

### UNITED STATES NUCLEAR REGULATORY COMMISSION REGIONI 631 PARK AVENUE

KING OF PRUSSIA, PENNSYLVANIA 19406

Docket No. 50-293

SEP 2 6 1979

Boston Edison Company M/C Nuclear ATTN: Mr. G. Carl Andognini, Manager Nuclear Operations Denartment 800 Boylston Street Boston, Massachusetts 02199

Gentlemen:

The enclosed Information Notice provides information with regard to failures of lube oil coolers for emergency diesel generators.

Sincerely,

Enclosures:

IE Information Notice 79-23

List of IE Information Notices Issued in the Last Six Months

cc w/encls:

P. J. McGuire, Pilgrim Station Manager A. Z. Roisman, Natural Resources Defense Council

1089 242

### ENCLOSURE 1

Accession No: 7908220121

SSINS: 6870

UNITED STATES
NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT
WASHINGTON, D.C. 20555

IE Information Notice No. 79-23 Date: September 26, 1979 Page 1 of 1

### EMERGENCY DIESEL GENERATOR LUBE OIL COOLERS

Within a two week time span (August 27 to September 11, 1979), the tube sheets failed in the Arkansas Nuclear 0. (ANO) Unit 1 lube oil coolers for both of the Unit 1 Emergency Diesel Generators. The introduction of water into the diesel lube oil system resulted in trips of both diesels during surveillance testing. The diesels were not considered capable of sustained operation.

Investigation by the licensee has indicated cracks around the outer periphery of the tube sheets. The exact failure mode has not been assessed; however, the licensee has replaced the Emergency Diesel lube oil coolers for both diesels with a cooler of different design. The original lube oil coolers had tube sheets which were one-eighth (1/8) inch in thickness and the tubes were soldered in place. Epoxy was also used as a sealer on the tube (water side) of the lube oil cooler. The new coolers have one-half (1/2) inch tube sneets and the tubes are rolled.

The ANO, Unit 1 Emergency Diesel Generators were purchased in 1970 and were manufactured by the Electromotive Division of General Motors Corporation. The lube oil coolers (Model Number D-191700) were manufactured by Young Radiator Corporation.

This information is provided as an early notification of a possible significant matter. It is expected that recipients will review the information for possible applicability to their facilities. No specific action or response is requested at this time. If further NRC evaluations so indicate, an IE Circular or Bulletin will be issued to recommend or request specific licensee actions. If you have questions regarding this matter, please contact the Director of the appropriate NRC Regional Office.

### ENCLOSURE 2

IE Information Notice No. 79-23 Date: September 26, 1979 Page 1 of 2

## LISTING OF IE INFORMATION NOTICES ISSUED IN THE LAST SIX MONTHS

Information Notice No.	Subject	Date Issued	Issued to
79-07	Rupture of Radwaste Tanks	3/26/79	All power reactor facilities with an OL or CP
79-08	Interconnection of Contaminated Systems with Service Air Systems Used As the Source of Breathing Air	3/28/79	All power reactor facilities with an OL and Pu Processing fuel facilities
79-09	Spill of Radioactivity Contaminated Resin	3/30/79	All power reactor facilities with an OL
79-10	Nonconforming Pipe Support Struts	4/16/79	All power reactor facilities with a CP
79-11	Lower Reactor Vessel Head Insulation Support Problem	5/7/79	All power reactor facilities with an OL or CP
79-12	Attempted Damage to New Fuel Assemblies	5/11/79	All Fuel Facilities, Research Reactors, and Power Reactors with an OL or CP
79-13	Indication of Low Water Level in the Oyster Creek Reactor	5/29/79	All power reactor facilities with an OL or CP
79-14	Safety Classification of Electrical Cable Support Systems	6/11/79	All applicants for, and holders of a power reactor CP

IE Information Notice No. 79-23 Date: September 26, 1979 Page 2 of 2

## LISTING OF IE INFORMATION NOTICES ISSUED IN 1979

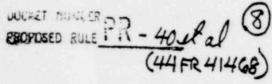
Information Notice No.	Subject	Date Issued	Issued to
79-15	Deficient Procedures	6/7/79	All power reactor facilities with an OL or CP
79-16	Nuclear Incident at Three Mile Island	6/22/79	All research and test reactors with an OL
79- 17	Source Holder Assembly Damage from Misfit Between Assembly and Reactor Upper Grid Plate	6/20/79	All holders of reactor OLs and CPs
79-18	Skylab Reentry	7/5/79	All holders of reactor OLs
79-19	Pipe Cracks in Stagnant Borated Water Systems at PWR Plants	7/17/79	All power reactor facilities with an OL or CP
79-20	NRC Enforcement Policy - NRC Licensed Individuals	8/14/79	All Holders of Reactor OLs and CPs and Production Licensees with Licensed Operators
79-20 (Revision No. 1)	Same Title as 79-20	9/7/79	Same as 79-20
79-21	Transportation and Com- mercial Burial of Radio- active Material	9/7/79	All power and research reactors with OLs
79-22	Qualification of Control Systems	9/14/79	All power reactor faci- cilities with an OL or CP

# GENERAL DE ELECTRIC

CASTLE HAYNE ROAD . P. O. BOX 780 . WILMINGTON, N. C. 28401 . (919) 343-5000

### NUCLEAR ENERGY PRODUCTS DIVISION

WILMINGTON MANUFACTURING DEPARTMENT



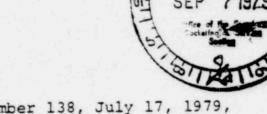
Secretary of the Commission U.S. Nuclear Regulatory Commission Washington, D. C. 20555

Attention: Docketing and Service Branch

Reference: Federal Register Volume 44, Number 138, July 17, 1979,

Nuclear Regulatory Commission, "Safeguards on Nuclear

Material; Implementation of U.S./IAEA Agreement"



August 30, 1979

### Gentlemen:

General Electric's Wilmington Manufacturing Department has reviewed the referenced proposed rule and offers the following comments:

- 1) Paragraph 75.3 Exemptions, "...consistent with the Agreement."
  - This paragraph should be modified to read:

"...consistent with the objectives of the Agreement."

This is necessary to ensure clear understanding that licensees are at liberty to utilize the best available methods and new technology to meet international objectives. The Agreement and regulations are written based on current and past knowledge and, in certain instances, do not specifically provide for advanced techniques.

- Paragraph 75.11(a)(4), "A Description of the Existing and Proposed Procedures at the Installation for Nuclear Material Accounting and Control..."
  - This paragraph should be modified to read:

"A Description of the Systems at the Installation..."

A "description of procedures" is really the specification for the system which the procedures implement. Therefore, it is more appropriate to require that a description of the systems be submitted than to require the more nebulous "description of procedures".

Acknowledged by card. 9//6

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### 2) Continued

The mechanism is already in place, both in proposed 10 CFR 75.11(b) and in existing 10 CFR 70.32(c), for the IAEA and the NRC to be kept informed concerning changes in the safeguards system; therefore, advance notice of "proposed" procedures is unnecessary.

Also, "proposed procedures" (or proposed systems) will be difficult to describe ahead of their implementation, without risking that the submittal will be useless since between proposal and implementation many changes are sometimes made.

In preparation of the guidance for licensees associated with preparation of compliance plans for this new 10 CFR 75, the NRC should assure that the description referred to above need only be concise and definitely need not include a requirement for the procedures themselves to be submitted.

- 3) Paragraph 75.11(b)(l), "...with respect to a modification or a change which will necessitate a change in a license condition or technical specification or which will decrease the effectiveness of the material accounting and control procedures at least 70 days before the modification or change is scheduled to be completed."
  - This paragraph should be modified to read:

"...control procedures prior to the completion of the modification or change sufficiently in advance for the safeguards procedures to be adjusted when necessary."

This change is in accord with the Agreement.

Much of the information required herein is already required in 10 CFR 70; however, there is no timing requirement for submittal of the changes which require prior NRC approval. We attempt to provide such requests as early as possible, but there are times when we must operate on a short cycle.

4) Paragraph 75.11(b)(2), "...with respect to any other change or modification, at the time the first inventory change report is submitted after the modification or change is completed." Page 3

### 4) Continued

This paragraph should be modified to read:

"...first inventory change report is submitted or within six months if inventory change reporting is not affected."

10 CFR 70 contains a comparable requirement specifying "within six months". The requirement to submit such other modifications or changes, at the next time a Form 741 is completed, puts an unwarranted burden on the licensee. This reporting requirement should be made compatible with that presently in 10 CFR 70.

All changes may not effect inventory change reporting. Therefore, consideration must be included for a reduced urgency in reporting changes which do not effect inventory change reports. 10 CFR 70 appears to be a good guide.

- 5) Paragraph 75.12(b)(1), "A licensee may request that information of particular sensitivity, which it customarily holds in confidence, not be transferred physically to the agency..."
  - This paragraph should be modified to read:

"In addition to Section 75.11(f), the licensee may request..."

Note: Add paragraph (f) to Section 75.11 as follows:

"The licensee may specify in the Facility Attachment those types or categories of information which shall be considered proprietary and, therefore, not provided to the agency, provided that justification for such specifications fulfill the conditions of Section 75.12."

These and other statements under paragraph 75.12 related to licensee-identified sensitive information, possibly could be covered under the Facility Attachment. Otherwise, the interest of the licensee may not be properly safeguarded as indicated; for example, under paragraph 75.12(d), which states that a request made to the NRC under paragraph 2.790(d) of 10 CFR will not be treated as a request under 10 CFR 75 unless the application makes specific reference to this action (etc.). This situation could lead to inadvertent disclosure of information sensitive to a licensee. Therefore, it might be appropriate to additionally cover such matters under the Facility Attachment.