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SUBJECT: Forwards IR 99901065/91-01 on issues identified in plant audits re generator supplied to PG&E per 10CFR50, app A program.

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Nuclear Power Generation

May 22, 1992

PG&E Letter No. DCL-92-126



U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555

Re: Docket No. 50-275, OL-DPR-80  
Docket No. 50-323, OL-DPR-82  
Diablo Canyon Units 1 and 2  
PG&E Resolution of Issues Identified in PG&E Audits and NRC  
Inspection Report 99901065/91-01 Regarding the Generator Supplied  
by Peebles Electrical Machines

Gentlemen:

NRC Inspection Report (IR) 99901065/91-01, dated February 13, 1992, summarizes the findings and conclusions of an NRC inspection conducted at the Peebles Electrical Machines (PEM) facility in Edinburgh, Scotland. This inspection centered around PEM's fabrication of a power generator for PG&E, which is to be used as part of PG&E's addition of a sixth emergency diesel generator (EDG) at the Diablo Canyon Power Plant Unit 2. This letter provides a description of PG&E's actions to resolve the findings against PEM.

The generator was fabricated jointly by PEM and NEI Peebles - Electric Products, Inc. (P-EP) and supplied to PG&E under a 10 CFR 50, Appendix B program. The NRC performed an inspection at the P-EP facilities and issued its findings in IR 99900772/91-01, dated January 13, 1992. PG&E audits of both P-EP and PEM prior to the NRC inspections had also identified several findings. PG&E provided information regarding the NRC and PG&E findings against P-EP in PG&E Letter No. DCL-92-034, dated February 12, 1992. Included as part of this letter was an evaluation of the findings against P-EP and the compensatory actions taken by PG&E to resolve the findings (hereafter referred to as a Nuclear Engineering Manual Procedure (NEMP) 12.4 Evaluation).

In a discussion with the NRC on May 6, 1992, the NRC stated that, rather than submitting a response for the PEM IR similar to that issued for the P-EP IR, PG&E could revise the NEMP 12.4 Evaluation to cover any new issues from the PEM IR and then submit the revised NEMP 12.4 Evaluation with an appropriate cover letter. Accordingly, the NEMP 12.4 Evaluation has been appropriately revised and is provided as Enclosure 1 to this letter.

In addition to the NEMP 12.4 Evaluation, Revision 2, the qualification of the generator now includes Replacement Parts Evaluation (RPE) E-7505. This RPE was generated to more clearly document the activities taken by PG&E as compensatory actions for findings from the PG&E audits and NRC inspections of P-EP and PEM. The RPE also incorporates the 200-hour,

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pre-operational endurance testing as a verification activity to be performed at Diablo Canyon (as described in detail in PG&E Letter No. DCL-92-092, dated April 17, 1992) and subsequent inspections. Credit for this testing and resolution of the PG&E audit and NRC inspection issues, in conjunction with other verification activities implemented by PG&E (described in the RPE, Enclosure 2), form the basis for the qualification of the generator for the sixth EDG.

Also, the attached RPE identifies those activities which remain to be completed to finalize the generator qualification. These activities are limited to: (1) the completion of P-EP's identification of all design changes from the generator design for the original five EDGs (this information will be used in the seismic qualification of the generator); (2) P-EP re-review of the PEM/P-EP specification/procedure equivalency evaluation; (3) testing by P-EP/PEM to resolve use of lightly varnished wire for the rotor pole magnet instead of unvarnished wire; and (4) successful completion of the pre-operational endurance test.

We believe that this documentation and the testing to be conducted will provide a solid basis for verification of the quality of this generator and for resolution of all NRC inspection and PG&E audit issues. PG&E is prepared to discuss the attached documents in detail during the NRC's next scheduled phase of inspection from June 1 through June 5, 1992, in PG&E's San Francisco offices.

Sincerely,



Gregory M. Rueger

cc: Dyle G. Acker  
Ann P. Hodgdon  
John B. Martin  
Steven M. Matthews  
Philip J. Morrill  
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Diablo Distribution

Enclosures

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ENCLOSURE 1

NEMP 12.4 Evaluation, Revision 2

