

ELECTRIC POWER SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

---

1. Verifying the fuel level in the day tank.
  2. Verifying the fuel level in the fuel storage tank.
  3. Verifying the fuel transfer pump can be started and transfers fuel from the storage system to the day tank.
  4. Verifying the diesel starts from ambient condition and accelerates to at least 900 rpm in less than or equal to 10 seconds. The generator voltage and frequency shall be  $4160 \pm 420$  volts and  $60 \pm 1.2$  Hz within 10 seconds after the start signal. The diesel generator shall be started for this test by using one of the following signals with startup on each signal verified at least once per 124 days.
    - a) Manual.
    - b) Simulated loss of offsite power by itself.
    - c) Simulated loss of offsite power in conjunction with an ESF actuation test signal.
    - d) An ESF actuation test signal by itself.
  5. Verifying the generator is synchronized, loaded to greater than or equal to 2750 kw in less than or equal to 60 seconds, and operates for greater than or equal to 60 minutes.
  6. Verifying the diesel generator is aligned to provide standby power to the associated emergency busses.
- b. At least once per 92 days by verifying that a sample of diesel fuel from the fuel storage tank is within the acceptable limits specified in Table 1 of ASTM D975-74 when checked for viscosity, water and sediment.
- c. At least once per 18 months during shutdown by:
1. Subjecting the diesel to an inspection in accordance with procedures prepared in conjunction with its manufacturer's recommendations for this class of standby service,
  2. Verifying that, on rejection of a load of greater than or equal to 610 kw the voltage and frequency are maintained within  $4160 \pm 420$  volts and  $60 \pm 1.2$  Hz.
  3. Verifying that the load sequencing timers are OPERABLE with times within the tolerances shown in Table 4.8-1.

8501150327 850108  
PDR ADOCK 05000339  
P PDR

ATTACHMENT 2

## DISCUSSION OF PROPOSED TECHNICAL SPECIFICATION CHANGE

The intent of Specification 4.8.1.1.2.b (either unit) is to require periodic verification that the quality of the fuel available to the emergency diesel engines compliments the operability requirements of the engines. The fuel oil systems of the station were designed and constructed to standards that were acceptable to the Commission. Unit 1 was granted a license for operation on that basis.

The additional phrase was included in the Unit 2 license as a result of a letter written by Mr. D. G. Eisenhut, January of 1980 (copy attached) that cited the failure of one station to bring fuel oil under the Quality Assurance Program. In that letter, Mr. Eisenhut indicated that Regulatory Guide 1.137, "Fuel Oil Systems for Standby Diesel Generators", described methods acceptable to the commission staff for complying with the Commission's regulations regarding fuel oil systems and adequacy of fuel oil quality.

Regulatory Guide 1.137 at C.2.c states that "The periodic sampling procedure for the fuel oil should be in accordance with ASTM D-270-1975, "Standard Method of Sampling Petroleum and Petroleum Products."

Station practice is to take samples from the discharge of the transfer pumps which transfer fuel oil from the storage tanks to the emergency diesel engine day tanks. This is a valid sample point based on the as-built configuration of the station. ASTM D-270 defines the DRAIN sample as one which comes from the draw-off or discharge valve. Station practice utilizes the draw-off point of the tank with an intervening pump which ASTM D-270 does not appear to permit.

Station practice is, therefore, in material compliance with ASTM D-270 but not "literal" compliance.

We submit that the sample point used by station practice is equally as acceptable as the sample point identified as a DRAIN sample point in ASTM D-270.

We believe, therefore, that the proposed change to Unit 2 Technical Specification 4.8.1.1.2.b removes a condition of "literal" noncompliance. The proposed change does not alter the probability of, or the consequences of a malfunction of equipment important to safety as previously evaluated in the UFSAR because it does not affect any operability features of the emergency generator.

The proposed change does not create the possibility of a different type of accident or malfunction than was previously evaluated in the UFSAR because no physical or operational feature of the emergency diesel generator is altered.

The proposed change does not reduce the margin of safety as described in the basis section of any part of the Technical Specification because it does not change any test frequency or quality requirement of the engine or fuel. The proposed change, therefore does not raise an unreviewed safety question.