# SURVEILLANCE REQUIREMENTS (Continued)

- 6. Verifying the diesel generator is aligned to provide standby power to the associated emergency busses.
- 7. Verifying the pressure in all diesel generator air start receivers to be greater than or equal to 380 psig.
- 8. Verifying the lube oil pressure, temperature and differential pressure across the lube oil filters to be within manufacturer's specifications.
- b. At least once per 31 days by visually examining a sample of lube oil from the diesel engine to verify absence of water.
- c. At least once per 31 days and after each operation of the diesel where the period of operation was greater than or equal to 1 hour by checking for and removing accumulated water from the fuel oil day tank.
- d. At least once per 92 days by removing accumulated water from the fuel oil storage tanks.
- e. At least once per 31 days by performing a functional test on the emergency load sequencer to verify operability.
- f. At least once per 92 days and from new fuel oil prior to addition to the storage tanks by obtaining a sample in accordance with ASTM-D270-1975 and by verifying that the sample meets the following minimum requirements and is tested within the specified time limits:
  - 1. As soon as sample is taken or from new fuel prior to addition to the storage tank, as applicable, verify in accordance with the tests specified in ASTM-D975-77 that the sample has:
    - a) A water and sediment content of less than or equal to 0.05 volume percent.
    - A kinematic viscosity @ 40°C of greater than or equal to 1.9 centistokes, but less than or equal to 4.1 centistokes or a Saybolt Second Universal (ssu) viscosity at 100°F of greater than or equal to 32 ssu but less than or equal to 35 ssu.
    - c) A specific gravity as specified by the manufacturer as API gravity @ 60°F of greater than or equal to 28 degrees but less than or equal to 42 degrees.
  - 2. Within one week after obtaining the sample, verify an impurity level of less than 2 mg of insolubles per 100 ml. when tested in accordance with ASTM-D2274-70.

40.1

#### ATTACHMENT II

## TECHNICAL SPECIFICATION 6.9.3 SPECIAL REPORTS

Technical Specification 6.9.2 indicates that special reports shall be submitted to the NRC Region within the time frame specified for each report. This change would add Specification 6.9.3 specifying that violations of the fire protection program as described in the FSAR require the submittal of a Licensee Event Report (LER) within 30 days.

On May 13, 1986 PSE&G requested the NRC to remove the fire protection program (FPP) requirements from the HCGS Technical Specifications with the issuance of the full-power operating license, thereby replacing surveillance test procedures with periodic test procedures. This request was made in accordance with the guidance provided in Generic Letter 86-10 and followed precedence set by the Cleveland Electric Illuminating Co. (CEI) for the Perry Nuclear Power Plant. HCGS License Condition 2.C.7 requires compliance with the FPP as specified; however, with the removal of the FPP elements from the Technical Specifications, there is no indication of what is reportable should the requirements of the FPP not be met. License Condition 2.F requires a 24-hour notification whenever a License Condition is not met (and in this case that would be License Condition 2.C.7); however, this requirement is unnecessary, overly restrictive and inconsistent with Item E of Generic Letter 86-10. PSE&G has reviewed a submittal by CEI dated June 18, 1986 and determined that the requested addition to the reporting requirements of Technical Specification 6.9 is also applicable to HCGS. The addition indicates that whenever the FPP is violated and that violation would have adversely affected the ability to achieve and maintain safe shutdown in the event of a fire, an LER must be submitted to the NRC Regional Administrator within 30 days. Therefore, the attached HCGS Technical Specification 6.9.3 has been revised accordingly.

# SEMIANUAL RADIOACTIVE EFFLUENT RELEASE REPORT (Continued)

The radioactive effluent release report to be submitted within 60 days after January 1, of each year shall also include an assessment of radiation doses to the likely most exposed MEMBER OF THE PUBLIC from reactor releases and other nearby uranium fuel cycle sources (including doses from primary effluent pathways and direct radiation) for the previous 12 consecutive months to show conformance with 40 CFR 190, Environmental Radiation Protection Standards for Nuclear Power Operation. Acceptable methods for calculating the dose contribution from liquid and gaseous effluents are given in Regulatory Guide 1.109, Rev. 1.

The radioactive effluents release shall include the following information for each class of solid waste (as defined by 10 CFR 61) shipped offsite during the report period:

- a. Container volume.
- Total curie quantity (specify whether determined by measurement or estimate),
- Principal radionuclide (specify whether determined by measurement or estimate),
- Type of waste (e.g., spent resin, compact dry waste, evaporator bottoms),
- e. Type of container (e.g., LSA, Type A, Type B, Large Quantity), and
- f. Solidification agent (e.g., cement, urea formaldehyde).

The radioactive effluent release reports shall include unplanned releases from the site to the UNRESTRICTED AREA of radioactive materials in gaseous and liquid effluents on a quarterly basis.

The radioactive effluent release reports shall include any changes to the PROCESS CONTROL PROGRAM (PCP), OFFSITE DOSE CALCULATION MANUAL (ODCM) or radioactive waste systems made during the reporting period.

### MONTHLY OPERATING REPORTS

6.9.1.8 Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis to the Director, Office of Management and Program Analysis, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, with a copy to the Regional Administrator of the Regional Office no later than the 15th of each month following the calendar month covered by the report.

### SPECIAL REPORTS

6.9.2 Special reports shall be submitted to the Regional Administrator of the Regional Office of the NRC within the time period specified for each report.



6.9.3 Violations of the requirements of the fire protection program described in the Final Safety Analysis Report which would have adversely affected the ability to achieve and maintain safe shutdown in the event of a fire shall be reported to the Regional Administrator of the Regional Office of NRC via the Licensee Event Report System within 30 days.