



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 22 TO FACILITY OPERATING LICENSE NO. NPF-73

DUQUESNE LIGHT COMPANY

OHIO EDISON COMPANY

THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

THE TOLEDO EDISON COMPANY

BEAVER VALLEY POWER STATION, UNIT NO. 2

DOCKET NO. 50-412

INTRODUCTION

Recently, Duquesne Light Company (the licensee, acting as agent for the above utilities) performed a surveillance test in accordance with Technical Specification 4.8.1.1.2.d.2 and discovered that the impurity level (insoluble) in the diesel fuel oil has exceeded the specified limit. On the licensee's request, we reviewed the subject requirement and concluded that the test specified in specification 4.8.1.1.2.d.2 was inappropriate, and was not in compliance with the current Westinghouse Standard Technical Specification (WSTS). As a result of the licensee's letter dated September 28, 1989, we granted a waiver of compliance from specification 4.8.1.1.2.d.2. All the review activities were covered by licensing action TAC 74885.

The licensee committed, as compensatory measures for receiving the waiver of compliance, to immediately meet current WSTS requirements expressed in the McGuire Technical Specifications. Details may be found in the waiver dated September 29, 1989. Furthermore, the licensee committed to adopt the WSTS for Beaver Valley Unit 2. By letter dated October 16, 1989, the licensee submitted an application to this effect. The same application also proposes to impose similar requirements on Beaver Valley Unit 1 but a Unit 1 amendment will be issued separately. Our review of the proposed amendment for Unit 2 follows.

DISCUSSION AND EVALUATION

The proposed amendment would modify the diesel generator fuel oil surveillance requirements to reflect the current WSTS. The following changes are made:

(1) Specification 3.8.1.1.a,b,d

A footnote * is added to clarify the allowable duration (7 days) when the diesel generators are considered inoperable per specification 4.8.1.1.2.d.2 and 4.8.1.1.2.e. These surveillance requirements verify the

quality of the fuel oil in the storage tanks on a periodic basis and in accordance with Regulatory Guide 1.137, Position C.2.a, the fuel oil may for a short period of time (about a week), be allowed not to meet the specification requirements. The intent of the surveillance requirements is to ensure the fuel oil satisfies the quality specifications; therefore, note * has been written to allow up to 7 days to correct the out-of-specification condition. These changes are acceptable due to their compliance with Regulatory Guide 1.137.

(2) Specification 4.8.1.1.2.a.3

This specification is deleted. The fuel oil sample verification requirements are now satisfied by the revised specifications 4.8.1.1.2.d and e (see below). The deletion is thus acceptable.

(3) Specification 4.8.1.1.2.d

The waiver of compliance granted on September 29, 1989, was partly based on the licensee's commitment to immediately meet the WSTS as expressed in the McGuire Technical Specifications. The licensee proposed to replace specification 4.8.1.1.2.d with the corresponding WSTS requirements. The new requirements specify tests to be applied to new fuel oil, i.e., API gravity test, kinematic viscosity, flash point and visual appearance. The acceptance criteria and procedures (ASTM documents) are also specified.

All the changes to specifications 4.8.1.1.2.d are identical to the WSTS as expressed in the McGuire TS. The requirements are more up-to-date, are at least equal to the former requirements in assuring diesel generator operability, and are identical to what was accepted in the September 29, 1989 waiver of compliance. We find these changes acceptable.

(4) Specification 4.8.1.1.2.e

This is newly added to require sampling the fuel oil in the storage tanks and day tanks at least every 31 days, and verifying the total particulate contamination be less than 10 mg/liter. This will be performed in accordance with ASTM D2276-78 Method A which provides a more accurate test method for indication of fuel oil impurity. The old method, specified in ASTM D2274-70 did not describe an accurate measure of existing fuel oil purity; it was a quality test mainly used to evaluate long-term fuel oil storage characteristics. The revised specification, which endorses ASTM D2276-78, would give accurate results, and is identical to the WSTS as is in existence in the McGuire TS. We find this change acceptable.

(5) Specification 4.8.1.1.2.e and f

Due to the new specification 4.8.1.1.2.e above, these two specifications are renumbered to be "4.8.1.1.2.f" and "4.8.1.1.2.g." These changes are purely editorial and are acceptable.

(6) Bases Section 3/4.8.1, 3/4.8.2

A paragraph is added to describe the basis of the * note. See change (1) above. This change is acceptable as discussed above.

EMERGENCY CIRCUMSTANCES

The licensee's September 28, 1989 letter clearly stated that the unit could not meet specification 4.8.1.1.2.d.2, and that a waiver of compliance would be needed immediately to prevent untimely shutdown. We agreed with the licensee's assessment and found the proposed compensatory measures acceptable, and thus granted the waiver of compliance. In the waiver, we stated that the then specification 4.8.1.1.2.d.2 was inappropriate and inaccurate. Ideally, the problematic specification could be amended in about two days under emergency circumstances. Such was not done since we realized that the problem was not just with that specification, but that most of the diesel fuel oil requirements were outdated. We therefore specified that the waiver would last until October 30, 1989, with the assumption that the licensee would have time to evaluate upgrade of all the diesel oil specifications to the WSTS.

Failure to grant this amendment under emergency circumstances would require shutdown of Beaver Valley Unit 2 shortly after October 30, 1989. The licensee has submitted a timely application on October 16, 1989. Based upon the above, we conclude that the licensee has adequately addressed the standards of 10 CFR 50.91(a)(5) with regard to demonstrating the need for an emergency license amendment. We further conclude, based on our frequent monitoring of the licensee's activities leading to the requested amendment, that the licensee has not abused the emergency provision by failing to make timely application for amendment.

FINAL NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The Commission's regulations in 10 CFR 50.92 state that the Commission may make a final determination that a license amendment involves no significant hazards consideration, if operation of the facility, in accordance with the amendment would not:

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated; or
- (2) Create the possibility of a new or different kind of accident from any accident previously evaluated; or
- (3) Involve a significant reduction in a margin of safety.

This amendment has been evaluated against the standards in 10 CFR 50.92. It does not involve a significant hazards consideration because the answers to the three criteria are all negative as follows:

We have evaluated the new diesel oil specifications and determined that they do not reduce the level of diesel generator operability. The new requirements cannot function as initiating events of any previously analyzed accidents.

Furthermore, we determined that despite the proposed changes to the technical specifications, the original design requirement of the system will continue to be met, and safety-related systems which require power supply from the diesel generators will be capable of performing their original design functions. Hence the probability and consequences of previously analyzed accidents will not be increased. There is no hardware, software or operational procedure changes as a result of the proposed amendment, and hence no new failure modes are introduced. Finally, there is no change in any analytical assumption or acceptance criteria.

STATE CONSULTATION

In accordance with the Commission's regulations, efforts were made to contact the Commonwealth of Pennsylvania representatives. The state representative (Mr. Richard Janati) was contacted on October 24, 1989 and he had no comments.

ENVIRONMENTAL CONSIDERATION

The amendment changes requirements with respect to the use of a facility component located within the restricted area, and changes surveillance requirements as defined in 10 CFR Part 20. We have determined that the amendment involves no significant increase in the amounts, and no significant change in the types of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. We have made a final no significant hazards consideration finding with respect to this amendment. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

CONCLUSION

We have concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

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Dated: October 30, 1989