



DOCKET NUMBER

PROPOSED RULE

*- Miss. Notice
Reg. Guide*

General Offices: 212 West Michigan Avenue, Jackson, Michigan 49201 (517) 788-0550

December 18, 1979

Secretary of the Commission
Att Docketing and Service Branch
US Nuclear Regulatory Commission
Washington, DC 20555

POOR ORIGINAL



The following comments concerning Regulatory Guide 1.137, Revision 1, "Fuel-Oil Systems For Standby Diesel Generators" are presented for your consideration:

1. It is recommended that the words "designed to Section III, Subsection ND of the Code" found in Regulatory Position C.1.e be replaced by the words "classified as ASME Section III Class 3 for the purpose of inservice testing." This change acknowledges that in some cases components are designed in accordance with Section III, Subsection ND for reasons which may make specific inservice testing requirements inappropriate. Examples of such reasons include compliance with Regulatory Guide 1.29 or addressing Section B of Regulatory Guide 1.26. Section XI of the ASME Code specifically recognizes that component classification may be inappropriate with respect to inservice inspection and consequently has included the provisions of IWA-1400(a) (making the owner responsible for classification in accordance with 10 CFR 50 criteria) and footnote 1 to IWB-1210 and JWC-1210.

Alternatively, if it is determined that certain portions of standby diesel generator fuel-oil systems be subjected to ASME Section XI requirements, selection criteria should be established. As discussed above, this criteria should not be solely based upon design code classification.

2. Regulatory Position C.1.e implies that the component support examination requirements of IWD Section XI are applicable. For this application, these requirements appear inappropriate. Words of clarification should be added specifically excluding the VT-3 and BT-4 examination requirements of IWD.
3. Regulatory Position C.2.a requires that the fuel oil meet the specifications of ASTM D975-77 or those of the diesel generator manufacturer, whichever are more restrictive. The specifications called out by the manufacturer of the actual

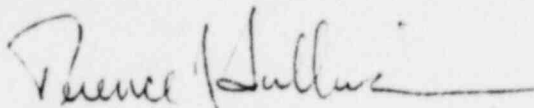
1766 272

Acknowledged by card.....

8001160165

diesel generator are more than adequate and therefore should provide an acceptable alternative to ASTM D975-77.

Please consider these comments in future revisions of this Guide.



Terence J. Sullivan
Executive Engineer

CC CJMaynard/RAWells/SHHowell
FStetson
CWoods
JJZabritski
TWElward/RMBrzezinski
AJBirkle/HMSlager
DPHoffman

POOR ORIGINAL