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 Forked River, New Jersey 08731-0388
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 Writer's Direct Dial Number:
 October 13, 1984

Mr. Darrell G. Eisenhut, Director
 Division of Licensing
 Office of Nuclear Reactor Regulation
 U.S. Nuclear Regulatory Commission
 Washington, DC 20555

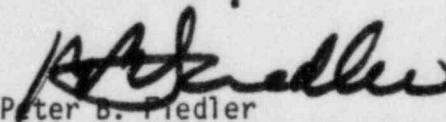
Dear Mr. Eisenhut:

Subject: Oyster Creek Nuclear Generating Station
 Docket No. 50-219
 Generic Letter 84-15

The attachment to this letter provides our response to the subject Generic Letter concerning diesel generator reliability. A notification was made on Tuesday, October 2, 1984 via telephone to our Project Manager indicating that several additional days were necessary for resolution of comments resulting from the review of our intended response.

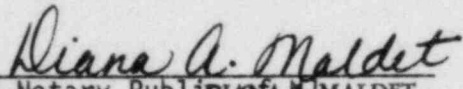
If there are any questions regarding our response, please contact the undersigned or Mr. Drew Holland at (609)971-4643.

Very truly yours,


 Peter B. Fiedler
 Vice President and Director
 Oyster Creek

PBF/dam
 Attachments

Sworn and subscribed to before me this 13th day of October, 1984.


 A Notary Public DIANA A. MALDET
 A Notary Public of New Jersey
 My Commission Expires June 5, 1986

cc: Dr. Thomas E. Murley, Administrator
 Region I
 U.S. Nuclear Regulatory Commission
 631 Park Avenue
 King of Prussia, PA 19406

NRC Resident Inspector
 Oyster Creek Nuclear Generating Station
 Forked River, NJ 08731

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ITEM 1 - REDUCTION OF COLD FAST START SURVEILLANCES

The Oyster Creek diesel generators are energized in the fast start mode during conduct of two surveillance procedures. One procedure, "Diesel Auto Actuation Test", is performed on each diesel during refueling outages in accordance with Technical Specifications. During this test, offsite power is interrupted to the safeguards power bus and the diesel fast starts to assume safeguard loads via sequence timing and single failure simulations. This demonstration is performed once per diesel during each refueling outage.

The second fast start sequence is performed on a staggered basis monthly for each diesel generator. Since offsite power and safeguards power buses are not interrupted during this surveillance, the diesel generator breaker is racked down to the test position such that breaker closure may occur without connection to the power bus. In this manner, a complete fast start logic sequence is exercised although the diesel does not assume load. Monthly fast start surveillance is not required by Oyster Creek Technical Specifications, but demonstrates fast start logic capability in accordance with the surveillance program.

All other required Technical Specification operability demonstrations required are performed through automatic synchronous peaking load controls. In this mode, the manufacturer's automatic 90 second idle period prewarms and lubricates the engine prior to speed acceleration and auto synchronization to the power bus.

Prior to August of 1983, the diesel generator monthly fast start logic tests were conducted only after prewarming the diesel via an automatic peaking load start as a prudent action recommended by the diesel vendor. A significant experience evolved in August, 1983 during a scheduled fast start test that ultimately uncovered a "masking" effect due to prewarming diesels. It was found that an "improved model" governor placed on Diesel Generator No. 1 had decreased the speed pickup rate during cold fast start attempts causing a lag in generator voltage buildup. The impact was not observed until the surveillance was "inadvertently" performed without prewarming. In an effort to avoid "masking" problems as observed, one of the corrective actions stated in R.O. #83-17 was to preclude prewarming diesels prior to fast start surveillances. As a result of the 1983 experience, and concerns by Oyster Creek personnel of additional cold fast starts, a decision had been made to reduce frequency from monthly to quarterly for tests after newer model governors were installed and tested. Since these governors have recently been installed and successfully tested, the ability exists to reduce the number of cold fast starts as requested. The original LER will be revised indicating additional findings from the experience and corrective action changes from this Generic Letter.

ITEM 1 - REDUCTION OF COLD FAST START SURVEILLANCES

Based on the above, Oyster Creek will take the following actions to reduce the number of cold fast starts during diesel generator surveillances:

I. O.C. Procedure 636.2.002 - Frequency of test will be reduced from monthly to quarterly. Since this surveillance was originally intended to exercise the fast start logic for proper sequence, all starts in this manner will be prewarmed, except one during refueling outages. This reduces the cold fast start from 12 per year to 1 per operating cycle, while still checking logic sequence on a quarterly basis. Technical Specification changes are not required for such a procedure revision.

II. O.C. Procedure 636.2.001 - NO CHANGE

This procedure is presently performed once per diesel during refueling periods at Oyster Creek.

The Oyster Creek Technical Specifications do not require tests of diesels for inoperability of core cooling system components. Therefore, changes to Technical Specifications are not required.

ITEM 2 - DIESEL GENERATOR RELIABILITY DATA

The reliability of Diesel Generators (DG) at Oyster Creek presented as described in Generic Letter 84-15 and per the criteria of Regulatory Guide 1.108, position C.2.e thru 9/3/84 are given as follows:

D.G.	Last 20 Valid Tests		Last 100 Valid Tests	
	<u>Failures</u>	<u>Reliability</u>	<u>Failures</u>	<u>Reliability</u>
D.G. 1	1	.95	1	.99
D.G. 2	1	.95	1	.99

It should be noted that the monthly fast start surveillance is performed with the diesel generator breaker racked down. As such, this surveillance does not meet criteria of Reg. Guide 1.108, position C.2.e (4) for a valid test. Therefore, some failures and maintenance have occurred (and been reported in accordance with Technical Specifications) which are not included above. Since a diesel load surveillance is always performed following the monthly fast start surveillance, the data does include all Technical Specification required operability demonstrations.

Appendix A contains a log compiled from plant records which itemizes the valid starts and failures in accordance with Reg. Guide 1.108, position C.2.e. Tests which were terminated intentionally by order of the Group Shift Supervisor (due to potential diesel or component damage) are recorded as invalid if the diesel would have started successfully in an emergency, and were considered valid failures if the condition would have prevented a successful emergency start.

A formal log or record of diesel generator demands, failures and operation in the format suggested by Regulatory Guide 1.108 has previously not been kept at Oyster Creek. However, several reliability studies have been performed, including one in similar, but varied format for earlier periods of time. Those studies reviewed numerous plant documents to arrive at the required data. We acknowledge the benefit of a centralized log in uniform format for the many corporate reviews of diesel generator performance. Therefore, we will incorporate the appropriate methods and administrative controls for an integrated, uniform log for diesel generator operation.

ITEM 3 - DIESEL GENERATOR RELIABILITY

Reliability improvement actions at Oyster Creek have included detailed reviews by various independent GPUN departments, and by maintenance personnel closely associated with diesel generator operation. With approximately 30 years of diesel operating experience, Oyster Creek has observed original failures along with the varied actions which have been successful in correction of those deficiencies. Increased diesel reliability, root cause investigations, and positive corrective actions continue to be the key points in review of any deviation from normal operation observed. During conduct of diesel performance reviews, a specific numerical reliability goal has not been used, although histories of failures have been reviewed to affirm all actions have been taken, and that actions are appropriate for resolution. In recent years, greater levels of action have been taken to provide recommended vendor improvements and upgrades to enhance performance and reduce failures encountered.

As indicated in Item 2, logs which will be maintained will provide data for future evaluations regarding diesel generator reliability. Efforts to install identified improvements will continue as they become apparent from vendor's recommendations, and from operating experience. Improvements in training, root cause evaluations, and attention to recommended upgrades to increase operability and maintainability have been the essential elements in the reliability of diesel generators.

NUREG/CR 0660, "Enhancement of On-Site Emergency Diesel Generator Reliability", was reviewed as prescribed to determine how the findings relate to improvements to diesel performance. Since the Oyster Creek station was one of the sites visited during compilation of this document, we have been previously aware of and have drawn attention to some of its findings. A brief synopsis of review findings follows:

- 1.) Air Start Systems - Diesels at Oyster Creek are electric start units - air start systems do not apply.
- 2.) Diesel Room Air Quality - Controls and most equipment described are contained presently in protective control cabinets. Our experience has not indicated any failures due to environmental contaminants via air sources or flow. The inertial air inlet filters and generator oil bath filters appear to be adequate.
- 3.) Turbocharger Heavy Duty Gear Drive - Note: This item closely relates to a vendor recommended Turbocharger/Bearing Oil Modification. - Oyster Creek will review the vendor's recommendation to determine if installation would benefit the diesel engines. We have found through inspections recently conducted, that there is a minimum of 30 psi oil pressure in Turbocharger bearings at all times, even when diesels are in the Standby Mode. We feel that the lack of turbocharger bearing wear indicates there is ample lube oil pressure available.

ITEM 3 - COMMENTS; ATTACHMENT TO ENCLOSURE 3
("Diesel Generator Performance Technical Specifications")

As requested, the following are comments on the proposed performance specifications:

Reliability Program:

1. The suggested level of .95 as a minimum desired reliability goal is reasonable. However, it is our opinion that certain repairs are corrective in nature and of themselves restore the reliability. Without consideration of actions previously taken (or reliability data correction), one could proceed to further remedial activities based on 100 start data with no tangible increase of diesel reliability. A more accurate assessment can be provided when a corrected failure proves successful during the next 10 to 20 component cycles, indicating that risk of repeated component failure in 100 starts has been significantly reduced. Whereas, a repeat failure in 10 to 20 component cycles clearly indicates actions were not sufficient and further remedial actions are required.
2. Reliability level remedial actions should depend on and vary dramatically with the type of component failure, how often it has failed, and the corrective action to preclude further failures. An example might be failure of a fuel transfer motor contactor. When failure occurs, it will be replaced and demonstrated by a start of the diesel. If the diesel operates for one or two hours, the transfer pump relay has operated 3 to 6 times for one start of the diesel unit and certainly "works" or the test demonstration would have failed. For a repeat failure there is obviously some other action required. Increasing surveillance frequency, or providing specific numbers of starts of the diesel unit, will provide undue wear and tear on all engine and control components. We believe that root cause analysis and proper corrective actions require a case by case determination of appropriate actions. We cannot concur that considering a diesel unit inoperable, for the purpose of statistical enhancement through more diesel starting, is prudent remedial action. On completion of appropriate corrective measures and proper testing, there would be no reason to continue to test without a basis for doing so.
- 3b. Comments regarding accelerated surveillance testing are described in section 2. Increased surveillance frequency should only occur when such a test is judged prudent due to the uncertainty of repair actions.
4. Although we have no objection to supply information and data as suggested, our recommendation regarding report requirements would be to utilize 10CFR 50.73 (b) (6) (c), "Supplemental Information" instead of imposing unique reporting mechanisms for individual plant systems. If such information is required by others in the NRC, we recommend the information be obtained at the plant site through appropriate channels. The requirements for information reports suggested in Attachment 1 to Table 4.8-2, particularly the explanatory paragraph following item f), are complex and should be simplified.

ITEM 3 - COMMENTS; ATTACHMENT TO ENCLOSURE 3
("Diesel Generator Performance Technical Specifications")

5. We agree that levels as described indicate unsatisfactory performance. The method, however, to resolve the deficient conditions should be close scrutiny and more positive corrective action. An unscheduled thorough maintenance inspection may be called for, along with review and adjustment of Preventive Maintenance timing. A requirement which dictates large numbers of starts when other auxiliary components have failed would certainly take a toll on all engine and control components, possibly resulting in future additional failures. It would appear such requalification may shift the proper maintenance intervals, Mean Time Between Failures (MTBF), that have over the years been incorporated in Preventive Maintenance programs.
6. No Comment.
7. Concur - Oyster Creek inoperability limits allow one Diesel Generator to be inoperable during power operation for 7 days in any 30 day period, however, there will have to be a proper balance of planned maintenance intervals vs. availability criteria or diesel reliability in the long run will be degraded.
8. Oyster Creek agrees Reg. Guide 1.108 position C.2.e criteria are reasonable.
9. Oyster Creek concurs with maintaining a diesel operation log as previously described. However, Attachment 1 to Table 4.8-2, as referenced in Sec. 9, appears to add significant reporting requirements. Oyster Creek believes with required data available on site, in a uniform format, that there are ample methods to audit, review or request copies via NRC Resident Inspectors. We would not favor or recommend additional unique reporting requirements.

ITEM 3 - COMMENTS; ATTACHMENT TO ENCLOSURE 3
("Diesel Generator Performance Technical Specifications")

Appendix A, "Typical Technical Specifications", goes further than the question of diesel reliability programs, since it would be unique for each plant design. Comments relative to diesel reliability and pertinent to Appendix A were included above.

In regard to Attachment 2 to Table 4.8-2, "Diesel Generator Requalification Program", we must restate our position given in Section 2 and 5 comments, indicating such a program for operating power plants could be counterproductive.

In summary, diesel engine demands are unsuccessful because of (sub) component failures. Subsequent testing to requalify the diesel should consider failed component reliability and appropriate testing applied to the subject component. The entire diesel generator should not be subjected to wear and tear unnecessarily.

APPENDIX A

EMERGENCY DIESEL GENERATOR START DATA

DIESEL GENERATOR NO. 1

Page 1 of 4

START NO.	DATE	COLD OR HOT START	SUCCESS	FAILURE	VALID		LOADED 1 HR - MIN.	COMMENTS
					YES	NO		
1	9-03-84	WARM	X		X		YES	
2	8-27-84	WARM	X		X		YES	
3	8-20-84	WARM	X		X		YES	
4	8-14-84	WARM	X		X		YES	FOLLOWING RADIATOR AND GOVERNOR REPLACEMENT
5	7-30-84	WARM	X		X		YES	
6	7-23-84	WARM	X		X		YES	
7	7-16-84	WARM	X		X		YES	
8	7-09-84	WARM	X		X		YES	
9	7-02-84	WARM	X		X		YES	ADJUSTED LOAD LIMIT TO SUMMER CURVE (2750 KW @100 F)
10	6-18-84	WARM	X		X		YES	
11	6-04-84	WARM		X	X		NO (10 MIN)	FUEL TRANS. SWITCH OFF GSS TERMIN. TEST (AFTER SWITCH TURNED BACK ON)
12	6-04-84	WARM	X		X		YES	
13	5-28-84	WARM	X		X		YES	
14	5-21-84	WARM	X		X		YES	
15	5-07-84	WARM	X		X		YES	
16	4-30-84	WARM	X		X		YES	
17	4-23-84	WARM	X		X		YES	
18	4-16-84	WARM	X		X		YES	
19	4-14-84	WARM	X		X		YES	
20	4-07-84	WARM	X		X		YES	
21	3-26-84	WARM	X		X		YES	
22	3-20-84	WARM	X		X		YES	
23	3-15-84	WARM	X		X		YES	
24	3-10-84	WARM	X		X		YES	
25	2-27-84	WARM	X		X		YES	
26	2-20-84	WARM	X		X		YES	FUEL OIL NOT TRANSFERRED FOLLOWING TEST (GAUGE ERROR)
27	2-13-84	WARM	X		X		YES	SLIGHT DRIFT IN VARS DURING WARMUP - TESTED O.K.
28	2-06-84	WARM	X		X		YES	
29	2-01-84	WARM	X		X		YES	MOMENTARY HIGH F.O. TANK ALARM - ADJ. SW. TO PROPER LEVEL
30	1-30-84	WARM	X		X		YES	
31	1-25-84	WARM	X		X		YES	
32	1-24-84	WARM	X		X		YES	
33	1-22-84	WARM	X		X		YES	(AFTER F.O. TRANSFER MOTOR REPLACEMENT)
34	1-21-84	WARM		X	X	X	NO (30 MIN)	TEST TERMINATED BY GSS - NO. 1 F.O. PUMP MOTOR FAILING - NO. 2 PUMP O.K.
35	10-03-83	WARM	X		X		YES	
36	9-26-83	WARM	X		X		YES	
37	9-20-83	WARM	X		X		YES	
38	9-12-83	WARM	X		X		YES	
39	9-06-83	WARM	X		X		YES	
40	8-29-83	WARM	X		X		YES	
41	8-27-83	WARM	X		X		YES	
42	8-08-83	WARM	X		X		YES	
43	8-01-83	WARM	X		X		YES	
44	7-25-83	WARM	X		X		YES	
45	7-18-83	WARM	X		X		YES	
46	7-12-83	WARM	X		X		YES	ADJUSTED LOAD LIMIT TO SUMMER CURVE
47	7-05-83	WARM	X		X		YES	
48	7-05-83	WARM	X		X		YES	
49	6-27-83	WARM	X		X		YES	
50	6-20-83	WARM	X		X		YES	

APPENDIX A

EMERGENCY DIESEL GENERATOR START DATA

DIESEL GENERATOR NO. 1

Page 2 of 4

START NO.	DATE	COLD OR HOT START	SUCCESS	FAILURE	VALID		LOADED 1 HR - MIN.	COMMENTS
					YES	NO		
51	6-24-83	WARM	X		X		YES	
52	6-06-83	WARM	X		X		YES	
53	6-01-83	WARM	X		X		YES	
54	5-26-83	WARM	X		X		YES	
55	5-23-83	WARM	X		X		YES	
56	5-16-83	WARM	X		X		YES	
57	5-09-83	WARM	X		X		YES	
58	5-02-83	WARM	X		X		YES	
59	4-25-83	WARM	X		X		YES	
60	4-18-83	WARM	X		X		YES	
61	4-11-83	WARM	X		X		YES	
62	4-04-83	WARM	X		X		YES	
63	3-28-83	WARM	X		X		YES	
64	3-21-83	WARM	X		X		YES	
65	3-14-83	WARM	X		X		YES	
66	3-08-83	WARM	X		X		YES	
67	2-28-83	WARM	X		X		YES	
68	2-22-83	WARM	X		X		YES	
69	2-14-83	WARM	X		X		YES	
70	2-07-83	WARM	X		X		YES	
71	1-31-83	WARM	X		X		YES	
72	1-24-83	WARM	X		X		YES	
73	1-17-83	WARM	X		X		YES	
74	1-10-83	WARM	X		X		YES	
75	1-03-83	WARM	X		X		YES	
76	12-27-82	WARM	X		X		YES	
77	12-20-82	WARM	X		X		YES	
78	12-16-82	WARM	X		X		YES	
79	12-06-82	WARM	X		X		YES	
80	11-29-82	WARM	X		X		YES	12/3/82 - CHECKED F.O. TANK LEVEL SWITCHES FOR SETTING
81	11-22-82	WARM	X		X		YES	
82	11-15-82	WARM	X		X		YES	
83	11-08-82	WARM	X		X		YES	
84	11-01-82	WARM	X		X		YES	
85	10-25-82	WARM	X		X		YES	
86	10-21-82	WARM	X		X		YES	
87	10-20-82	WARM	X		X		YES	
88	10-19-82	WARM	X		X		YES	
89	10-18-82	WARM	X		X		YES	
90	10-13-82	WARM	X		X		YES	
91	10-04-82	WARM	X		X		YES	
92	9-27-82	WARM	X		X		YES	
93	9-20-82	WARM	X		X		YES	
94	9-13-82	WARM	X		X		YES	
95	9-7-82	WARM	X		X		YES	
96	8-31-82	WARM	X		X		YES	
97	8-24-82	WARM	X		X		YES	
98	8-16-82	WARM	X		X		YES	
99	8-10-82	WARM	X		X		YES	
100	8-09-82	WARM	X		X		YES	
101	8-02-82	WARM	X		X		YES	

APPENDIX A

EMERGENCY DIESEL GENERATOR START DATA

DIESEL GENERATOR NO. 2

Page 3 of 4

START NO.	DATE	COLD OR HOT START	SUCCESS	FAILURE	VALID		LOADED 1 HR - MIN.	COMMENTS
					YES	NO		
1	9-03-84	WARM	X		X		YES	
2	8-01-84	WARM	X		X		YES	
3	7-23-84	WARM	X		X		YES	
4	7-09-84	WARM	X		X		YES	
5	6-26-84	WARM	X		X		YES	
6	6-11-84	WARM	X		X		YES	
7	6-05-84	WARM	X		X		YES	
8	5-28-84	WARM		X	X		NO START	GOV. FAILED (BLOCKED LOW SPEED PORT-AGE RFLATED) REPLACED.
9	5-04-84	WARM	X		X		YES	
10	4-16-84	WARM	X		X		YES	
11	4-09-84	WARM	X		X		YES	
12	4-02-84	WARM	X		X		YES	
13	3-22-84	WARM	X		X		YES	
14	3-25-84	WARM	X		X		YES	
15	3-15-84	WARM	X		X		YES	
16	3-06-84	WARM	X		X		YES	
17	3-05-84	WARM	X		X		YES	
18	3-03-84	WARM	X		X		YES	
19	3-02-84	WARM	X		X		YES	
20	1-25-84	WARM	X		X		YES	
21	1-16-84	WARM	X		X		YES	
22	1-09-84	WARM	X		X		YES	
23	1-02-84	WARM	X		X		YES	
24	12-26-83	WARM	X		X		YES	
25	12-19-83	WARM	X		X		YES	
26	12-12-83	WARM	X		X		YES	
27	12-05-83	WARM	X		X		YES	
28	11-28-83	WARM	X		X		YES	
29	11-21-83	WARM	X		X		YES	
30	11-14-83	COLD	X		X		APP. 8HR a70%	EMERG. START-LOSS OF OFFSITE POWER DUE TO SWITCH YARD FIRE
31	11-07-83	WARM	X		X		YES	
32	10-31-83	WARM	X		X		YES	
33	10-26-83	WARM	X		X		YES	
34	10-18-83	WARM	X		X		YES	
35	10-13-83	WARM	X		X		YES	
36	10-12-83	WARM	X		X		YES	
37	10-11-83	WARM	X		X		YES	
38	10-10-83	WARM	X		X		YES	
39	10-04-83	WARM	X		X		YES	
40	9-20-83	WARM	X		X		YES	
41	9-06-83	WARM	X		X		YES	
42	8-27-83	WARM	X		X		YES	
43	8-26-83	WARM	X		X		YES	
44	8-25-83	WARM	X		X		YES	
45	8-24-83	WARM	X		X		YES	ADJUSTED GOV. LOAD SWITCH. FROM 600 KW TO 400 KW
46	8-23-83	WARM	X		X		YES	
47	8-22-83	WARM	X		X		YES	
48	8-21-83	WARM	X		X		YES	
49	8-20-83	WARM	X		X		YES	
50	8-19-83	WARM	X		X		YES	

EMERGENCY DIESEL GENERATOR START DATA

DIESEL GENERATOR NO. 2

START NO.	DATE	COLD OR HOT START	SUCCESS	FAILURE	VALID YES NO	LOADED 1 HR - MIN.	COMMENTS
51	8-18-83	WARM	X		X	YES	
52	8-17-83	WARM	X		X	YES	
53	8-16-83	WARM	X		X	YES	
54	8-08-83	WARM	X		X	YES	
55	7-25-83	WARM	X		X	YES	
56	7-12-83	WARM	X		X	YES	
57	7-08-83	WARM	X		X	YES	
58	7-05-83	WARM	X		X	YES	
59	6-27-83	WARM	X		X	YES	
60	6-14-83	WARM	X		X	YES	
61	5-31-83	WARM	X		X	YES	
62	5-26-83	WARM	X		X	YES	
63	5-16-83	WARM	X		X	YES	
64	4-18-83	WARM	X		X	YES	
65	4-4-83	WARM	X		X	YES	
66	3-21-83	WARM	X		X	YES	
67	3-08-83	WARM	X		X	YES	
68	2-22-83	WARM	X		X	YES	
69	2-07-83	WARM	X		X	YES	
70	1-24-83	WARM	X		X	YES	
71	1-10-83	WARM	X		X	YES	
72	12-27-83	WARM	X		X	YES	
73	11-29-83	WARM	X		X	YES	
74	11-15-83	WARM	X		X	YES	
75	11-01-83	WARM	X		X	YES	
76	10-21-82	WARM	X		X	YES	
77	10-20-82	WARM	X		X	YES	
78	10-18-82	WARM	X		X	YES	
79	10-13-82	WARM	X		X	YES	
80	10-04-82	WARM	X		X	YES	
81	9-20-82	WARM	X		X	YES	
82	9-07-82	WARM	X		X	YES	
83	8-24-82	WARM	X		X	YES	
84	8-10-82	WARM	X		X	YES	
85	8-09-82	WARM	X		X	YES	
86	7-26-82	WARM	X		X	YES	
87	7-12-82	WARM	X		X	YES	
88	6-29-82	WARM	X		X	YES	
89	6-28-82	WARM	X		X	YES	
90	6-21-82	WARM	X		X	YES	
91	6-14-82	WARM	X		X	YES	
92	6-01-82	WARM	X		X	YES	
93	5-17-82	WARM	X		X	YES	
94	5-03-82	WARM	X		X	YES	
95	4-19-82	WARM	X		X	YES	
96	4-16-82	WARM	X		X	YES	
97	4-10-82	WARM	X		X	YES	
98	4-07-82	WARM	X		X	YES	
99	4-05-82	WARM	X		X	YES	
100	4-04-82	WARM	X		X	YES	

350KW OSC IN PEAK (NOT IN XFER MODE) ADJ ELEC GOV WOULD NOT AFFECT EMERG.