RELATED CORRESPONDENCE June 25, 1984

84 JUL-2 P4:18

Lawrence Brenner, Esq. Administrative Judge Atomic Safety and Licensing Board U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Dr. George A. Ferguson Administrative Judge School of Engineering Howard University 2300 - 6th Street, N.W. Washington, D.C. 20059 Dr. Peter A. Morris Administrative Judge Atomic Safety and Licensing Board U.S. Nuclear Regulatory Commission Washington, D.C. 20555

In the Matter of LONG ISLAND LIGHTING COMPANY (Shoreham Nuclear Power Station, Unit 1) Docket No. 50-322-1 (OL)

Dear Administrative Judges:

On June 21, 1984, the Staff filed its response to Suffolk County Filing Concerning Litigation of Emergency Diesel Generator Contentions. In a cover letter, the Staff stated that, with permission of the Board, it would file an attested statement of W. W. Laity, to replace the unattested statement that accompanied the response. Enclosed is that attested statement of W. W. Laity.

Sincerely,

Edwin J. Reis Assistant Chief Hearing Counsel

DSO

Enclosure: As stated

cc: See next page.

Jonnthan D. Feinberg, Esq. cc: Howard L. Blau, Esq. Cherif Sedkey, Esq. Herbert H. Brown, Esq. Atomic Safety and Licensing Board Panel Karla Letsche, Esq. Edward M. Barrett, Esq. Marc W. Goldsmith Fabian G. Palomino, Esq. Hon. Peter Cohalan John F. Shea, III, Esq. James B. Dougherty, Esq. Leon Friedman, Esq. Ben Wiles, Esq.

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Pacific Northwest Laboratories P.O. Box 999 Richland, Washington U.S.A. 99352 Telephone (509)

Telex 15-2874

June 20, 1984

Mr. Carl Berlinger Division of Licensing Office of Nuclear Reactor Regulation U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Dear Mr. Berlinger:

SUBJECT: OPERATING HISTORY OF TRANSAMERICA DELAVAL, INC. DIESEL ENGINES IN NON-NUCLEAR APPLICATION 3: RELEVANCE FOR RESOLUTION OF KNOWN PROBLEMS

Summarized in this letter are PNL's comments on the penultimate paragraph of Section IV, "ADDITIONAL INFORMATION," in "SUFFOLK COUNTY'S FILING CONCERNING LITIGATION OF EMERGENCY DIESEL GENERATOR CONTENTIONS" dated June 11, 1984. The filing is before the Atomic Safety and Licensing Board in the matter of Long Island Lighting Company's Shoreham Nuclear Power Station, Unit 1, Docket No. 50-322-0L.

Suffolk County's filing includes the following statement in the paragraph referenced above: "The Staff's consultants testified in a deposition on May 23 that marine diesel experience would be useful information, but that Pacific Northwest Laboratory (the Staff's contractor) is not directly obtaining information on TDI diesel problems in marine and other nonnuclear applications." In response to this comment, it is pertinent to elaborate on the approach that PNL is taking to review and evaluate the TDI Diesel Generator Owners' Group Program Plan and related information submitted by the Owners' Group to NRC.

PNL is relying heavily on the experience and expertise of consultants in diesel engine technology who are under subcontract to the Laboratory to participate in providing technical support to the NRC staff. To date, eight consultants have assisted in various aspects of this work. Each of the consultants has extensive experience in the design, testing, installation, and/or field engineering of diesel engines similar in size to those installed at nuclear power stations by members of the TDI Diesel Generator Owners' Group. The consultants gained their experience in diesel engine technology for non-nuclear applications, including diesel-electric power generation and ship propulsion.

The experience of PNL's consultants encompasses diese! engine technology as it has been developed in European countries as well as in the United States. Of the consultants who have participated to date, one is a Professor of Internal Combustion Engines at the Norwegian Institute of Technology, and a second is on the staff of an internationally-known engineering firm located in West Sussex, England.



Mr. Carl Berlinger June 20, 1984 Page 2

With the advice and counsel of the consultants, PNL is reviewing reports submitted by the Owners' Group on known problems in the context of the overall effort for establishing the adequacy of TDI diesels for nuclear applications. Analyses submitted by the Owners' Group in support of design changes are a key aspect of this effort, but are not sufficient to establish that problems are resolved. Other key aspects include verification of corrective actions (e.g., through engine testing, which is a major element of the Owners' Group Program Plan), enhanced engine surveillance and maintenance, and the implementation of an effective quality assurance program to ensure that new engines and replacement parts meet established requirements.

Because diesel engine problems and appropriate corrective actions are closely related to the conditions under which the engines are operated (e.g., load, speed, and fuel used), PNL's reviews of the TDI Diesel Generator Owners' Group Program Plan and related submittals are focusing on operating experience, tests and inspections of TDI engines in nuclear service. Through on-site examinations of components during engine disassemblies at nuclear power stations, PNL's consultants are able to observe directly how engine components have performed under the conditions to which they have been exposed. This information is, of course, highly relevant to PNL's evaluations of the problems being addressed by the Owners' Group that would affect the reliability and operability of TDI engines in nuclear service.

Nothing in the data on non-nuclear applications already available to PNL through the Owners' Group suggests that a comprehensive effort to acquire additional, non-nuclear data is justified. In separate correspondence to NRC, PNL's consultants who participated in the deposition taken by Suffolk County on May 23, 1984 are providing their own views on this issue.

Sincerely,

V. H. Laity W. W. Laity

PNL Project Manager (

cc: M. Plahuta, DOE/RL M. Carrington, NRC (2) K. Trickett, DOE/HQ

| Sworn to before me this 20 | day of Jun | NANCY L. MICLELLAND, NOTARY PUBLIC 206 COTTONWOOD |
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