

April 3, 2014

Technical Specifications Task Force (TSTF)  
11921 Rockville Pike, Suite 100  
Rockville, MD 20852

SUBJECT: IDENTIFICATION AND RESOLUTION OF ISSUES REGARDING  
PLANT-SPECIFIC ADOPTION OF TRAVELER TSTF-501, REVISION 1,  
"RELOCATE STORED FUEL OIL AND LUBE OIL VOLUME VALUES TO  
LICENSEE CONTROL"

Dear Members of the TSTF:

The purpose of this letter is to inform the TSTF of issues that the U.S. Nuclear Regulatory Commission (NRC) staff has recently identified during a review of a plant-specific license amendment requesting adoption of the subject Traveler.

The availability of Traveler TSTF-501, Revision 1, "Relocate Stored Fuel Oil and Lube Oil Volume Values to Licensee Control," (TSTF-501) was published in the *Federal Register* on May 26, 2010 [75 FR 259881]. TSTF-501 relocates the Emergency Diesel Generator (EDG) fuel oil volume and lube oil volume requirements (gallons) from the Standard Technical Specifications (STSS) to the STS Bases and the EDG run duration (days) from the STS Bases to the STS. Because the energy contained in a gallon of EDG fuel oil can vary due to the specific diesel fuel oil composition, one of the intents of the traveler was to allow a licensee to modify the relocated fuel oil volume requirement by relocating the current stored diesel fuel oil numerical volume requirements from the Technical Specification (TS) to the TS Bases. This relocation would allow the licensee to modify the fuel oil volume necessary to meet the required EDG run duration in accordance with the TS Bases Control Program.

During the NRC staff review of a recent license amendment requesting adoption of TSTF-501, it was identified that "relocation" of the current fuel oil volume requirements (gallons of fuel oil) from the licensee TS to the TS Bases could imply that the diesel fuel oil volume requirements remains in effect but are relocated to the TS Bases. This implication is contrary to the regulation at Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.36(a)(1) which states:

Each applicant for a license authorizing operation of a production or utilization facility shall include in his application proposed technical specifications in accordance with the requirements of this section. A summary statement of the bases or reasons for such specifications, other than those covering administrative controls, shall also be included in the application, **but shall not become part of the technical specifications** [emphasis added].

To resolve the issue for the license amendment request, the NRC staff revised the wording in the license amendment safety evaluation (SE) by removing all use of the word "relocate," or

“relocated,” when used in the context of relocating a current TS requirements to the TS Bases, and replaced it with “removed” or “removed and replaced with ...” as applicable. Additionally, statements made in regard to TS Bases run duration values (days) being relocated to the TS were deleted. The NRC staff considers the revised SE wording a resolution to this issue and, therefore, a change to the Traveler as announced for availability in the *Federal Register* is not necessary.

During the resolution of the above TS to TS Bases “relocate” issue, the NRC staff further reviewed TSTF-501 for any other TS Bases requirements identified by the TSTF-501. The NRC staff noted that TSTF-501 requires the licensee to identify the NRC-approved EDG fuel oil volume calculation methodology, used to calculate the volume of fuel oil necessary to support the operation of the EDGs for the TS run duration, in the TS Bases. As stated in 10 CFR 50.36(a)(1) above, the TS Bases “... shall not become part of the TSs.” Furthermore, 10 CFR 50.36(b) states:

Each license authorizing operation of a production or utilization facility of a type described in § 50.21 or § 50.22 will include technical specifications. The technical specifications will be derived from the analyses and evaluation included in the safety analysis report, and amendments thereto, submitted pursuant to § 50.34. The Commission may include such additional technical specifications as the Commission finds appropriate.

In light of the cited 10 CFR 50.36 requirements and importance of utilizing an NRC-approved EDG fuel oil calculation methodology to determine the run-duration equivalent diesel fuel oil volume, the NRC staff has determined that the licensee must identify the NRC-approved calculation methodology in the Final Safety Analysis Report (FSAR). Therefore, current and future license amendments requesting adoption of TSTF-501 will need to provide a regulatory commitment consistent with the following to ensure an acceptable and consistent fuel oil calculation methodology is maintained.

[LICENSEE NAME] is providing a regulatory commitment to verify the inclusion or to revise the [PLANT NAME] [FSAR] with the following information and to submit the revised description with the next [FSAR] update:

The specific Emergency Diesel Generator (EDG) fuel oil volumes contained in the diesel fuel oil storage tank(s) necessary to ensure that EDG run-duration requirements are calculated using Section 5.4 of American National Standards Institute (ANSI) N195- 1976, ‘Fuel Oil Systems for Standby Diesel-Generators,’ and are based on applying the conservative assumption that the EDG is operated continuously at rated capacity. This fuel oil calculation methodology is one of the two approved methods specified in Regulatory Guide (RG) 1.137, Revision 1, ‘Fuel Oil Systems for Standby Diesel Generators,’ Regulatory Position C.1.c.’

Licensees using an NRC-approved fuel oil calculation methodology that differs from the above TSTF-501 described methodologies will need to verify inclusion or revise the FSAR to include a description of the methodology consistent with the level of detail identified in the above description.

It is the NRC staff's position that identification of the EDG fuel oil calculation methodology in the FSAR will provide adequate controls to future license changes, as any deviation from the NRC-approved EDG fuel oil calculation methodology that affects the EDG TS duration-based requirements described above requires the licensee to perform an evaluation pursuant to the provisions of 10 CFR 50.59 to determine whether the calculation methodology change requires prior NRC approval. Therefore, the NRC staff considers the regulatory commitment to include the EDG fuel oil calculation methodology in the FSAR a resolution to this issue and a change to TSTF-501 as announced for availability in the *Federal Register* is not necessary.

If you have concerns with the staff disposition of the issues related to TSTF-501 described herein, the NRC staff would consider working with the industry to resolve your concerns.

If you have any questions please contact Michelle Honcharik of my staff at 301-415-1774 or [Michelle.Honcharik@nrc.gov](mailto:Michelle.Honcharik@nrc.gov).

Sincerely,

**/Holly Cruz for RA/**

Anthony J. Mendiola, Chief  
Licensing Processes Branch  
Division of Policy and Rulemaking  
Office of Nuclear Reactor Regulation

Project No. 753

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If you have concerns with the staff disposition of the issues related to TSTF-501 described herein, the NRC staff would consider working with the industry to resolve your concerns.

If you have any questions please contact Michelle Honcharik of my staff at 301-415-1774 or [Michelle.Honcharik@nrc.gov](mailto:Michelle.Honcharik@nrc.gov).

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**/Holly Cruz for RA/**

Anthony J. Mendiola, Chief  
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Project No. 753

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