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U. S. Nuclear Regulatory Commission
Washington, DC 20555

ATTENTION: Document Control Desk

SUBJECT: Calvert Cliffs Nuclear Power Plant
Unit Nos. 1 & 2; Docket Nos. 50-317 & 50-318
License Amendment Request; Diesel Fuel Oil Technical Specifications

- REFERENCES:
- (a) Letter from Mr. G. C. Crec' (BG&E) to NRC Document Control Desk, dated June 4, 1992, Planned Technical Specification Revisions
 - (b) Letter from Mr. A. E. Lundvall, Jr. (BG&E) to Mr. J. R. Miller (NRC), dated December 22, 1983, Request for Amendment
 - (c) Letter from Mr. D. H. Jaffe (NRC) to Mr. A. E. Lundvall, Jr. (BG&E), dated April 19, 1984, Issuance of Unit 1 Amendment No. 92 and Unit 2 Amendment No. 73
 - (d) Letter from Mr. J. A. Tiernan (BG&E) to Mr. A. C. Thadani, dated April 14, 1986, Request for Amendment
 - (e) Letter from Mr. S. A. McNeil (NRC) to Mr. J. A. Tiernan (BG&E), dated October 6, 1986, Issuance of Unit 1 Amendment No. 123 and Unit 2 Amendment No. 105

Gentlemen:

The Baltimore Gas and Electric Company hereby requests an Amendment to its Operating License Nos. DPR-53 and DPR-69 for Calvert Cliff, Unit Nos. 1 & 2, respectively, with the submittal of three proposed changes to the Technical Specifications. In Reference (a), BG&E informed the NRC that a recent design basis review identified inadequacies in the existing technical specifications for emergency diesel fuel oil storage requirements. We indicated in that letter that we would submit proposed changes to the technical specifications to correct these problems. This request for amendment accomplishes this objective.

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DESCRIPTION

The proposed amendment would revise the Technical Specifications for both Units 1 and 2 regarding the diesel fuel oil requirements. These proposed changes would revise the volume required in each of the fuel oil storage tanks (FOSTs) and the minimum fuel oil volume for the day tanks. In addition, a minor change to the diesel-driven fire pump fuel chemistry surveillance requirement is requested to make it the same as the current diesel generator fuel chemistry surveillance requirements.

BACKGROUND

The fuel oil system for the three Emergency Diesel Generators (EDGs) consists of two above-ground FOSTs (No. 11 and No. 21), three fuel oil transfer pumps, and three fuel oil day tanks. The Seismic Category I FOSTs provide fuel oil for the operation of the EDGs, auxiliary heating boilers, and the diesel-driven fire pump. In addition, No. 21 FOST is protected against tornado wind and tornado-generated missiles. This protection consists of a Seismic Category I concrete structure of sufficient thickness to stop tornado-generated missiles and resist tornado wind pressures. The concrete structure also acts as a dike for the storage tank. In the event of a tank failure, fuel for the EDGs can also be taken through a non-safety-related (NSR) line from the concrete structure itself. Internally, each FOST is equipped with a standpipe, from which the auxiliary heating boilers and the diesel-driven fire pump take suction. The standpipe in No. 21 FOST has a height of 11 feet, while the standpipe in No. 11 FOST has a height of 7 feet, 6 inches. The volume of fuel oil below the standpipes is reserved exclusively for the operation of the EDGs.

Culvert Cliffs has three EDGs. Normally, one EDG is dedicated to each unit. The third "swing" EDG is capable of powering one emergency bus on either unit. Fuel oil is distributed to the EDGs through two independent and redundant headers. Each EDG can take suction from either storage tank through either header. The two distribution headers connect to the FOSTs at the height of 8 inches and 12 inches above the bottom of each tank. Manual isolation valves are located at the tank outlets to allow isolation of a failure in either distribution header. A check valve in each header ensures that a failure of No. 11 FOST will not drain No. 21 FOST. (See Attachment (3) for a simplified diagram of the FOSTs and distribution system.)

Each EDG is equipped with a fuel oil transfer pump, rated at 16 gpm, and a fuel oil day tank having a maximum capacity of approximately 485 gallons. The Technical Specification-required minimum fuel oil volume in the day tank is 375 gallons. The fuel oil day tank level is normally maintained by automatic cycling of the fuel oil transfer pump. Automatic operation of the transfer pump is controlled by level switches connected to the day tank. High and low day tank level alarms are also provided to warn of abnormal conditions.

REQUESTED CHANGE NO. 1

Change Specifications 3.8.1.1.b.2 and 3.8.1.2.b.2 of the Unit 1 and Unit 2 Technical Specifications as shown on the marked-up pages attached to this transmittal. These changes to the Technical Specifications include the following items:

1. Revise the Limiting Condition for Operation (LCO) for 3.8.1.1.b.2 to require a minimum of 74,000 gallons of fuel oil to be maintained in No. 21 FOST (bunkered) and a minimum of 32,000 gallons of fuel oil to be maintained in No. 11 FOST (non-bunkered).
2. Revise Action Statement 3.8.1.1.f to clarify the FOST requirements during periods of high tornado probability (April 1 to September 30), as opposed to periods of low probability (October 1 to March 31). A separate Action Statement (3.8.1.1.g) has been added for the non-bunkered fuel oil storage tank (No. 11 FOST) which will increase the allowed out-of-service time for this tank from 72 hours to 7 days.
3. Remove from Action Statement 3.8.1.1.f the requirement to maintain an 8,000 gallon alternate source of fuel oil onsite whenever a FOST is inoperable.
4. Revise Technical Specification 3.8.1.2 (Mode 5 and 6) to more clearly specify the LCO and action requirements for inoperable FOSTs.

Additional Bases are also included to support the requested changes to the Technical Specifications.

SAFETY ANALYSES/JUSTIFICATION

There are two principal design criteria for the FOSTs; (1) design basis accident [e.g., loss of coolant accident (LOCA)] requirements, and (2) requirements for protection against external phenomena such as earthquakes and tornados.

The design of the EDG fuel oil system is based on a fuel oil capacity of seven days. Specifically, IEEE-308 requires that, for multi-unit stations, sufficient fuel oil be available to run one EDG powering one unit under accident conditions and one EDG powering the opposite unit under normal shutdown conditions, for seven days (or the time to replenish fuel oil from an offsite source following a design basis event, whichever is longer). The two FOSTs (No. 11 and No. 21) contain a volume of fuel oil well in excess of that needed to satisfy this requirement. Each tank is sized to hold approximately 107,000 gallons of usable fuel oil. Normally, the volume of fuel maintained in each tank is between 90,000 and 107,000 gallons.

Each of the two FOSTs was designed with an internal standpipe which reserves a minimum fuel oil volume below the standpipes for operation of the EDGs. The original height of the standpipe in each tank was 7.5 feet. The standpipe feature is not a requirement of IEEE-308, nor was this feature described in any previous licensing correspondence between BG&E and NRC. As best can be identified through our design basis reviews, the standpipes were added and the height was selected to ensure that the combined EDG reserve fuel oil capacity would satisfy the requirements of IEEE-308 for all design basis accidents (e.g., LOCA).

Whereas protection against earthquakes was an original design criterion, protection against tornadoes was not. In 1972 (during construction of Calvert Cliffs Units 1 and 2), the decision was made to protect No. 21 FOST from tornadoes by adding a concrete enclosure and to raise the associated internal standpipe to 11 feet, so that No. 21 tank would be capable of providing seven days of fuel oil to one EDG powering each unit to facilitate a safe and orderly normal shutdown. The design was based on the assumption that a tornado and a simultaneous design basis accident was not credible. In the event of a design basis accident, both FOSTs are assumed available with sufficient capacity to run one EDG powering one unit under accident conditions and one EDG powering the

opposite unit under normal shutdown conditions for seven days. Under tornado conditions, only No. 21 FOST is assumed available with sufficient capacity to run one EDG per unit carrying normal shutdown loads for seven days.

In summary, the combined minimum usable volume of the fuel oil storage system must be capable of meeting design basis accident conditions, i.e., LOCA, assuming a loss of offsite power. In the event of a tornado concurrent with a loss of offsite power, the capacity of No. 21 FOST must have sufficient capacity alone to operate two EDGs under normal shutdown conditions, assuming one EDG powering each unit, for a period of seven days.

Currently, the Technical Specifications require 18,250 gallons of fuel oil to be maintained in each fuel oil storage tank for a total of 36,500 gallons. During a recent review of the custom technical specifications issued with the original plant operating license, we were able to clarify that this requirement applies to each unit such that 73,000 gallons is the minimum onsite volume that must be maintained to support two-unit operation. During conversion from custom to standard technical specification format in 1977, the volume requirement for two-unit operation was not clearly translated into the new technical specifications. The additional design requirement to maintain 73,000 gallons of fuel in No. 21 FOST during tornado season was not incorporated in either the custom or the current standard technical specifications. This amendment request clarifies both of the above requirements. Also, both of these requirements are presently being implemented through administrative controls.

During our design basis review of the system, some non-conservatisms were found in the EDG fuel consumption rate calculation. A new, conservative calculation of fuel oil consumption rate was performed. Incorporating the new fuel oil consumption rate and the design basis requirements discussed above yielded the following required volumes:

1. The minimum volume of fuel oil required to operate one EDG under accident conditions and one EDG under normal shutdown conditions for seven days was determined to be 73,685 gallons (i.e., required volume to satisfy design basis accident criteria). This volume has been rounded up to 74,000 gallons.

and

2. The minimum volume of fuel oil required to operate two EDGs (one per unit) under normal shutdown conditions for seven days is 67,738 gallons (i.e., required volume to satisfy tornado protection criteria).

Also, new calculations were performed to determine the volume of usable fuel oil maintained below the standpipes in the tanks. For No. 11 FOST, this volume is approximately 32,000 gallons. For No. 21 FOST, the volume is approximately 51,000 gallons, for a total of 83,000 gallons. This exceeds the requirement to reserve 74,000 gallons in the tanks for design basis accidents involving a concurrent loss of offsite power.

As indicated earlier, No. 21 FOST also provides a tornado-protected source of fuel oil sufficient to operate two EDGs carrying normal safe shutdown loads for seven days (approximately 68,000 gallons). As this capability is not presently required by the technical specifications, a new requirement is proposed which would require an additional volume of fuel to be maintained in this tank. We also request an increase in the allowable out-of-service time for No. 11 FOST from 72 hours to 7 days. This will permit the tank to be drained, inspected, and repaired, as necessary. To compensate for this increase in the allowed out-of-service time for No. 11 FOST, we propose that

the minimum required volume for No. 21 FOST be increased to 74,000 gallons. This will ensure that sufficient fuel will be available in No. 21 FOST alone to satisfy the site's fuel demands for both design basis accidents or tornadoes. This volume is assured by administrative controls. These controls include periodic monitoring using local level indication. The continuous level annunciation/alarm in the Control Room is in the process of being modified, but may not be completed prior to approval of this request. Until this modification is completed, the above administrative controls will remain in effect.

When No. 11 FOST is operable, the level in both tanks is periodically verified in accordance with existing Surveillance Requirement 4.8.1.1.2.a.2. When No. 11 FOST is inoperable, the level of No. 21 FOST will be verified once per eight hours in accordance with Action Statement 3.8.1.1.g (proposed).

Existing Action Statement 3.8.1.1.f is revised to more clearly define the action requirements during periods of high tornado probability (April 1 through September 30) as opposed to periods of lower tornado probability (October 1 through March 31).

There are no proposed changes to the allowed out-of-service times for No. 21 FOST.

In a Request for Amendment dated December 22, 1983 (Reference b), relief was requested from the requirement to have two independent storage tanks available. This relief was necessary to perform inspection of the tank bottom without resulting in a dual unit outage. This relief was intended for a one-time tank inspection to be performed during the April 1984 Unit 2 refueling outage for a period of approximately two months. The relief included that when one of the FOSTs was taken out-of-service for inspection, an 8,000 gallon alternate fuel source would be onsite and connected to the fuel oil system. The NRC approved this relief request in License Amendment 92 for Unit 1 and Amendment 73 for Unit 2 (Reference c). In License Amendment Request dated April 14, 1986 (Reference d), an allowed out-of-service time of 72 hours was proposed for the FOSTs. Action Statements were also included to verify the operability of the remaining tank by verifying the tank level and the flowpath from the operable FOST to the diesel generators within one hour. It was determined that the incremental increase in risk resulting from the removal of a FOST from service for a period up to 72 hours was negligible. At the time of this request, it was incorrectly assumed that the requirement to have an 8,000 gallon alternate fuel source onsite when a FOST was drained was still in effect and was included in our request. License Amendments 123 for Unit 1 and 105 for Unit 2 (Reference e) revised the wording of this requirement to require the alternate source of fuel oil to be onsite whenever either FOST is declared inoperable. The requirement to have the alternate source of fuel oil was not necessary since the Action Statements did not allow the FOSTs to be taken out-of-service for an extended period of time as was requested for the April 1984 Unit 2 refueling outage. Therefore, we request that this requirement be removed from the Action Statement. The revisions we have proposed for the FOSTs will ensure that there will be sufficient fuel oil maintained onsite for all normal and analyzed accident conditions. We will revisit the need for the alternate source of fuel oil if in the future the need develops to take a FOST out-of-service for an extended period of time (beyond the Technical Specification allowed out-of-service time) and request similar relief as requested in the December 22, 1983 letter.

While in Modes 5 and 6, each unit is required to have at least one diesel generator operable and capable of providing power for normal shutdown loads. We have decided that the Mode 5 and 6 Technical Specifications should be revised to reflect tornado protection requirements, as well. To ensure consistency between the Modes 1 - 4 and the Modes 5 and 6 Technical Specifications, LCO 3.8.1.2 is revised to require that both FOSTs meet the same volume requirements as in Modes 1 - 4. Action Statements have been added to clarify the requirements for inoperable FOSTs.

DETERMINATION OF SIGNIFICANT HAZARDS

The proposed change has been evaluated against the standards in 10 CFR 50.92 and has been determined to not involve a significant hazards consideration, in that operation of the facility in accordance with the proposed amendment:

1. *Would not involve a significant increase in the probability or consequences of an accident previously evaluated.*

Implementation of these changes will ensure the fuel oil storage and transfer system contains the required fuel oil volume for all normal and analyzed accident conditions, for all modes of operation. In the design basis accident analysis, the fuel oil storage and transfer system is assumed to contain a sufficient fuel oil volume to operate one Emergency Diesel Generator (EDG) powering one unit under accident conditions and one EDG powering the opposite unit under normal shutdown conditions for seven days. This volume has been determined to be 74,000 gallons. The Limiting Condition of Operation (LCO) has been revised so that this fuel oil volume will be roughly split between the two fuel oil storage tanks (FOSTs). To be consistent with the tornado protection criteria, the fuel oil storage and transfer system is also required to contain a minimum volume of bunkered fuel oil to operate two EDGs, one per unit, under normal shutdown conditions for seven days. This volume has been determined to be approximately 68,000 gallons. Because only No. 21 FOST is tornado protected (bunkered), this entire volume must be contained in that tank. Since this proposed technical specification will require No. 21 FOST to contain a minimum of 74,000 gallons, the tornado protection criterion is satisfied. The minimum volume required for design basis accidents (e.g. Loss-of-Coolant Accidents) is reserved below the standpipes in the FOSTs. The additional volume of fuel oil maintained in No. 21 FOST for safe shutdown following a tornado involving the loss of No. 11 FOST will be assured by administrative controls. These controls include periodic monitoring using local level indication. The continuous annunciation/alarm of FOST level in the Control Room will be modified following approval of this request. Until this modification is complete, the level in the bunkered FOST will be checked daily. In summary, these proposed requirements will ensure that the fuel oil storage and transfer system contains a sufficient volume of fuel for design basis accidents and tornadoes. The proposed increase in the allowed out-of-service time for No. 11 FOST from 72 hours to 7 days is compensated by the requirement to maintain the total site fuel oil requirement in No. 21 FOST. When No. 11 FOST is inoperable, the surveillance frequency for No. 21 FOST level would be increased.

Deletion of the present requirement to provide an 8,000 gallon fuel oil source whenever a FOST is out-of-service is not a significant change because its inclusion in the technical specifications has been determined to be inappropriate, based upon a review of the licensing basis. This review indicates that this requirement is only appropriate as a temporary compensatory measure for planned maintenance involving out-of-service times longer than those presently allowed by the technical specifications. In the future, extended maintenance activities would be handled under a separate license amendment request.

These changes would not increase the probability of any accidents previously analyzed because a failure in the fuel oil storage and transfer system is not an accident initiator. The purpose of the fuel oil storage and transfer system is to support the onsite emergency AC power systems in mitigating the consequences of design basis events involving the loss-of-offsite power. Because these proposed changes correct deficiencies and add new restrictions and compensatory measures to address the fuel oil capacity requirements for these events,

there will be greater assurance that these events will be successfully mitigated. Therefore, these changes do not represent a significant increase in the probability or consequences of any accidents previously evaluated.

2. *Would not create the possibility of a new or different type of accident from any accident previously evaluated.*

The proposed changes to the fuel oil technical specification requirements do not change the function of the fuel oil storage and transfer system and do not represent a significant change in the configuration or operation of the plant. Rather, these changes primarily add new requirements and operating restrictions to reflect the results of licensing basis reviews conducted by the licensee. No new hardware is being added to the plant as part of the proposed changes, nor are any significantly different types of operations being introduced. The minimum fuel oil volumes that would be required by these proposed technical specifications are already being administratively maintained at the plant. Therefore, the proposed amendment would not create the possibility of a new or different type of accident from those previously evaluated.

3. *Would not involve a significant reduction in a margin of safety.*

The proposed changes will ensure that the fuel oil storage and transfer system contains enough fuel oil to operate the EDGs for seven days following design basis accidents or a tornado involving a loss-of-offsite power. Allowing the non-bunkered (No. 11) FOST to be removed from service for seven days does not significantly reduce the system design or operating safety margins since the total site fuel oil requirement will be maintained in the operable, bunkered FOST. The operable FOST can provide fuel oil to the EDGs through either of the two independent and redundant headers. Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

REQUESTED CHANGE NO. 2

Change Specifications 3.8.1.1.b.1 and 3.8.1.2.b.1 of the Unit 1 and Unit 2 Technical Specifications as shown on the marked-up pages attached to this transmittal. The Limiting Condition for Operation (LCO) has been revised to require that a minimum volume of 275 gallons of fuel oil is maintained in the day tank. Additional Bases are also included to supplement the requested change to the Technical Specifications.

SAFETY ANALYSES/JUSTIFICATION

Each emergency diesel generator (EDG) is equipped with a fuel oil transfer pump, rated at 10 gpm, and a fuel oil day tank having a maximum capacity of approximately 485 gallons. The fuel oil transfer pumps can take suction on either fuel oil storage tank (FOST) through either of two fuel oil distribution headers. The fuel oil day tank level is normally maintained by automatic cycling of the fuel oil transfer pump. Operation of the transfer pump in automatic is controlled by pump start and stop level switches connected to the day tank. High and low day tank level alarms are also provided to warn of abnormal conditions. The fuel oil contained in the day tank allows sufficient operating

time to correct most problems that may develop with the fuel oil transfer system before the EDG trips due to low fuel oil.

Currently, the Technical Specifications require that a usable volume of 375 gallons be maintained in each day tank. Our design basis review indicates that this volume was originally selected in order to provide approximately two hours of diesel generator operation at full load. However, there was no known regulatory basis for the selection of a two-hour supply during original plant design. Rather, we have concluded that the two-hour capability was derived from the maximum capacity of the installed day tanks. Current standards (Regulatory Guide 1.137 and ANSI N195-1976) recommend a fuel oil volume equivalent to at least one hour of operation be maintained in the day tank.

It is requested that the minimum fuel oil day tank volume requirements be amended to 275 gallons to provide for one hour of fuel oil in each day tank, based on the EDGs operating under full load conditions. One hour is sufficient time to perform corrective actions for most problems that may develop in the fuel oil transfer system. It should be recognized that Regulatory Guide 1.137 and ANSI N195-1976 were published after issuance of the Calvert Cliffs Nuclear Power Plant Safety Evaluation Report (August 28, 1972). Although in general the design of the fuel oil transfer system conforms to the requirements of these standards, BG&E intends to adopt only the one-hour day tank capacity stipulated in ANSI N195. ANSI N195 requires that the one-hour interval be based on the 100% continuous rating of the diesel generator, which at Calvert Cliffs is 2,500 Kw. Therefore, ANSI N195 would require a minimum volume of 222 gallons to be maintained in the fuel oil day tank. For additional conservatism, the calculation used at Calvert Cliffs to determine the required fuel oil day tank volume for the one-hour interval was based on the seven-day maximum rating of 3,250 Kw. The requested 275 gallons of fuel oil would provide approximately 65 minutes of operation at a load of 3,250 Kw.

Lowering the required Technical Specification volume in the day tank would permit the pump start level switch to be lowered, resulting in reduced cycling of the pumps and level switches. This should result in reduced component wear and improved system reliability. Based on the most recent fuel oil consumption rate calculation, the time between each cycle of the fuel oil transfer pump could be doubled to approximately 30 minutes by adopting the proposed minimum Technical Specification volume of 275 gallons.

DETERMINATION OF SIGNIFICANT HAZARDS

The proposed change has been evaluated against the standards in 10 CFR 50.92 and has been determined to not involve a significant hazards consideration, in that operation of the facility in accordance with the proposed amendment:

1. *Would not involve a significant increase in the probability or consequences of an accident previously evaluated.*

The volume of the day tank is not credited in the calculations for the volumes of the fuel oil storage tanks (FOSTs). During an accident, fuel is automatically made up to the day tank from the FOSTs via the fuel oil headers and fuel transfer pumps. The proposed reduction in the minimum volume of fuel oil maintained in the tank would reduce the amount of time that the day tanks would support operation of the emergency diesel generators (EDGs) before fuel is transferred from the FOSTs. However, this reduction is not significant because the fuel oil transfer function is automatic and one hour allows sufficient time for the operators to detect and correct most problems that may arise with the system. Failure of the fuel oil

storage and transfer system is not an accident initiator. Therefore, reducing the required minimum volume of the fuel oil day tanks will not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. *Would not create the possibility of a new or different type of accident from any accident previously evaluated.*

The proposed change to reduce the minimum required volume for the fuel oil day tanks does not represent a significant change in the configuration or operation of the plant. Specifically, no new hardware is being added to the plant as part of the proposed change nor are there significantly different types of operations being introduced. Therefore, the proposed change does not create the possibility of a new or different kind of accident from those previously evaluated.

3. *Would not involve a significant reduction in a margin of safety.*

The margin of safety for this technical specification is defined by the ability of the day tank to support short-term operation of the EDGs before fuel is automatically transferred from the FOSTs by the fuel transfer pumps. This period of short-term operation allows time for the plant operators to respond to most problems that may arise in the fuel transfer system. Although this change would result in this period being reduced from approximately two hours to one hour, there is still sufficient time for the operators to detect and correct most problems that may develop in the fuel oil transfer system. Therefore, the proposed change would not involve a significant reduction in the margin of safety.

REQUESTED CHANGE No. 3

Change Specification 4.7.11.1.2.b of the Unit 1 and Unit 2 Technical Specifications as shown on the marked-up pages attached to this transmittal. The diesel-driven fire pump fuel oil chemistry surveillance requirement will be revised to require fuel oil to meet the applicable limits of ASTM D975-74 to ASTM D975-81.

SAFETY ANALYSES/JUSTIFICATION

A minor change is requested to Technical Specification 4.7.11.1.2.b to correct an inconsistency between surveillance requirements concerning the diesel-driven fire pump fuel oil chemistry and the EDG fuel oil chemistry. Amendment No. 111 for Unit 1, and Amendment No. 94 for Unit 2 (Reference b), authorized use of ASTM D975-81 for determining acceptance of diesel fuel oil chemistry. This change should have been implemented for the diesel fire pump fuel oil chemistry surveillance as well, since the EDGs and the diesel-driven fire pump are supplied from a common source of fuel oil. A comparison of ASTM D975-74 and ASTM D975-81 indicates that no change to the diesel-driven fire pump operation or fuel oil chemistry would result from the use of the revised standards. This proposed change to the Technical Specification reflects no actual change as the fuel currently being used meets the 1981 standard. Therefore, we request the Technical Specification 4.7.11.1.2.b be revised to require fuel oil to meet the applicable limits of ASTM D975-81.

DETERMINATION OF SIGNIFICANT HAZARDS

The proposed change has been evaluated against the standards in 10 CFR 50.92 and has been determined to not involve a significant hazards consideration, in that operation of the facility in accordance with the proposed amendment:

1. *Would not involve a significant increase in the probability or consequences of an accident previously evaluated.*

The diesel-driven fire pump fuel oil chemistry surveillance requirement will be revised to require fuel oil to meet the applicable criteria of ASTM D975-81 to correct an inconsistency between the diesel-driven fire pump fuel oil chemistry surveillance requirements and those for the EDG fuel oil chemistry. This proposed change is minor in nature and will not result in a change to the diesel-driven fire pump fuel oil chemistry. The change will ensure consistency in the specifications applied to the testing of the diesel fuel oil chemistry. Therefore, this proposed change would not result in a decrease in the reliability of the diesel-driven fire pump and would not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. *Would not create the possibility of a new or different type of accident from any accident previously evaluated.*

The proposed change to the diesel-driven fire pump fuel chemistry surveillance requirement does not represent a change in the configuration or operation of the plant. The proposed change reflects no actual change in the chemistry specifications for the diesel-driven fire pump. Therefore, the proposed change would not create the possibility of a new or different kind of accident from those previously evaluated.

3. *Would not involve a significant reduction in a margin of safety.*

The proposed change is minor in nature and does not constitute a substantive change to the Technical Specifications. This change will not result in a change to the diesel-driven fire pump operation. The fuel oil chemistry will not change nor will any actual testing requirements change as a result of this minor revision. Therefore, the proposed change would not involve a significant reduction in a margin of safety.

SCHEDULE

These changes are requested to be approved and issued by April 1, 1993. However, issuance of this amendment is not currently identified as having an impact on outage completion or continued plant operation.

