P. Tam

Docket No. 50-412

Mr. J. D. Sieber, Vice President Nuclear Group Duquesne Light Company Post Office Box 4 Shippingport, Pennsylvania 15077

Dear Mr. Sieber:

DISTRIBUTION
Docket File S. Norris
S. Varga (14E4) Plant File
B. Boger (14A2) NRC and local PDR
B. Grimes (9A2)
ACRS (10)
OGC
E. Jordon (MNBB 3302)

SUBJECT: BEAVER VALLEY UNIT 2 - TEMPORARY WAIVER OF COMPLIANCE FROM TECHNICAL SPECIFICATION SECTION 4.8.1.1.2.d.2 (TAC 74885)

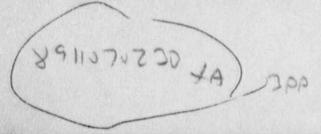
By letter dated September 28, 1989, you informed the NRC of a problem with the diesel fuel oil. Specifically, recent test results show that the impurity level (insolubles) has exceeded the current limit of 2mg/100ml in accordance with Technical Specifications (TS) section 4.8.1.1.2.d.2. This puts the unit into a 72-hour action requirement (i.e. shutdown in 72 hours). You requested a temporary waiver of compliance.

We evaluated the appropriateness of the current Beaver Valley Unit 2 requirement. We note that the subject specification requires that impurity level be "tested in accordance with ASTM D2274-1970." This document does not describe an accurate measure of existing fuel oil purity; it is a quality test mainly used to evaluate long-term storage characteristics. Test results obtained for D2274 are known to be inaccurate (±50% uncertainty). The 2mg/100ml criterion in the Beaver Valley 2 TS was selected as an alarm point, and is a somewhat arbitrary number because there is no evidence that impurities at this level are in fact detrimental to diesel generator operation. Actual insoluble impurity in fuel oil should be determined in accordance with the more accurate ASTM D2276, Method A, as is currently prescribed in the McGuire and Millstone TS, and in the Standard Technical Specifications.

On such basis, we believe that a plant shutdown based on potentially inaccurate test results and an arbitrary criterion cannot be justified. We, therefore, grant a waiver of compliance from TS section 4.8.1.1.2.d.2 to Beaver Valley Unit 2 for the duration it will take to amend the current Technical Specifications to be in line with the relevant McGuire TS. Since the amendment request would not be submitted until mid-October, and it would take a period of time for us to process an amendment, the expiration date of this waiver is set for October 30, 1989.

As compensatory measures, you committed to meet the current Standard Technical Specifications as is represented by the McGuire TS specifically:

(1) The new fuel oil that is being added to replace part of the existing oil should be tested, prior to addition to the storage tank, for API gravity, kinematic viscosity, flash point, and "clear and bright." Fuel oil in each tanker compartment should be given these tests, unless your personnel can independently verify that each tank compartment was uncontaminated before the new oil was loaded on.



OFOI

(2) After the new fuel oil has settled in the storage tank, test for total insolubles in accordance with ASTM D2276, Method A. The acceptance criterion is 10mg/1 (1mg/100ml). Repeat this test for fuel oil in the storage tank and day tanks every 31 days until the TS can be amended.

As stated in your September 28, 1989 letter, you committed to comply with the AcGuire TS (enclosed) until such time that the Beaver Valley 2 TS can be amended. Your commitment, together with our evaluation above, constitute the sole basis of this waiver of compliance. This review was performed by Mr. E. Tomlinson and Mr. P. Tam, Beaver Valley project manager.

Sincerely,

Signed by R. Martin for

Bruce A. Boger, Assistant Director for Region I Reactors Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

JBenil Concurr cc: See next page Devent alala : LA: PD 1-4 : POX:PDI-4 : Region PD4 AME : SNorris ETemlinson :PTam: Im:() (.: JStole WButle Ban : CMcCraken ATE :09 25/89 :09/28/89 :09/29/89 :09/2/89 :09/ /89

OFFICIAL RECORD COPY Document Name: BY WAIVER Briggesne Light Company

cc:

Jay E. Silberg, Esquire Shaw, Pittman, Potts and Trowbridge 2300 N Street, N.W. Washington, DC 20037

Kenny Grada, Manager Nuclear Safety Duquesne Light Company P. O. Box 4 Shippingport, Pennsylvania 15077

John A. Lee, Esquire
Duquesne Light Company
One Oxford Centre
301 Grant Street
Pittsburgh, Pennsylvania 15279

Commissioner Roy M. Smith
West Virginia Department of Labor
Building 3, Room 319
Capitol Complex
Charleston, WV 25305

John D. Borrows
Director, Utilities Department
Public Utilities Commission
180 East Broad Street
Columbus, Ohio 43266-0573

Director, Pennsylvania Emergency Management Agency Post Office Box 3321 Harrisburg, Pennsylvania 17105-3321

Mr. J. D. Sieber, Vice President Nuclear Group Duquesne Light Company Post Office Box 4 Shippingport, Pennsylvania 15077 Beaver, Valley Power Station

Bureau of Radiation Protection Pennsylvania Department of Environmental Resources ATTN: R. Janati Post Office Box 2063 Harrisburg, Pennsylvania 17120

Mayor of the Borrough of Shippingport Post Office Box 3 Shippingport, Pennsylvania 15077

Ashley C. Schannauer Assistant City Solicitor City of Pittsburgh 313 City-County Building Pittsburgh, Pennsylvania 15219

Regional Administrator, Region I U.S. Nuclear Regulatory Commission 475 Allendale Road King of Prussia, Pennsylvania 19406

Resident Inspector
U.S. Nuclear Regulatory Commission
Post Office Box 181
Shippingport, Pennsylvania 15077