



Southern California Edison Company

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June 20, 1986

Director, Office of Nuclear Reactor Regulation
Attention: G. E. Lear, Director
PWR Project Directorate No. 1
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Gentlemen:

Subject: Docket No. 50-206
Revised TDI Diesel Generators M/S Program
San Onofre Nuclear Generating Station
Unit 1

Reference: Letter, R. F. Dudley (NRC) to K. P. Baskin (SCE) dated May 27, 1986, Transamerica Delaval (TDI) Diesel Engine Reliability and Operability

Enclosed for your information are copies of Revision 2 of the "TDI Diesel Generator Design Review and Quality Revalidation Report," as applicable to the San Onofre Nuclear Generating Station, Unit 1.

As requested by the referenced letter, Southern California Edison hereby agrees to comply with all provisions of this revised Maintenance/Surveillance program. However, we have one comment as explained below.

On page II-A-2 of the Generic Maintenance Matrix it is stated that the nineteen (19) diesel engine operating surveillance parameters that are listed in Table 1 of the Matrix "are to be recorded and/or checked [hourly] during the monthly testing and any other period of operation." We interpret this provision to apply only to those diesel operations which are of at least one hour duration and which are non-emergency related. In an actual plant emergency, it would not be a prudent use of operator resources to carry out the full scope of surveillances whose purpose is to establish trends in diesel performance.

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June 20, 1986
Mr. G. E. Lear

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Station procedures are presently being revised to incorporate the additional recommendations identified in Revision 2 of the report. It is anticipated that final implementation will be completed by September 30, 1986.

If you have any questions, please call me.

Very truly yours,

m d medford

Enclosure

cc: R. Dudley, NRC/NRR San Onofre Unit 1 Project Manager
F. R. Huey, NRC Senior Resident Inspector, Units 1, 2 and 3
J. B. Martin, NRC Region V, Regional Administrator
D. E. Broeils, Duke Power Co., TDI DG Owners Group