Enclosure 2

UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA ST., N.W., SUITE 3100
ATLANTA, GEORGIA 30303

OCT 2 3 1981

SSINS 50-335

MEMORANDUM FOR: James Sniezek, Director, Division of Resident and Regional Reactor Inspection

FROM: Paul J. Kellogg, Chief, Reactor Projects Branch 2, Division of Resident and Reactor Project Inspection

SUBJECT: LUBRICATING OIL FOR EMERGENCY DIESEL GENERATORS (F02700145)

Review of IE Circular No. 80-05, Emergency Diesel-Generator Lubricating Oil Addition And Onsite Supply, at St. Lucie Unit 1 determined that the licensee's interpretation of emergency diesel generator (EDG) onsite lubricating oil requirements differed from the apparent position stated in the circular. The licensee's position is that anticipated Post-LOCA loads would not require two EDG's be run simultaneously for a week. The licensee contends the amount of onsite storage should be that needed for two generators, until one could be reasonably shut down and then, lubricating oil for only one generator would be needed. The licensee increased their diesel generator supply of lubricating oil to a minimum of 550 gallons following this review. The licensee estimates this amount of lubricating oil is sufficient to operate one DG for eight days. According to the licensee, lubricating oil has always been readily available.

IE Circular 80-05, Paragraph 5, states that the amount of lubricating oil to be stored for each EDG should be compatible with the amount of fuel to be stored for that EDG. Technical Specifications 3/4.8.1 and 3/4.8.1 and 3/4.8.2 specifies only the minimum amount of fuel oil required and does not address lubricating oil. It is our position that the statement in Paragraph 5 of IEC 80-05 is compatible with our definition of operability. Therefore, the licensee should be required to have on hand the amount of lubricating oil approximately equivalent to the running time of the required fuel oil.

You are requested to review our position for adequacy and consistency. If you concur, we recommend this concept be incorporated in the definition of operability and included in standard Technical Specifications as appropriate. Please provide us with the results of your review.

Paul J. Kellogg

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