



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555-0001

January 31, 1994

Docket Nos. 50-498
and 50-499

Mr. William T. Cottle
Group Vice-President, Nuclear
Houston Lighting & Power Company
South Texas Project Electric
Generating Station
Post Office Box 289
Wadsworth, Texas 77483

Dear Mr. Cottle:

SUBJECT: REVIEW OF LER 93-022, "DEVIATION FROM THE METHOD FOR THE
CONTAMINATION SAMPLING OF THE FUEL OIL SYSTEM"

By letter dated January 18, 1994, you submitted Licensee Event Report (LER) 93-022 regarding a deviation from the method for the contamination sampling of the diesel-generator fuel oil system. Technical Specification 4.8.1.1.2.d requires that the diesel generator fuel oil storage tanks be sampled in accordance with ASTM-D2276-78 once every 31 days to verify that the total particulate contamination is less than 10 mg/liter. Your staff identified a deviation from this standard, and concluded that the deviation could produce results in the conservatively high direction such that there was no potential violation of the fuel contamination control requirements. Additionally, your staff concluded that there was no detrimental impact associated with the testing methodology since all sample analysis results were below the technical specification value of 10 mg/liter.

Moreover, your staff committed to an evaluation to ensure that all appropriate diesel generator technical specifications have been correctly interpreted and determined that Technical Specifications 4.8.1.1.2.c and 4.8.1.1.2.d had requirements that were misunderstood. A subsequent evaluation found additional deviations, which your staff stated, were either insignificant or resulted in conservative high bias. Your staff committed to amend the technical specifications to resolve the identified deficiencies and develop a fuel oil program prior to submittal of the technical specification amendment request. Finally, your staff committed to provide continuing training on LER 93-022.

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The staff has reviewed LER 93-022 and finds that discrepancies have no impact on the ability to establish fuel quality, and achieve results which are equal to, or more conservative than, the technical specifications. You have taken, or will take, appropriate corrective action, including the submittal of a technical specification amendment request, which we understand will be submitted in June 1994. However, this does not preclude any subsequent violation Region IV may pursue in this matter.

Sincerely,

Original Signed By

Lawrence E. Kokajko, Senior Project Manager
Project Directorate IV-2
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

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*See Previous Sheet for Concurrence

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