AmerenUE
Callaway Plant

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August 20, 2007

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
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Ladies and Gentlemen: ULNRC-05379

DOCKET NUMBER 50-483
CALLAWAY PLANT
UNION ELECTRIC COMPANY
PROPOSED REVISION TO TECHNICAL SPECIFICATION 3.8.3, "DIESEL FUEL OIL, LUBE OIL, AND STARTING AIR"
(LICENSE AMENDMENT REQUEST OL-1271)

Pursuant to 10 CFR 50.90, AmerenUE (Union Electric) hereby requests an amendment to the Facility Operating License (No. NPF-30) for Callaway Plant in order to incorporate proposed changes to Technical Specification (TS) 3.8.3, "Diesel Fuel Oil, Lube Oil, and Starting Air," which specifies requirements for the diesel fuel oil storage tanks associated with the standby emergency diesel generators (EDGs) at the facility.

Specifically, AmerenUE proposes to revise Condition A of TS 3.8.3 and associated Surveillance Requirement (SR) 3.8.3.1 in order to incorporate new values for the minimum fuel oil volume required to be contained in the DG fuel oil storage tanks. The minimum required fuel oil volume is being revised (increased) to provide conservative margin against potential vortex effects that could occur during fuel oil transfer pump operation.

Essential or supporting information for the proposed TS changes is provided in the attachments to this letter. Attachment 1 provides a detailed description and technical evaluation of the proposed changes, including AmerenUE's determination that the proposed changes involve no significant hazards consideration. Attachment 2 provides mark-ups of the current, affected TS pages to show the proposed changes, and Attachment 3 provides a copy of the affected TS pages retyped with the proposed changes incorporated (if approved).

The Callaway Plant Review Committee and the Nuclear Safety Review Board have reviewed and approved this amendment application. In addition, it has been determined that this amendment application involves no significant hazards consideration as determined per 10 CFR 50.92, and that pursuant to 10 CFR 51.22(b) no environmental assessment is required to be prepared in connection

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with the issuance of this amendment. It should also be noted that pursuant to 10 CFR 50.91(b)(1), AmerenUE is providing the State of Missouri with a copy of this proposed amendment.

AmerenUE respectfully requests approval of the proposed license amendment by March 31, 2008. Once approved, it is anticipated that the requested license amendment will be required to be implemented within 90 days from the issue date of the amendment.

For any questions on the above or attached, please contact Scott Maglio at (573) 676-8719 or Tom Elwood at (573) 676-6479.

I declare under penalty of perjury that the foregoing and attached are true and correct.

Sincerely,

Executed on: August 20, 2007

Luke H. Graessle
Manager, Regulatory Affairs

TBE/slk

Attachments: 1) Evaluation
2) Marked-up Technical Specification Pages
3) Retyped Technical Specification Pages

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ATTACHMENT 1

EVALUATION

EVALUATION

1.0 INTRODUCTION

This amendment application is being submitted for proposed changes to Technical Specification (TS) 3.8.3, "Diesel Fuel Oil, Lube Oil, and Starting Air," which specifies requirements for support functions and/or auxiliary systems associated with the two onsite standby/emergency diesel generators (EDGs) at Callaway Plant, including the fuel oil storage tanks.

Specifically, changes to TS 3.8.3 are being proposed in order to revise the minimum volume of fuel required to be contained in each EDG fuel oil storage tank (when the associated EDG is required to be OPERABLE). The changes are being made in response to a recent calculation revision in which potential vortex effects have been more appropriately taken into account. The minimum required fuel oil volume is thus being increased by approximately 0.6 % to provide additional margin for precluding adverse effects that could result from air entrapment caused by a vortex condition during fuel oil transfer pump operation. The proposed changes to TS 3.8.3 are described and addressed in more detail as follows.

2.0 DESCRIPTION OF PROPOSED TS CHANGES

The change to the minimum fuel oil volume required to be contained in each fuel oil storage tank (when the associated EDG is required to be OPERABLE) requires the following changes to be made to TS 3.8.3:

CONDITION A (in the ACTIONS section of TS 3.8.3): CONDITION A currently reads as follows:

A. One or more DGs with fuel level < 80,400 gal and > 69,300 gal in storage tank.

This CONDITION would be revised to read as follows:

A. One or more DGs with fuel level < 80,900 gal and > 69,800 gal in storage tank.

SR 3.8.3.1: This SR currently reads, in part, as follows:

Verify each fuel oil storage tank contains ≥ 80,400 gal of fuel.

This SR would be revised to read as follows:

Verify each fuel oil storage tank contains ≥ 80,900 gal of fuel.

Technical analyses and justification for the changes are provided in Section 4.0. In addition, the requested changes are reflected on marked-up and edited pages from the Technical Specifications, which are provided as Attachments 2 and 3, respectively.

3.0 BACKGROUND

3.1 Onsite Standby Power System – General Description

The onsite power system at Callaway Plant is generally divided into two (redundant) load groups. Each load group consists of an arrangement of buses, transformers, switching equipment, and loads fed from a common power supply for that group. The Class 1E AC power system loads are accordingly separated into two load groups which are powered from separate engineered safety feature (ESF) transformers. Each load group has power distributed by a 4.16-kV bus (NB01 or NB02), 480-V load centers, and 480-V motor control centers. Each load group is independently capable of safely bringing the plant to a cold shutdown condition, as the Class 1E electrical power distribution system is designed to satisfy the single-failure criterion.

The onsite standby power system includes the Class 1E AC and DC power supply capability for equipment used to achieve and maintain a cold shutdown of the plant and to mitigate the consequences of a design basis accident (DBA). With respect to Class 1E AC power, each of the two Class 1E load groups, at the 4.16-kV bus level, is capable of being powered from an independent EDG (one per load group) which functions to provide power in the event of a loss of the preferred power source. Undervoltage relays are provided for each 4.16-kV bus to detect an undervoltage condition and automatically start the EDG in response to such a condition.

The onsite standby power sources are designed to permit inspection and testing of all important areas and features in accordance with 10 CFR 50, Appendix A, General Design Criterion (GDC) 18. Periodic component tests are supplemented by extensive functional tests during refueling outages (under simulated accident conditions). The SRs for demonstrating OPERABILITY of the EDGs are in accordance with the recommendations of Regulatory Guide 1.9, Regulatory Guide 1.108, and Regulatory Guide 1.137, as described in the updated Final Safety Analysis Report (FSAR) for Callaway.

3.2 Standby/Emergency Diesel Generators

As noted above, the onsite standby power source for each 4.16-kV ESF bus is a dedicated EDG. EDGs NE01 and NE02 are dedicated to ESF buses NB01 and NB02, respectively. An EDG starts automatically on a safety injection (SI) signal (i.e., low pressurizer pressure, steam line pressure or high containment pressure signals) or on an ESF bus undervoltage signal. After the EDG has started, it will automatically tie to its respective bus after offsite power is tripped as a consequence of ESF bus undervoltage or degraded voltage, independent or coincident with an SI signal. (The EDGs will start and operate in the standby mode without tying to the ESF bus on an SI signal alone). Following a trip of offsite power, a Load Shedder and Emergency Load Sequencer (LSELS) strips nonpermanent loads from the ESF bus. When the EDG is tied to the ESF bus, loads are then sequentially connected to its respective ESF bus by the LSELS. The sequencing logic controls the permissive and starting signals to motor breakers to prevent overloading the EDG by automatic load application.

In the event of a loss of preferred power, the ESF electrical loads are automatically connected to the EDGs in sufficient time to provide for safe reactor shutdown and to mitigate the consequences of a DBA such as a loss of coolant accident (LOCA).

As noted above, each EDG must be capable of starting, accelerating to rated speed and voltage, and connecting to its respective ESF bus on detection of bus undervoltage. This is required to be accomplished within 12 seconds. Each EDG must also be capable of accepting required loads within the assumed loading sequence intervals, and continuing to operate until offsite power can be restored to the ESF buses.

3.3 Diesel Fuel Oil Storage System

Each EDG is provided with a fuel oil storage tank having a fuel oil capacity sufficient to operate the diesel for a period of 7 days with the EDG operating at its continuous rating, as discussed in FSAR Section 9.5.4. (Each tank has a capacity of approximately 100,000 gallons.) This capacity ensures the EDG is capable of meeting its maximum post-LOCA load demand for 7 days, and is sufficient to operate the EDGs for longer than the time required to replenish the onsite supply from outside sources (such as by truck).

For each EDG, fuel oil is transferred from the storage tank to the EDG's day tank by a can-type transfer pump that is submerged in the fuel oil storage tank. (The pump is suspended from a structure that is flanged to a nozzle penetrating the crown of the storage tank. The pump is offset towards one end of the tank by about 13 feet from the center when viewing the tank lengthwise. Suction is taken

horizontally and directly from the inlet nozzle, which is a 1-inch 150-pound class weld neck flange. The centerline of the inlet is 9-1/2 inches from the floor of the storage tank.) Level transmitters installed on the day tanks initiate a signal to start the transfer pumps on low level and to stop the pump on high level. If the EDGs are running, the transfer pumps will run continuously

Redundancy of pumps and piping precludes the failure of one pump, or the rupture of any pipe, valve, or tank resulting in the loss of more than one EDG. All outside tanks, pumps, and piping are located underground.

4.0 TECHNICAL ANALYSIS

In late 2005, Callaway personnel completed review of an Operating Experience (OE) report that summarized inspection findings at another facility. The OE report identified a design control issue wherein vortex prevention was not properly taken into account in the calculation that was performed to determine the usable volume in the diesel fuel oil storage tanks for the plant's EDGs. It was noted that this condition could cause the transfer pump to ingest air. After thorough review of the OE, Engineering personnel at Callaway confirmed (in 2006) that this condition was applicable to Callaway.

As part of confirming the applicability of the noted condition to Callaway, the calculation that was originally performed for establishing the fuel oil tank volume requirements and corresponding level setpoints at Callaway was reviewed. It was confirmed that while net positive suction head requirements were considered in the calculation (with respect to proper transfer pump operation), vortex prevention was not considered.

A vortex represents a flow in which the streamlines are in concentric circles. The formation of surface and subsurface vortices can cause numerous hydraulic problems. Surface vortices are produced by localized eddies on the surface of the liquid. If the disturbance continues, the fluid flow will carry the submerged part of the vortex down toward the suction inlet and ultimately into the pump. The ingestion of a surface vortex into a pump's suction will introduce air resulting in efficiency loss, performance degradation, increased vibration, and eventually pump damage. Subsurface vortices can cause similar problems.

The original calculation performed for the fuel oil storage tanks at Callaway accounted for net positive suction head with respect to the fuel oil transfer pumps, and thus provided for what was thought to be adequate submergence. However, it did not adequately take vortex prevention into account, as a pump may have adequate submergence from a pressure standpoint but still be lacking in sufficient depth of cover above the suction inlet to prevent surface air from being drawn in.

With this understanding, the diesel fuel oil tank calculation was revised, and per the revision, an additional unusable fuel oil volume of approximately 0.6% (~500 gallons) was identified to preclude vortex problems.

TS 3.8.3 specifies requirements for the diesel fuel oil, lube oil, and starting air systems for the EDGs. With regard to diesel fuel oil requirements, SR 3.8.3.1 requires verifying, at least once per 31 days, that each fuel oil storage tank has at least a 7-day supply of fuel (currently specified as $\geq$ 80, 400 gallons). Condition A under the Limiting Condition for Operation (LCO) of TS 3.8.3 addresses the condition of having less than the required 7-day supply. More precisely, it addresses the condition of having less than a 7-day supply but greater than a 6-day supply (currently specified as $\geq$ 69, 300 gallons). With a fuel oil volume in this range, some time is allowed per Required Action A.1 (i.e., 48 hours) to restore fuel oil to within the required limit (i.e., to greater than the 7-day volume).

Based on the revised calculation, the value for the required 7-day fuel oil volume given in SR 3.8.3.1 and Condition A must be changed from 80,400 to 80,900 (gallons). In addition, the value for the 6-day fuel oil volume given in Condition A must be changed from 69,300 to 69,800 (gallons). These values are consistent with respect to the adjustment that must be made for the unusable fuel oil volume included in each limit, in order to preclude potentially adverse vortex effects.

With regard to fire load considerations and the potential impact of the proposed increase in the minimum required fuel oil volume for the storage tanks, it should be noted that fire loading calculations and assumptions for a fire in the plant are based on an EDG's fuel oil day tank volume and an assumed time for continued operation of the fuel oil transfer pump, and not on the fuel oil volume in the associated storage tank. Therefore, no changes to the plant's fire analyses are required for the proposed changes.

5.0 REGULATORY ANALYSIS

5.1 No Significant Hazards Determination

As described above, this amendment application involves requested changes to Technical Specification 3.8.3, "Diesel Fuel Oil, Lube Oil, and Starting Air," in order to increase the minimum volume of fuel oil required to be contained in the fuel oil storage tanks for the emergency diesel generators (EDGs) at Callaway Plant.

AmerenUE has evaluated whether or not a significant hazards consideration is involved with the proposed changes by focusing on the three standards set forth in 10 CFR 50.92(c) as discussed below:

1. Do the proposed changes involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No

The proposed changes to the minimum required fuel oil volume required in the EDG storage tanks have no impact on the frequency of occurrence of any of the accidents evaluated in the FSAR. Changing the minimum required fuel oil volume in the EDG fuel oil storage tank has no impact on the likelihood of occurrence of a loss of coolant accident (LOCA), line break, plant transient, loss of offsite power, or any such accident because the precursors for such accidents do not involve the fuel oil storage tanks.

The EDGs are designed to provide electrical power to systems required for mitigating the effects of accidents in the event of a loss of the preferred (offsite) power source (i.e., from the grid). However, the failure or malfunction of an EDG (due, for example, to a loss or interruption of fuel oil supply) is not itself an initiator of any accident previously evaluated.

Based on these considerations, the proposed changes have no impact on the probability of occurrence of any accident evaluated in the FSAR, and therefore the proposed changes do not involve a significant increase in the probability of an accident previously evaluated.

With respect to the consequences of postulated accidents addressed in FSAR, the support function provided by the EDGs for accident mitigation is not affected by the proposed TS changes. Each of the diesel fuel oil storage tanks has adequate excess capacity to more than accommodate a slight increase in the unusable volume of fuel oil contained therein. Thus, even with this increase, the tanks will still be fully capable of storing the required fuel oil volume needed to ensure EDG operation throughout the assumed duration after an accident. At the same time, the proposed changes to TS 3.8.3 will serve to ensure that the unusable volume in the tanks provides adequate margin against potentially adverse vortex effects (by precluding the potential for air ingestion into the fuel oil transfer pumps). On this basis, the proposed changes have no impact on the capability of the EDGs to perform their required mitigation/support function for accidents involving a loss of offsite power. Since the proposed changes have no impact on accident mitigation capability, they involve no increase in the consequences of any accident evaluated in the FSAR.

Based on the above, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Do the proposed changes create the possibility of a new or different kind of accident from any accident previously evaluated?

   Response: No

   The proposed changes involve a slight change to the minimum fuel oil volume required for the EDGs, but they do not involve hardware changes or changes to EDG operation or testing that would create any new failure modes for the EDGs or any other system or component, or that would adversely affect plant operation. The changes do not involve the addition of any new equipment. No changes to accident assumptions, including any new limiting single failures, are involved. With respect to the proposed changes, the plant will continue to be operated within the envelope of the existing safety analyses.

   Therefore, based on the above, the proposed changes do not create a new or different kind of accident previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

   Response: No

   The margin of safety is related to the confidence in the ability of the fission product barriers to perform their design functions during and following an accident situation. These barriers include the fuel cladding, the reactor coolant system, and the containment system. The proposed changes do not directly affect these barriers, nor do they involve or cause any adverse impact on the EDGs which serve to support these barriers in the event of an accident concurrent with a loss of offsite power.

   The proposed changes do not alter the manner in which safety limits or limiting safety system settings are determined, nor is basis for any limiting condition for operation changed or affected. The safety analysis acceptance criteria are not impacted by these changes. The proposed changes will not result in plant operation in a configuration outside the design basis.

   Therefore, the proposed changes do not involve a significant reduction in the margin of safety.

Based on the above evaluations, AmerenUE concludes that the activities associated with the above described changes present no significant hazards

consideration under the standards set forth in 10 CFR 50.92 and accordingly, a finding by the NRC of "no significant hazards consideration" is justified.

5.2 Applicable Regulatory Requirements/Criteria

Applicable regulatory requirements and associated guidance documents are as follows:

- 10 CFR 50, Appendix A, GDC 17, "Electric power systems," includes the following criteria:

  An onsite electric power system and an offsite electric power system shall be provided to permit functioning of structures, systems, and components important to safety. The safety function for each system shall be to provide sufficient capacity and capability to assure that (1) specified acceptable fuel design limits and design conditions of the reactor coolant pressure boundary are not exceeded as a result of anticipated operational occurrences and (2) the core is cooled and containment integrity and other vital functions are maintained in the event of postulated accidents.

  The onsite electric power supplies, including the batteries, and the onsite electric distribution system, shall have sufficient independence, redundancy, and testability to perform their safety functions assuming a single failure.

  Provisions shall be included to minimize the probability of losing electric power from any of the remaining supplies as a result of or coincident with, the loss of power generated by the nuclear power unit, the loss of power from the transmission network, or the loss of power from the onsite electric power supplies."

- GDC-18, "Inspection and testing of electric power systems," requirements are as follows:

  Electric power systems important to safety shall be designed to permit appropriate periodic inspection and testing of important areas and features, such as wiring, insulation, connections, and switchboards, to assess the continuity of the systems and the condition of their components. The systems shall be designed with a capability to test periodically (1) the operability and functional performance of the components of the systems, such as onsite power sources, relays, switches, and buses, and (2) the operability of the systems as a whole and, under conditions as close to design as practical, the full operation sequence that brings the systems into operation, including operation of the applicable portions of the

protection system, and the transfer of power among the nuclear power unit, the offsite power system, and the onsite power system.

- Regulatory Guide 1.9, Revision 3, "Selection, Design, Qualification, and Testing of Emergency Diesel generator Units Used as Class 1E Onsite Electric Power Systems at Nuclear Power Plants," Regulatory Position C.2, provides recommended surveillance tests for demonstrating OPERABILITY of the DGs.

- Regulatory Guide 1.137, Revision 1, "Fuel-Oil Systems for Standby Diesel Generators," provides guidance concerning design and other requirements for EDG fuel oil systems, including calculation of fuel oil storage requirements.

The proposed changes to TS 3.8.3 are a conservative action for precluding the potential for adverse vortex effects in the fuel oil transfer systems for the diesel generators. At the same time, the change is based on preserving adequate capacity in the fuel oil storage tanks (with respect to usable fuel oil volume) and thereby maintaining compliance with Regulatory Guide 1.137 (as conditionally described in the Callaway FSAR).

The proposed changes do not impact the design of the DGs themselves, nor do they affect required testing of the DGs. The design basis for the DGs in accordance with GDC 17, as well as the testing provisions for the DGs in accordance with GDC 18, would not be changed by the proposed changes. Under the proposed changes, verification that the DGs are performing within their required limits/parameters would continue to be performed, as DG testing would continue to be performed in accordance with the Technical Specifications and the recommendations of Regulatory Guide 1.9 (as provisionally described in the Callaway FSAR).

In conclusion, based on the considerations discussed above, 1) there is a reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, 2) such activities will be conducted in compliance with the Commission's regulations, and 3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

6.0 ENVIRONMENTAL CONSIDERATION

AmerenUE has evaluated the proposed changes for environmental considerations, and has determined that the proposed amendment would change requirements with respect to the installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, and would change an inspection or

surveillance requirement. However, the proposed amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types of or significant increase in the amounts of any effluents that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment is required to be prepared in connection with the proposed amendment.

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ATTACHMENT 2

MARKED-UP TECHNICAL SPECIFICATION PAGES

3.8 ELECTRICAL POWER SYSTEMS

3.8.3 Diesel Fuel Oil, Lube Oil, and Starting Air

LCO 3.8.3 The stored diesel fuel oil, lube oil, and starting air subsystem shall be within limits for each required diesel generator (DG).

APPLICABILITY: When associated DG is required to be OPERABLE.

ACTIONS

---------- NOTE ----------
Separate Condition entry is allowed for each DG.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more DGs with fuel level < 80,~~400~~ 900 gal and > 69,~~900~~ 800 gal in storage tank.	A.1 Restore fuel oil level to within limits.	48 hours
B. One or more DGs with lube oil inventory < 750 gal and > 686 gal.	B.1 Restore lube oil inventory to within limits.	48 hours
C. One or more DGs with stored fuel oil total particulates not within limit.	C.1 Restore fuel oil total particulates within limit.	7 days
D. One or more DGs with new fuel oil properties not within limits.	D.1 Restore stored fuel oil properties to within limits.	30 days

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
E. One or more DGs with two starting air receivers in service with pressure < 435 psig and ≥ 250 psig. OR One or more DGs with only one starting air receiver in service with pressure < 610 psig and ≥ 300 psig.	E.1 Restore two starting air receivers with pressure ≥ 435 psig. OR E.2 Restore one starting air receiver with pressure ≥ 610 psig.	48 hours 48 hours
F. Required Action and associated Completion Time not met. OR One or more DGs diesel fuel oil, lube oil, or starting air subsystems not within limits for reasons other than Condition A, B, C, D, or E.	F.1 Declare associated DG inoperable.	Immediately

No changes to this page
(provided for context/continuity).

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.8.3.1	Verify each fuel oil storage tank contains ≥ 80,~~400~~ 900 gal of fuel.	31 days
SR 3.8.3.2	Verify lubricating oil inventory is ≥ 750 gal.	31 days
SR 3.8.3.3	Verify fuel oil properties of new and stored fuel oil are tested in accordance with, and maintained within the limits of, the Diesel Fuel Oil Testing Program.	In accordance with the Diesel Fuel Oil Testing Program
SR 3.8.3.4	Verify pressure in two starting air receivers is ≥ 435 psig or pressure in one starting air receiver is ≥ 610 psig, for each DG starting air subsystem.	31 days
SR 3.8.3.5	Check for and remove accumulated water from each fuel oil storage tank.	31 days
SR 3.8.3.6	Not used.	

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ATTACHMENT 3

RETYPED TECHNICAL SPECIFICATION PAGES

3.8 ELECTRICAL POWER SYSTEMS

3.8.3 Diesel Fuel Oil, Lube Oil, and Starting Air

LCO 3.8.3 The stored diesel fuel oil, lube oil, and starting air subsystem shall be within limits for each required diesel generator (DG).

APPLICABILITY: When associated DG is required to be OPERABLE.

ACTIONS

---------- NOTE ----------
Separate Condition entry is allowed for each DG.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more DGs with fuel level < 80,900 gal and > 69,800 gal in storage tank.	A.1 Restore fuel oil level to within limits.	48 hours
B. One or more DGs with lube oil inventory < 750 gal and > 686 gal.	B.1 Restore lube oil inventory to within limits.	48 hours
C. One or more DGs with stored fuel oil total particulates not within limit.	C.1 Restore fuel oil total particulates within limit.	7 days
D. One or more DGs with new fuel oil properties not within limits.	D.1 Restore stored fuel oil properties to within limits.	30 days

(continued)

SURVEILLANCE REQUIREMENTS

	SURVEILLANCE	FREQUENCY
SR 3.8.3.1	Verify each fuel oil storage tank contains ≥ 80,900 gal of fuel.	31 days
SR 3.8.3.2	Verify lubricating oil inventory is ≥ 750 gal.	31 days
SR 3.8.3.3	Verify fuel oil properties of new and stored fuel oil are tested in accordance with, and maintained within the limits of, the Diesel Fuel Oil Testing Program.	In accordance with the Diesel Fuel Oil Testing Program
SR 3.8.3.4	Verify pressure in two starting air receivers is ≥ 435 psig or pressure in one starting air receiver is ≥ 610 psig, for each DG starting air subsystem.	31 days
SR 3.8.3.5	Check for and remove accumulated water from each fuel oil storage tank.	31 days
SR 3.8.3.6	Not used.	