

Dr. Glenn G. Sherwood, Manager
Nuclear Safety and Licensing Operations
General Electric Company
175 Curtner Avenue
San Jose, California 95125

OCT 31 1983

Dear Dr. Sherwood:

Subject: Letter from Glenn G. Sherwood to Harold R. Denton, July 23, 1982
(MFN-100-82)

It is our position on qualification testing of the HPCS Diesel Generators that diesel generator units which have not previously been qualified for the HPCS application must be qualified by completing the same series of tests as described in General Electric Topical Report NEDO-10905 Amendment 3.

The determination of whether one diesel generator unit is sufficiently similar to another qualified diesel generator unit to forego qualification testing itself, is made based on the criteria in Sections 5.4.2, 5.4.3 and 5.4.4 of industry standard IEEE 387-1977. These sections indicate the type of changes to a qualified diesel generator unit which shall require requalification of the unit, and those types of changes which can be qualified by analysis alone. The criteria in IEEE 387 is based on a comparison of the actual physical and performance characteristics of the two machines being compared rather than a comparison of design bases or design specifications as referenced in the General Electric letter.

Based on the criteria in Section 5.4.2 of IEEE 387, the difference in the number of cylinders in a diesel generator unit alone would require that each diesel generator unit listed in Table 3-1 of NEDO-10905-1 be separately qualified.

Based on the criteria in Section 5.4.4 of IEEE 387, even changes to a qualified diesel generator which are defined as "minor" may require requalification of the unit if such changes degrade the engine starting or load acceptance capability.

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In summary, the staff uses the criteria in IEEE 387 to judge the applicability of the qualification tests of a previously tested diesel generator unit to another diesel generator unit. This comparison is based on the actual physical and performance characteristics of the two machines being compared. General Electric should therefore provide a comparison of the diesel generator units it wishes to qualify based on the IEEE 387 criteria rather than on mere design bases or design specifications.

Sincerely,

Cecil O. Thomas, Chief
Standardization & Special
Projects Branch
Division of Licensing

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