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 KEISER, H.W. Pennsylvania Power & Light Co.
 RECIPIENT AFFILIATION
 BUTLER, W.R. Project Directorate I-2

SUBJECT: Clarifies util position re load testing requirements for diesel generators. NRC requested to consider incorporation of 5% load range into plant Tech Specs. W/o marked-up pages of SSES.

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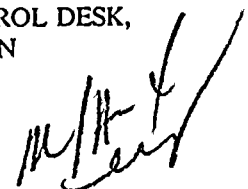
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Director of Nuclear Reactor Regulation
Attention: Dr. W.R. Butler, Project Director
Project Directorate I-2
Division of Reactor Projects
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUSQUEHANNA STEAM ELECTRIC STATION
CLARIFICATION TO PREVIOUS REQUEST -
DIESEL GENERATOR TESTING
PLA-3490 FILES A17-2/R41-2

Docket Nos. 50-387
and 50-388

Reference: PLA-3417, H.W. Keiser to W.R. Butler, "Revisions to Proposed Amendments 129 and 81 to License Nos. NPF-14 and NPF-22 : Diesel Generators", dated August 7, 1990.

Dear Dr. Butler:

The purpose of this letter is to clarify PP&L's position regarding load testing requirements for the diesel generators. In the referenced request, PP&L noted that the NRC staff had informed us that they had been considering incorporating a 10% load range into the next revision of Regulatory Guide 1.9. PP&L therefore requested that the NRC consider incorporation of a 10% load range into the SSES Technical Specifications.

The NRC has subsequently informed PP&L that a 5% load range is the maximum that they will consider under our request. Based on this notification, PP&L hereby requests the 5% load range be incorporated as noted on the attached marked-up pages from the SSES Units 1 and 2 Technical Specifications. With regard to the load reject test (Surveillance Requirement 4.8.1.1.3d.3), the words "greater than or equal to" have been added to clarify that loads greater than 4000 kW are acceptable to meet the intent of the test. Also, the footnote proposed in the referenced letter regarding "common cause" inoperability of diesels has been indicated on the attachment.

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With regard to implementation of these changes, please note that PP&L is requesting that they be issued expeditiously. The basis for this is that if extended unanticipated work (that is not indicative of a common mode failure concern) is required on any of the diesel generators, unwarranted testing of the operable diesels will be required. As documented several times in the past, PP&L believes that this kind of testing is a contributor to engine degradation, and therefore we want to avoid it at all costs.

Any questions on this request should be directed to Mr. R.R. Sgarro at (215) 774-7916.

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 Sr. Resident Inspector