



Wisconsin Electric POWER COMPANY
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March 24, 1980

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

Attention: Mr. D. G. Eisenhut, Acting Director
Division of Operating Reactors

Gentlemen:

DOCKET NOS. 50-266 AND 50-301
QA REQUIREMENTS FOR DIESEL GENERATOR FUEL OIL
POINT BEACH NUCLEAR PLANT UNITS 1 AND 2

In response to your letter dated January 7, 1980, we have evaluated the PBNP Quality Assurance Program specifically as it applies to diesel generator fuel oil. Since this fuel oil is a consumable item important to the functional performance of the diesel generators, it does fall within the scope of our program. As a result of our evaluation, it is concluded that adequate controls to assure the quality of the fuel oil are being implemented.

These controls can be summarized as follows:

1. Fuel oil is purchased under an agreement which includes specific requirements for the fuel oil properties. These requirements are generally consistent with those specified in ANSI/ASTM D975-78. (Regulatory Guide 1.137 endorses this standard).
2. Prior to placing fuel oil in the on-site storage tank, a sample from each truck is taken (per ASTM D270-65) for analysis. This sample is then analysed off-site for specific gravity, flashpoint, sulfur and BTU content. Reg. Guide 1.137 recommends testing for specific gravity, water and sediment, and viscosity prior to placing fuel oil in the storage tank. However, this is not practical due to the rapid turnaround of trucks and the unavailability of the necessary equipment at the site. Also, considering the design of the fuel oil system, there is a considerable period of time between adding fuel oil to the storage tank and when it reaches the diesel generator day tanks. We believe this further justifies the delayed analysis.

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3. Quarterly, an additional fuel oil sample is taken and analyzed. This sample is analyzed and verified to be in accordance with the requirements of ANSI/ASTM D975. This sampling frequency is also in agreement with Appendix B to ANSI N195-1976.
4. Attempts are made to maintain storage tanks as full as possible to minimize condensation. All fuel oil receipts are recorded and day tank and storage tank levels are monitored every eight hours. This exceeds the requirements of Appendix B to ANSI N195-1976.

These controls are considered adequate to assure the quality of diesel generator fuel oil. This conclusion is also supported by past experience, since no major quality problems have been experienced with fuel oil at Point Beach Nuclear Plant.

Very truly yours,

C. W. Fay
C. W. Fay, Director
Nuclear Power Department