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JSP-402-92
August 17, 1992
10CFR50.90

Docket No. 50-461

Document Control Desk
Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Clinton Power Station
Proposed Amendment of Facility
Operating License No. NPF-62

Dear Sir:

Pursuant to 10CFR50.90, Illinois Power (IP) hereby applies for amendment of Facility Operating License No. NPF-62, Appendix A - Technical Specifications, for Clinton Power Station (CPS). This request consists of proposed changes to the CPS Technical Specification 3/4.8.1.1, "AC Sources-Operating," to update the testing requirements for the fuel oil used by the standby emergency diesel generators.

As discussed with NRC personnel on July 30, 1992, IP recently identified that the fuel oil testing requirements were not being met for CPS because the offsite laboratory that performs this testing for CPS utilizes the latest industry-accepted revision of American Society for Testing and Materials (ASTM) Standard ASTM-D975 "Standard Specification for Diesel Fuel Oils." [See CPS Licensee Event Report (LER)-92-009.] As a result, the laboratory utilizes ASTM-D4294 (X-ray fluorescence spectrometry method) to determine sulfur content of the fuel oil sample. This test method is considered acceptable in the 1988 and later revisions of ASTM-D975. However, prior revisions (including the 1977 revision currently identified in the CPS Technical Specifications) require that ASTM-D129 (general bomb method) be utilized to determine sulfur content.

Use of ASTM-D4294 to determine sulfur content of fuel oil samples has been reviewed by the NRC Staff and found acceptable on other plants' dockets. In addition, the sulfur content of the fuel at CPS was found to meet the limits specified in ASTM-D975-77. As a result, IP determined that the subject fuel oil was acceptable and that there was no impact on operability of the associated diesel generators. However, based on discussion with NRC personnel, IP committed to submit proposed changes to the CPS Technical Specifications by August 31, 1992 to resolve this testing issue.

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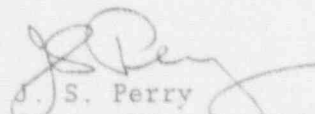
In addition to providing an update to the revision date of ASTM-D975, IP has proposed a number of enhancements to the diesel fuel oil testing requirements in the CPS Technical Specifications. These enhancements are based on changes to the Technical Specification fuel oil testing requirements recently approved for Washington Public Power Supply System's Nuclear Project No. 2 (WNP-2) and the Perry Nuclear Power Plant.

For each of the proposed Technical Specification changes, a description and the associated justification (including a Basis for No Significant Hazards Consideration) are provided in Attachment 2. Marked-up copies of pages from the current CPS Technical Specifications reflecting the proposed changes are provided in Attachment 3. In addition, an affidavit supporting the facts set forth in this letter and its attachments is provided in Attachment 1.

IP has reviewed the proposed changes against the criteria of 10CFR51.22 for categorical exclusion from environmental impact considerations. The proposed changes do not involve a significant hazards consideration, or significantly increase the amounts or change the types of effluents that may be released offsite, nor do they significantly increase individual or cumulative occupational radiation exposures. Based on the foregoing, IP concludes the proposed changes meet the criteria given in 10CFR51.22(c)(9) for a categorical exclusion from the requirement for an Environmental Impact Statement.

As testing of diesel generator fuel oil is currently performed upon each receipt of new fuel oil and at least once per 92 days, IP requests your prompt attention to this amendment request.

Sincerely yours,


J. S. Perry
Senior Vice President

DAS/msh

Attachments

cc: NRC Clinton Licensing Project Manager
NRC Resident Office, V-690
Regional Administrator, Region III, USNRC
Illinois Department of Nuclear Safety

STATE OF ILLINOIS

COUNTY OF DEWITT

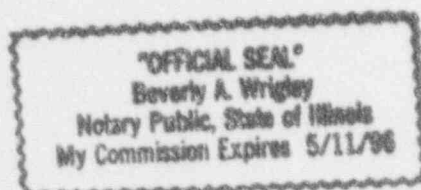
J. Stephen Perry, being first duly sworn, deposes and says:
That he is Senior Vice President of Illinois Power Company;
that the application for amendment of Facility Operating
License NPF-62 has been prepared under his supervision and
direction; that he knows the contents thereof; and that to
the best of his knowledge and belief said application and
the facts contained therein are true and correct.

DATE: This 17 day of August 1992.

Signed: _____

J. Stephen Perry

Subscribed and sworn to before me this 17th day of
August 1992.



Beverly A. Wrigley
Notary Public

Background

As discussed with NRC personnel on July 30, 1992, Illinois Power (IP) recently identified that the standby diesel generator fuel oil testing requirements were not being met for Clinton Power Station (CPS) because the offsite laboratory that performs this testing for CPS utilizes the latest industry-accepted revision of American Society for Testing and Materials (ASTM) Standard ASTM-D975, "Standard Specification for Diesel Fuel Oils." [See CPS Licensee Event Report (LER)-92-009.] As a result, the laboratory utilizes ASTM-D4294 (X-ray fluorescence spectrometry method) to determine sulfur content of the fuel oil sample. This test method is considered acceptable in the 1988 and later revisions of ASTM-D975. However, prior revisions (including the 1977 revision currently identified in the CPS Technical Specifications) require that ASTM-D129 (general bomb method) be utilized to determine sulfur content.

Use of ASTM-D4294 to determine sulfur content of fuel oil samples has been reviewed by the NRC Staff and found acceptable on other plants' dockets (e.g., Amendment No. 34 to Operating License No. NPF-58 for the Perry Nuclear Power Plant). In addition, the sulfur content of the fuel at CPS was found to meet the limits specified in ASTM-D975-77. As a result, IP determined that the fuel oil was acceptable and there was no impact on operability of the associated diesel generators. However, based on discussion with NRC personnel, IP committed to submit proposed changes to the CPS Technical Specifications by August 31, 1992 to resolve this testing conflict.

In addition to providing an update to the revision date of ASTM-D975, IP has proposed a number of enhancements to the diesel fuel oil testing requirements. These enhancements are based on the requirements recently approved for Washington Public Power Supply System's Nuclear Project No. 2 (WNP-2) and the Perry Nuclear Power Plant.

Description of Proposed Changes

In accordance with 10CFR50.90, the following changes to CPS Technical Specification 3.8.1.1 and associated Surveillance Requirement 4.8.1.1.2.d for testing of the diesel generator fuel oil are being proposed:

- (1) Update Surveillance Requirement 4.8.1.1.2.d to specify the use of a more up-to-date version of ASTM-D975 (i.e., ASTM-D975-89 instead of ASTM-D975-77) for testing fuel oil for the diesel generators.
- (2) Add performance of the more sensitive "Clear and Bright" appearance test (per ASTM-D4176-82) as an alternative to the currently required water and sediment test per ASTM-D1796 (centrifuge method).
- (3) Add determination of specific gravity as an alternative to the current requirement for determination of the American Petroleum Institute (API) gravity of new fuel.

- (4) Revise the time limit for obtaining ASTM-D975 test results for the "other properties" (i.e., those properties other than water and sediment and kinematic viscosity) from two weeks to 31 days.
- (5) Remove the requirement to perform ASTM-D975 testing every 92 days for fuel oil contained in the storage tanks.
- (6) Replace the requirement to perform an accelerated oxidation stability test per ASTM-D2274-70 every 92 days and on addition of new fuel (per current Surveillance Requirement 4.8.1.1.2.d.2) with a requirement to perform a particulate contamination test per ASTM-D2276-88 every 31 days. The purpose of this surveillance requirement would be to detect actual particulate contamination in the fuel oil contained in the storage tanks.
- (7) Add new Action Statement "j" to Technical Specification 3.8.1.1 to address fuel oil in the storage tanks not meeting the applicable testing requirements of Surveillance Requirements 4.8.1.1.2.d.2 or 4.8.1.1.2.d.3. The proposed Action Statement would allow up to seven days to correct the out-of-specification condition prior to declaring the associated diesel generators inoperable. The proposed Action Statement is consistent with Regulatory Guide 1.137 (1979), "Fuel-Oil Systems for Standby Diesel Generators," paragraph C.2.a.

These proposed changes are identified on the marked-up copies of pages from the current Technical Specifications contained in Attachment 3.

Justification for Proposed Changes

The diesel generator fuel oil storage and transfer system is described in CPS Updated Safety Analysis Report (USAR) Section 9.5.4. As described in the USAR, the diesel generator fuel oil storage and transfer system is divided into three separate divisions, each of which provides a sufficient supply of quality fuel oil for its associated diesel generator set to supply the maximum post-loss-of-coolant accident (post-LOCA) load demand for seven days. As such, this system is one of the support systems required to ensure proper diesel generator operation. Current Technical Specification Surveillance Requirement 4.8.1.1.2.d ensures the quality of the fuel oil is maintained within acceptable limits.

The current Technical Specification requirements for testing the diesel generator fuel oil generally consist of the following requirements: (1) Testing new fuel oil to ensure that the requirements for water and sediment, kinematic viscosity, and API gravity are met prior to adding the fuel to the storage tanks, (2) Performing an accelerated oxygen stability test on the new fuel oil within one week, (3) Verifying, within two weeks, that the new fuel meets the requirements of ASTM-D975-77, and (4) Sampling the fuel oil storage tanks every 92 days and verifying that the stored fuel meets the same test requirements for new fuel as described in (1) through

(3) above. In addition, accumulated water is removed from the day tanks at least once per 31 days and after each operation of the associated diesel generator for one hour or greater, and from the storage tanks at least one per 92 days.

The proposed changes to the fuel oil surveillance requirements are intended to establish a surveillance program which is more up-to-date and at least as or more effective in ensuring fuel oil quality is maintained. The proposed surveillance requirements are based on the following considerations. New fuel oil should be tested prior to addition to the storage tanks to detect contamination which could cause the properties of the fuel in the storage tanks to become unacceptable. (Fuel oil leaving the refinery is generally of good quality and must meet ASTM standards. However, contamination can occur after leaving the refinery and, as a verification of the transport process controls, the proposed Technical Specifications require verifying ASTM-D975-89 is met for new fuel.) Secondly, fuel in storage should be tested periodically to detect degradation; however, only those parameters which can change during storage need to be determined. Thirdly, periodic testing for particulates formed in storage should concentrate on actual particulate contamination existing at the time of testing, rather than predicting the tendency of fuel to oxidize and subsequently form particulates during long-term storage.

Justification for each of the proposed changes are discussed below:

- (1) IP proposes to change Technical Specification Surveillance Requirement 4.8.1.1.2.d to specify the use of the more current 1989 version of ASTM-D975 for testing fuel oil rather than the 1977 version. The fuel oil properties to be determined and the limits on those properties required by ASTM-D975-89 are identical to those required by ASTM-D975-77. The primary advantage of the 1989 edition, however, is the incorporation of alternative test methods for determining sulfur content. The 1977 edition of ASTM-D975 requires testing for sulfur content to be performed in accordance with ASTM-D129 (general bomb method). The 1989 edition of ASTM-D975 allows use of alternate test methods ASTM-D1552 (high-temperature method), ASTM-D2622 (X-ray spectrographic method), and ASTM-D4294 (non-dispersive X-ray fluorescence spectrometry method) in addition to ASTM-D129. The proposed change will allow the use of the most up-to-date test methods for determining sulfur content. These additional methods have also been approved for use in Federal Specification VV-F-800D (July 29, 1988). IP believes that the test results obtained by use of the above methods will be equivalent to, or more accurate than, the results obtained by use of ASTM-D129.
- (2) IP proposes to add performance of a visual appearance test ("Clear and Bright" appearance per ASTM-D4176-82) as an alternative to the water and sediment test (centrifuge method per ASTM-D1796) currently required by Surveillance Requirement 4.8.1.1.2.d.1. The "Clear and Bright" appearance test is more sensitive for detecting water and sediment in fuel oil than the centrifuge method currently specified. According to ASTM-D4176-82, an experienced tester can visually detect

as little as 40 ppm of free water in fuel by use of the proposed "Clear and Bright" appearance test. On the other hand, the lower limit of water detectable by the centrifuge method is 250 ppm. This limit is based on the smallest readable division on the centrifuge tube. Not only is the "Clear and Bright" appearance test more sensitive, it is simpler and faster to perform than the water and sediment test using the centrifuge method. The proposed "Clear and Bright" appearance test can also detect contamination of the diesel fuel by residual (black) fuel oil which may have been introduced at some point in the transportation process, although carriers do not typically cross-utilize transport tanks for residual oil and distillate fuel.

- (3) IP proposes to add determination of specific gravity as an alternative to the determination of API gravity currently required by Surveillance Requirement 4.8.1.1.2.d. This proposed change is consistent with the requirements of Regulatory Guide 1.137, Revision 1, which require testing of new fuel for either specific or API gravity prior to addition to the storage tanks. The primary purpose of testing for specific or API gravity is to detect gross contamination of the fuel oil during transport. Determination of either specific or API gravity will fulfill this purpose. The method for determining specific and API gravity are identical; only the units of the reported results are different.
- (4) Surveillance Requirement 4.8.1.1.2.d currently requires new fuel and the fuel contained in the storage tanks to be tested for conformance to the limits of the "other" fuel oil properties listed in Table 1 of ASTM-D975. (The "other properties" are in addition to those verified prior to addition of the fuel to the storage tanks.) These test results are currently required to be obtained within two weeks of taking the sample. Under the proposed surveillance program, this time limit has been increased to 31 days. Based on the proposed testing, those fuel oil properties which, if not in conformance with specification requirements, could result in detrimental and immediate impact on diesel generator operability (water and sediment, viscosity, and gravity) are checked for conformance to applicable limits prior to acceptance of the new fuel (or adding new fuel to the storage tanks, as applicable). The remaining fuel oil properties are those which might impact diesel generator performance only on a long-term basis. Because of the effective screening done to verify that acceptable fuel is being received before unloading, the proposal to extend the time for obtaining test results for the remaining fuel oil properties from two weeks to 31 days will not adversely affect diesel generator reliability.
- (5) The proposed changes to Surveillance Requirement 4.8.1.1.2.d include deleting the requirement for testing of the fuel oil contained in the storage tanks in accordance with ASTM-D975 on a 92-day basis. The rationale for this deletion is that the majority of fuel oil properties determined in accordance with ASTM-D975 (flash point, Cetane number, viscosity, cloud point, etc.) do not change during

storage. If these properties are within specification when the fuel oil is placed in storage, they will remain within specification during storage unless unacceptable petroleum products are added to the storage tanks. The addition of unacceptable petroleum products is precluded by the proposed surveillance program for new fuel as detailed above. Although the majority of fuel oil properties do not change during storage, over prolonged periods of time, stored fuel oil can oxidize and form particulates. These particulates, in significant concentrations, can impair diesel generator performance. Particulate concentrations and bacteria concentrations are the only characteristics that will change significantly in stored fuel. Particulate concentrations will be monitored every 31 days as detailed in item (6) below. Bacteria growth is currently prevented and will continue to be prevented by periodic removal of water from the storage tanks every 92 days (in accordance with Surveillance Requirement 4.8.1.1.2.c). In addition, though not specifically required by the Technical Specifications, biocides are often added to fuel storage tanks as an additional measure for controlling bacteria growth. Considering that the fuel oil properties will not change significantly during storage and that fuel oil conditions which could adversely affect diesel generator operation will be closely monitored, further testing of stored fuel in accordance with ASTM-D975 every 92 days would not provide any additional, worthwhile data nor improve diesel generator reliability.

- (6) One of the most significant proposed changes to the fuel oil testing requirements involves replacing the requirement for testing stored fuel every 92 days and new fuel in accordance with ASTM-D2274-70 (accelerated oxidation stability) per current Surveillance Requirement 4.8.1.1.2.d.2 with a test for determining particulate concentration in the stored fuel oil only, performed in accordance with ASTM-D2276-88 (laboratory filtration) every 31 days per proposed Surveillance Requirement 4.8.1.1.2.d.3.

The purpose of testing fuel oil for "impurity level" is to limit the amount of particulate (solid) matter in the fuel oil that can be pumped to the diesel generators and impair diesel generator operation or result in diesel generator unavailability. While particulate concentration can change during storage of the fuel oil and is a significant parameter, industry experience has shown that the ASTM-D2274-70 accelerated oxidation stability test is not an accurate method for determining fuel oil impurity level. [ASTM-D2274-70 provides a rough prediction of the tendency of fuel oil to oxidize and form particulates during long-term storage; it does not indicate actual particulate contamination.] Furthermore, ASTM-D975-89, Appendix X3 states that "correlation [of ASTM-D2274-70 test results] with actual storage stability may vary significantly, depending upon field conditions and fuel composition" and that "correlation [of ASTM-D2274 test results] with fuel stability are tenuous." This is because the severely oxidizing conditions of the test may not be representative of the environment for fuel in relatively quiescent storage. The 2 mg/100 ml acceptance criterion provided in

Surveillance Requirement 4.8.1.1.2.d.2 for the ASTM-D2274-70 oxidation stability test was originally selected as an alarm point and may be somewhat arbitrary. There is no evidence that impurities of this level are in fact detrimental to diesel generator operation. This is especially true at the time of test performance since the purpose of the test is to evaluate the tendency for the fuel to degrade and form particulates in the future rather than to determine the actual particulate concentration. As stated in ASTM-D975-89, Appendix X3, "performance criteria for accelerated stability tests that assume satisfactory long-term storage of fuels have not been established." Also, the precision and reproducibility of this method is relatively poor.

Finally, it should be noted that the ASTM-D2274-70 test method involves a significant cost and a significant administrative burden. The test takes a considerable amount of time to perform (up to 24 hours) and is considered a significant fire hazard to personnel. This test involves bubbling pure oxygen for sixteen hours through a filtered fuel oil sample heated to 203 degrees F, a temperature significantly greater than the flash point of the sample.

For the above reasons, IP considers it more pertinent to measure and monitor the actual particulate contamination of fuel oil in the storage tanks rather than trying to predict the future stability of the fuel oil. Therefore, in lieu of the accelerated oxidation stability test, a test for actual particulate contamination, ASTM-D2276-88, is being proposed. IP proposes that this test be performed on the stored fuel oil every 31 days. This is more frequently than the current test frequency of 92 days for the accelerated oxidation stability test.

The more frequent testing for actual particulates in the stored fuel oil will provide more accurate data on actual fuel oil condition and more reliable information on the tendency for formation of particulates under site storage conditions. Since formation of particulates during storage at ambient temperature is a relatively slow process, the 31-day test frequency will ensure early detection of particulate contamination. The proposed test method for determining actual particulate contamination (ASTM-D2276-88) and the proposed test frequency (at least every 31 days) will allow IP to more closely monitor the actual condition of the fuel oil in the storage tanks. The proposed test will therefore be more conservative in determining the quality of stored fuel oil than the present requirements. In addition, ASTM-D2276-88 is a relatively simple test which can be performed much more quickly on-site. This test need not be a requirement for new fuel because the current water and sediment test [ASTM-D1796 (per ASTM-D975-89)] or the proposed "Clear and Bright" appearance test (ASTM-D4176-82) described above is sufficient to detect unacceptable particulate concentrations in new fuel prior to addition of the new fuel to the storage tanks.

- (7) Finally, IP proposes to revise Technical Specification 3.8.1.1 by adding Action Statement "j" to clarify the requirements to be met when the properties of the fuel oil contained in the storage tanks do not meet the limits of proposed Surveillance Requirement 4.8.1.1.2.d.2 or 4.8.1.1.2.d.3. These surveillances verify, on a periodic basis, the quality of new fuel oil added to the storage tanks (4.8.1.1.2.d.2) and the quality of fuel oil in the storage tanks (4.8.1.1.2.d.3). The intent of these surveillance requirements is to ensure the fuel oil satisfies the quality specifications. In accordance with Regulatory Guide 1.137, Revision 1, Regulatory Position C.2.a, the fuel oil may be replaced in a short period of time (about a week) when the fuel oil does not meet the specified requirements. Therefore, proposed Action Statement "j" has been added to allow up to seven days to correct the out-of-specification condition by replacing the fuel oil or taking other necessary actions.

Summary

In summary, the proposed changes to Surveillance Requirement 4.8.1.1.2.d will provide a more conservative approach to fuel oil surveillance. The added conservatism, coupled with the simplified testing procedures, provides prompt assurance of the quality of fuel oil upon delivery and continued maintenance of high quality stored fuel.

Basis for No Significant Hazards Consideration

In accordance with 10CFR50.92, a proposed change to the operating license (Technical Specifications) involves no significant hazards considerations if operation of the facility in accordance with the proposed change would not: (1) involve a significant increase in the probability or consequences of any accident previously evaluated, or (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety. The proposed Technical Specification changes are evaluated against each of these criteria below.

- (1) The proposed changes to the Technical Specification surveillance requirements for sampling and testing of diesel generator fuel oil will not involve a significant increase in the probability or the consequences of any accident previously evaluated because the proposed changes primarily consist of replacing specified fuel oil tests with tests which are either more effective or equally effective in detecting unsatisfactory fuel oil properties.

The proposed change to allow use of the more current 1989 revision of ASTM-D975, rather than the 1977 revision, will not affect the quality of fuel oil or the reliability of the diesel generators as the updated standard is substantially equivalent to the one being replaced. There is no change in what fuel oil properties are required to be determined or in the limits on these properties between the 1977 and 1989 revisions of ASTM-D975. While ASTM D975-89

does provide for alternative methods of testing for sulfur content (ASTM-D1552, E2622 and D4294), IP believes that the results obtained by use of these alternative methods will be equivalent to those obtained using the method currently specified in D975-77 (i.e., ASTM-D129).

This proposed change adds, as an alternative to the current requirement to perform water and sediment tests using the centrifuge method (ASTM-D1796), performance of "Clear and Bright" appearance tests per ASTM-D4176-82. This is a conservative change in that the "Clear and Bright" appearance test is more sensitive in determining the presence of water and sediment in fuel oil than the test currently specified.

Adding specific gravity as an alternative to determining API gravity will not affect the reliability of the emergency diesel generators. Specific gravity is specifically identified as an acceptable alternative to API gravity in Regulatory Guide 1.137, Revision 1, and is therefore acceptable. The method for determining specific and API gravity are identical; only the units of the reported results are different.

Under the proposed fuel oil surveillance program, those fuel oil properties which, if not within specification, would have the most detrimental and immediate impact on diesel generator operation (water and sediment, viscosity, and gravity) are checked for conformance to applicable limits immediately prior to accepting the new fuel. The remaining fuel oil properties (the "other properties" of proposed Surveillance Requirement 4.8.1.1.2.d.2) are those which could impact diesel generator performance only on a long-term basis. Therefore, the proposal to extend the time limit for obtaining test results for these remaining fuel oil properties from two weeks to 31 days will not adversely affect diesel generator reliability.

The proposed change to remove the requirement to perform ASTM-D975 testing every 92 days for fuel contained in the storage tanks is based upon the rationale that the majority of fuel oil properties required to be determined by ASTM-D975 (flash point, Cetane number, viscosity, cloud point, etc.) do not change during storage. If these properties are within specification when the fuel oil is placed in storage, they will remain within specification unless other unacceptable petroleum products are added to the storage tanks. The addition of unacceptable petroleum products is precluded by the proposed fuel oil surveillance program detailed above. However, over prolonged periods of time, stored fuel oil can oxidize to form particulates which, in significant concentrations, could impair diesel generator performance. Particulate concentrations and bacteria concentrations are the only characteristics that will change significantly in stored fuel oil. IP proposes that particulate concentrations in the fuel oil storage tanks be monitored every 31 days in accordance with ASTM-D2276-88 as discussed below. Bacteria growth is currently prevented (and will continue to be prevented) by

periodic removal of water from the storage tanks as required by existing Surveillance Requirement 4.8.1.1.2.c. Considering that those fuel oil properties which can change during storage conditions and which could affect diesel generator operation will be closely monitored, further testing of stored fuel oil in accordance with ASTM-D975 every 92 days will not provide any additional, worthwhile data nor improve diesel generator reliability.

The proposed changes also involve replacing the requirement for testing stored fuel oil every 92 days and new fuel oil in accordance with ASTM-D2274-70 (accelerated oxidation stability test) with a requirement to test for actual particulate concentrations in the stored fuel only in accordance with ASTM-D2276-88 every 31 days. The proposed test, ASTM-D2276-88, addresses the actual condition of the fuel oil. The current surveillance requirement, ASTM-D2274-70, is based on predicting the tendency of fuel oil to oxidize and form particulates during long-term storage. Industry experience has shown that ASTM-D2274-70 is not an appropriate test for determining actual particulate contamination of fuel in storage. In addition, ASTM-D2274-70 test results may not accurately correlate with actual fuel conditions because test results tend to vary depending on factors such as storage conditions and fuel composition. Further, the proposed ASTM-D2276-88 test will be performed every 31 days rather than every 92 days as currently required for the ASTM-D2274-70 test. The more frequent testing for actual particulates in the stored fuel will provide better information regarding actual fuel condition as well as the tendency for formation of particulates under site storage conditions. The proposed, periodic test will therefore be more conservative in establishing the adequacy of the stored fuel oil than the present requirements.

Proposed Surveillance Requirements 4.8.1.1.2.d.2 and 4.8.1.1.2.d.3 verify, on a periodic basis, the quality of new fuel oil added to the storage tanks (4.8.1.1.2.d.2) and the quality of fuel oil in the storage tanks (4.8.1.1.2.d.3). In accordance with Regulatory Guide 1.137, Revision 1, Regulatory Position C.2.a, when the fuel oil in the storage tanks does not meet the specified requirements, the fuel oil may be replaced in a short period of time (about a week). Therefore, Action Statement "j" has been proposed to allow up to seven days to correct the out-of-specification condition by replacing the fuel oil or taking other necessary actions.

Based on the above discussion of the proposed changes, it is evident that the performance capabilities of the diesel generators and their associated fuel oil systems will not be compromised. Therefore, these changes will not adversely impact the reliability of the emergency diesel generators or their capability to respond to mitigate transients/accidents. In addition, the proposed changes have no effect on the diesel generator control system, nor do they have any impact on the seismic or environmental qualification of the subject equipment. These proposed changes do not impact the independence and redundancy of the onsite safety-related power

supplies. Furthermore, these proposed changes do not impact those systems/components whose failure could create an accident. Therefore, these proposed changes do not involve a significant increase in the probability or the consequences of any accident previously evaluated.

- (2) The proposed changes do not involve a change in the design of any plant system or component, nor do they involve a change in the operation of any plant system or component. In addition, the proposed changes do not reduce the level of diesel generator reliability nor do they impact initiating events of any accident. Based on the above justification which demonstrates that performance, function, and redundancy of the original design remain unchanged, these proposed changes do not create the potential for a new event. Furthermore, since no new types of equipment have been introduced and the proposed fuel oil requirements will have no adverse effect on existing equipment, no potential for a different type of malfunction is created. Therefore, these proposed changes cannot create the possibility of a new or different kind of accident from any accident previously evaluated.
- (3) The margin of safety for the diesel generator fuel oil testing as defined in the Basis to Technical Specification Section 3/4.8 relates to the reliability of the onsite power supplies. As shown above, these proposed changes do not adversely affect the reliability of the diesel generators. As a result, these proposed changes do not involve a significant reduction in a margin of safety.

Based upon the foregoing, IP has concluded that these proposed changes do not involve a significant hazards consideration.