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 BUTLER, W.R. Project Directorate I-2

SUBJECT: Provides clarification to one of proposed Tech Spec changes submitted under 900316 ltr.

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Harold W. Keiser
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AUG 07 1990

Director of Nuclear Reactor Regulation
Attention: Dr. W. R. Butler, Project Director
Project Directorate I-2
Division of Reactor Projects
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUSQUEHANNA STEAM ELECTRIC STATION
REVISION TO PROPOSED AMENDMENTS 129 AND
81 TO LICENSE NO.'S NPF-14 AND NPF-22
DIESEL GENERATORS
PLA-3417 FILE A17-2/R41-2

Dockets 50-387
50-388

References: Letter, PLA-3362, H.W. Keiser to Dr. W.R. Butler,
"Proposed Amendment 129 to NPF-14 and Proposed
Amendment 81 to NPF-22, "Diesel Generator Technical
Specifications," dated March 16, 1990.

Dear Dr. Butler:

The purpose of this correspondence is to provide a clarification
to one of the proposed Technical Specification changes submitted
under the referenced PLA.

Presently, if a diesel generator becomes inoperable, the
Technical Specifications require the remaining operable engines
be tested per Surveillance 4.8.1.1.2.a. Our proposed change
added a footnote which waived this requirement if the diesel
became inoperable solely because it was removed from service for
purposes of performing preplanned preventative maintenance.

The basis for requesting that change was a desire to reduce the
number of tests performed on each engine since the stress placed
on a diesel as a result of testing has been determined to be a
potential contributor to the diesel generator overpressurization
events which occurred at Susquehanna in September and October of
last year. If a diesel generator becomes inoperable, testing the
other remaining operable engines is only necessary to ensure a
common mode failure mechanism does not exist. If a diesel
generator is removed from service to perform preventative

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maintenance there is no reason to suspect a common mode failure and hence, the remaining operable engines need not be tested. Given that argument we would propose to clarify the footnote by using the following language in lieu of the originally proposed wording:

"This ACTION is not required to be performed if the absence of common cause for diesel generator inoperability can be established for the diesel generators (i.e. cause can be established and does not represent a common mode/generic failure mechanism for the remaining OPERABLE diesel generators)."

We also proposed revising the load testing requirements such that the diesels could be tested to a load range in lieu of their nameplate ratings. For example, the existing Technical Specifications require the diesels be load tested at 4000 Kw (continuous rating) and 4700 Kw (overload rating) Kw depending on the Surveillance. Our proposed change would allow testing to a 10% load range i.e. 3600 Kw - 4000 Kw and 4100 Kw - 4400 Kw. Based on discussions with your staff we understood this change was not acceptable, but that a 5% band was and would be approved. However in a recent phone conversation with your Staff, we were informed NRC is considering incorporating the 10% load range into the next revision of Regulatory Guide 1.9. In light of this, we request NRC reconsider our proposed change.

Your prompt consideration of the above items would be appreciated.

Very truly yours,



H. W. Keiser

cc: NRC Document Control Desk (original)
NRC Region I
Mr. M. C. Thadani, NRC Project Manager
Mr. G. S. Barber, NRC Senior Resident Inspector

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