG. Additionally, two Notes apply to the Actions of TS 3.8.3. Note 2 states:

2. On a one-time basis, the main fuel oil storage tank may be made inoperable and drained, to support cleaning, inspection, and associated repair activities, for 14 days without entering Conditions A or B. If not restored within 14 days, Condition D must be entered. Fuel oil level in the day fuel oil storage tank(s) shall be confirmed to be $\geq 22,650$ gal per required DG prior to removing the main fuel oil storage tank from service and once per 12 hours thereafter. This Note expires upon completion of these activities, but no later than December 31, 2008.

2.3 Reason for the Proposed Change

Regulatory Guide 1.137, Revision 1 (i.e., Reference 1), Fuel-Oil Systems for Standby Diesel Generators, Section C.2.f states, in part:

As a minimum, the fuel oil stored in the supply tanks should be removed, the accumulated sediment removed, and the tanks cleaned at 10-year intervals.

Additionally, Spill Prevention Control and Countermeasure requirements, contained in 40 CFR 112.8(c)(6), state, in part:

Test or inspect each aboveground container for integrity on a regular schedule and whenever you make material repairs. You must determine, in accordance with industry standards, the appropriate qualifications for personnel performing tests and inspections, the frequency and type of testing and inspections, which take into account container size, configuration, and design (such as containers that are: shop-built, field-erected, skid-mounted, elevated, equipped with a liner, double-walled, or partially buried).

Draining of the main fuel oil storage tank is the preferred method for performing inspection, cleaning, or repair activities of the tank. Duke Energy plans to perform the next internal inspection in May 2019. It is estimated that the required draining, inspecting, and refilling the main fuel oil storage tank will take 7 to 10 days. The requested 14 day allowed out of service time provides margin should the evolution take longer than expected and provides time for any necessary repairs which may be required. Thereby, eliminating the burden of a dual unit outage to accomplish the required inspections.

Duke Energy requests issuance of the proposed amendment by May 1, 2019, to support the planned inspection of the main fuel oil storage tank in May 2019.

2.4 Description of the Proposed Change

The proposed change revises the existing Note 2. The current expiration date of December 31, 2008 is revised to June 1, 2020. The expiration date allows for potential unforeseen delays in beginning the inspections.

3. TECHNICAL EVALUATION

3.1 Deterministic Evaluation

Currently, TS 3.8.3 requires each EDG, which is required to be operable, have a minimum of 43,500 gallons of fuel oil available for use. This provides approximately seven days of operation at rated load. Should less than 43,500 gallons of fuel oil be available to a required EDG, the required fuel oil level must be restored within 48 hours; otherwise the associated EDG must immediately be declared inoperable.

The proposed change will allow the main fuel oil storage tank to be inoperable for up to 14 days for the purpose of performing required inspection activities. During this time period, fuel oil levels in the 4-day fuel oil storage tank, for each required EDG, must be greater than 22,650 gallons. When combined with the fuel oil in the engine mounted storage tank this provides four days of operation at rated load. Should less than 22,650 gallons of fuel oil be available to a required EDG, TS 3.8.3 Condition D would be entered and the associated EDG must immediately be declared inoperable.

To accomplish the internal inspection of the main fuel oil storage tank, fuel oil in the tank will be maintained in temporary, onsite storage. Provisions will be made to use this fuel to replenish the 4-day fuel oil storage tanks should the need arise. This will ensure that a full seven day fuel oil supply for each required diesel is available onsite. In the event of an emergency requiring operation of the EDGs while the main fuel oil storage tank is inoperable, actions will be taken to return the tank to an operable status in an expeditious manner.

As discussed in Section 8.3.1.1.6.2.8 of the BSEP UFSAR, the main fuel oil storage tank was seismically designed but not seismically qualified. To ensure supply to the 4 day tanks following damage to the main fuel oil storage tank, fuel oil can be readily obtained by truck or rail directly to BSEP, or by barge on the Cape Fear River or Intracoastal Waterway to local docks and off loaded into trucks for delivery to the site. Thus, operation in accordance with the proposed change is consistent with the existing design and evaluation of the Diesel Fuel Oil System and the proposed change will not impact the availability of the EDGs to perform their required design function of auto-starting and load sequencing during an emergency EDG demand event.

For the diesel-driven fire pump, the primary difference between the current plant configuration and the configuration during inspection and repair activities will be the location of the make-up diesel fuel oil supply and the operator actions required to refill the diesel-driven fire pump fuel supply storage tank. Both configurations require manual operator actions to maintain an adequate fuel supply. The existing operator actions require unlocking and opening two manual isolation valves. With the main fuel oil storage tank out of service, re-supply fuel will require use of temporary hoses from the temporary on-site storage location. As such, this change does not adversely impact fire protection capabilities.

3.2 Nuclear Risk Insights

A qualitative assessment was performed to determine whether the requested 14-day Completion Time could cause a significant increase in Core Damage Frequency (CDF) or Large Early Release Frequency (LERF) risks that would necessitate a quantitative risk assessment in accordance with the guidance of Regulatory Guide (RG) 1.177, *An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications*. A thorough examination of the

potential impacts concluded that a qualitative evaluation was sufficient since any increase to CDF or LERF risks are not risk significant.

The first step of the qualitative assessment identified any equipment or structures, modeled in the BSEP Probabilistic Risk Assessment (PRA) models, which could be potentially impacted by the proposed change. The evaluation determined that only the diesels and diesel-driven fire pump systems could potentially be impacted by the activities.

The second step of the evaluation was to determine the impact on equipment modeled in the BSEP PRA and to qualitatively determine whether the activities would cause a significant increase in CDF or LERF.

The evaluation determined that the impact to the diesel-driven fire pump was not significant. The primary differences between the current plant configuration and the configuration during inspection and repair activities are the location of the make-up diesel fuel oil supply and actions required to refill the diesel-driven fire pump fuel supply storage tank. It should be noted that both configurations require manual operator actions to maintain adequate fuel supply and that the PRA models an operation to re-fuel the diesel-driven fire pump fuel tank. The operator actions to refill are slightly different with the proposed configuration since it will require use of hoses from the temporary on-site storage location to refill the diesel fire pump supply tank versus the current configuration that requires unlocking and opening manual isolation valves. However, the difference is considered small since the important actions would involve the diagnosis to maintain an adequate supply of diesel fuel oil to the diesel-driven fire pump. Timing is not an issue since a minimum inventory of 500 gallons is currently maintained to meet fire protection requirements, and the pump is only credited as a late injection source in a limited number of scenarios.

As discussed above, the primary difference between the current configuration and the proposed configuration is the source for diesel fuel oil make-up to the diesel-driven fire pump. Since an alternate supply of diesel fuel oil would be used to provide make-up, there is no impact to the Diesel-Driven Fire Pump availability. The use of appropriate procedural controls and training will ensure adequate fuel oil inventory to the Diesel-Driven Fire Pump from alternate supplies. As such, the proposed activity does not impact CDF or LERF.

A qualitative assessment of the risk associated with the inspection/repair activity was performed. The determination of "not risk significant" is based on a review of the inspection activity that determines that the activity a) does not impact the availability of the diesel generators, and b) essentially no change in the plant configuration due to implementation of adequate compensatory measures. From a qualitative perspective, the risk associated with the inspection/repair of the Main fuel oil storage tank is not risk-significant for the following reasons.

- Adequate supply of diesel fuel oil is stored in the 4-day tanks to maintain the diesels available for the entire exposure window analyzed by PRA (i.e., each diesel will maintain a four day diesel fuel oil supply). Probabilistic risk assessments analyze an exposure window of 24 hours. This exposure window is considered sufficiently long since additional offsite resources would be available to mitigate or further prevent accident progression.
- An alternate supply of fuel oil of sufficient volume will be maintained onsite for the diesel-driven fire pump.

- Plant procedures will be developed to ensure adequate fuel oil inventory to the diesel-driven fire pump from the alternate fuel oil supply.
- Any changes to the human error probability (HEP) for controlling and maintaining adequate inventory are minimal and, therefore, the risk increase is not risk significant. No significant change in the HEP is expected for the Emergency Operating Procedure (EOP) alternate injection actions associated with monitoring and maintaining the diesel-driven fire pump fuel oil tank since execution errors for both configurations would be similar.
- There is no increase in fire CDF since the diesel fuel oil is planned to be stored away from mitigation systems credited in the PRA, and outside the current fire zones.
- The affected systems are standby systems and the activity does not impact the likelihood of a transient event.
- The inspection activity does not introduce any new accidents that may impact CDF or LERF.
- There is no impact to diesel availability.
- There is no impact to the diesel-driven fire pump availability.
- No impact to success criteria, due to inspection/repair activities, has been identified.
- No new common cause failure modes are introduced, or increases in the likelihood of existing common cause failure has been identified.
- The activity does not impact the defense in depth of functions credited in the PRA analysis.
- Loss of offsite power (LOOP) events with durations exceeding four days were investigated. Such events are not common, and the licensee identified only two such events occurring in the industry since 1990, one involved a hurricane and the other involved a tornado. Makeup to the 4-day tanks will be available using a temporary, on-site storage facility during the time the main fuel oil storage tank was unavailable. In the event of a prolonged LOOP lasting more than four days, additional fuel oil would be available on-site from this temporary storage facility. Therefore, the risk impact of the proposed extension due to the impacts to the EDGs is considered to be insignificant, since the fuel oil could still be supplied to each of the EDGs, which is the only function of the main fuel oil storage tank for the EDGs in the PRA model. There is also no impact to the diesel-driven fire pump availability.
- Additional defense in depth is provided by the supplemental diesel generator (SUPP-DG) and two FLEX diesel generators.
 - The SUPP-DG is rated at 4000 kW, 4160 V, and can be connected to the 4160 V emergency busses (i.e., E1, E2, E3, or E4) in approximately 1 hour. The SUPP-DG is made available as a defense-in-depth alternate source of AC power to one emergency bus to mitigate a station blackout (SBO) event during a Loss of Offsite Power. The SUPP-DG has a 10,000 gallon storage tank with a minimum of 6,700 gallons (i.e., 24 hour supply) available.
 - The two permanently installed 500 kW FLEX diesel generators each have an integral 526 gallon sub-base fuel tank (i.e., which provide a minimum 13-hour full-load runtime capacity), a self-contained, closed loop cooling system, and an

exhaust system. Each is a fully contained system, capable of starting and operating with no reliance on other equipment or systems. The FLEX Diesel Generators provide the capability to power 480 V emergency busses E6 and E8 in the event of an extended loss of station AC power following a Beyond Design Basis External Event. The FLEX-DGs can supply power to the battery chargers via the emergency busses.

These activities do not cause a significant, if any, increase in core damage frequency, or large early release frequency. Therefore, extending the Completion Time to 14 days is acceptable and is not considered to cause an increase in CDF or LERF.

3.3 Compensatory Actions

In support of the main fuel oil storage tank inspection and cleaning activities, Duke Energy will establish an implementing procedure to assure that the EDGs and diesel-driven fire pump will be able to perform their intended functions when the main fuel oil storage tank is removed from service. This procedure will include the proposed following provisions.

- BSEP will maintain on-site adequate inventory of diesel fuel oil to refill the diesel-driven fire pump fuel oil supply tank to meet a minimum time exposure window of 36 hours. Probabilistic risk assessments analyze an exposure window of 24 hours. This exposure window is considered sufficiently long since additional offsite resources would be available to mitigate or further prevent accident progression.
- BSEP will develop plant procedures to ensure adequate fuel oil inventory to the diesel-driven fire pump from the alternate fuel oil supply. In addition, BSEP will store adequate tools (i.e., hoses, etc.) to allow successful implementation of the procedure.
- BSEP will provide adequate training to operators and/or contractors for implementation of the procedure to refill the diesel-driven fire pump fuel oil supply tank.
- BSEP will store the inventory of Main fuel oil storage tank in a safe manner at a location that provides adequate distance to protect any equipment credited in the PRA from the impact of leakage or fires (i.e., including structures or buildings housing equipment credited in the PRA).
- BSEP will store the Main fuel oil storage tank inventory in a manner to prevent contamination of the diesel fuel oil to protect against common cause failure of the diesels.
- BSEP will consider the potential for inclement weather, such as hurricanes, in the risk assessment of the scheduled inspection and repair activities. The assessment will consider contingencies needed to restore the tank and refill the inventory if inclement weather poses an imminent threat to the long term availability of offsite power.
- BSEP will ensure that adequate industrial safety measures are taken to minimize the risk of fires during inspection and/or repair activities for the Main fuel oil storage tank.
- BSEP will provide adequate barriers to prevent any fire associated with the repair (i.e., welding, hot surfaces, and volatile gases) from propagating to the diesel fuel oil 4-day tank or headers.

- BSEP will ensure that the diesel fuel oil tank inspection and repair activities do not introduce foreign material that could impact transfer of fuel oil before returning the Main fuel oil storage tank to service.
- Additional requirements associated with the temporary fuel oil storage and storage location.
 - Meet the applicable requirements of Regulatory Guide 1.137 (i.e., Reference 1), as described in Table 1-6 of the BSEP UFSAR.
 - Eliminate ignition sources.
 - Properly ground equipment to prevent fuel oil fires.
 - Provide for fuel oil storage inside a berm or catch basin.
 - Minimize potential for crystallization of fuel oil during low temperatures.

The above procedural controls encompass those procedural aspects of the qualitative assessment that provide the bases for determining that extended 14-day Completion Time for the main fuel oil storage tank is not risk-significant.

4. REGULATORY EVALUATION

4.1 Applicable Regulatory Requirements/Criteria

10 CFR 50.36(c)(2)(ii), stipulates that a TS Limiting Condition for Operation must be established for each item meeting one or more of the following criteria:

1. Installed instrumentation that is used to detect, and indicate in the Control Room, a significant abnormal degradation of the reactor coolant pressure boundary.
2. A process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of, or presents a challenge to, the integrity of a fission product barrier.
3. A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of, or presents a challenge to, the integrity of a fission product barrier.
4. A structure, system, or component which operating experience or probabilistic risk assessment has shown to be significant to public health and safety.

The proposed changes do not modify any plant equipment that provides emergency power to the safety-related emergency buses. Evaluation of the proposed changes has determined that the reliability of AC electrical sources is not significantly affected by the proposed changes and that applicable regulations and requirements continue to be met.

The BSEP design was reviewed for construction under the *General Design Criteria for Nuclear Power Plant Construction*, issued for comment by the AEC in July 1967 and is committed to meet the intent of the General Design Criteria (GDC), published in the Federal Register on May 21, 1971, as Appendix A to 10 CFR Part 50. GDC 17, *Electric power systems*, requires that nuclear power plants have onsite and offsite electric power systems to permit the functioning of structures, systems, and components (SSCs) that are important to safety. The onsite system is required to have sufficient independence, redundancy, and testability to perform its safety function, assuming a single failure. The offsite power system is required to be

supplied by two physically independent circuits that are designed and located so as to minimize, to the extent practical, the likelihood of their simultaneous failure under operating and postulated accident and environmental conditions. The proposed change does not affect BSEP's compliance with the intent of GDC 17.

GDC 18, *Inspection and testing of electric power systems*, states that electric power systems that are important to safety must be designed to permit appropriate periodic inspection and testing of important areas and features, such as insulation and connections to assess the continuity of the systems and the condition of their components. The proposed change does not affect BSEP's compliance with the intent of GDC 18.

Section 50.63(a) of 10 CFR, *Loss of all alternating current power*, requires that each lightwater-cooled nuclear power plant licensed to operate be able to withstand for a specified duration and recover from a station blackout. The proposed change does not affect BSEP's compliance with 10 CFR 50.63(a).

Therefore, based on the considerations discussed above, Duke Energy has determined that the proposed change does not require any exemptions or relief from regulatory requirements, other than the TS, and does not affect conformance with the intent of any GDC differently than described in the UFSAR.

4.2 Precedent

The proposed license amendment is consistent with Amendments 242 and 270 for BSEP Units 1 and 2, respectively (i.e., Reference 2).

4.3 No Significant Hazards Consideration Determination Analysis

Duke Energy Progress, LLC (Duke Energy), is requesting a one-time amendment associated with Technical Specification (TS) 3.8.3, *Diesel Fuel Oil*, for the Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2. The proposed change revises an existing Note to allow, on a one-time basis, the main fuel oil storage tank to be inoperable for up to 14 days for the purpose of performing required inspection, cleaning, and any necessary repair activities.

Duke Energy has evaluated whether a significant hazards consideration is involved with the proposed amendment(s) by focusing on the three standards set forth in 10 CFR 50.92, *Issuance of amendment*, as discussed below:

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 alter the assumption of the accident analyses or the Technical Specification Bases. The Diesel Fuel Oil system supplies each Emergency Diesel Generator (EDG) with fuel oil capacity sufficient to operate that EDG for a period of approximately seven days while the EDG is operating at rated load. The one-time allowance to permit internal inspection of the main fuel oil storage tank during plant operation does not impact the availability of the EDGs to perform their intended safety function. Furthermore, while the main fuel oil storage tank is out of service, the availability

of onsite and offsite fuel oil sources ensures that an adequate supply of fuel oil remains available.

In addition to supplying the four EDGs, the main fuel oil storage tank also supplies the Standby Diesel Fire Pump fuel oil tank. With the main fuel oil storage tank out of service, operator actions necessary to refill this tank are similar in nature to existing operator actions. As such, this change does not adversely impact fire protection capabilities.

Therefore, the proposed amendments do 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

Creation of the possibility of a new or different kind of accident requires creating one or more new accident precursors. New accident precursors may be created by modifications of plant configuration, including changes in allowable modes of operation. The proposed change does not involve a physical change to the design of the Diesel Fuel Oil system, nor does it alter the assumptions of the accident analyses. The one-time allowance to permit internal inspection of the main fuel oil storage tank during plant operation does not introduce any new failure modes.

Therefore, the proposed amendments do 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

The proposed change alters the method of operation of the Diesel Fuel Oil system. However the availability of the EDGs to perform their intended safety function is not impacted and the assumptions of the accident analyses are not altered. Additionally, this change does not adversely impact fire protection capabilities.

Therefore, the proposed amendments do not result in a significant reduction in the margin of safety.

Based on the above, Duke Energy concludes that the proposed amendment presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

4.4 Conclusion

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 operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

5. ENVIRONMENTAL CONSIDERATION

A review has determined that the proposed amendment would change a requirement 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 a significant increase in the amounts of any effluents 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(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

6. REFERENCES

1. Regulatory Guide 1.137, *Fuel-Oil Systems for Standby Diesel Generators*, Revision 1, dated October 1979.
2. Letter from the US Nuclear Regulatory Commission to Carolina Power & Light Company, *Issuance of Amendment Related to Main Fuel Oil Storage Tank*, dated September 27, 2007 (ADAMS Accession Numbers ML072600327 and ML072710141).

Proposed Technical Specification Changes (Mark-Up)
Unit 1

3.8 ELECTRICAL POWER SYSTEMS

3.8.3 Diesel Fuel Oil

LCO 3.8.3 The stored diesel fuel oil shall be within limits for each required diesel generator (DG).

APPLICABILITY: When associated DG is required to be OPERABLE.

ACTIONS

-----NOTES-----

1. Separate Condition entry is allowed for each DG.
2. On a one-time basis, the main fuel oil storage tank may be made inoperable and drained, to support cleaning, inspection, and associated repair activities, for 14 days without entering Conditions A or B. If not restored within 14 days, Condition D must be entered. Fuel oil level in the day fuel oil storage tank(s) shall be confirmed to be $\geq 22,650$ gal per required DG prior to removing the main fuel oil storage tank from service and once per 12 hours thereafter. This Note expires upon completion of these activities, but no later than ~~December 31, 2008~~. June 1, 2020

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>A. One or more required DGs with fuel oil level in the associated day fuel oil storage tank(s) $< 22,650$ gal per required DG and $\geq 17,000$ gal per required DG.</p> <p><u>AND</u></p> <p>Fuel oil level in the main fuel oil storage tank $\geq 20,850$ gal per required DG.</p>	<p>A.1 Restore required day fuel oil storage tank level to within limit.</p>	48 hours

(continued)

Proposed Technical Specification Changes (Mark-Up)
Unit 2

3.8 ELECTRICAL POWER SYSTEMS

3.8.3 Diesel Fuel Oil

LCO 3.8.3 The stored diesel fuel oil shall be within limits for each required diesel generator (DG).

APPLICABILITY: When associated DG is required to be OPERABLE.

ACTIONS

-----NOTES-----

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2. On a one-time basis, the main fuel oil storage tank may be made inoperable and drained, to support cleaning, inspection, and associated repair activities, for 14 days without entering Conditions A or B. If not restored within 14 days, Condition D must be entered. Fuel oil level in the day fuel oil storage tank(s) shall be confirmed to be $\geq 22,650$ gal per required DG prior to removing the main fuel oil storage tank from service and once per 12 hours thereafter. This Note expires upon completion of these activities, but no later than ~~December 31, 2008~~. June 1, 2020

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more required DGs with fuel oil level in the associated day fuel oil storage tank(s) $< 22,650$ gal per required DG and $\geq 17,000$ gal per required DG. <u>AND</u> Fuel oil level in the main fuel oil storage tank $\geq 20,850$ gal per required DG.	A.1 Restore required day fuel oil storage tank level to within limit.	48 hours

(continued)

Revised (Typed) Technical Specification Pages
Unit 1

3.8 ELECTRICAL POWER SYSTEMS

3.8.3 Diesel Fuel Oil

LCO 3.8.3 The stored diesel fuel oil shall be within limits for each required diesel generator (DG).

APPLICABILITY: When associated DG is required to be OPERABLE.

ACTIONS

-----NOTES-----

1. Separate Condition entry is allowed for each DG.
2. On a one-time basis, the main fuel oil storage tank may be made inoperable and drained, to support cleaning, inspection, and associated repair activities, for 14 days without entering Conditions A or B. If not restored within 14 days, Condition D must be entered. Fuel oil level in the day fuel oil storage tank(s) shall be confirmed to be $\geq 22,650$ gal per required DG prior to removing the main fuel oil storage tank from service and once per 12 hours thereafter. This Note expires upon completion of these activities, but no later than June 1, 2020.

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>A. One or more required DGs with fuel oil level in the associated day fuel oil storage tank(s) $< 22,650$ gal per required DG and $\geq 17,000$ gal per required DG.</p> <p><u>AND</u></p> <p>Fuel oil level in the main fuel oil storage tank $\geq 20,850$ gal per required DG.</p>	<p>A.1 Restore required day fuel oil storage tank level to within limit.</p>	48 hours

(continued)

Revised (Typed) Technical Specification Pages
Unit 2

3.8 ELECTRICAL POWER SYSTEMS

3.8.3 Diesel Fuel Oil

LCO 3.8.3 The stored diesel fuel oil shall be within limits for each required diesel generator (DG).

APPLICABILITY: When associated DG is required to be OPERABLE.

ACTIONS

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1. Separate Condition entry is allowed for each DG.
2. On a one-time basis, the main fuel oil storage tank may be made inoperable and drained, to support cleaning, inspection, and associated repair activities, for 14 days without entering Conditions A or B. If not restored within 14 days, Condition D must be entered. Fuel oil level in the day fuel oil storage tank(s) shall be confirmed to be $\geq 22,650$ gal per required DG prior to removing the main fuel oil storage tank from service and once per 12 hours thereafter. This Note expires upon completion of these activities, but no later than June 1, 2020.

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>A. One or more required DGs with fuel oil level in the associated day fuel oil storage tank(s) $< 22,650$ gal per required DG and $\geq 17,000$ gal per required DG.</p> <p><u>AND</u></p> <p>Fuel oil level in the main fuel oil storage tank $\geq 20,850$ gal per required DG.</p>	<p>A.1 Restore required day fuel oil storage tank level to within limit.</p>	<p>48 hours</p>

(continued)