



Duane Arnold Energy Center
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September 29, 1995
NG-95-2920

Mr. William T. Russell, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-37
Washington, DC 20555-0001

Subject: Duane Arnold Energy Center
Docket No: 50-331
Op. License No: DPR-49
Diesel Fuel Oil Testing Program

References: 1) Letter, L. Root to D. Eisenhut, dated 04/21/80, LDR-80-111
2) Letter, W. Rothert to Dr. Murley, dated 09/13/88, NG-88-2051
3) Letter, J. Franz to Dr. Murley, dated 01/24/92, NG-92-0290
4) Letter, J. Franz to Dr. Murley, dated 07/01/92, NG-92-2216

File: A-100, R-43

Dear Mr. Russell:

In Reference 1, we provided the Staff with a description of our program to ensure the quality of fuel oil for the Emergency Diesel Generators (EDGs) at the Duane Arnold Energy Center (DAEC). This program met the intent of Regulatory Guide 1.137 (Rev. 1). In references 2, 3 and 4, we notified the Staff of revisions to that program. The purpose of this letter is to inform the Staff that we are revising our testing program by deleting the requirement to test the flash point of new fuel.

Currently, when new fuel arrives at the DAEC, a sample is sent offsite for testing, which includes determination of flash point. The flash point of a fuel refers to the lowest temperature at which the vapor above the fuel will ignite under test conditions. This parameter is important with respect to legal requirements and safety precautions involved in fuel handling and storage.

A Service Information Letter (SIL) from Coltec Industries, the manufacturer of our EDGs, was issued on June 30, 1989. This SIL indicated that the flash point of the fuel oil need only be determined to be above the legal limit required for transport. Recent discussions with Coltec Industries confirmed that the flash point has little relation to fuel performance in the EDG itself. According to Coltec Industries, if the fuel is acceptable by state and federal law for transport, it is acceptable for use in the EDGs. The flash point of the fuel is determined by the supplier prior to transport. Therefore, there is no need to retest the flash point after its arrival at the DAEC.

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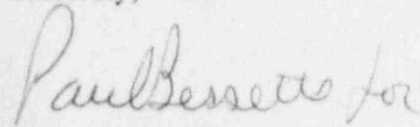
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This letter is to inform you that the DAEC does not consider flash point to be a critical characteristic and will no longer be performing flash point testing on new fuel samples.

This letter represents a change in commitment. The revised program continues to conform to the DAEC Technical Specifications and ensures that fuel oil stored at the DAEC is of sufficient quality to support Emergency Diesel Generator operability.

Should you have any questions regarding this matter, please contact this office.

Sincerely,



Keith D. Young
Manager, Nuclear Licensing

KDY/LBS

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