UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. for a Class 103 License to Acquire, Possess, and Use a Utilization Facility as Part of Unit No. 3 of the San Onofre Nuclear Generating Station	)))))	Docket No. 50-362 Amendment Application No. 175

SOUTHERN CALIFORNIA EDISON COMPANY, et al. pursuant to 10CFR50.90, hereby submit Amendment Application No. 175. This amendment application consists of Proposed Change No. NPF-15-505 to Facility Operating License No. NPF-15. Proposed Change No. NPF-15-505 is a request to revise Technical Specification 5.5.2.13, "Diesel Fuel Oil Testing Program." The proposed change is an administrative change to ensure consistency with the Bases of Surveillance Requirement 3.8.3.3, "Diesel Fuel Oil, Lube Oil, and Starting Air."

Subscribed on this 12th day of November, 1999.

Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By: _____
Dwight E. Nunn
Vice President

State of California
County of San Diego
On 11/12/99 before me, Mariane Sanchez, personally appeared Dwight E. Nunn, personally known to me to be the person whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his authorized capacity, and that by his signature on the instrument the person, or the entity upon behalf of which the person acted, executed the instrument.

WITNESS my hand and official seal.

Signature _____

MARIANE SANCHEZ
Commission #1196482
Notary Public - California
San Diego County
My Comm. Expires Oct 14, 2002

ENCLOSURE 1

PCN NPF-10/15-505
Diesel Fuel Oil Testing Program

DESCRIPTION
OF PROPOSED CHANGE NPF-10/15-505
DIESEL FUEL OIL TESTING PROGRAM
SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2 AND 3

This proposed change is a request to revise Technical Specification (TS) 5.5.2.13, "Diesel Fuel Oil Testing Program." The proposed change is an administrative change to ensure consistency with the Bases of Surveillance Requirement 3.8.3.3, "Diesel Fuel Oil, Lube Oil, and Starting Air."

Existing Technical Specifications

Unit 2: See Attachment "A"
Unit 3: See Attachment "B"

Proposed Technical Specifications

Unit 2: See Attachment "C" (Redline and Strikeout shown)
Unit 3: See Attachment "D" (Redline and Strikeout shown)

Proposed Technical Specifications

Unit 2: See Attachment "E"
Unit 3: See Attachment "F"

DESCRIPTION OF CHANGES:

This proposed change is a request to revise Technical Specification (TS) 5.5.2.13, "Diesel Fuel Oil Testing Program." The proposed change is an administrative change to ensure consistency with the Bases of Surveillance Requirement 3.8.3.3, "Diesel Fuel Oil, Lube Oil, and Starting Air."

The following changes are proposed for the Diesel Fuel Oil Testing Program as described in TS 5.5.2.13:

1) The at least once per 92 days test is deleted for water and sediment, American Petroleum Institute (API) gravity or an absolute specific gravity, and kinematic viscosity for the diesel fuel oil in the Emergency Diesel Generator fuel oil storage tanks. The requirement to test these properties prior to addition of new fuel to the storage tank remains unchanged.

2) A requirement is added to test new fuel oil prior to addition to the storage tank to verify that the flash point is within limits.

3) A requirement is added to test new fuel oil within 31 days of delivery for "other properties for ASTM 2D fuel."

4) The acceptance criteria for the properties listed, with the exception of the particulate criterion, are replaced with the phrase "within limits." The statement which requires sampling in accordance with ASTM-D4057-81 is deleted. Acceptance criteria and reference to the applicable standard for sampling are currently provided in the Bases for Surveillance Requirement 3.8.3.3.

BACKGROUND:

System Description

San Onofre Units 2 and 3 each have two Diesel Generators (DGs) available as standby power sources. Each diesel generator is provided with a storage tank having a fuel oil capacity sufficient to continuously operate that DG for a period of 7 days. Fuel oil is transferred from the storage tank to the day tank by either of two transfer pumps associated with each storage tank. For proper operation of the DGs, it is necessary to ensure the proper quality of the fuel oil. San Onofre has a Diesel Fuel Oil Testing Program which ensures proper fuel oil quality. The program includes purchasing, receipt testing of new fuel oil, and periodic analyses of the stored fuel.

Applicable Guidance Documents

Regulatory Guide (RG) 1.137, "Fuel Oil Systems for Standby Diesel Generators," describes a method acceptable to the NRC staff for complying with the Commission's regulations regarding fuel oil systems for standby diesel generators and assurance of adequate fuel oil quality. RG 1.137, Section C.2.b states:

> "Prior to adding new fuel oil to the supply tanks, onsite samples of the fuel oil should be taken. As a minimum, prior to the addition of new fuel, tests for the following properties should be conducted:
>
> (1) Specific or API gravity
> (2) Water and Sediment
> (3) Viscosity
>
> Test results for the latter two tests should not exceed the limits specified in the applicable specification. Analysis of the other

properties of the fuel oil listed in the applicable specification should be completed within 2 weeks of addition."

The tests described above are intended as a means of determining if the new fuel oil is of the appropriate grade and has not been contaminated.

NUREG 1432, "Standard Technical Specifications, Combustion Engineering Plants," presents these requirements in a format for incorporation into improved Technical Specifications.

In accordance with NUREG 1432, Revision 0, Surveillance Requirement (SR) 3.8.3.3 requires verification that "Fuel oil properties of new and stored fuel oil are tested in accordance with, and maintained within the limits of, the Diesel Fuel Oil Testing Program." The Bases for this SR contain specific guidance related to acceptance criteria and frequency of testing as follows:

"These tests are to be conducted prior to adding the new fuel to the storage tank(s), but in no case is the time between receipt of new fuel and conducting the tests to exceed 31 days. The tests, limits, and applicable ASTM Standards are as follows:

a. Sample the new fuel oil in accordance with ASTM D4054-[ ] (Ref. 6);

b. Verify in accordance with the tests specified in ASTM D975-[ ] (Ref. 6) that the sample has an absolute specific gravity at 60/60 °F of ≥ 0.83° and ≤ 0.89°, or an API gravity at 60 °F of ≥ 0.27° and ≤ 0.39°, a kinematic viscosity at 40 °C of ≥ 1.9 centistokes and ≤ 4.1 centistokes, and a flash point ≥ 125 °F; and

c. Verify that the new fuel oil has a clear and bright appearance with proper color when tested in accordance with ASTM D4176-[ ] (Ref. 6)...

Within 31 days following the initial new fuel oil sample, the fuel oil is analyzed to establish that the other properties specified in Table 1 of ASTM D975-[ ] (Ref. 7) are met for new fuel oil when tested in accordance with ASTM D975-[ ] (Ref. 6), except that the analysis for sulfur may be performed in accordance with ASTM D1522-[ ] (Ref. 6) or ASTM D2622-[ ] (Ref. 6)...

"Particulate concentrations should be determined in accordance with ASTM D2276-[ ], Method A (Ref. 6). This method involves a gravimetric

determination of total particulate concentration in the fuel oil and has a limit of 10 mg/l."

NUREG 1432 presents this Basis information as a requirement in Technical Specification Section 5.0, "Administrative Controls," as the Diesel Fuel Oil Testing Program, which states:

"The purpose of the program is to establish the following:

a. Acceptability of new fuel oil for use prior to addition to storage tanks by determining that the fuel oil has:

   1. An API gravity or an absolute specific gravity within limits,

   2. A flash point and kinematic viscosity within limits for ASTM 2D fuel oil, and

   3. A clear and bright appearance with proper color;

b. Other properties for ASTM 2D fuel oil are within limits within 30 days following sampling and addition to storage tanks; and

c. Total particulate concentration of the fuel oil is $\leq$ 10 mg/l when tested every 31 days in accordance with ASTM D-2276, Method A-2 or A-3."

In addition to the tests for new fuel, NUREG 1432 contains a periodic test for particulate content. Fuel oil degradation during long term storage may be indicated by an increase in particulate, due mostly to oxidation. Because this test is meant to determine changes in the fuel composition over time, a repetitive frequency is appropriate, as opposed to the one-time tests for new fuel.

Licensing History

The guidance provided by NUREG-1432 was the model for the Technical Specification Improvement Program (TSIP) for San Onofre Units 2 and 3. TSIP was approved for Units 2 and 3 by License Amendments 127 and 116, respectively. Southern California Edison's (SCE's) TSIP License Amendment Applications (Proposed Change Number [PCN]-299 through Supplement 4) stated that the Diesel Fuel Oil Testing Program would be contained in the Licensee Controlled Specifications. The Bases for SR 3.8.3.3 were consistent with the guidance in NUREG-1432, with the following exceptions:

1. There was no requirement for verification of clear, bright, proper color.

2. The frequency for verifying "other properties as defined in Table 1 of ASTM-D975-81" was within 31 days following delivery of new fuel oil, as opposed to within 31 days following addition of new fuel oil to the storage tanks. Also, there was an exception taken to Table 1 concerning the method of calculation of the cetane index.

3. The frequency for verification of particulate concentration was every 92 days, as opposed to every 31 days.

It is important to note that the proposed Bases for SR 3.8.3.3 in PCN 299 differed from the existing SR in that the frequency of testing changed from every 92 days to prior to addition of new fuel to the storage tanks, except for the case of particulate concentration. Also, the pre-TSIP TSs did not include requirements for testing flash point or "other properties as defined in Table 1 of ASTM D975-81."

Late in the review and approval process for PCN-299 (following submittal of Supplement 4), it was decided to place the Diesel Fuel Oil Testing Program in Section 5.0 of the TSIP Technical Specifications, in accordance with the NUREG-1432 model. The text that was submitted and approved as TS 5.5.2.13 was not consistent with NUREG-1432 nor the 3.8.3.3 Bases that were submitted and approved by the NRC, but was instead identical to the pre-TSIP TSs 4.8.1.1.2.c.1 and 4.8.1.1.2.c.2.

TS 5.5.2.13 incorrectly states a test frequency of 92 days, in addition to "prior to addition of new fuel to the storage tanks" for the water and sediment, specific gravity, and kinematic viscosity tests. In addition, TS 5.5.2.13 does not include requirements to test new fuel oil to verify an acceptable flash point, or to test for "other properties of ASTM 2D fuel."

DISCUSSION

Southern California Edison (SCE) considers this change to be administrative in nature. The changes will provide consistency between TS 5.5.2.13, "Diesel Fuel Oil Testing Program," the Bases of SR 3.8.3.3, and the NUREG 1432 model for Diesel Fuel Oil Testing Programs. The differences between the proposed TS 5.5.2.13 and NUREG-1432 were approved by the NRC when the Bases for SR 3.8.3.3 were issued as part of Amendments 127 and 116 for Units 2 and 3, respectively.

The following changes are proposed for TS 5.5.2.13, "Diesel Fuel Oil Testing Program":

1) The at least once per 92 days test is deleted for water and sediment, specific gravity, and the kinematic viscosity for the diesel fuel oil in the Emergency Diesel Generator fuel oil storage tanks. The requirement to test these properties prior to addition of new fuel to the storage tank remains unchanged.

   These tests are one-time tests intended to determine whether new fuel is of the appropriate grade and is not contaminated. Therefore, a repetitive frequency of 92 days for this test is not appropriate. This change is consistent with NUREG 1432, TS 5.7.2.17, "Diesel Fuel Oil Testing Program." This change is also consistent with the existing Bases for SR 3.8.3.3 as approved by the NRC in Amendments 127 and 116 for San Onofre Units 2 and 3, respectively.

2) A requirement is added to test new fuel oil prior to addition to the storage tank to verify that the flash point is within limits.

   This change is consistent with NUREG 1432, TS 5.7.2.17, "Diesel Fuel Oil Testing Program." This change is also consistent with the existing Bases for SR 3.8.3.3 as approved by the NRC in Amendments 127 and 116 for San Onofre Units 2 and 3, respectively.

3) A requirement is added to test new fuel oil within 31 days of delivery for "other properties for ASTM 2D fuel."

   This change is consistent with NUREG 1432, TS 5.7.2.17, "Diesel Fuel Oil Testing Program," with an exception noted as specified in the Bases for SR 3.8.3.3 (method of calculation of the cetane index). This change is consistent with the existing Bases for SR 3.8.3.3 as approved by the NRC in Amendments 127 and 116 for San Onofre Units 2 and 3, respectively.

4) The acceptance criteria for the properties listed, with the exception of the particulate criterion, are replaced with the phrase "within limits." Acceptance criteria are currently provided in the Bases for Surveillance Requirement 3.8.3.3. Similarly, the statement that a sample will be obtained in accordance with ASTM-D4057-81 is replaced with a general statement that sampling is "in accordance with applicable ASTM standards." Reference to the specific standard (ASTM D4057-81) is provided in the Bases to SR 3.8.3.3.

   These changes are administrative in nature. The changes are consistent with NUREG 1432, TS 5.7.2.17, "Diesel Fuel Oil Testing Program."

It should also be noted that the existing TS 5.5.2.13 states a frequency of 92 days for particulate content verification, which is less than the frequency of 31 days as stated in NUREG 1432 TS 5.7.2.17. The 92 day frequency was approved by the NRC in the Bases for SR 3.8.3.3 as part of Amendments 127 and 116 for San Onofre Units 2 and 3. Therefore, the 92 day frequency remains unaffected by this change.

Because all differences between the proposed TS 5.5.2.13 and the NUREG 1432 TS 5.7.2.17 were previously approved by the NRC in the Bases for SR 3.8.3.3 as part of Amendments 127 and 116, these proposed changes provide an acceptable method to meet the requirements of Regulatory Guide 1.137, "Fuel Oil Systems for Standby Diesel Generators," and are therefore acceptable.

NO SIGNIFICANT HAZARDS CONSIDERATION:

The Commission has provided standards for determining whether a significant hazards consideration exists as stated in 10 CFR 50.92. A proposed amendment to an operating license for a facility involves no significant hazards consideration if operation of the facility in accordance with a proposed amendment would not: (1) Involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) Create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) Involve a significant reduction in a margin of safety. A discussion of these standards as they relate to this amendment request follows:

(1) Will operation of the facility in accordance with this proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

This change is an administrative change to make Technical Specification (TS) 5.5.2.13, "Diesel Fuel Oil Testing Program," consistent with the existing Bases for Surveillance Requirement (SR) 3.8.3.3. The specific changes are:

1. The at least once per 92 days diesel fuel oil test is deleted for water and sediment, American Petroleum Institute (API) gravity or an absolute specific gravity, and kinematic viscosity. The requirement to test these properties prior to addition of new fuel to the storage tank remains unchanged.

2. A requirement is added to test new fuel oil prior to addition to the storage tank to verify that the flash point is within limits.

3. A requirement is added to test new fuel oil within 31 days of delivery for "other properties for ASTM 2D fuel."

4. The acceptance criteria for the properties listed, with the exception of the particulate content, are replaced with the phrase "within limits." Acceptance criteria are currently provided in the Bases for Surveillance Requirement 3.8.3.3.

These changes are all consistent with the existing Bases for SR 3.8.3.3 and NUREG 1432.

Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

(2) Will operation of the facility in accordance with this proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

This change is an administrative change to make TS 5.5.2.13, "Diesel Fuel Oil Testing Program," consistent with the existing Bases for Surveillance Requirement 3.8.3.3.

Therefore, this proposed change will not create the possibility of a new or different kind of accident from any accident that has been previously evaluated.

(3) Will operation of the facility in accordance with this proposed change involve a significant reduction in a margin of safety?

Response: No.

This change is an administrative change to make TS 5.5.2.13, "Diesel Fuel Oil Testing Program," consistent with the existing Bases for Surveillance Requirement 3.8.3.3.

Therefore, there will be no significant reduction in a margin of safety as a result of this change.

Based on the responses to these three criteria, Southern California Edison (SCE) has concluded that the proposed amendment involves no significant hazards consideration.

ENVIRONMENTAL CONSIDERATION:

SCE has determined that the proposed amendment involves no changes in the amount or type of effluent that may be released offsite, and results in no increase in individual or cumulative occupational radiation exposure. As described above, the proposed TS amendment involves no significant hazards consideration and, as such, meets the eligibility criteria for categorical exclusion set forth in 10CFR51.22(c)(9).

Attachment A

Existing Technical Specifications

SONGS Unit 2

5.5 Procedures, Programs, and Manuals (continued)

5.5.2.12 Ventilation Filter Testing Program (VFTP) (continued)

The provisions of Technical Specification Surveillance Requirement 3.0.2 and Technical Specification Surveillance Requirement 3.0.3 are applicable to the VFTP test frequencies.

5.5.2.13 Diesel Fuel Oil Testing Program

This program implements required testing of both new fuel oil and stored fuel oil. The program shall include sampling and testing requirements, and acceptance criteria, all in accordance with applicable ASTM standards. The purpose of the program is to establish the following:

a. At least once per 92 days and from new fuel oil prior to addition to the storage tanks by verifying that a sample obtained in accordance with ASTM-D4057-81 has a water and sediment content of less than or equal to 0.05 volume percent, an API gravity or an absolute specific gravity within limits, and a kinematic viscosity @ 40 C of greater than or equal to 1.9 but less than or equal to 4.1 when tested in accordance with ASTM-D975-81.

b. At least once every 92 days by obtaining a sample of fuel oil in accordance with ASTM-D4057-81 and verifying that particulate contamination is less than 10mg/liter when checked in accordance with ASTM-D2276-83, Method A.

5.5.2.14 Configuration Risk Management Program (CRMP)

The Configuration Risk Management Program (CRMP) provides a proceduralized risk-informed assessment to manage the risk associated with equipment inoperability. The program applies to technical specification structures, systems, or components for which a risk-informed Completion Time has been granted. The program shall include the following elements:

a. Provisions for the control and implementation of a Level 1 at power internal events PRA-informed methodology. The assessment shall be capable of evaluating the applicable plant configuration.

b. Provisions for performing an assessment prior to entering the LCO Condition for preplanned activities.

c. Provisions for performing an assessment after entering the LCO Condition for unplanned entry into the LCO Condition.

Attachment B

Existing Technical Specifications

SONGS Unit 3

5.5 Procedures, Programs, and Manuals (continued)

5.5.2.12 Ventilation Filter Testing Program (VFTP) (continued)

The provisions of Technical Specification Surveillance Requirement 3.0.2 and Technical Specification Surveillance Requirement 3.0.3 are applicable to the VFTP test frequencies.

5.5.2.13 Diesel Fuel Oil Testing Program

This program implements required testing of both new fuel oil and stored fuel oil. The program shall include sampling and testing requirements, and acceptance criteria, all in accordance with applicable ASTM standards. The purpose of the program is to establish the following:

a. At least once per 92 days and from new fuel oil prior to addition to the storage tanks by verifying that a sample obtained in accordance with ASTM-D4057-81 has a water and sediment content of less than or equal to 0.05 volume percent, an API gravity or an absolute specific gravity within limits, and a kinematic viscosity @ 40 C of greater than or equal to 1.9 but less than or equal to 4.1 when tested in accordance with ASTM-D975-81.

b. At least once every 92 days by obtaining a sample of fuel oil in accordance with ASTM-D4057-81 and verifying that particulate contamination is less than 10mg/liter when checked in accordance with ASTM-D2276-83, Method A.

5.5.2.14 Configuration Risk Management Program (CRMP)

The Configuration Risk Management Program (CRMP) provides a proceduralized risk-informed assessment to manage the risk associated with equipment inoperability. The program applies to technical specification structures, systems, or components for which a risk-informed Completion Time has been granted. The program shall include the following elements:

a. Provisions for the control and implementation of a Level 1 at power internal events PRA-informed methodology. The assessment shall be capable of evaluating the applicable plant configuration.

b. Provisions for performing an assessment prior to entering the LCO Condition for preplanned activities.

c. Provisions for performing an assessment after entering the LCO Condition for unplanned entry into the LCO Condition.

Attachment C

Proposed Technical Specifications

(Redline and Strikeout)

SONGS Unit 2

5.5 Procedures, Programs, and Manuals (continued)

5.5.2.12 Ventilation Filter Testing Program (VFTP) (continued)

The provisions of Technical Specification Surveillance Requirement 3.0.2 and Technical Specification Surveillance Requirement 3.0.3 are applicable to the VFTP test frequencies.

5.5.2.13 Diesel Fuel Oil Testing Program

This program implements required testing of both new fuel oil and stored fuel oil. The program shall include sampling and testing requirements, and acceptance criteria, all in accordance with applicable ASTM standards. The purpose of the program is to establish the following:

~~a. At least once per 92 days and from new fuel oil prior to addition to the storage tanks by verifying that a sample obtained in accordance with ASTM-D4057-81 has a water and sediment content of less than or equal to 0.05 volume percent, an API gravity or an absolute specific gravity within limits, and a kinematic viscosity @ 40 C of greater than or equal to 1.9 but less than or equal to 4.1 when tested in accordance with ASTM-D975-81.~~

~~b. At least once every 92 days by obtaining a sample of fuel oil in accordance with ASTM-D4057-81 and verifying that particulate contamination is less than 10mg/liter when checked in accordance with ASTM-D2276-83, Method A.~~

a. Acceptability of new fuel oil use prior to addition to storage tanks by determining that the fuel oil has:

1. an API gravity or an absolute specific gravity within limits,

2. a flash point and kinematic viscosity within limits for ASTM 2D fuel oil, and

3. a water and sediment content within limits.

b. Other properties for ASTM 2D fuel oil are within limits within 31 days following sampling and addition to the storage tanks, with exceptions noted in the Bases for Surveillance Requirement 3.8.3.3; and,

c. Total particulate concentration of fuel oil is $\leq$ 10 mg/l when tested every 92 days in accordance with ASTM D-2276, Method A.

5.5 Procedures, Programs, and Manuals (continued)

5.5.2.14 Configuration Risk Management Program (CRMP)

The Configuration Risk Management Program (CRMP) provides a proceduralized risk-informed assessment to manage the risk associated with equipment inoperability. The program applies to technical specification structures, systems, or components for which a risk-informed Completion Time has been granted. The program shall include the following elements:

a. Provisions for the control and implementation of a Level 1 at power internal events PRA-informed methodology. The assessment shall be capable of evaluating the applicable plant configuration.

b. Provisions for performing an assessment prior to entering the LCO Condition for preplanned activities.

c. Provisions for performing an assessment after entering the LCO Condition for unplanned entry into the LCO Condition.

Attachment D

Proposed Technical Specifications

(Redline and Strikeout)

SONGS Unit 3

5.5 Procedures, Programs, and Manuals (continued)

5.5.2.12 Ventilation Filter Testing Program (VFTP) (continued)

The provisions of Technical Specification Surveillance Requirement 3.0.2 and Technical Specification Surveillance Requirement 3.0.3 are applicable to the VFTP test frequencies.

5.5.2.13 Diesel Fuel Oil Testing Program

This program implements required testing of both new fuel oil and stored fuel oil. The program shall include sampling and testing requirements, and acceptance criteria, all in accordance with applicable ASTM standards. The purpose of the program is to establish the following:

~~a. At least once per 92 days and from new fuel oil prior to addition to the storage tanks by verifying that a sample obtained in accordance with ASTM-D4057-81 has a water and sediment content of less than or equal to 0.05 volume percent, an API gravity or an absolute specific gravity within limits, and a kinematic viscosity @ 40 C of greater than or equal to 1.9 but less than or equal to 4.1 when tested in accordance with ASTM-D975-81.~~

~~b. At least once every 92 days by obtaining a sample of fuel oil in accordance with ASTM-D4057-81 and verifying that particulate contamination is less than 10mg/liter when checked in accordance with ASTM-D2276-83, Method A.~~

a. Acceptability of new fuel oil use prior to addition to storage tanks by determining that the fuel oil has:

   1. an API gravity or an absolute specific gravity within limits,

   2. a flash point and kinematic viscosity within limits for ASTM 2D fuel oil, and

   3. a water and sediment content within limits.

b. Other properties for ASTM 2D fuel oil are within limits within 31 days following sampling and addition to the storage tanks, with exceptions noted in the Bases for Surveillance Requirement 3.8.3.3; and,

c. Total particulate concentration of fuel oil is $\leq$ 10 mg/l when tested every 92 days in accordance with ASTM D-2276, Method A.

5.5 Procedures, Programs, and Manuals (continued)

5.5.2.14 Configuration Risk Management Program (CRMP)

The Configuration Risk Management Program (CRMP) provides a proceduralized risk-informed assessment to manage the risk associated with equipment inoperability. The program applies to technical specification structures, systems, or components for which a risk-informed Completion Time has been granted. The program shall include the following elements:

a. Provisions for the control and implementation of a Level 1 at power internal events PRA-informed methodology. The assessment shall be capable of evaluating the applicable plant configuration.

b. Provisions for performing an assessment prior to entering the LCO Condition for preplanned activities.

c. Provisions for performing an assessment after entering the LCO Condition for unplanned entry into the LCO Condition.

Attachment E

Proposed Technical Specifications

SONGS Unit 2

5.5 Procedures, Programs, and Manuals (continued)

5.5.2.12 Ventilation Filter Testing Program (VFTP) (continued)

The provisions of Technical Specification Surveillance Requirement 3.0.2 and Technical Specification Surveillance Requirement 3.0.3 are applicable to the VFTP test frequencies.

5.5.2.13 Diesel Fuel Oil Testing Program

This program implements required testing of both new fuel oil and stored fuel oil. The program shall include sampling and testing requirements, and acceptance criteria, all in accordance with applicable ASTM standards. The purpose of the program is to establish the following:

a. Acceptability of new fuel oil use prior to addition to storage tanks by determining that the fuel oil has:

   1. an API gravity or an absolute specific gravity within limits,

   2. a flash point and kinematic viscosity within limits for ASTM 2D fuel oil, and

   3. a water and sediment content within limits.

b. Other properties for ASTM 2D fuel oil are within limits within 31 days following sampling and addition to the storage tanks, with exceptions noted in the Bases for Surveillance Requirement 3.8.3.3; and,

c. Total particulate concentration of fuel oil is $\leq$ 10 mg/l when tested every 92 days in accordance with ASTM D-2276, Method A.

5.5.2.14 Configuration Risk Management Program (CRMP)

The Configuration Risk Management Program (CRMP) provides a proceduralized risk-informed assessment to manage the risk associated with equipment inoperability. The program applies to technical specification structures, systems, or components for which a risk-informed Completion Time has been granted. The program shall include the following elements:

a. Provisions for the control and implementation of a Level 1 at power internal events PRA-informed methodology. The assessment shall be capable of evaluating the applicable plant configuration.

b. Provisions for performing an assessment prior to entering the LCO Condition for preplanned activities.

c. Provisions for performing an assessment after entering the LCO Condition for unplanned entry into the LCO Condition.

Attachment F

Proposed Technical Specifications

SONGS Unit 3

5.5 Procedures, Programs, and Manuals (continued)

5.5.2.12 Ventilation Filter Testing Program (VFTP) (continued)

The provisions of Technical Specification Surveillance Requirement 3.0.2 and Technical Specification Surveillance Requirement 3.0.3 are applicable to the VFTP test frequencies.

5.5.2.13 Diesel Fuel Oil Testing Program

This program implements required testing of both new fuel oil and stored fuel oil. The program shall include sampling and testing requirements, and acceptance criteria, all in accordance with applicable ASTM standards. The purpose of the program is to establish the following:

a. Acceptability of new fuel oil use prior to addition to storage tanks by determining that the fuel oil has:

   1. an API gravity or an absolute specific gravity within limits,

   2. a flash point and kinematic viscosity within limits for ASTM 2D fuel oil, and

   3. a water and sediment content within limits.

b. Other properties for ASTM 2D fuel oil are within limits within 31 days following sampling and addition to the storage tanks, with exceptions noted in the Bases for Surveillance Requirement 3.8.3.3; and,

c. Total particulate concentration of fuel oil is $\leq$ 10 mg/l when tested every 92 days in accordance with ASTM D-2276, Method A.

5.5.2.14 Configuration Risk Management Program (CRMP)

The Configuration Risk Management Program (CRMP) provides a proceduralized risk-informed assessment to manage the risk associated with equipment inoperability. The program applies to technical specification structures, systems, or components for which a risk-informed Completion Time has been granted. The program shall include the following elements:

a. Provisions for the control and implementation of a Level 1 at power internal events PRA-informed methodology. The assessment shall be capable of evaluating the applicable plant configuration.

b. Provisions for performing an assessment prior to entering the LCO Condition for preplanned activities.

c. Provisions for performing an assessment after entering the LCO Condition for unplanned entry into the LCO Condition.