

RS 070-4

EBASCO SERVICES INCORPORATED

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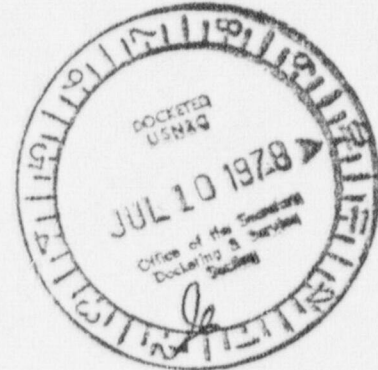
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DOCKET NUMBER

PROPOSED RULE

PR - Misc. Notice
Reg. Guide

June 22, 1978



Secretary of the Commission
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Docketing and Service Section

Subject: REGULATORY GUIDE 1.137, REV. 0, JANUARY 1978, FOR COMMENT
"FUEL-OIL SYSTEMS FOR STANDBY DIESEL GENERATORS"

Gentlemen:

Ebasco Service has reviewed the subject regulatory guide and has the following comments:

Regulatory
Position

C.l.e Ebasco does not believe the scope of this regulatory position is adequately defined since it would apply the inspection and testing requirements of ASME Section XI to diesel generator subcomponents already subjected to the inspection and testing of the diesel generator as a component. Ebasco believes that the scope of the application of ASME Section XI to the inservice inspection and testing program for those portions of the fuel-oil system that are designed to ASME Section III, Subsection ND can be properly defined by adding "except for those portions regarded as subcomponents and subjected to inservice inspection and testing as part of the program for the diesel generator" to the end of the last sentence. For example, the fuel oil system downstream of the day tank is supplied, inspected, and tested as part of the diesel engine periodic surveillance and inspection program required in accordance with plant technical specifications and ASME Section XI would not be applicable.

Acknowledged

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Regulatory
Position

Comment

- C.1.g Ebasco believes that the amplification of corrosion protection requirements found in this regulatory position is overly restrictive in failing to recognize the adequacy of other means of corrosion protection and is restrictive to designer flexibility because of this specificity. In this regard, Ebasco suggests that the position be revised to say: "Section 7.5, "Other Requirements" of the standard states, "protection against external and internal corrosion shall be provided" for the fuel-oil system. To amplify this requirement, buried supply tanks not located within a water-proof vault and other buried portions of the system, should be provided with a high dielectric protective coating and a cathodic protection system in accordance with NACE Standard RP 01-69 (1972 Revision), "Recommended Practice - Control of External Corrosion on Underground or Submerged Metallic Piping Systems."³ In addition, the cathodic protection system should be designed to prevent the ignition of combustible vapors or fuel oil present in the fuel-oil systems for standby diesel generators."
- C.2.a This position should be revised to reflect the fact that diesel generator manufacturer recommendations on fuel oil specifications are often based on non-safety related considerations (i.e. fuel economy) or the reference to these recommendations should be deleted.
- C.2.b Ebasco notes that the testing required by this position is well beyond the resources of onsite testing labs and will require dependence on fuel oil vendors or an offsite laboratory. The time frames specified in this position should recognize the potential delays involved.
- C.2 e This position should be revised to reflect the fact that the injector recirculation system can handle small amounts of water without harmful effects. Ebasco suggests revising the beginning of the second sentence to say "Any significant quantity of accumulated water..."
- C.2.g This position should be deleted as impractical and unnecessary. It is impossible to add fuel oil to a tank that is less than half full without stirring up sediment. The important point in this case is that the sediment that is stirred up will not cause a problem. Most of the sediment in the storage tank will re-settle with only a small amount passed to the day tank.

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Regulatory
Position

Comment

C.2.g
(Cont'd)

Assuming day tanks have a 2 hour or longer residence time, the small amount of sediment that is transferred will settle in the day tank. Additional protection is provided by the design of the fuel delivery system and fuel filtration system, the testing provisions of position C.2.b and the cleaning provisions of position C.2.f.

C.2.h(3)

In order to keep this position consistent with the comment on position C.1., Ebasco suggests that this position be revised to say "Each of the cathodic protection rectifiers, if any, should be inspected at intervals not exceeding two months to insure continued operation. Cathodic protection systems of the galvanic type should be checked for current output at intervals not exceeding six months."

Ebasco hopes these comments will be considered carefully and would welcome the opportunity to participate in any discussions the NRC Staff has on this guide.

Very truly yours,

E P O'Donnell

E P O'Donnell
Chief Engineer
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EPO:bds