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 SCHWENCER, A. Licensing Branch 2

SUBJECT: Responds to Generic Ltr 84-15, "Proposed Staff Actions to Improve & Maintain Diesel Generator Reliability," Express concerns re significant increase of interpretation required to comply w/already complex Tech Specs.

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SEP 28 1984

Director of Nuclear Reactor Regulation
Attention: Mr. A. Schwencer, Chief
Licensing Branch No. 2
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUSQUEHANNA STEAM ELECTRIC STATION
GENERIC LETTER 84-15 (PROPOSED STAFF ACTIONS
TO IMPROVE AND MAINTAIN DIESEL GENERATOR
RELIABILITY)

ER 100450

FILE 841-13

Docket Nos. 50-387

PLA-2312

50-388

Dear Mr. Schwencer:

This letter is in response to Generic Letter 84-15, "Proposed Staff Actions to Improve and Maintain Diesel Generator Reliability." As a general comment on this document, we wish to express our appreciation of your efforts to reduce the current amount of testing being imposed on emergency diesel generators. We do, however, have an overall concern with the final product. The newly proposed Technical Specifications appear to significantly increase the amount of interpretation required to comply with an already complex Technical Specification. We hope that you will focus your attention on this concern as this guidance evolves into its final form.

The items covered by this letter cover the three areas contained in Generic Letter 84-15.

1. Reduction in Number of Cold Fast Start Surveillance Tests
for Diesel Generators

As Pennsylvania Power & Light Company has stated in response to Generic Letter 83-41, "Fast Cold Starts of Diesel Generators," the diesel generators at Susquehanna SES are not cold started since 125°F lubricating oil and engine coolant are kept circulating through the diesel generators to increase their reliability and prevent damage from cold starts. Therefore the proposed change to the Standard Technical Specifications contained in the attachment to Enclosure 1 is not applicable to Susquehanna SES.

2. Diesel Generator Reliability Data

The term "valid demand" is not used in Regulatory Guide 1.108 nor at Susquehanna SES. For the purpose of this response, valid demand is assumed to mean that which is described in Regulatory Guide 1.108 for a

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SEP 28 1984

Page 2

SSES PLA-2312
ER 100450 File 841-13
Mr. A. Schwencer

valid test. Since Susquehanna SES Unit 1 was granted an operating license on July 17, 1982, there has been less than 100 valid tests on each of the four diesel generators. As of September 18, 1984, there have been four failures out of 209 valid tests accumulated on all four diesels. Two failures occurred on the "D" diesel generator on January, 1984 and September 10, 1984. Two failures occurred on the "B" diesel generator on September 12, 1984 and September 13, 1984. The following is a breakdown of the diesel generator failures for the last 20 and 100 valid tests for each diesel generator as of September 18, 1984.

<u>Diesel</u>	<u>Failures Last 20 Valid Tests</u>	<u>Failures/Valid Tests</u>
A	0	0/57
B	2	2/49
C	0	0/53
D	1	2/50

The procedures at Susquehanna SES require that a record itemizing the tests and failures experienced on the diesel generators be kept.

A yearly data report is not maintained for each diesel generator's reliability.

3. Diesel Generator Reliability

At Susquehanna SES, Pennsylvania Power & Light Company does not have a program which is called a diesel generator reliability improvement program. We maintain diesel generator reliability by performing routine maintenance on each diesel generator at periodic intervals as specified in the plant procedures.

Pennsylvania Power & Light Company would support a technical specification based on diesel reliability and require less testing of diesel generators.

The following are comments on the attachment to enclosure 3:

1. It is unclear what is meant by a valid demand. Does it mean the same as valid tests as defined in Regulatory Guide 1.108?
2. In the requalification criteria, the writeup is very unclear as to what actions must be taken to make the diesel operable and gives rise to the question, "Can a disqualified diesel be considered operable prior to completing a requalification?"

The following are comments on the proposed Technical Specification in Appendix A:

1. This Technical Specification should not be applicable in Mode 4 since we are required to go to Mode 4 if we can not comply with any of the action statements.

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SEP 28 1984

Page 3

SSES PLA-2312
ER 100450 File 841-13
Mr. A. Schwencer

2. The change in Action a to perform Surveillance Requirement 4.8.1.1.2.a.4 within 24 hours instead of performing it within four hours and at least once per 8 hours thereafter will reduce stress and wear on the diesel generators.
3. In Actions a, b, c, d, and e the shutdown times should be: HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours. Note that HOT STANDBY is a mode switch position, not a defined OPERATIONAL CONDITION.
4. In Action b, the diesel generators should be restored to operability within a set period of time. No maximum total cumulative time that the diesel generators of the onsite emergency AC power system may be in the inoperable status in a given year should be included in this Technical Specification.
5. The Additional Reliability Actions contain a requirement to create a report on diesel generator reliability within 14 days of the third failure on a diesel generator. A report of this nature would be significantly greater than a 14 day effort and would be of little value in that time frame. We would recommend the deletion of this requirement.
6. In footnote **, we would discourage wording such as "every reasonable effort". Taken in the literal sense, such words could force an unnecessary plant shutdown.
7. As stated earlier in this letter, we would like to know the difference, if any, between "valid test" and "valid demand". They again appear in Table 4.8.1.

In order to evaluate the impact of changing the diesel generator test frequency, the technical basis used for proposing these technical specification changes should be published.

If you have any questions please contact us.

Very truly yours,



N. W. Curtis

Vice President-Engineering & Construction-Nuclear

cc: R. L. Perch - NRC
R. H. Jacobs - NRC

Dear Mr. [Name],

I have your letter of [Date] regarding [Subject].

I am sorry that I cannot give you a more definite answer at this time.

The matter is still under consideration and I will contact you again as soon as a final decision has been reached.

I appreciate your patience and understanding.

Sincerely,
[Signature]

[Name]
[Address]
[City, State, Zip]