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Ollie S. Bradham
Vice President
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May 29, 1990

Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Virgil C. Summer Nuclear Station
Docket No. 50/395
Operating License No. NPF-12
Diesel Fuel Oil Monitoring -
Technical Specifications Change
Request Clarification

Gentlemen:

This letter is in regard to an April 19, 1990, conversation with Mr. J. J. Hayes, of the Nuclear Regulatory Commission, concerning an administrative error in the Virgil C. Summer Nuclear Station (VCSNS) Technical Specifications Change Request for Diesel Fuel Oil Monitoring (TAC NO. 74823).

In a letter dated April 10, 1990, South Carolina Electric & Gas Company (SCE&G) submitted a reformatted version of a Technical Specifications Change Request to revise Surveillance Requirement 4.8.1.1.2 of Technical Specification 3/4.8.1, "A. C. Sources." Specifically, the proposed amendment replaces the diesel fuel oil storage, monitoring, sampling, and analysis requirements currently in the Specification with the corresponding requirement in NUREG-0452, "Standard Technical Specifications for Westinghouse Pressurized Water Reactors."

The proposed marked-up Technical Specifications pages in the April 10, 1990, submittal reflect SCE&G's intent to check for total particulate contamination in accordance with ASTM-D2276-88, which is an update to the Standard specified in NUREG-0452, ASTM-D2276-78. However, in the "Description of Amendment Request" sections, which compare the current Virgil C. Summer Nuclear Station Technical Specifications with the proposed revision, the submittal incorrectly indicates that SCE&G intends to obtain and check samples for total particulate contamination in accordance with ASTM-D2276-78. The referenced standard should be ASTM-D2276-88.

As previously mentioned, ASTM-D2276-88 is simply an update to ASTM-D2276-78. There are no differences in the requirements of the two editions. For your reference, Attachment 1 contains marked-up pages of the April 10, 1990, submittal indicating the locations where the incorrect standard was referenced.

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Should you have any questions, please call at your convenience.

Very truly yours,

O. S. Bradham

EWR/OSB:lcd
Attachment

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ATTACHMENT 1

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Current VCSNS Technical Specifications	Proposed Revision (NUREG-0452)
•Requires that, within 2 weeks of obtaining the sample, the properties specified in Table 1 of ASTM-D975-77 and Regulatory Guide 1.137 Position 2.a are verified when tested in accordance with ASTM-D975-77	•Requires that, within 30 days of obtaining the sample, the properties specified in Table 1 of ASTM-D975-81 are verified when tested in accordance with ASTM-D975-81, WITH THE EXCEPTION that the analysis for sulfur may be performed in accordance with ASTM-D1552-79 or ASTM-D2622-82
•Requires that, within one week of obtaining the sample, an impurity level of less than 2 mg of insoluble per 100 ml be verified when tested per ASTM-D2274-70	•Requires that at least once every 31 days a sample of fuel oil be obtained per ASTM-D2276-78, and the total particulate contamination be verified less than 10mg/liter when checked per ASTM-D2276-78. 881

Additionally, the proposed revision re-letters sections 4.8.1.1.2 (d),(e),(f), and (g) to make the VCSNS Technical Specifications consistent with the changes mentioned above.

South Carolina Electric and Gas Company is proposing this change to update the VCSNS Technical Specification on testing methodology and acceptability of emergency diesel generator fuel oil to comply with the latest ASTM test standards and to concur with the Standard Technical Specifications. The most beneficial aspect of this change will be the replacement of the Oxidation Stability analysis (4.8.1.1.2.(c)2. in the VCSNS Technical Specifications) with the Total Particulate Contamination analysis as found in the Standard Technical Specifications. The Oxidation Stability test is hazardous to perform and is very time consuming. Additionally, the results from the stability test are not indicative of the actual conditions in the tanks. Chemistry personnel at VCSNS have performed a trial run on the Total Particulate Contamination Test and are satisfied with the results and the methodology for performing the analysis.

South Carolina Electric and Gas Company (SCE&G) intends for this revision to be a permanent change in the VCSNS Technical Specifications. The change in diesel fuel oil monitoring and analyses does not affect the purpose of the Technical Specification. With the methods proposed in NUREG-0452 implemented at VCSNS, the diesel generator fuel oil will continue to meet the NRC guidelines for kinematic viscosity, water and sediment content, and specific gravity, and will, therefore, ensure the proper quality fuel oil for operation of the diesel generators.

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•Requires that, within one week of obtaining the sample, an impurity level of less than 2 mg of insoluble per 100 ml be verified when tested per ASTM-D2274-70	•Requires that at least once every 31 days a sample of fuel oil be obtained per ASTM-D2276-78, and the total particulate contamination be verified less than 10mg/liter when checked per ASTM-D2276-78. 88

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