

September 29, 1989

Docket No. 50-412

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

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)  
P. Tam

Dear Mr. Sieber:

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 ( $\pm 50\%$  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.

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- (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/l (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 McGuire 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

cc: See next page

*minute - Done  
BST 9/5/89*

*CONCUR WITH  
TECHNICAL  
RECOMMENDATION*

*E. Wenzinger, C. Congill  
and J. Beall concurred  
by phone, 11:00 am,  
9/29/89 BST Tam*

FC	:LA:PDI-4	:PM:PDI-4	:PD:PDI-4	:ADRI	:SPLB	:Region I	: PD4
AME	:SNorris	:PTam:lm:	<i>BST</i> :JStola	<i>RWButler</i>	:CMcCraken		:ETomlinson
ATE	:09/28/89	:09/28/89	:09/28/89	:09/29/89	:09/29/89	:09/ /89	:9/28/89

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Duquesne Light Company

Beaver Valley Power Station  
Units 1 & 2

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