

ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9001160172 DOC. DATE: 90/01/03 NOTARIZED: NO DOCKET #
 FACIL: 50-397 WPPSS Nuclear Project, Unit 2, Washington Public Powe 05000397
 AUTH. NAME AUTHOR AFFILIATION
 POWERS, C.M. Washington Public Power Supply System
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Requests temporary relief from TS Surveillance Requirement
 4.8.1.1.2.d.2.

DISTRIBUTION CODE: A001D COPIES RECEIVED: LTTR 1 ENCL 0 SIZE: 3
 TITLE: OR Submittal: General Distribution

NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
	PD5 LA	1 1	PD5 PD	1 1
	SAMWORTH, R	5 5		
INTERNAL:	ACRS	6 6	NRR/DET/ECMB 9H	1 1
	NRR/DOEA/OTSB11	1 1	NRR/DST 8E2	1 1
	NRR/DST/SELB 8D	1 1	NRR/DST/SICB 7E	1 1
	NRR/DST/SRXB 8E	1 1	NUDOCS-ABSTRACT	1 1
	OC/LFMB	1 0	OGC/HDS2	1 0
	<u>REG FILE 01</u>	1 1	RES/DSIR/EIB	1 1
EXTERNAL:	LPDR	1 1	NRC PDR	1 1
	NSIC	1 1		

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK,
 ROOM P1-37 (EXT. 20079) TO ELIMINATE YOUR NAME FROM DISTRIBUTION
 LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 27 ENCL 25-0

MA/25



WASHINGTON PUBLIC POWER SUPPLY SYSTEM

P.O. Box 968 • 3000 George Washington Way • Richland, Washington 99352

January 3, 1990
G02-90-003

Docket No. 50-397

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Gentlemen:

Subject: NUCLEAR PLANT NO. 2, OPERATING LICENSE NPF-21
REQUEST FOR TEMPORARY RELIEF FROM TECHNICAL
SPECIFICATION SURVEILLANCE REQUIREMENT 4.8.1.1.2.d.2

The purpose of this letter is to request a one time relief from the Technical Specification surveillance requirement applicable to emergency diesel generator fuel oil accelerated stability testing (4.8.1.1.d.2).

The subject Technical Specification section requires that the fuel oil impurity level be less than 2 mg of insolubles per 100 ml when tested in accordance with ASTM D2274-70.

On January 2, 1990 the Supply System was notified of results from quarterly samples taken on December 27, 1989 that indicated impurity levels were:

2.0 mg/100 ml - Tank 1A (Division A diesel)
5.6 mg/100 ml - Tank 1B (Division B diesel)
2.6 mg/100 ml - Tank 2 (HPCS diesel)

The Supply System responded to this information by contacting two outside consultants who indicated that it would be unusual to experience a step change in the impurity level. Previous sample results were in the range of 0.6 to 1.0 mg/100 ml.

9001160172 900103
PDR ADOCK 05000397
P PDC

Acc
1/0

REQUEST FOR TEMPORARY RELIEF FROM TECHNICAL SPECIFICATION
SURVEILLANCE REQUIREMENT 4.8.1.1.2.d.2

It was decided to request that the contract laboratory repeat the tests and on January 3, 1990 the results of the second test were provided as:

1.7 mg/100 ml - Tank 1A
4.7 mg/100 ml - Tank 1B
2.4 mg/100 ml - Tank 2

With these two sets of results we concluded that the laboratory testing method was probably acceptable but as the samples for the second tests were the same as for the first we could not confirm the sampling method.

To obtain data more indicative of the current condition of the fuel oil quality, on January 3, a test was performed to the requirements of ASTM D2276-78, Method A. The use of ASTM D2276-78 for determining fuel oil quality with respect to stability and storage has been approved for Limerick-1/2, Wolf Creek, and the McGuire-1/2 plants. Where ASTM D2276-78 is utilized no requirement to meet ASTM D2274-70 is imposed.

The above test was performed by the contractor with fuel of the original sample. These samples had been obtained by a fuel thief from the bottom of the bulk fuel oil storage tanks per ASTM D270-1975. The results of these tests were:

4.3 mg/liter - Tank 1A
9.8 mg/liter - Tank 1B
7.9 mg/liter - Tank 2

The Supply System believes the acceptable test results to ASTM D2276-78 provide an adequate bases for the NRC to grant temporary relief from the subject Technical Specification requirement as the ASTM D2276-78 test provides results that are more indicative of the current condition of the fuel oil quality than the ASTM D2274 accelerated stability test. The ASTM D2274 test is performed under an extreme testing environment and the results are only indicative of long term storage stability.

The fuel oil analysis includes all the diesel engine manufacturer's fuel oil testing recommendations. All these parameters fell within the recommended limits. The diesel manufacturer has not established a recommended limit for a ASTM D2274-70 test. A preliminary Supply System analysis of Tank 1B, per ASTM D2276 indicated an insoluble content of 1.8 mg/liter

Page Three

REQUEST FOR TEMPORARY RELIEF FROM TECHNICAL SPECIFICATION
SURVEILLANCE REQUIREMENT 4.8.1.1.2.d.2

The three diesels are available for service and operable in all respects with the one exception of the subject insolubility limit. As stated above, this includes satisfying all other fuel quality requirements including those required by the Technical Specifications, the diesel manufacturer and ASTM 2276-78. In addition we do not believe that exceeding the ASTM D2274 insolubility limit is an indication that the diesels will not perform as required.

With the approval of the requested one time relief of the Technical Specification surveillance requirement, the Supply System will provide for monthly sampling from the discharge of the running fuel oil transfer pump and testing in accordance with ASTM D2276 Method A. Action will be taken based on compliance with an acceptance criterion of ≤ 10.0 mg/liter.

During this period the Supply System will initiate a Technical Specification change to replace the ASTM D2274 test with the ASTM D2276 Method A test.

Very truly yours,



C. M. Powers
WNP-2 Plant Manager

AGH/bk

cc: JB Martin - NRC RV
NS Reynolds - BCP&R
RB Samworth - NRC
DL Williams - BPA/399
NRC Site Inspector - 901A

