



## Omaha Public Power District

1623 HARNEY • OMAHA, NEBRASKA 68102 • TELEPHONE 536-4000 AREA CODE 402

May 2, 1980

Mr. Darrell G. Eisenhut, Acting Director  
U. S. Nuclear Regulatory Commission  
Division of Operating Reactors  
Washington, D. C. 20555

Dear Mr. Eisenhut:

The Omaha Public Power District received the Commission's letter dated January 7, 1980, regarding quality assurance requirements for diesel generator fuel oil.

Procedures in use at Fort Calhoun Station Unit No. 1, as described and compared to Regulatory Guide 1.137 guidance in the attachment, will assure the quality of diesel fuel oil. The District maintains that this existing program has proven effective; thus, there is no need for changes to existing procedures.

Sincerely,

  
W. C. Jones  
Division Manager  
Production Operations

WCJ/KJM/SJH/lp

Attachment

cc: LeBoeuf, Lamb, Leiby & MacRae  
1333 New Hampshire Avenue, N. W.  
Washington, D. C. 20036

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USNRC Regulatory Guide 1.137

Similar Items in Present Program

Remarks

1. Determine and log the quantity of fuel available in storage after each operation of the diesel for one hour or longer. This determination shall be made at least monthly.

The fuel oil levels in the fuel oil storage tank, both wall mounted auxiliary day tanks and both engine mounted day tanks are checked daily per surveillance test SF-DG-1 in accordance with Technical Specification 3.2, Table 3-5, Item 9.

Checking the fuel oil level daily rather than after each operation of a diesel generator for one hour or longer is adequate since the fuel oil storage system contains enough fuel for one week running of a diesel generator at full safeguards load.

2. Sample and analyze the fuel oil from every supply tank at least once every three months.

Every month a sample of fuel oil is obtained from the auxiliary day tank (not the main storage tank) of each diesel generator. The samples are analyzed to determine specific gravity % water content, % sediment content, flash point and the 90% distillation temperature.

The sampling of the auxiliary day tanks on a monthly basis is adequate since both diesel generators are run for one hour each month and any impurities in the main fuel oil tank would be carried over to the auxiliary tanks and detected there.

3. Analyze the fuel oil before loading it into the storage tanks to ensure that it meets certain minimum requirements.

None

There have been minimal problems encountered with the present fuel handling and sampling program. Our diesel vendors have always supplied clean, high quality fuel as verified by the monthly samples. To sample the fuel before it is loaded into the main storage tank would require an extensive modification to provide a holding tank and transfer pump with associated piping and wiring.

USNRC Regulatory Guide 1.137

Similar Items in Present Program

Remarks

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| 4. Remove accumulated condensate from storage tanks on a monthly basis and one day after the addition of new fuel.  | The main storage tank is checked for water on a six month basis under the preventative maintenance program. Any water found will be removed.  | Samples taken on a monthly basis from the auxiliary day tanks will indicate whether there is significant condensate accumulation. As stated in item 3 above, there has been no problem in the past with any contaminants in fuel delivered to the Station. |
| 5. Day tanks and integral tanks should be checked for water monthly, as a minimum, and after each operation of the diesel for 1 hour or more. Immediately remove any water. | Condensate is drained from the fuel oil day tank every year per surveillance test ST-ESF-6, F.5.  | Same as item 4 above.  |
| 6. Drain, clean and inspect the supply tanks at least every ten years.  | Supply tanks are drained, cleaned and inspected when the monthly sample shows that there is a significant amount of sediment in the fuel oil. This item was last completed in January 1980. | The present program of cleaning the supply tanks when the monthly sample shows evidence of sediment in tank is adequate to comply with the intent of this requirement.   |
| 7. Ensure that fuel oil can be added to the supply tank without stirring up the sediment in the bottom of the tank.   | With the present fill arrangement we cannot be sure that the addition of fuel oil will not stir up sediment.  | There have been no problems identified by the present sampling program of sediment being stirred up in the bottom of the storage tank while it is being filled.  |
| 8. Perform surveillance tests on cathodic protection system.  | Portions of the cathodic protection system are included in a weekly preventative maintenance program.   | Performing this test on the preventative maintenance program rather than the surveillance testing program complies with the intent of the regulatory guide   |