

ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9205200289 DOC. DATE: 92/05/15 NOTARIZED: NO DOCKET #
FACIL: 50-261 H.B. Robinson Plant, Unit 2, Carolina Power & Light Co 05000261
AUTH. NAME AUTHOR AFFILIATION
DIETZ, C.R. Carolina Power & Light Co.
RECIP. NAME RECIPIENT AFFILIATION
Document Control Branch (Document Control Desk)

SUBJECT: Supplemental response to NRC ltr re deviations noted in insp
rept 50-261/91-21. Corrective actions: data sheet reflecting
sampling/analysis results & dates attached. Reasons why
current method of sampling represents tank contents listed.

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TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

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	NRR MORISSEAU, D	1 1	NRR/DLPQ/LHFBPT	1 1
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	NRR/DREP/PEPB9H	1 1	NRR/DST/DIR 8E2	1 1
	NRR/PMAS/ILRB12	1 1	NUDOCS-ABSTRACT	1 1
	OE DIR	1 1	OGC/HDS2	1 1
	<u>REG FILE</u> 02	1 1	RGN2 FILE 01	1 1
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NOTE TO ALL "RIDS" RECIPIENTS:

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Carolina Power & Light Company

ROBINSON NUCLEAR PROJECT DEPARTMENT
POST OFFICE BOX 790
HARTSVILLE, SOUTH CAROLINA 29550
MAY 15 1992

Robinson File No: 13510E

Serial: RNP/92-1404

United States Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

H. B. ROBINSON STEAM ELECTRIC PLANT
DOCKET NO. 50-261
LICENSE NO. DPR-23
SUPPLEMENTAL RESPONSE TO NRC INSPECTION REPORT NO. 50-261/91-21

Gentlemen:

Carolina Power and Light Company (CP&L) provides this supplement to our response, Serial RNP/92-0241 dated January 31, 1992, concerning sampling of diesel generator fuel oil which was identified as a Notice of Deviation included in NRC Inspection Report No. 50-261/91-21.

As addressed in the previous response, sampling of the Diesel Fuel Oil Storage Tank (DFOST) was performed during the First Quarter 1992. Sampling and analysis occurred concurrent with routine monthly sampling and/or following transfer of fuel oil from the Unit 1 storage tank to the Unit 2 DFOST.

Attached you will find a data sheet reflecting the sampling/analysis results as well as the sampling/analysis dates. Comparison of analyses data for the current method of sampling, from the transfer pump discharge, with the ASTM D270-1975 method reveals no difference in the results of the analysis. There are several reasons why the current method of sampling is representative of the tanks contents:

- Fuel oil is transferred from the Unit 1 storage tank to the DFOST approximately eight times a year. The fuel oil is sampled and analyzed prior to transfer.
- New fuel purchases are delivered to the Unit 1 storage tank. The Unit 1 storage tank is recirculated and analyzed prior to each transfer to the Unit 2 DFOST. Therefore, the guidelines of ASTM D270-1975 are exceeded.

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Q PDR

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- Unit 2 DFOT is a "small" volume tank (25,000 gallons) relative to that discussed in the ASTM (1,000-barrels and greater).
- Fuel oil from the transfer pump discharge, the current sampling point, is the fuel the Emergency Diesel Generator would consume in the event of an emergency requiring use of the Emergency Diesel Generators.

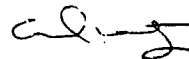
CP&L currently plans to continue sampling the DFOT from the transfer pump discharge and would like to consider that sample point as "mutually agreeable". The reasons for this are as follows:

- The reasons above that show the current sampling method provides a representative sample in conjunction with the attached analyses which show no appreciable difference in the results obtained using the two methods.
- The ASTM method would require the manway on top of the tank to be opened for sampling the fuel oil. This is undesirable because of the personnel safety issues from climbing on top of the tank to conduct sampling.
- A modification to the DFOT to add sampling taps is an alternative; however, since the tank is "safety related", a modification would cost an estimated \$100,000 which far exceeds a five year pay back and is therefore economically burdening based on Industry Standard.
- The opening of the manway on top of the tank also creates a pathway for contamination and debris to enter the DFOT. Should an item be dropped into the tank that could interfere with or prevent pump suction, shutdown of the Plant would be required.

The data collected during the sampling/analysis period has revealed no difference in the quality of fuel oil as measured using our current method of sampling as compared with the ASTM D270-1975 method. The results justify continued sampling from the transfer pump discharge and should prove to be "mutually agreeable."

Should you have any questions regarding this submittal, please contact Mr. J. L. Harrison at (803) 383-1433.

Very truly yours,



Charles R. Dietz
Vice President

Robinson Nuclear Project Department

DHB:sgk

cc: Mr. S. D. Ebnetter
Mr. L. W. Garner
INPO

1992 Emergency Diesel Fuel Oil Storage Tank Results

Transfer Pump Discharge Sampling Analysis

Date	Viscosity	Water & Sediment	Gravity, API	Cloud Point
01-17-92	36.5	< LLD	37.3	18°
01-27-92	36.1	< LLD	37.3	22°
02-14-92	36.2	< LLD	37.2	22°
03-10-92	36.8	< LLD	36.0	21°
04-10-92	36.1	< LLD	37.2	22°
Average	36.3	-----	37.0	-----

Three Level Composite Sampling Analysis

Date	Viscosity	Water & Sediment	Gravity, API	Cloud Point
01-17-92	36.3	< LLD	37.3	18°
01-27-92	36.1	< LLD	37.3	22°
02-14-92	36.1	< LLD	37.2	22°
03-10-92	36.9	< LLD	36.0	21°
04-10-92	36.2	< LLD	37.2	22°
Average	36.3	-----	37.0	-----

NOTES:

01-17-92 Dual Sample obtained.

01-22-92 Transferred approx. 1,700 gallons from Unit 1.

01-27-92 Dual Sample obtained.

02-04-92 Transferred approx. 1,900 gallons from Unit 1.

02-14-92 Dual Sample obtained.

03-03-92 Transferred approx. 1,800 gallons from Unit 1.

03-10-92 Dual Sample obtained.

04-10-92 Dual Sample obtained.

LLD for Water & Sediment = 0.05%

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