

**St. Lucie SLRA: Breakout Questions**

SLRA Section: B.2.3.18 Fuel Oil Chemistry

TRP: XI. M30 Fuel Oil Chemistry

Note: Breakout Questions are provided to the applicant and will be incorporated into the publicly-available audit report.

<b>Technical Reviewer</b>	Lydiana Alvarado	01/12/2022
<b>Technical Branch Chief</b>	Steven Bloom	01/12/2022
<b>Breakout Session</b>	<i>Date/Time</i>	<i>To be filled in by PM</i>

<b>Applicant Staff</b>	<b>NRC staff</b>

<b>Question Number</b>	<b>SLRA Section</b>	<b>SLRA Page</b>	<b>Background / Issue (As applicable/needed)</b>	<b>Discussion Question / Request</b>	<b>Outcome of Discussion</b>
1	SLRA - Appendix B Section B.2.3.18 XI. M30 Fuel Oil Chemistry	SLRA - Page B-163	SLRA Exception #2: Multilevel sampling or sampling from the lowest point is not used specified in Element 4 of the NUREG-2191, XI.M30. As an alternate to the GALL-SLR Element 4 requirements, the DOSTs are placed on recirculation for 30-minutes prior to sampling. The periodic recirculation of fuel oil also achieves filtering, reducing need for fuel treatments and additives by preventing contaminant build-up.	Why is "conditioning the sample," before taking a sample acceptable? The staff is concerned that under normal conditions, when no recirculation is occurring, water may collect at the bottom of the tank(s). Without a true bottom sample, how is settled water, identified, and mitigated? How is the integrity of the tank bottom ensured?	