

Questionnaire

for

NUCLEAR REGULATORY COMMISSION RELIABILITY STUDY

of

Standby Diesel Generator Units

Date Questionnaire Completed:	1-5-78	_
Plant Name: Three Mile Island	Unit No	
Diesel Manufacturer: Fairbanks-Mor	se Model: 3800 TD 8 1/8	2
Number of Units: 2		
Size Kw/Unit: 3000 KW	Rated Speed: 900_3PM	_
Average Operating Hours Per Unit to	Date:426	_

DIESEL GENERATCR STATUS

A. Engine:

1.	Problems	are	caused	chiefly	by	(give	estimated	number)	
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- a. Defective parts 2
 b. Installation errors: 0
 c. Failure of system to respond properly in function or sequence: 0
- d. Faulty adjustment: 0
- e. Operator Error-Exact Number not known but this most frequent failure.
 2. Would more stringent inspection and testing requirement;
- during acceptance or preoperational tests significantly improve the diesel-generator power plant performance? Yes No X
- B. Starting Systems (indicate which):
 - 1412 222 . 1. Air-to-cylinder cranking. Yes Mfr. Model No. N/A Air cranking motor No N/A Model No. N/A Electric cranking motor No Mfr. N/A

Docket # Control # Date ---of Document **REGULATORY DOCKET FILE**

Enclatere in.

2. If air cranking, then:

Give size of starting air tank: Length 103" Diameter ________ Diameter _________ Normal standby air tank pressure 250 psi. Is pressure reducer used? Yes ____ No _X Reducer pipe size? N/A inches. Starting air control admission valve pipe size in air piping system, 1 1/2 inches. Minimum air tank pressure for engine cranking 75 psi. Number of five-second cranking periods between above pressures with no tank recharging UN Number of air tanks per engine 2 Can starting air tanks serve more than one engine? Yes No x Is air pipe to engine from top of air tank? Yes X No Does starting air tank have water condensate drain? Yes X No ___ (Off bottom of start air receiver) Does starting air pipe have water condensate trap and drain near engine? Yes No x Is starting air piping horizontal? Yes ___ No ___ Both X Does it slant toward drain? Yes No X If water condensate drains are provided, then is draining:

a. Automatic through float valve? Yes No X b. Manual by hand valve? Yes x No c. If manual, then is draining water condensate done:

14

1412 221

-2-

daily? weekly? X monthly? before each start if manual? no procedure? Is dirt and rust filter provided in starting air pipe? Yes X No If provided, where installed? Upstream of air start solenoid valves. How is it cleaned? "Y" Strainers - Manual How often and when? Annually - Year end Give pipe size of filter: ____23 inches. How is it known whether filter is plugged or has high pressure drop? No DPI installed - Not known Is starting air pipe to engine positioned: a. Below floor? X b. On the floor?

-3-

c. Overhead? X

What is air pressure drop from air tank to engine during cranking N/A psi

Give approximate length (nearest ten feet) of starting air pipe for individual engine or all engines from air tank to:

1.1

1412 224

a. Nearest engine <u>25</u> feet
b. Furthest engine <u>25</u> feet

Diameter of starting air pipe from:

a. Air tank to starting valve 21 inches b. At air starting valve 115 inches c. At engine 115 inches

What is the primary source of power for the starting air system? Flec Air Compressor

Is there a duplicate and redundant motor and air compressor set? Yes No X

What is the time required to recharge one air tank? UN minutes

Does starting air supply system have independent secondary power supply for compressor? Yes X No

If yes, then by:

a. Gasoline engine? No.

b. Motor driven? No
 c. Other? (Specify) ONAN Diesel Engine

This Section is N/A.

3. If electric (Battery powered) cranking, then:

a. Battery charging: Continuous trickle charger _ Intermittent charging

If so, how is charging requirement determined?

-Time cycle Test Other

b. Battery used: Common Plant Individual Unit Other

> Starting cable size ____; Length: Battery to engine (longest)

1412 225

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- C. Fuel Oil System: Buik Tank to Day Tank
 - Does the bulk tank to day tank fuel supply system (viz: pump, motor, etc.) have redundant independent power supplies? Yes X No

Does this system have a hand-operated emergency fuel pump? Yes No y

If yes, is this hand-operated pump and piping in immediate operating condition? Yes N/A No N/A

Is there a water and sediment drain from the very bottom of the:

a. Bulk tank? Yes No \underline{X} b. Day tank? Yes \underline{X} No \underline{X}

 Is the regular functional fuel oil outlet slightly above (two to three inches) the bottom of the:

a. Bulk tank? Yes X No b. Day or integral tank? Yes X No

4. Is bottom of day tank and/or integral tank above all parts and piping of the engine fuel injection systems? Yes ____ No _x___

If yes,

Give approximate amount inches N/A feet N/A

 Does the engine fuel system have a fuel bleed return line to the fuel day tank and/or integral tank? Yes x No _____

During extended operation, such as more than two to three hours, does the fuel in the day tank become: (yes or no)

a. Warm? No b. Hot? No (above 130°F)

1412 226

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What is fuel oil return line size (nominal)?

 a. Pipe size 3/4 inches b. Tubing size UN inches

6. Do engine fuel oil filters have air bleed or vent valvas plugs readily accessible? Yes x No

7. How is fuel transferred from day tank to engine fuel system?

-6-

- a. By gravity No_
- b. Engine driven pump <u>x</u> (At rated speed)
 c. Electric motor driven pump <u>x</u> (Below cated speed)
 d. Is a manual pump also provided for injection speed)
- system filling and/or air venting after servicing or replacement of parts in the fuel injection system? Yes No X

If yes, is the manual pump in immediate operating condition? Yes N/A NO N/A

8. Type of fuel (e.g., #1, #2, #3, JP-4, etc.) #2

9. Approximate bulk tank capacity, 30,000 gallons.

10. Typical frequency of refilling (weekly, monthly, etc.) every 2 mos nominally.

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1412 227

11. Typical refill (gallons), 2,000 nominally

D. Lube Oil System

1. Lube oil

- a. Type Ester GLX-30
- b. Viscosity <u>SAE 30</u>
 c. Specification number <u>UN</u>
- d. Oil change determined by:

Time interval: Yes No \underline{x} Give interval N/A monthly, yearly By oil analysis: Yes X No

- 2. Lube oil filters are:
 - a. Full flow No
 - b. Bypass No
 - c. Combination Yes
- Interval and/or basis for changing filter cartridge:
 - a. Monthly No
 - b. Yearly Yes.

 - c. By running time <u>No</u> hours d. By oil analysis. Yes <u>No x</u> e. By pressure drop. Yes <u>No x</u> f. Does provisions exist for changing cartridges during engine operation? Yes ___ No _X_

4. Oil Pressure Monitoring

- a. Normal operating pressure 31 psi
- b. Alarm 16 psi
- c. Shutdown 16 psi
- 5. Oil temperature control:
 - a. By standby heater in engine sump N/A °F. b. Heating means for maintaining standby temperature:

Direct in oil No. Oil-to-water heat exchanger Yes Other (Specify) No

E. Cooling System - Engine Water

1. Temperature control by:

a. By thermostat in water? Yes X No ____

If yes, then:

Bypass thermostat? Yes X No Throttle thermostat? Yes No X ,

b.	By	radiat	tor shu	itter:	None
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Automatic <u>No</u> Manual <u>No</u> Other (give type) <u>No</u>

2. Corresion control (water additive)? Yes x No

If yes, give chemical additive or name of compound.

Permanent Antifreeze - Brand Name

Proportion or concentration control:

a. By additive measurement? Yes No X
b. By water coolant analysis? Yes X No

Engine cooling water cooled by:

a. Radiator? X
b. Heat exchanger from sea, river or other water? X
c. Other? (give type) X

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1412 229

4. Engine cooling water temperature-monitoring

a. Standby temperature <u>120</u> °F
b. Normal operating temperature <u>120-180</u> °F
c. Alarm temperature <u>195</u> °F
d. Shutdown temperature <u>None</u> °F
e. Water circulation during standby: Thermo-syphon <u>No</u> <u>Pump Yes</u>

5. Water Pressure Monitoring: Yes X No ____

a. Alarm Yes

- b. Shutdown No
- c. Both No

-8-

	Water temperature Sensor Position:
	a. In piping from engine Yes
	b. In engine piping No
	c. In engine direct No.
7.	Water surge or supply tank in system. Yes \underline{X} No
	If yes, then bottom connected to:
	a. Water pump suction? Yes X No
	b. Top of system? Yes X No
	c. Both of above? Yes X No
	d. Is bottom of surge tank above top of engine
	system? Yes X No
	e. Does engine have constant air bleed from top of
	engine water piping to surge or supply tank?
	Yes X No
	f. Give size of bleed or vent line, UN inches.
	N N N N N N N N N N N N N N N N N N N
	g. Manual air bleed only? tes A No
	g. Manual air bleed only? Tes X NO
Gov	g. Manual air bleed only? Tes <u>x</u> No vernor - Speed Control
Gov	g. Manual air bleed only? Tes <u>x</u> No
Gov	g. Manual air bleed only? Yes <u>x</u> No vernor - Speed Control nufacturer <u>Woodward</u>
Gov	g. Manual air bleed only? Yes <u>x</u> No vernor - Speed Control nufacturer <u>Woodward</u> ectric (speed sensing) <u>No</u>
Gov Mar Ele Hyd	g. Manual air bleed only? Yes <u>x</u> No <u>vernor - Speed Control</u> nufacturer <u>Woodward</u> ectric (speed sensing) <u>No</u>
Gov Mar Ele Hyd	g. Manual air bleed only? Yes <u>X</u> NO <u>vernor - Speed Control</u> nufacturer <u>Woodward</u> ectric (speed sensing) <u>No</u> draulic <u>Yes</u> be or code (such as EGB-35, LSG-10, etc.) <u>VG8</u>
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Gon Mar Ele Hyd Tyr Aun 1.	<pre>g. Manual air bleed only? Yes <u>X</u> No vernor - Speed Control mufacturer <u>Woodward</u> ectric (speed sensing) <u>No</u> draulic <u>Yes</u> be or code (such as EGB-35, LSC-10, etc.) <u>VG8</u> tomatic load sharing? Yes <u>X</u> No Is compensation or stability control and/or speed of response manually adjustable? Yes <u>X</u> No</pre>
Gon Mar Ele Hyd Tyr Aun 1.	<pre>g. Manual air bleed only? Yes <u>X</u> No vernor - Speed Control mufacturer <u>Woodward</u> ectric (speed sensing) <u>No</u> draulic <u>Yes</u> be or code (such as EGB-35, LSC-10, etc.) <u>VG8</u> tomatic load sharing? Yes <u>X</u> No Is compensation or stability control and/or speed of response manually adjustable? Yes <u>X</u> No If yes, adjusted by:</pre>
Gor Mar Ele Hyo Typ Aur	g. Manual air bleed only? Yes <u>X</u> No <u>vernor - Speed Control</u> nufacturer <u>Woodward</u> ectric (speed sensing) <u>No</u> draulic <u>Yes</u> be or code (such as EGB-35, LSC-10, etc.) <u>VG8</u> tomatic load sharing? Yes <u>X</u> No <u>VG8</u> Is compensation or stability control and/or speed of response manually adjustable? Yes <u>X</u> No <u>If</u> yes, adjusted by: a. Eye and ear? <u>No</u>
Got Mai Ele Hyd Aut	g. Manual air bleed only? Yes <u>X</u> No <u>vernor - Speed Control</u> nufacturer <u>Woodward</u> ectric (speed sensing) <u>No</u> draulic <u>Yes</u> be or code (such as EGB-35, LSC-10, etc.) <u>VG8</u> tomatic load sharing? Yes <u>X</u> No <u>VG8</u> Is compensation or stability control and/or speed of response manually adjustable? Yes <u>X</u> No <u>If</u> yes, adjusted by: a. Eye and ear? <u>No</u> b. Test and specification? <u>Yes</u>

F.

Engine - generator normal shutdown or stopping means and method.

Electrically Trip out Fuel Racks and Manually

-9-

1412 230

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- Is the engine stopped:
- a. Manually? Yes x No

== If yes, then:

Directly at engine? Yes X No Through local control panel? Yes X No

- b. Automatically through the controls in the control room? Yes X No _____
- c. By setting governor to "fuel-off" position? Yes ____ No _X__
- d. By over-ride of governor settings and control position directly to fuel injection pumps? Yes Un No Un

e. Other means. Describe briefly. No

3. When engine is stopped, is fuel control in:

a. Full fuel or maximum fuel position? No
b. Full off or no fuel position? Yes
c. Intermediate? No
d. Random? No

(If not consistent and typical in above, then give the usual.)

4. When starting from the standby condition after shutdown for at least 24 hours, give number of seconds from startto-crank to full fuel or maximum fuel position of governor and fuel control, <1 seconds.</p>

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G.	Gov	ernor - Overspeed (shutdown)
	1.	Speed sensing?
		a. Electrical Yes
		c. Other (Specify) No
	2.	Fuel shutoff force generated by:
		a. Spring? Yes
		b. Air? No
		c. Hydraulic? No
		d. Electrical? No
		e. Other? (Specify) No
	3.	Overspeed sensing setting? (in terms of full speed)
		a. 115% No.
		b. 110% No
		c. Other (Specify) A Discol & 114 45%, P Discol & 115 55%

4. Is overspeed tripping set point tested periodically? Yes No X

If yes, then how often? N/A (yearly, monthly, etc.)

- Type No. TGZDJ H. 1. Generator Mfr. Fairbanks Morse. Single bearing or two bearings? Does generator have damper windings? Yes No x
 - 2. Does generator have any obvious fault or difficulty? Yes No X

Is problem repetitive? Yes No x

If yes, then describe briefly. N/A

1412 232

I. Exciter and Voltage Regulator

1.	Exciter Manufacturer: Basler Model SBHV	
	Type: Rotating No StaticYes	
	If rotating drive? Direct <u>N/A</u> Belt or Chain <u>N/A</u> DC with field control <u>N/A</u> Brushless with rectifier <u>N/A</u>	
2.	Voltage Regulator: Manufacturer <u>Basler</u> Model	SBHV
	Type: Mechanical No Static Yes	
3.	Are paralleled units of automatic load sharing control of fully automatic type? Yes No _X	
	If yes, has any obvious influence or interrelationship been noted between the stability and response time of the engine governor and the stability and voltage control of the generators? YesNo_ χ _	
۰.	Have engine governor and voltage regulator/exciter adjustments been made on the site or under any con- ditions since any of the units have been placed in service? Yes \underline{X} No	
	If yes, by means of what tests and what standards? Give name or very brief description	
	Maintenance Procedure #1420-EG-1	
•	If any difficulties have occurred, give approximate number of problems.	
	 a. Components 0 b. Wiring 0 c. Other (damage in service or dropping of miscellaneous bardware into switchboard atc.) 	

1412 233

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J. Paralleling: Engine-Generator Units _	This	Section N/	A
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- 1. Do all units consistently have the proper voltage output? Yes No
- 2. Do all units automatically share both the "real" or in-phase load and also the reactive load reasonably well? Yes No
- 3. At the same Kw load, are both the field and the armature line currents of the several units consistently close to the same value? Yes No _____

If no, approximate percent difference.

Synchronizing

- a. In automatic synchronizing do circuit breakers close immediately after reaching full synchronous speed? Yes No
- b. If "no" above then, does speed of some units drift slowly while failing to synchronize and close circuit breakers?

How many seconds?

Occasionally _____ Always Never

- K. Switch Gear and Electrical Con (other than exciter/ voltage regulator)
 - 1. If any difficulties have occurred, then give approximate number of problems.
 - a. Components
 - b. Wiring O
 - c. Other (damage in service or dropping of miscellaneous
 - hardware into switchboard, etc.) 0d. Design concept faults. That is, does the switch gear and its controls perform the proper functions and in proper sequence and timing. O

1412 234

- 2. a. Do the on-site diesel generator units and related support equipment have any storage battery power systems for any service whatsoever? Yes X No
- . Identify each storage battery power system associated with the on-site diesel generator unit and its function. Start Emerg. Air Compressor Diesel
 - c. Does each system identified above adequately fulfill the service requirements for which it is intended? Yes X No

If no, briefly describe.

d. Is there a DG battery maintenance program? Yes X No

L. Safety Shut downs

Give safety shut down settings compared to equilibrium operating conditions.

1. Engine and generator speed. Give rpm or hertz:

900 rpm or a. Synchronous and usua! HZ b. Overspeed shutdown setting 1030 for "A" rpm or HZ. 1040 for "B"

2. Engine cooling water (see E.4)

- a. Equilibrium 175
- b. Alarm 195
- c. Shut down None

3. Lube oil pressure (see D.4)

- a. Equilibrium 31 psi
- b. Alarm 16 psi c. Shut down 16 psi

1412 235

- 4. Lube oil temperature
 - a. Equilibrium 180 °F
 - b. Alarm 90 °F
 - c. Shutdown None °F
- Indicate all other protective interlocks (give name and;)
 - a. Usual or proper condition Crankcase Hi Press S/D_
 - b. Shutdown condition Cranking Timer Max 7 Secs Manual & Auto

Start (1 timer each) Low Starting Lube Oil Press.

- a. What source of power is provided to operate alarms and shutdown controls? (See G.2) 125 VDC
 - b. Do the generator units automatically shutdown in case of the electrical power loss to its control system? Yes _____No __X

M. Emergency or Alert Conditions

- Are all safety shutdown and safety interlocks bypassed during emergency conditions? Yes _____ No __X___
- 2. If "no" above, then which are not bypassed. Name items.

Low Lube Oil Press, Crankcase Press Hi, Eng Overspeed

 For each interlock not bypassed is coincident logic used? Yes No X

If yes, is it testable? Yes N/A No N/A

N. Maintenance

 Does plant have recularly scheduled maintenance procedures? Yes

If so, return copy of these procedures with questionnaire. See 1301-8.2 Attached

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14

- 2. When need for minor adjustments obviously exists, then:
 - a. Is remedial action taken immediately or at earliest practical opportunity? Yes X No

-16-

- b. Is remedial action taken only at periodic prescheduled or programmed times and conditions? Yes No x
- c. For best performance record which of above appears better:

immediate or early action? Yes as scheduled only? No

- d. Must permission for minor maintenace be obtained from some higher out-of-plant authority? Yes No X
- e. Is maintenance referred to above allowed and encou aged? Yes X No
- f. In periodic surveillance tests, simulated alert standby tests, etc., is the criteria "pass/not pass" the test used? Yes X No
- g. Is there a conscious continuing policy to detect and remedy marginal conditions or imminent trouble: for examples: lube oil pressure shutdown only two to five psi below operating pressure or, perhaps overspeed governor setting only one or two percent above starting speed surge or etc.? Yes X No
- h. Are efforts to remedy marginal or questionable conditions as mentioned above encouraged by plant management?

Yes x No

i. Are remedial steps on items similar to the above taken or allowed when the unit has started and operated satisfactorily within specified limits or conditions? Yes X No

0. Starting Conditions

- 1. Give starting or necessary cranking time as experienced.
 - a. Starting time per specification 7 seconds 1412 237
 - b. Usual starting time 4-5 seconds
 - c. Maximum starting time observed <7 seconds

- 2. Give usual time intervals as follows:
 - a. Time from start-to-crank to first firing of any cylinder. UN seconds
 - b. Time from start-to-crank to approximate full firing of all cylinders. 4-5 seconds
- Give maximum speed surge when starting; use both tachometer and frequency meter if possible.
 - a. Usual conditions UN rpm UN Hz b. Maximum observed UN rpm UN Hz
- During a surveillance test, give time from start-to-crank to when steady synchronous speed is attained and maintained.
 - a. Usual <10 _____ seconds
 - b. Maximum 10 seconds
 - c. As specified 7-10 seconds.
- 5. Give briefly the most troublesome problems in starting.

a. Most troublesome Lube Oi, Press Switches

b. Next to most troublesome None

P. Air Cleaner or Air Filter - Combustion Air

 Combustion air source: taken from engine room or inside the building, or from outdoors?

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- a. Indoors Yes
- b. Outdoors No

2. Give type and make of air clea	aners or air filter:
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		. Oil bathNo MakeN/A
		. Oil wetted screer. Yes lake Not Known
	(Paper NO Make N/A
	(A. Other NO Hake N/A
	•	e. Precleaner. les no
:	3. 8	Excessive air flow restriction and servicing need determined by?
		a. Instrument such as:
		manometer X
		If other give type N/A
		b. Personal judgement by appearance, etc. Air Filter Inspection
		c. By smoking exhaust No
		d. Time schedule <u>Annual</u>
		e. Other (Specify) <u>No</u>
	4.	Are climatic extremes normally experienced such as:
		a Air heavily loaded with water mist, high humidity
		and low temperature? Yes No X
		h Blowing sand and dust? Yes No X
		c. Blowing snow (blizzards)? Yes No X
		d. Other-Name
	5.	Are climatic extremes potentially possible such as:
		a. Air heavily loaded with water mist, high humidity
		and low temperature? Yes No X
		b Blowing sand and dust? Yes No X
		c. Blowing snow (blizzards)? Yes X No
		d. Other-Name
0.	Temp	erature Conditions
	,	Arbient outside hotsest 100 °F.
	1.	Ambrent butside noticest
	2.	Ambient outside coldest °F.
	3.	Engine-generator room hottest F.
	4.	Engine-generator room coldest 50 °F. 1412 239
	5.	Inside switch gear hottest <u>84°</u> F
	6.	Inside voltage regulator or ambient near voltage regulator hottest 100 °r
		그는 것 같은 것 같

7. Ambient at exciter hottest 100 °F

-18-

R. Operator Qualifications (as presently exists, and suggested minimums if different)

1. Minimum education required (check)

			Existing	Suggested
	a. b. c. d.	High School Trade School Technical School No minimum		not different
2.	Min gen	imum Years of operating ex erator)	perience (diese)	electric
			Existing	Suggested
	a. b. c.	0-3 3-6 6-10 10-15	2 years	not different
3.	Ope	rator training		
			Existing	Suggested
	a. b.	Military Industrial On-the-job Combination of a b	Combination	
	4.	and c (indicate which)	as required	i <u>oc arrier</u> ent
4.	Lic	ensing required		
			Existing	Suggested
	a. b. c.	State Federal Utility or self	yes	not different
	d.	None		

-19-

1412 240

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If yes, (other than hand portable fire extinguishers), then identify gases and give approximate tank size.

Gases	N/A	Volume (ft)	N/A
	N/A		N/A
	N/A		N/A
	N/A		• N/A
	N/A		N/A

T. Does control system automatically bypass, in emergency starting, any engine temporarily out of service for maintenance? Yes No x

If yes, then how many failures to bypass have occured? N/A

- U. Does the control system automatically override the test mode under emergency conditions? Yes No x
- Y. Have repetitive mechanical failures occurred in any component part or subsystem of the engine, generator, or switch gear, etc.? Yes No x

If yes, then which part or subsystem? N/A

How	many	failures?	N/A
		and the state of the state	
Giv	e nat	ure of failure.	N/A

Give nature of failure.

W. Would periodic (yearly or other) evaluation and/or testing by "outside experts" contribute significantly to the dieselgenerator reliability? Yes ____ No __X

Give brief reasons for the answer. TMI has enough qualified people and thorough enough procedures to adequately maintain the diesel generators.

1.1

X. 1. Give the accumulated time-load operating record for each diesel-generator unit from installation to the present (Running Hours):

Preoperational test Date

	: Engine :Serial No. :	:	Surv. Maint No Loa	Tes enan id :	ting & ce Hrs. Loaded	::	Emergency and Other Service Hrs.	: : :	Total Hours
Diesel B	: 38D870076 : TDSM 12	:	UN	:	UN	:	UN	:	414
Diesel A	: 38D870073 : TDSM 12	:	UN	:	UN	:	UN	:	438
	;	:		:	14-6	:	1. Statist	:	
	:	:		:		:		:	
	:	:		:		:		:	

2. Surveillance test load (percent of continuous rating) 100%

3. Give the projected or planned time-load operation for each diesel-generator unit during the next 12 months.

:Surveillance & :Main:enance Hrs.		Emergency and other Service Hrs.	: : :	Total Hours			
:	:		:		1.	:	
25	:	UN	:	125	:	:	

- 4. Provide the following summary of the periodic surveillance testing experience:
 - a. Starting date of surveillance testing (OL date) 9/2/74
 - b. Periodic test interval Monthly
 - c. Total number of surveillance tests performed <u>M=212</u>
 d. Total number of test failures _____

failure	to	star	t 1		failu	ire to	acce	pt load	t 0	2
failure	to	carr	y load	0	failu	ires d	ue to	operat	tor error	*
failure	due	e to	equipment	not	being	opera	tive	during	energenc	Y
conditio	ons	0								

e. Supply a copy of the surveillance test procedures with this completed questionnaire. See 1303-4.16 and 1303-11.10 attached.

1412:242

Additional Comments

----- None-----

Y. General Suggestions

Briefly give constructive criticism or suggestions as to improvement in reliability of the diesel generators. These remarks may cover tests, maintenance, practices, orders, policy, adjustments, etc.

The present monthly testing program is too extensive in that the machinery is "Tested to death". If these tests were eliminated, fewer corrective maintenance requirements would be generated. The Annual Inspection is deemed necessary and desireable.

2.