

NORTHEAST UTILITIES



THE CONNECTICUT LIGHT AND POWER COMPANY
WESTERN MASSACHUSETTS ELECTRIC COMPANY
HOLYOKE WATER POWER COMPANY
NORTHEAST UTILITIES SERVICE COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY

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June 14, 1988

Docket No. 50-336

B12913

Re: 10CFR50.90

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Gentlemen:

Millstone Nuclear Power Station, Unit No. 2
Proposed Revision to Technical Specifications
Diesel Fuel Oil Surveillance Requirement

Pursuant to 10CFR50.90, Northeast Nuclear Energy Company (NNECO) hereby proposes to amend its Operating License, DPR-65, by incorporating the changes identified in Attachment 1 into the Technical Specifications of Millstone Unit No. 2.

The proposed change would change the year of the ASTM standard that is used for acceptance of the emergency diesel generator fuel oil. The existing Technical Specifications require that the fuel oil acceptance limits be in accordance with Table 1 of the 1974 Edition of ASTM D975, when sampled for viscosity, water and sediment. The request proposes to make the 1978 Edition of ASTM D975 the governing standard.

The following table summarizes the criteria presented in each of the editions for Grade No. 2-D Diesel Fuel Oil:

	<u>1974 Edition</u>	<u>1978 Edition</u>
Water/Sediment (Volume %)	0.05 Max.	0.05 Max.
Kinematic Viscosity (cST)		
- Normal	2.0 - 4.3	1.9 - 4.1
- Cloud Pt >10°F	1.8	1.7
Saybolt Viscosity (SUS)	32.6 - 40.1	32.6 - 40.1
Test Method (Water/Sediment)	ASTM D1796	ASTM D1796
Test Method (Viscosity)	ASTM D445/D2161	ASTM D445/D2161

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*Approval w/ check
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It can be seen from the above comparison that the only difference between the two editions is the allowable kinematic viscosity limits. The 1974 edition presents an acceptable range of 2.0 to 4.3 and the 1978 edition requires 1.9 to 4.1. The upper end of the range is limited by the engine and injection system design and the minimum limit is specified to minimize power loss caused by injector pump and injector leakage. The reduction in Cloud Pt $>10^{\circ}\text{F}$ from 1.8 to 1.7 is in a conservative direction in that it increases the temperature at which cloudiness would be detected in diesel fuel oil.

The reduction from 4.3 to 4.1 is conservative in that it reduces the maximum allowable viscosity, thus ensuring that the engine or injection system limitations are not exceeded. The reduction from 2.0 to 1.9 is in the direction which would tend to increase system leakage, but the change is relatively insignificant. The diesel engine manufacturer has been contacted and concurred that no significant difference exists between the two ranges.

The Technical Specification Section affected by this proposed change is 4.8.1.1.2.b, on page 3/4 8-3. The reference to "Table 1 of ASTM D975-74" would be changed to "Table 1 of ASTM D975-78".

NNECO has reviewed the attached proposed change, in accordance with 10CFR50.92, and has concluded that it does not involve a significant hazards consideration in that this change would not:

1. Involve a significant increase in the probability of occurrence or consequences of an accident previously analyzed. The proposed update in the ASTM Standard used to set acceptance criteria for emergency diesel fuel oil would have no effect on plant operation.
2. Create the possibility of a new or different kind of accident from any previously analyzed. The reduction from 2.0 to 1.9 in allowable kinematic viscosity of the diesel fuel oil is in the direction which would tend to increase system leakage but the change is relatively insignificant. The manufacturer of the diesel generator was contacted and concurs that no significant difference exists between the two viscosity ranges.
3. Involve a significant reduction in a margin of safety. A significant reduction in safety will not be realized in the change from one edition of the Standard to a later edition as the only difference is a minor reduction in allowable viscosity.

The Commission has provided guidance concerning the application of standards in 10CFR50.92 by providing certain examples (51FR7751, March 6, 1986). The change proposed herein most closely resembles example 'i), a purely administrative change to technical specifications: for example a change to achieve consistency throughout the technical specifications, correction of an error, or a change in nomenclature. The change from a 1974 ASTM standard to a 1978 standard has no operational or safety impact on the plant.

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The Millstone Unit No. 2 Nuclear Review Board has reviewed and approved the attached proposed revision and has concurred with the above determinations.

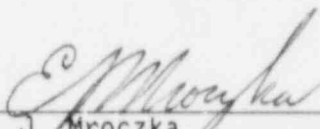
The proposed change is not required to support continued operation. Therefore, NNECO requests the effective date for the proposed change be 60 days after issuance by the NRC Staff. This will provide adequate time for changes to controlled documents and any applicable training of operational personnel.

In accordance with 10C R50.91(b), we are providing the State of Connecticut with a copy of this proposed amendment.

Pursuant to the requirements of 10CFR170.12(c) enclosed with this amendment request is the application fee of \$150.00.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



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Senior Vice President

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