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SUBJECT: Submits comments on proposed Rev 3 to Reg Guide 1.9.

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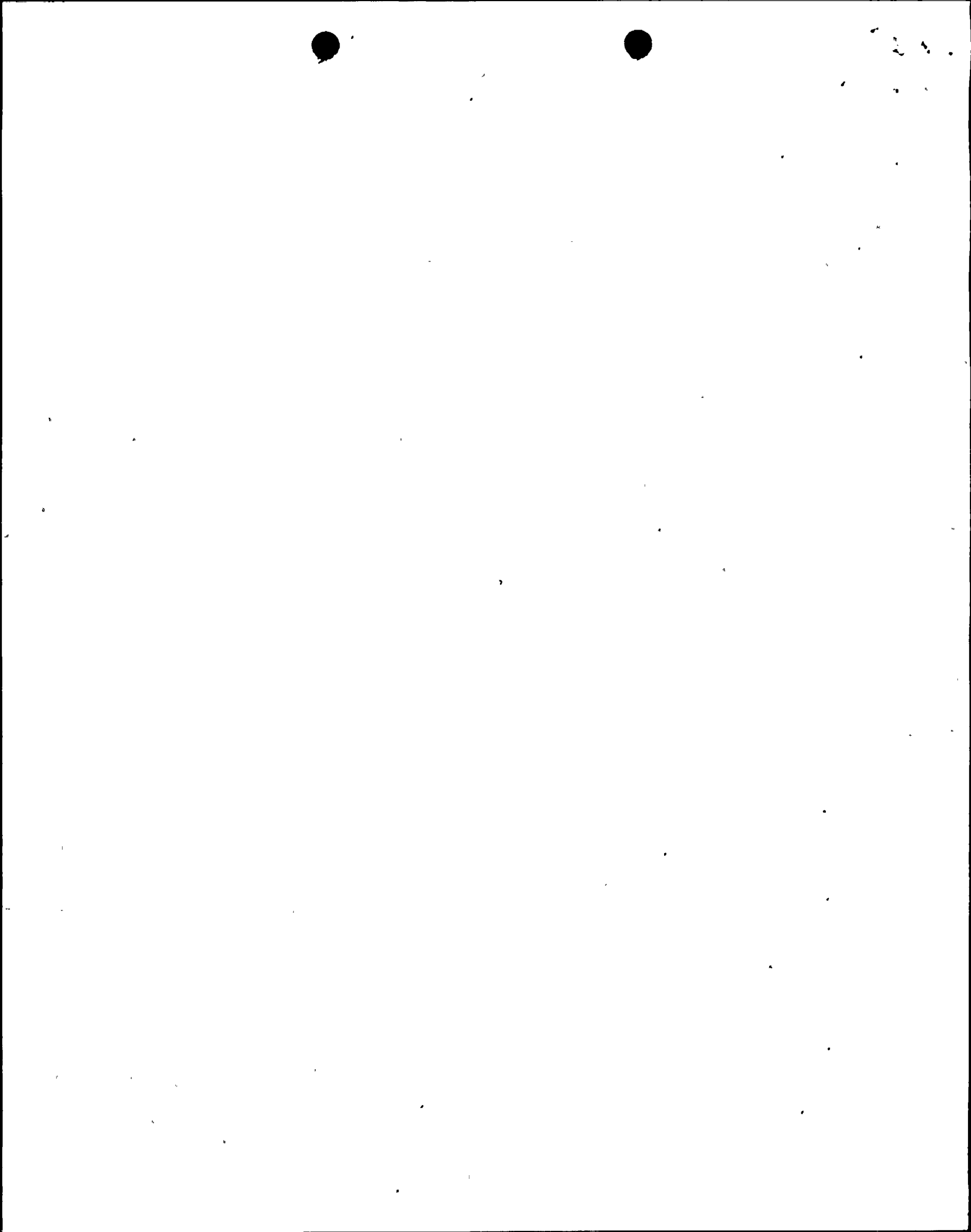
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SUSQUEHANNA STEAM ELECTRIC STATION
COMMENTS ON PROPOSED REVISION 3
TO REGULATORY GUIDE 1.9
PLA-3164 FILE A17-11

The purpose of this memorandum is to transmit comments on the subject Regulatory Guide. A general comment is it appears that this revision of Regulatory Guide 1.9 includes guidance very similar to that which is found in Regulatory Guide 1.108. What is the relationship between these two documents? Is Regulatory Guide 1.9 going to replace Regulatory Guide 1.108?

Specific comments are as follows:

Subsection 7.1 under 'Regulatory Position' - This subsection suggests testing diesel generators during normal operation. Is the intent to test diesel generators more frequently (i.e. more than every 18 months)?

Section 9, under 'Regulatory Position' - A trip on low lube oil pressure (for Cooper-Bessemer diesel units) should also be considered.

Subsection 10.2.1.1 under 'Regulatory Position' - This subsection indicates the diesel generators should be slow started. The diesel generators (Cooper-Bessemer) at Susquehanna cannot be slow started.

Subsection 10.2.1.2 under 'Regulatory Position' - Presently the diesel generators at Susquehanna must demonstrate full-load carrying capability in less than or equal to 90 seconds. Would this requirement be deleted as a result of Reg. Guide 1.9?

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Subsection 10.2.2 under 'Regulatory Position' - If a utility's Technical Specifications require the diesel generator testing frequency to be based on the number of failures in the last 100 demands, would the Technical Specifications have to be changed to base the number of failures on the last 20 demands?

Subsection 10.2.3 under 'Regulatory Position' - This subsection discusses testing which is equivalent to the monthly diesel generator testing performed at Susquehanna. Would the issuance of Reg. Guide justify the elimination of monthly testing?

Subsection 10.2.4.1 under 'Regulatory Position' - There is no mention of permanently connected loads.

Subsection 10.2.4.5 under 'Regulatory Position' - This testing requirement is unclear. What is meant by 'full short-time rating'?

Subsection 10.2.4.9 under 'Regulatory Position' - Recommend low lube oil trip (for Cooper-Bessemer diesel units) be added as an exception under this subsection.

Thank you for the opportunity to comment on proposed revision 3 to Regulatory Guide 1.9.

Very truly yours,



H. W. Keiser

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