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NUCLEAR REGULATORY COMMISSION  
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ADP TIC

MEMORANDUM FOR: E. L. Jordan, Assistant Director, Division of Reactor Operations Inspection

FROM: W. Gammill, Assistant Director for Operating Reactor Projects, Division of Operating Reactors

SUBJECT: PROPOSED BULLETIN-POTENTIAL FAILURE OF EMERGENCY DIESEL GENERATOR FIELD EXCITER TRANSFORMER

We have reviewed the draft of the subject proposed IE Bulletin and herewith submit our comments for your consideration.

COMMENTS

1. On page 2 of 2, in the second paragraph, the following can be added after the manufacturer's quotation:

"However, removal of the neutral connection can subject the transformer to neutral instability if its loads were not balanced. It should, therefore, be ensured that the EPT or CPT has balanced load.

In this context, the connection of other potential transformers (PT's) used at the system interface between EDG and 4Kv bus should also be reviewed for similar problems."

2. On page 2 of 2, the first sentence of action 1 could be revised to read as follows:

"Determine, whether or not, there is a connection, directly or thru common grounding, between the neutrals of low KVA rated instrument transformers and high KVA rated EDG without adequate limitations on the flow of circulating currents that would cause overheating of the transformers."

3. Since the requirements of Regulatory Guide 1.108 have not been implemented on operating plants, it will be advisable to re-write paragraph C.2.a.3 in the action 2 paragraph, rather than referring to the Reg. Guide.

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