

DRAFT – UNVERIFIED INFORMATION

Question

TRP 031 Fuel Oil Chemistry
RAI B.1.15-1 Revised

Background

SRP-LR Table 3.0-1, "FSAR Supplement for Aging Management of Applicable Systems," summary description provides an acceptable program description for the GALL Report AMP XI.M30, "Fuel Oil Chemistry," as per 10 CFR 54.21(d). The FSAR Supplement includes the specific ASTM Standards used for monitoring and control of fuel oil contamination to maintain fuel oil quality.

Issue

LRA Section A.1.15, "Diesel Fuel Monitoring," USAR supplement does not appear to include the specific industry standards used for the program. The current licensing basis will not be consistent with the staff-issued guidance document during the period of extended operation if the industry standards recommended by the GALL Report are not used.

Request

Justify the apparent absence of the above mentioned industry standards in the USAR supplement for the Diesel Fuel Monitoring program. Alternatively, state the changes to the USAR supplement necessary to include the GALL Report recommended industry standards that will be used for the program.

Response

River Bend Station (RBS) previously responded to RAI B.1.15-1 by letters dated January 24, 2018 (RBG-47812) and March 27, 2018 (RGB-47849). The following is the response to RAI B.1.15-1 revised to include additional information requested by the NRC during a public telephone conference call held on April 10, 2018. The revised response supersedes the previous responses. Changes to the previous response of March 27 are marked with revision bars.

Changes are provided to the USAR supplement to identify ASTM standards used in the monitoring and control of diesel fuel, specifically, ASTM D4057, D2274, D2276, and D2709. Diesel fuel monitoring program procedures will be revised to include sampling for water and sediment in accordance with ASTM D2709.

The changes to LRA Sections A.1.15 and B.1.15 follow with additions underlined.

A.1.15 Diesel Fuel Monitoring

The Diesel Fuel Monitoring Program manages loss of material in piping, tanks and other components in an environment of diesel fuel oil by verifying the quality of the fuel oil source. This is performed by receipt inspection, sampling, and limiting the quantities of contaminants before allowing it to enter the fuel oil storage tanks. Parameters monitored include water and sediment content, total particulates, and levels of microbiological organisms in the fuel oil. Monitoring and control are performed in accordance with ASTM standards D4057, D2274, D2276, and D2709. The program includes multi-level sampling of fuel oil storage tanks. Where multi-level sampling cannot be performed due to design, a representative sample is taken from the lowest part of the tank. A stabilizer/biocide is added to new fuel.

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The Diesel Fuel Monitoring Program will be enhanced as follows.

- Revise Diesel Fuel Monitoring Program procedures to specify sampling for water and sediment in accordance with ASTM Standard D2709.

B.1.15 Diesel Fuel Monitoring

Program Description

The Diesel Fuel Monitoring Program manages loss of material in piping, tanks and other components in an environment of diesel fuel oil by verifying the quality of the fuel oil source. This is performed by receipt inspection, sampling, and limiting the quantities of contaminants before allowing it to enter the fuel oil storage tanks. Parameters monitored include water and sediment content, total particulates, and levels of microbiological organisms in the fuel oil. Monitoring and control are performed in accordance with ASTM standards D4057, D2274, D2276, and D2709. The program includes multi-level sampling of fuel oil storage tanks. Where multi-level sampling cannot be performed due to design, a representative sample is taken from the lowest part of the tank. A stabilizer/biocide is added to new fuel.

The following enhancements will be implemented prior to the period of extended operation.

Element Affected	Enhancement
5. Monitoring and Trending	<u>Revise Diesel Fuel Monitoring Program procedures to specify sampling for water and sediment in accordance with ASTM Standard D2709.</u>