

PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET

P.O. BOX 8699

PHILADELPHIA, PA. 19101

(215) 841-5001

SHIELDS L. DALTROFF
VICE PRESIDENT
ELECTRIC PRODUCTION

April 14, 1980

Docket Nos. 50-277
50-278

Mr. D. G. Eisenhut
Acting Director
Division of Operating Reactors
United States Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Eisenhut:

This letter is in response to your letter dated January 7, 1980 concerning quality assurance of diesel generator fuel oil at Peach Bottom Atomic Power Station.

We have reviewed the status of diesel generator fuel oil with regard to our Quality Assurance Program. To fully control the quality of the oil, we are modifying our Quality Assurance Program so that it will conform to the guidance contained in Section C.2 of Regulatory Guide 1.137, Revision 1, "Fuel Oil System for Standby Diesel Generators" except for the alternatives described in the attached Appendix.

Implementation of the enhanced controls required by the Regulatory Guide will require modification of the storage tanks and procurement of additional testing equipment. Modifications to the main fuel oil storage tank are necessary to provide sampling ability and condensate determination. The modifications are expected to be completed by October 15, 1980, depending upon the availability of the storage tanks for modification. Until these modifications are completed, sampling will continue from the day tanks.

Additional equipment is necessary to perform testing of the fuel at the plant at the time of delivery. Testing at the plant site will be initiated within thirty days of receipt of the equipment which is expected within forty days.

Handwritten notes:
Pool
ADD.
QAB
Eisenhut

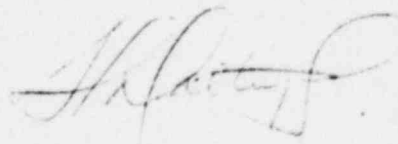
Handwritten mark: P

8004240 402

Paragraph C.2.f of Regulatory Guide 1.137 requires draining and cleaning of the main storage tanks at least once every ten years. We are reviewing the need for such cleaning. This review will be completed within thirty days. If this review indicates that actions other than those listed in Paragraph C.2.f of Regulatory Guide 1.137 should be taken, we will notify you concerning our proposed action.

Should further information be necessary, do not hesitate to inform us.

Very truly yours,

A handwritten signature in cursive script, appearing to read "M. J. ...".

Attachment

APPENDIX

Alternatives to Regulatory Guide 1.137, Revision 1 Section C.2 for Quality Assurance of Diesel Generator Fuel Oil for Peach Bottom Atomic Power Station

Philadelphia Electric Company will follow the guidance of Regulatory Guide 1.137, Revision 1, Section C.2 as a means for providing quality assurance of diesel generator fuel oil except as noted below:

1. Section C.2 states "Appendix B to ANSI N195 - 1976 should be used as a basis for a program to ensure initial and continuing quality of the fuel oil . . .". Appendix B to ANSI N195 - 1976 states, "The quantity of fuel available in storage shall be determined and logged after each operation of the diesel for a period of one hour or longer." Philadelphia Electric Company will determine and log the fuel oil volumes on a monthly basis in accordance with the Technical Specifications. At present, the diesels are run for approximately one hour per week. The fuel oil consumption of a diesel when run for one hour is approximately one-half of one percent of the capacity of the associated storage tank. This small change would probably not be distinguishable on the level indicating scheme. In addition, the tanks are equipped with a low level alarm which operates at approximately 80% of tank capacity which is well above the Technical Specification minimum volume.
2. Appendix B to ANSI N195 - 1976 also requires quarterly testing of the fuel oil to ASTM D2274-70, "Test for Stability of Distilled Fuel Oil". Philadelphia Electric Company does not believe this test to be necessary for Peach Bottom fuel oil. The Peach Bottom Technical Specifications require periodic testing, presently on a monthly basis, of the fuel oil to the requirements of ASTM D975-68. Data from this testing, available from July 1973, has shown no indication of degradation. Such degradation would be indicated by the periodic testing to ASTM D975-68 in a significant increase in sediment levels. In addition, it is the opinion of our Chemistry Section that instability of the fuel oil would not be a problem with the PBAPS storage system since oxygenation and attack by chemical contaminants would not be involved.
3. Paragraph "a" of Section C.2 of Regulatory Guide 1.137 states ". . . If test results for viscosity or for water and sediment for fuel oil contained in the supply tanks exceeds the limits specified in the applicable specification, the diesel should be considered inoperable . . .". The fuel oil system at Peach Bottom has four separate fuel oil tanks, one for each diesel, with the capability to isolate any tank and feed a diesel from an alternate tank. The

capacity of three diesel fuel tanks is greater than the Technical Specifications requirement for the minimum onsite volume of diesel fuel oil. Therefore, should the oil in a tank not meet the above requirement, the diesel would not be considered inoperable. The tank could be isolated and the oil replaced while the generator was fed from an alternate source. With one oil tank unavailable for use, the operability of the diesel generators would be governed by the Technical Specification minimum allowable volume of onsite diesel fuel oil.

4. Section C.2.e of Regulatory Guide 1.137 requires day tanks to be checked for water monthly as a minimum, and after each operation of the diesel where the period of operation was one hour or longer. Philadelphia Electric Company will check the day tanks for water following the routine test runs of the diesel generators, which are presently performed weekly.

Prepared by QA Division, 4/14/80