

Colt Industries



DOCKET NUMBER  
PROPOSED RULE

PR- *Prop. Notice*  
*Reg. Guide*

Fairbanks Morse  
Engine Division  
701 Lawton Avenue  
Beloit, Wisconsin 53511  
608/364-4411

August 16, 1979

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

Attention: Docketing & Service Branch

Subject: Regulatory Guide 1.9 - Selection, Design, &  
Qualification of Diesel-Generator Units as  
Onsite Electrical Power Systems at Nuclear  
Power Plants - Rev. 1 - For Comment



Gentlemen:

Fairbanks Morse Engine Division of Colt Industries is a supplier of Diesel Generator Units for the service covered by the subject Regulatory Guide 1.9. We would like to offer the following comments to Rev. 1.

- 1) We suggest the title be modified to call the D-G sets "Standby Diesel-Generator Units" in order to get the exemption the Environmental Protection Agency has indicated will apply relative to exhaust emissions for "Standby Diesel-Generator Units".
- 2) We suggest Paragraph C.5 be modified to permit minimum voltage of less than 75% rated for approximately 10 cycles during the energization of transformers with the first load group.
- 3) We welcome the change in recovery times from 40% to 60% of each load-sequence time.
- 4) Earlier editions of the Regulatory Guide required the use of the continuous duty rating to cover the conservatively estimated loads during the PSAR stage and permitted operation at the smaller of the 2000 hour rating, or 90% of the 30 minute rating when loads are more accurately known during the FSAR stage. The revised wording effectively limits operation to the continuous rating since the short time ratings of IEEE STD 387-1977 is 10% overload for 2 hours out of 24 hours. We suggest a return to the earlier wording.
- 5) Paragraph C.7 covers a concept difficult to apply in practice. It would be helpful if "where practical" was added to the testability paragraph.

Acknowledged by card... *8/31* .....

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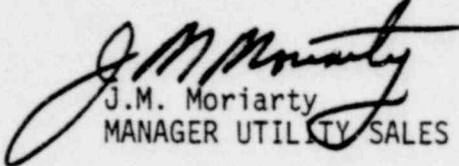
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August 16, 1979

- 6) Paragraph C.8 Clarification of the last sentence in parenthesis is desirable.
- 7) Paragraph C.11 requires counting of trouble shooting verification tests. This is undesirable since if the trouble has not been corrected the trial start would count as a second failure. We suggest that any tests conducted in a preidentified trouble shooting period, whether successful or unsuccessful not be counted.

We wish to thank you for the opportunity to comment on the proposed Revision to the guide. If you have any questions on our comments please let us know.

Very truly yours,

  
J.M. Moriarty  
MANAGER UTILITY SALES

JMM/j1

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