

November 6, 1989

MEMORANDUM FOR: James M. Taylor  
Acting Executive Director  
for Operations

*G. Serby*

FROM: Edward L. Jordan, Chairman  
Committee to Review Generic Requirements

*Rec'd 11/16/89  
A.W.S.*

SUBJECT: MINUTES OF CRGR MEETING NUMBER 171

The Committee to Review Generic Requirements (CRGR) met on Wednesday, October 11, 1989 from 1:00 - 5:30 p.m. The following items were addressed at the meeting:

1. The Committee reviewed proposed final Revision 3 to Reg. Guide 1.9, "Diesel Generator Reliability." The Committee was unable to complete their review of this item at this meeting, but recommended a number of changes to be considered by the staff. The staff will revise the package and resubmit it for completion of CRGR review at a future meeting. This matter is discussed in Enclosure 1.
2. Due to unforeseen time constraints, CRGR review of proposed Revision 3 to Reg. Guide 1.35 and proposed Reg. Guide 1.35.1 scheduled at this meeting was rescheduled for the next CRGR meeting.
3. The Committee considered the staff's plans to publish guidance (initially discussed with licensees in public workshops) to facilitate implementation of Generic Letter 89-04 regarding Inservice Testing Programs. The Committee determined that formal CRGR review of this guidance is not required; but the guidance should be transmitted to licensees by a generic letter that states clearly no new requirements are intended by this guidance. This matter is discussed in Enclosure 2.

In accordance with the EDO's July 18, 1983 directive concerning "Feedback and Closure of CRGR Reviews," a written response is required from the cognizant office to report agreement or disagreement with the CRGR recommendations in these minutes. The response, which is required within five working days after receipt of these minutes, is to be forwarded to the CRGR Chairman and if there is disagreement with CRGR recommendations, to the EDO for decisionmaking.

Questions concerning these meeting minutes should be referred to Jim Conran (492-9855).

Original Signed By:

*C. J. Meltemes, Jr.*

Edward L. Jordan, Chairman  
Committee to Review Generic  
Requirements

Enclosures:  
As stated

cc: See next page

OFC	: AEOD:CRGR	: AEOD:DD	: C/CRGR:AEOD	:	:	:	:
NAME	: JConran:cg	: CJH	: E Jordan	:	:	:	:
DATE	: 11/14/89	: 11/16/89	: 11/16/89	:	:	:	:

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cc w/enclosures:  
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R.W. Houston (w/enc.)

L. Shao (w/enc.)

J.E. Richardson (w/enc.)

A. Serkiz (w/enc.)

T. Sullivan (w/enc.)

E. Jordan (w/enc.)

J. Heltemes (w/enc.)

J. Conran (w/enc.)

D. Allison (w/enc.)

Enclosure 1 to the Minutes of CRGR Meeting No. 171  
Proposed Final Revision 3 to Reg. Guide 1.9  
October 11, 1989

TOPIC

W. Minners (RES) and A. Serkiz (RES) presented for CRGR review the proposed final Rev. 3 to Reg. Guide 1.9, "Diesel Generator Reliability." The Committee also heard the differing views of a member of the NRC staff regarding several specific new positions in the proposed guidance. Briefing slides used by the staff to guide their presentations and discussions with the Committee on these matters are enclosed (Attachments 1 and 2).

BACKGROUND

1. The documents submitted initially to CRGR for review in this matter were transmitted by memorandum dated September 12, 1989, E. S. Beckjord to E. L. Jordan; that initial review package included the following documents:
  - a. Proposed final Revision 3 (dated September 12, 1989) to Reg. Guide 1.9, "Selection, Design, Qualification, Testing, and Reliability of Diesel Generator Units Used As Onsite Electric Power Systems At Nuclear Power Plants";
  - b. Draft Appendix D, "EDG Reliability Program" (dated August 28, 1989) to NUMARC 87-00, "Guidelines and Technical Basis for NUMARC Initiatives," Revision 1;
  - c. Backfit Analysis, dated August 21, 1989, for GSI B-56, "Diesel Generator Reliability";
  - d. Draft Federal Register Notice dated August 16, 1989
2. At Meeting No. 171, the Committee received revised pages for Item 1.a. above. (See Slides Nos. 1A and 3A thru 10A in Attachment 1 to this Enclosure.)

CONCLUSIONS/RECOMMENDATIONS

The Committee did not complete their review of this item at this meeting; but they identified a number of questions to be addressed and recommended a number of specific changes to be incorporated by the staff in the revised package that will be resubmitted for completion of the CRGR review of this item at a later meeting:

1. The backfit analysis for this proposed package should be revised to address the items in Section IV.B of the CRGR Charter (as required for all packages submitted to CRGR for review); for example:

- a. Proposed Rev. 3 contains many new/different staff positions (i.e., changes from existing approved guidance) on EDG reliability that constitute backfitting; these proposed backfits should be acknowledged explicitly in the backfit analysis.
- b. Proposed Rev. 3 appears to contain both relaxations and increases of existing EDG reliability requirements; these should be clearly identified for the Committee. Also, in this context, the applicable finding should be made explicitly by the sponsoring Office Director in the package, in accordance with Section IV.B.(viii)(a) or IV.B.(ix)(a), as applicable.
- c. The justification for the direct and indirect costs involved in implementing proposed Rev. 3 should be stated explicitly in the backfit analysis, in accordance with Section IV.B.(viii)(b) or IV.B.(ix)(b), as appropriate.
- d. The incremental changes between existing approved EDG reliability requirements and the specific requirements in proposed Rev. 3 should be more clearly identified in the package (i.e., one-to-one correlation between specific provisions in Rev. 3/IEEE-387-1984 and the corresponding existing requirements in Rev. 2/IEEE-387-1977, Reg. Guide 1.108, Reg. Guide 1.155, Generic Letter 84-15, etc.), so that any proposed changes can be fully understood and properly evaluated by the Committee. A revised/updated version of the table provided to the Committee in support of Rev. 3 at the draft stage would be appropriate (Attachment 3).

Also, in this context, the staff should indicate more clearly what is intended with regard to NUMARC 87-00, Appendix D. Is it the staff's intent to endorse Appendix D in Rev. 3 as an alternative acceptable means for licensees to provide an adequate EDG reliability program? Are the specific provisions of proposed Rev. 3 equivalent to the provisions of Appendix D with additions only (as indicated in Table 1 of the Reg. Guide) or will Rev. 3 also identify exceptions to Appendix D after resolution of some still-outstanding issues noted in the package?

- e. With regard to implementation of the detailed requirements contained in proposed Rev. 3, the staff should indicate more clearly in the "Implementation" section of the Reg. Guide what positions will be applied to whom; the intent of the handwritten additions to this section of the Reg. Guide in Slide 9A is not clear to the Committee in this regard. Also, the proposed method of implementation of Rev. 3 (if approved) should be indicated in the package; and the staff should include a draft of the regulatory instrument (e.g., generic letter) that will be used to formally impose the proposed new EDG reliability requirements for review by the Committee. As a final point related to implementation issues, the staff should also identify any intended implementation guidance to be developed/used by the staff (e.g., model Tech. Spec. revisions, SRP revisions, TI's, etc.) and should submit such proposed guidance to CRGR for review, as appropriate, along with estimates of the corresponding NRC staff resource commitments involved.

- h. At page 14, change the first sentence to read as follows:
- "Following the occurrence and correction of a degrading situation..."
- i. At page 15, delete proposed paragraph 3.2, "Design Basis Accidents Assessment" or justify it in its present form.
- j. At page 17, the staff should reexamine the technical basis for the "14 failure-free tests" specified after major overhaul/teardown of the diesel engine or generator. Why is full endurance testing not required in such circumstances? In considering the need to revise this paragraph, the staff should also consider adding a separate paragraph (e.g., 3.5.a.) on "Requalification of EDGs" following major repair or overhaul.
- k. At pages 18 and 19, reexamine the regulatory need for any new record-keeping and reporting requirements in proposed Rev. 3. Also, review throughout proposed Rev. 3 for internal consistency in this regard (e.g., see the last paragraph on p.2).
- l. At page 21, make the following corrections in paragraph 6.2:
- i. In the fourth sentence of the first paragraph, change the word "must" to "should." Also, do not reference a Draft ANSI/ASME Standard (use current approved version or delete).
- ii. In subparagraph 6.2.4, change the word "aging" to "degradation."
- m. At page 22, in the last sentence in paragraph 6.3, change the term "developed from" to "based on."
- n. At page 22, in paragraph 6.4, delete the second sentence entirely and delete the words "Generally speaking," in the following sentence.
- o. At page 22, in paragraph 6.5, change the last sentence in the second paragraph to read as follows:
- "Figure 6 is an example of a systematic approach..."
- p. At page 23, examine the root cause elements (a through g) for consistency with NUMARC Appendix D, and revise as necessary (e.g., is "a. Management" in Appendix D?)
- q. The third paragraph of the draft Federal Register Notice for this package should be revised to indicate the proposed backfit "EDG Reliability Goals and Calculations" requirements, e.g., in position 3 of proposed Rev. 3.