



PECO ENERGY

10 CFR 50.90

PECO Energy Company  
Nuclear Group Headquarters  
965 Chesterbrook Boulevard  
Wayne, PA 19087-5691

May 24, 1995

Docket Nos. 50-277  
50-278

License Nos. DPR-44  
DPR-56

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

Subject: Peach Bottom Atomic Power Station, Units 2 and 3  
Supplement 7 to TSCR 93-16  
Conversion to Improved Technical Specifications

Reference: (1) Letter from G. A. Hunger, Jr. (PECO Energy) to USNRC Document Control Desk  
dated September 29, 1994

Dear Sir:

In Reference (1), PECO Energy submitted Technical Specification Change Request (TSCR) 93-16, requesting changes to Appendices A and B of the Facility Operating Licenses for Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3. This TSCR proposed an overall conversion of the current PBAPS Technical Specifications to the Improved Technical Specifications (ITS), as contained in NUREG 1433, "Standard Technical Specifications, General Electric Plants, BWR/4."

A public meeting was held on April 19, 1995 at Peach Bottom Atomic Power Station to address questions concerning ITS Section 3.8, Electrical Distribution. During this meeting, a concern was expressed over PECO Energy's statement that diesel fuel oil testing would be performed "in accordance with applicable ASTM Standards." The attachment to this letter provides clarifications on PECO Energy's exceptions to ASTM standards for fuel oil testing.

If you have any questions, please contact us.

Very truly yours,

G. A. Hunger, Jr.  
Director - Licensing

Affidavit, Attachment

cc: T. T. Martin, Administrator, Region I, USNRC  
W. L. Schmidt, USNRC Senior Resident Inspector, PBAPS  
R. R. Janati, Commonwealth of Pennsylvania

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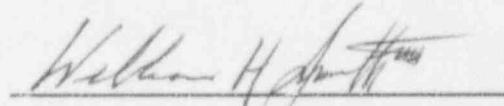
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: SS.

COUNTY OF CHESTER :

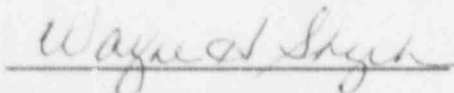
W. H. Smith, III, being first duly sworn, deposes and says:

That he is Vice President, Station Support, of PECO Energy Company; the Applicant herein; that he has read the attached Supplement 7 to Technical Specifications Change Request 93-16 for Peach Bottom Facility Operating Licenses DPR-44 and DPR-56, and knows the contents thereof; and that the statements and matters set forth therein are true and correct to the best of his knowledge, information and belief.

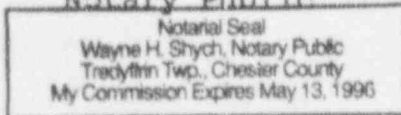


Vice President

Subscribed and sworn to  
before me this 25<sup>th</sup> day  
of May 1995.



Notary Public



Member, Pennsylvania Association of Notaries

PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3  
IMPROVED TECHNICAL SPECIFICATIONS, SECTION 3.8  
EXCEPTIONS TO ASTM STANDARDS REGARDING DIESEL FUEL OIL TESTING

As discussed at the April 19, 1995 meeting with the NRC the following exceptions to the ASTM Standards used by Peach Bottom Atomic Power Station (PBAPS) for diesel fuel oil testing (and associated justifications for the exceptions) are provided to clarify the meaning of the wording "In accordance with applicable ASTM Standards" in Technical Specification 5.5.9, Diesel Fuel Oil Testing Program.

1. ASTM D445-83 specifies thermometers with an accuracy of  $\pm 0.02$  degree F or  $\pm 0.01$  degree C for the determination of kinematic viscosity.

Thermometers with increments smaller than 0.05 degree C are not commercially available. As a result, PBAPS will use thermometers with subdivisions of 0.05 degree C consistent with ASTM 120C Specification.

2. ASTM D445-83 specifies two flow measurements using the same sample to be within 0.2% (99.8% agreement) of one another for the determination of kinematic viscosity.

The intent of this test is to demonstrate kinematic viscosity is within the required range of  $\geq 1.9$  centistokes and  $\leq 4.1$  centistokes. PBAPS requires the results of two measurements to be within the required range and also requires the results of both measurements to be within 99% agreement. As a result, taking two measurements from the same sample and requiring the results to be within 0.2% of one another is not required for assuring the kinematic viscosity of the diesel fuel oil is within the required limits.

3. ASTM D445-83 specifies the instruments used for determining kinematic viscosity be periodically cleaned with chromic acid to remove organic deposits.

Chromic acid is specified to clean organic staining. Should organic staining occur on the instruments used to determine kinematic viscosity at PBAPS, cleaning is performed using isopropyl alcohol or other volatile solvents which are not as severely hazardous as chromic acid. The effectiveness of the cleaning agent is verified by the performance of a calibration check of the viscometer. If the acceptance criteria of the calibration check are not satisfied, the affected glassware (viscometer tubes) is replaced with new glassware.

4. ASTM D445-83 specifies the use of a No. 200 (75 micrometer) screen to filter fuel oil prior to performing the kinematic viscosity analysis.

Filtering diesel fuel oil through a No. 200 screen is not necessary prior to performing the kinematic viscosity analysis during the receipt of fuel oil. The clear and bright water and sediment test is performed during fuel receipt at PBAPS. This test precludes the acceptance of fuel oil with particulates that could affect the results of the kinematic viscosity determination in a non-conservative manner.

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5. ASTM D1298-80 specifies the specific gravity and API gravity be recorded to the nearest 0.0001/0.05 respectively.

Specific gravity and API gravity measurements do not normally need to be as precise 0.0001/0.05, respectively, since the normal required ranges for these parameters are 0.83-0.89/27°-39°, respectively. When the specific gravity and API gravity measurement requirements are satisfied by comparison to the supplier's certificate, the specific gravity and API gravity limits are to be within 0.0016/0.3°, respectively, of the value specified in the supplier's certificate. Consistent with the normal required limits, PBAPS will normally record specific gravity and API gravity measurements to the nearest 0.01/1°, respectively. When the specific gravity and API gravity measurement requirements are satisfied by comparison to the supplier's certificate, PBAPS will record specific gravity and API gravity measurements to the nearest 0.0001/0.1°, respectively.

6. ASTM D4176-82 specifies the clear and bright test for water and sediment to be performed in the field.

The clear and bright test may be performed in the laboratory and still meet the intent of the ASTM requirement for field testing. At PBAPS, with the fuel oil truck in close proximity to the outside chemistry laboratory, it is considered an extension of the field sampling process. Laboratory conditions will protect the sample from erroneous results due to inclement weather conditions and will enhance safety by eliminating the need for the technician to climb to the top of a fuel oil truck with extra glassware.

7. ASTM D2276-78 specifies the use of an apparatus cleaning process when determining particulate concentrations.

The specified apparatus cleaning process is intended for use when determining particulate concentrations in aviation fuels. Aviation fuels have extremely low particulate concentrations. The higher allowance for PBAPS diesel fuel oil particulates minimizes the impact of labware particulate contamination. Furthermore, particulates from the apparatus would not give a lower than actual reading. Therefore, the ASTM D2276-78 cleaning process can be omitted at PBAPS without affecting the measurement in a non-conservative manner.

8. ASTM D2276-78 specifies rinsing solvent amounts and the rinsing methods to use when determining particulate concentration.

At PBAPS, the rinsing solvent amounts maybe greater than those specified in ASTM D2276-78 and the rinsing methods may be more thorough than those specified in ASTM D2276-78 to ensure complete removal of diesel fuel from the filters and to avoid false high weights on either the "test" or "control" filters. This is acceptable since only diesel fuel will be rinsed through the filters; particulates will not be rinsed through the filters. Therefore, the change in the rinsing solvent amounts and the rinsing methods will not affect the results of the test in a non-conservative manner.

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9. ASTM D2622-82 specifies tungsten, platinum, or chromium as X-ray tube target materials when determining sulfur concentrations.

At the PECO Energy Corporate Laboratories, the Chemistry Laboratory employs a scandium target X-ray tube when determining sulfur concentrations in diesel fuel for PBAPS. This tube provides enhanced sensitivity to sulfur and is listed as acceptable in the latest revision of this method, ASTM D2622-94. Use of a scandium target X-ray tube provides an analytical precision consistent with that of method ASTM D2622-82 and in no way compromises the validity of sulfur test data.