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SUBJECT: Responds to deviation noted in insp rept 50-261/91-21.
Corrective action:sampling method for diesel storage tank
justified as equivalent to method described in
ASTM D270-1975.Dual sampling will continue through Mar 1992.

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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261:
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NRC INSPECTION REPORT NO. 50-261/91-21 REPLY TO A NOTICE OF DEVIATION

Gentlemen:

Carolina Power and Light Company (CP&L) provides this reply to the Notice of Deviation identified by NRC Inspection Report No. 50-261/91-21.

Deviation (RII 91-21-05)

Licensee letter dated May 14, 1980, QA REQUIREMENTS REGARDING DIESEL GENERATOR FUEL OIL, committed to Regulatory Guide 1.137, Fuel Oil Systems for Standby Diesel Generators, position C.2, which endorsed ASTM D270-1975, Standard Method of Sampling Petroleum and Petroleum Products. ASTM D270-1975 requires fuel oil samples to be representative of the stored volume being sampled and provides methods for acquiring the representative sample.

Contrary to the above, the licensee deviated from the above commitment in that diesel fuel oil storage tank sample methodology does not implement the methodologies provided in ASTM D270-1975. No justification demonstrating equivalency between the ASTM methodologies and that practiced by the licensee was documented.

I Reason for Deviation:

The licensee's methodology for sampling the Diesel Fuel Oil Storage Tank (DFOST) placed priorities on sampling the recirculated fuel oil from the Unit 1 storage tank prior to transfer to the Unit 2 DFOST, as well as the Unit 2 DFOST transfer pump discharge on a monthly frequency. The Unit 2 DFOST transfer pump discharge represents the fuel oil that is transferred to the Emergency Diesel Generators (EDG). The Licensee's methodology of sampling Fuel Oil is considered equivalent and/or superior to the methodology described in ASTM D270-1975, however, documentation to demonstrate equivalency is not available.

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II Corrective Steps Which Have Been Taken and Results Achieved:

The licensee has purchased an ASTM approved sampling bottle to obtain a sample as described in ASTM D270-1975 for comparison with the current sampling method as stated above. Dual sampling will continue through the end of the First Quarter 1992 and will coincide with routine monthly sampling.

To date, two separate dual sample comparisons have been completed. The resulting analysis has shown no difference between the current sampling method and the method described in ASTM D270-1975.

III Corrective Steps Which Will be Taken to Avoid Further Deviations:

Based on the sampling comparisons as described above, the licensee will justify the current sampling method as capable of producing a representative sample of the storage tank; or should there be differences in the sampling analyses, the licensee will implement a sampling method as described in ASTM D270-1975.

IV Date when corrective action will be completed:

The two sampling methods as described above will continue through the First Quarter 1992 to obtain adequate comparison data. Following analysis of the data the licensee will report those results to the U.S. Nuclear Regulatory Commission under a separate letter by June 30, 1992. The report will describe the DFOST sampling results and provide justification for the licensee's method of continued sampling.

Should you have any questions regarding this submittal, please contact Mr. J. D. Kloosterman at (803) 383-1491.

Very truly yours,

Charles R. Dietz
Vice President
Robinson Nuclear Project Department

DHB:sgk

cc: S. D. Ebneter
L. W. Garner
INPO