

Technical Evaluation Report

REVIEW AND EVALUATION
OF TRANSAMERICA DELAVAL, INC.,
DIESEL ENGINE RELIABILITY AND
OPERABILITY - COMANCHE PEAK
STEAM ELECTRIC STATION UNIT 1

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Reliability/Operability

NRC Lead Engineer: C. H. Berlinger

Pacific Northwest Laboratory
Richland, Washington 99352

ABBREVIATIONS AND INITIALISMS

BMEP	brake mean effective pressure
CPSES	Comanche Peak Steam Electric Station
DR/QR	design review/quality revalidation
EDG, EDGs	emergency diesel generator(s)
ESF	engineered safety feature
FaAA	Failure Analysis Associates
LOCA	loss-of-coolant accident
LOOP	loss of offsite power
M/S	maintenance/surveillance
NDE	nondestructive examination
NRC	U.S. Nuclear Regulatory Commission
OG	Owners' Group; the TDI Diesel Generator Owners' Group
OGPP	Owners' Group Program Plan
O/R	operability and reliability
PNL	Pacific Northwest Laboratory
SWECO	Stone & Webster Engineering Corporation
TDI	Transamerica Delaval, Inc.
TER	technical evaluation report
TUGCO	Texas Utilities Generating Company

review/quality revalidation (DR/QR) analyses of both the Train A and Train B engines. Therefore, PNL is constrained from reaching unlimited conclusions relative to the CPSES Train A and Train B engines' operability and reliability to perform indefinitely their expected design function. PNL conclusions are subject to full completion of all OGPP and TUGCO DR/QR programs and implementation of their findings (PNL feels these actions should be a part of TUGCO's licensing authorization).

Hence, PNL has evaluated all components in light of expected operating conditions and patterns at CPSES over a period of time corresponding to the first reactor refueling outage, which PNL understands to be approximately 18 months from initial plant startup. By that time, all phases of both the general OGPP evaluation and implementation and the plant-specific CPSES DR/QR program should be complete and ready to implement. Because these actions will represent proposed resolution of the TDI engine issues at CPSES, PNL will make its final conclusions regarding the long-term operability/reliability of the CPSES engines at that time.

The considerations and recommendations presented in this TER are sometimes expressed in terms of "until the first reactor refueling outage." However, in using this phrase, PNL does not intend to imply (unless specifically stated otherwise) that the engines or their components are therefore unreliable or inoperable for their intended use over their normally expected life.

1.3 REPORT PREPARATION

As stated, this report is based in part on a review of documents cited in Section 2.0. The PNL team also visited the CPSES on May 24 and 25, 1984, while the Train B engine was disassembled for inspection. At that time many of the "generic" components of that engine (identified by the Owners' Group as Phase I issues) were visually examined, and the TUGCO disassembly, inspection, and replacement parts records were reviewed for both Train A and Train B. At that time the PNL team, together with NRC, also met with appropriate TUGCO staff and management concerned with diesel engine operability/reliability.

inspection plan and acceptance criteria. PNL understands that CPSES has been supplied this Phase 2 information for their Train A and B engines.

- The third stage is a program of further testing and surveillance and maintenance. Testing and inspection are intended to help identify and evaluate the problems, both initially and at appropriate future intervals. The surveillance and maintenance procedures, enhanced beyond that which is "customary", are meant to prevent or to identify future problems before they appear.

At NRC's request, PNL reviewed the Owners' Group Program Plan. The results of that evaluation were reported to NRC in PNL-5161, Review and Evaluation of TDI Diesel Generator Owners' Group Program Plan (Pacific Northwest Laboratory June 1984).

Section 4 of PNL-5161 deals with considerations for interim licensing of nuclear stations prior to completion of the implementation of the Owners' Group Program Plan. Recommendations in that report relevant to TUGCO's license for the Comanche Peak Steam Electric Station at this time are:

1. The engine should have AE pistons or complete "lead-engine" tests as described in Section 2.3.2 of PNL-5161. (Confirmed in Section 3.7.4 herein.)
2. The diesel generator should not be required to carry a load in excess of that corresponding to an engine brake mean effective pressure (BMEP) of 185 psig. (Confirmed in Sections 6.1.1.)
3. The engine should be inspected per Section 2.3.2.1 of PNL-5161 to assure that the components are sound. (Confirmed in Sections 3.0 and 4.0.)
4. Preoperational testing should be performed as discussed in Section 2.3.2 of PNL-5161. (Confirmed in Section 6.1.)
5. The engines should receive enhanced surveillance and maintenance. (Discussed in Section 5.0.)

conditions the dowel would yield sufficiently in compression that the bolt preload would relax, with resultant fatigue problems. Replacement with dowels of proper length, followed by proper bolt preload, corrects the incipient problem.

The second failure mechanism was fatigue cracking of the cross-joint connecting rod bolts and/or the link rod box at the mating threads. TDI attributed these rod cracks to "thread fretting," which they concluded resulted from distortion of the rod bolt under operating loads in the area of the mating threads. The distortion could occur even if the bolts had been installed with the originally specified bolt preloads. The Owners' Group addressed this concern for the two versions of the connecting rod, namely the original design equipped with 1-7/8-inch bolts and a later design in which the rod boxes were equipped with 1-1/2-inch bolts. Stress analysis, including finite element studies, was done by FaAA. They concluded that both designs are adequate for the service intended, provided connecting rod bolt preload is regularly checked within specified time limits that are related to engine load requirement. However, the rod with the 1-1/2-inch bolts was found to have an 8% to 9% greater margin of safety than the rod with 1-7/8-inch bolts because the related rod-box structure is more massive with the smaller bolt configuration. The Owners' Group recommends inspection by eddy current of the rod box threaded hole. Implementation of this recommendation has so far proven to be impractical.

Another area of concern was that of possible sideways bowing of the connecting rod, sometimes coming as a consequence of the forging process. FaAA computed the consequences and established a functional tolerance limit against which connecting rods should be checked.

The last area of possible failure was in the wrist pin (or piston pin) bushings, considered by TDI as a component of the connecting rod assembly. Several original and replacement bushings at Shoreham, in particular, were found to have indications on both inner and outer surfaces. FaAA evaluated these as interdendritic anomalies (casting defects), having little functional significance but best replaced where encountered.

Because nuclear EDGs have unusual quick-start requirements--and are tested extensively to assure reliability for such duty--the owners and TDI investigated the failure parameters early in the history of such service. It was recognized that the bearing and bearing lubrication systems inherent in the 90G design did not provide adequate lubrication on the bearing thrust pads and rotor thrust collars under fast startup conditions to high loads. TDI instituted two steps of modifications in an attempt to address this problem; one instituted and modified the oil drip system and the second provided for manual prelubrication prior to planned starts.

3.2.12.3 Owners' Group Status

In behalf of the Owners' Group, FaAA undertook an extensive study of causes of reported failures in nuclear service. The net result was an affirmation of inadequate startup lubrication. Briefly, the resulting recommendations were:

- Retain and use a "drip system" that directs a small flow of oil toward the bearings at all times in standby, but increases the flow of oil to 0.35 gph. (Higher flows are apt to flood past the bearing into the exhaust manifolds and create fire risk.)
- Provide and use an auxiliary prelubrication pump to direct substantial flow to the bearings immediately prior to planned startups.
- Maintain oil filtration at 10 microns or better and utilize spectrochemical and ferrographic oil analysis regularly.
- Enhance bearing inspection programs. At least one bearing should be inspected at a station following every 100 starts, of whatever nature. Inspection should also be done following 40 starts without manual prelude.

An OG supplementary report dealing with turbocharger vanes and inlet capscrews has yet to be released.

All items listed in Table 4.1 that have at least one S and no U are considered satisfactory by TUGCO. An S means that the component passed all the inspections without exceeding allowable criteria and that no repair or replacement was needed. A U denotes failure to comply with criteria in effect at the time of the inspection. In discussions with NRC and PNL, TUGCO noted that some components (viz., air start distributor) could now be considered satisfactory because the acceptance criteria applied by TUGCO at the time led to some components being rejected that would be accepted under the OG criteria. When more than one unit of a component was tested and one of those units did not pass the inspection, the result was a U in Table 4.1.

In George (August 15, 1984) TUGCO provides summary details of the findings and disposition of the unsatisfactory findings for Train A and B components. In evaluating the TUGCO Phase 2 U components, PNL has elected to consider them in two categories: those U components with any conditions found that could influence the engines' function, and those U components considered to be less consequential. This subdivision is useful in reviewing the evaluation and conclusions provided in Section 4.2.2 of this TER. Tables 4.2 and 4.3 provide the TUGCO inspection results in these two categories, respectively.

4.2 PNL EVALUATION

4.2.1 Methodology

The PNL evaluation is based largely on a review of the three documents describing the inspection plans and results (George June 7, June 29, and August 15, 1984). This review is supplemented by a visit to TUGCO on May 23 and 24, 1984, during which PNL and its consultants briefly reviewed the Phase 2 revalidation process. This included a sampling review of inspection plans and Nonconformance Reports and their disposition. Backup photographs and files were viewed also.

4.2.2 Findings and Conclusions

On the basis of information provided to date, the TUGCO inspection procedures and acceptance criteria are considered adequate. The PNL sampling inspection of records suggests that adequate records are kept and that any

TABLE 4.2. Defective Components That Could Significantly Affect Engine Operability/Reliability

Component/(TDI Part No.)	TUGCO Findings/Actions
Crankshaft main bearing shells (02-310B). This component supports and aligns the crankshaft, its failure will lead to engine shutdown.	<p>Train A - No. 10 upper and lower shells were replaced because of indications that extended through the babbitt overlay into the base metal [LP,^(a) VI,^(b) DI^(c)].</p> <p>Train B - No. 1 upper shell showed rejectable linear indications and No. 10 lower shell was galled. Both were replaced with spares (LP, VI, DI).</p>
Camshaft support bolting (02-350C). These bolts support the camshaft. The engine can operate with some bolts loosened but sufficient loss of bolt support can lead to engine shutdown.	<p>Train A - 16 bolt holes would not permit 1-1/4-inch bolts without bottoming out. New 1-inch bolts were installed at all 16 locations. Sufficient thread engagement is provided with the 1-inch bolts for proper torquing [TO^(d) for bolts, MA^(e) and VI for gears].</p>
Cylinder head valves, intake and exhaust (02-360B). These valves control air into the cylinders and exhaust out of the cylinders; minor leakage is tolerable.	<p>Nearly all valves showed evidence of inadequate seating, scuffing or erosion of stems and/or scuffing or pitting of valve stem contact areas. Three valves required replacement and the rest are being machined to fit the new cylinder heads (VI, DI, LP of stem/head blended radius).</p>
Cylinder head subcovers (02-32A). These elements support the rocker shafts and their structural integrity is essential to engine performance.	<p>Train A - three subcovers were replaced with satisfactory spares because of rejectable linear indications (VI, LP).</p> <p>Train B - an unsatisfactory weld repair area was noted on the web area of subcover 7L. Linear indications were also found by inspection on subcovers 7L, 6L and 8R in the boss areas. These were replaced with satisfactory spares (VI, LP).</p>

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- (a) LP = liquid penetrant inspection
 - (b) VI = visual inspection
 - (c) DI = dimensional inspection
 - (d) TO = torque verification
 - (e) MA = material verification

TABLE 4.2. (contd)

Component/(TDI Part No.)	TUGCO Findings/Actions
Intake Manifolds (02-375). The elbow flange helps support manifold and seals gasket. Leakage will degrade engine output.	Train A - intake manifold elbow no. 8L had a corner broken off of the head flange and was replaced with a satisfactory spare [VI ^(a)]. Train B - intake elbow 8R was replaced with a satisfactory spare because of two broken-off corners and elongated bolt holes (VI).
Rocker arms, intermediate rocker shaft assembly (02-390A). This assembly transmits cam motion to valves and its operation is essential to engine operation.	Train A - chips or linear indications in three intermediate rocker arms resulted in replacement with satisfactory spares for two rocker arms and refurbishment of the other [VI, DI, ^(b) MA ^(c)].
Starting air distributor assembly (02-442A). This assembly sends starting air to cylinders. It is essential for startup.	Train A - both assemblies were replaced because of "excessive wear" (VI).
Turbocharger bracket, bolting and gaskets (02-475D). This bracket supports the turbocharger. Some missing bolts can be tolerated; however, loss of turbocharger seriously reduces engine power.	Train A - 24 bolts on the right bank were found to have insufficient thread engagement, and were properly retorqued. One bolt was replaced with a modified bolt because of stripped bolt hole threads. Missing lockwashers were also replaced where necessary [VI, VID ^(d)]. Train B - five bolts without grade 5 markings were replaced with grade 5 bolts.

(a) VI = visual inspection

(b) DI = dimensional inspection

(c) MA = material verification

(d) VID = visual inspection of identification markings

TABLE 4.3. Defective Components That Will Not Significantly Affect Engine Operability/Reliability

<u>Component/(TDI Part No.)</u>	<u>TUGCO Findings/Actions</u>
Cylinder Block, Liner and Manifold Nuts (02-315F)	<p>Train A - 48 of 128 nuts had no identifying marks. LP was satisfactory and all nuts were reinstalled in the engine [VI,^(a) TO,^(b) LP^(c)].</p> <p>Train B - four nuts on cylinder head No. 8R had forging laps extending across the flat onto the machined face, and were replaced with satisfactory spares.</p>
Idler Gear Assembly (02-355C)	<p>Train B - because of a number of different markings and lengths on camshaft cover and idler gear cover bolting, all bolts have been replaced with 1-1/4-inch grade 5 bolts to ensure uniformity (except for four camshaft cover bolts which require 1-inch bolts because of shorter hole depths) [VI, DI, VID^(d)].</p>
Air Start Valve (02-359)	<p>Train B - a layer of carbon deposition was cleaned from the valves (VI, DI, TO).</p>
Exhaust Manifold Bolting and Gaskets (02-380B)	<p>Train A - one bolt was too long, one bolt was of the incorrect material, and two bolts were damaged. All four of these bolts were replaced with satisfactory bolts of the new socket head type (TO, DI, VI).</p> <p>Train B - nine bolts were found to be of incorrect length. All of the bolts on Train B are being replaced with the latest TDI socket head type. Only 48 were available for reassembly; however, the remaining 16, which are satisfactory, will be replaced later (DI, VID).</p>

- (a) VI = visual inspection
(b) TO = torque verification
(c) LP = liquid penetrant inspection
(d) VID = visual inspection of identification markings

TABLE 4.3. (contd)

Component/(TDI Part No.)	TUGCO Findings/Actions
Valve Lifters (02-390F)	<p>Train A - four lifters did not pass the leak down rate test and were replaced with satisfactory spares [VI,^(a) LP^(b)].</p> <p>Train B - 32 of 64 lifters did not pass the leak down rate test. 57 satisfactory spares were available and were installed with 7 of the original satisfactory lifters (VI, LP).</p>
Overspeed Trip, Governor, and Accessory Drive (02-410B)	<p>Train A - a missing locking clip on one bolt and a missing lockwire on one coupling capscrew were replaced [DI,^(c) MA^(d) on shaft].</p>
Overspeed Trip Coupling (02-410C)	<p>Train A - coupling spider showed some peeling and couplings had some nicks. Spider was replaced with a satisfactory spare and the couplings were refurbished. Neoprene peeling on the spider was caused by burrs or discontinuities on the coupling, which were removed. A missing setscrew was also replaced (VI).</p>
Governor Linkage (02-413)	<p>Train A - some rust, but no pitting, was noticed on the linkage. Rust was removed prior to reinstallation (VI).</p>
Turbocharger Bracket - Air Butterfly Valve Assembly (02-475B)	<p>Train A - right bank shaft showed some pitting at 3 locations and was refurbished [VI, VID^(e)].</p>
Control Panel Assembly (02-500N)	<p>Train A and Train B - cleaning of assembly was required (VI).</p>

- (a) VI = visual inspection
- (b) LP = liquid penetrant inspection
- (c) DI = dimensional inspection
- (d) MA = material verification
- (e) VID = visual inspection of identification markings.

component's history can be reconstructed. It is noted that the TUGCO DR/QR reports have not been issued as of this date, so the PNL evaluation does not provide conclusions relative to the Phase 2 revalidation program for the CPSES. Consequently, the adequacy or completeness of the components selected by the Owners' Group for the CPSES Phase 2 revalidation program is not evaluated here. PNL has concluded that interim licensing action is not contingent upon the OG Phase 2 completion (Pacific Northwest Laboratory June 1984, p. 10). In reviewing the Phase 2 component revalidation, PNL noted that TUGCO states that they have addressed 45 components (George August 15, 1984, p. 5), whereas only 44 component findings are reported. In a telephone conversation with NRC, TUGCO reported that 44 is the correct number due to the method TUGCO later used to account for the wrist pin (as part of the connecting rod).

4.2.2.1 Satisfactory Components

PNL notes that there are components found satisfactory by TUGCO for one engine but not inspected for the other engine. In those cases it is PNL's judgment that that same component in the other engine need not be inspected. The probability for significant findings is considered small. PNL considers all components found satisfactory are adequate to perform their intended function both for Train A and Train B.

4.2.2.2 Defective Components That Could Affect Engine Operability/Reliability

In general, the TUGCO Component Revalidation Checklist and accompanying QA Inspection Plans do not provide any indication of the underlying cause for the rejectable indications reported. Presumably this will be supplied in the DR/QR submittal to NRC. In the absence of TUGCO's presenting a definite cause (PNL acknowledges that in many instances the cause may be indeterminable and unsequential), PNL consultants have applied judgment, based on experience with other engines, to evaluate the adequacy of the TUGCO actions to remedy the problem.

Two items, camshaft bolting (02-3506) and turbocharger support bolting (02-475D), appear to be assembly errors. No further problem is anticipated following the TUGCO repair/replacement actions. PNL notes that the camshaft

bolting problem is not the same problem encountered at the Shoreham Nuclear Power Station where cracks occurred in a region of the block that supports the camshaft. This region is different in the straight and vee engine designs. However, failure of any bolts or threads can have serious consequences.

The main bearing shells (02-310B), rocker arms (02-390A), and subcovers (02-362A) all had generally minor indications. No cause was supplied by TUGCO. In view of the low number of operating hours, and based on previous experience, PNL consultants believe manufacturing defects (especially the faulty weld repair in the subcover) or minor abrasives in the lubricant could cause the indications noted. All replacement parts were inspected to the Owners' Group specification. PNL judges the possibility of recurrence to be small, and considers TUGCO's actions adequate for these components to serve their intended functions.

Intake and exhaust valves (02-360B) showed more than normal surface distress but no fundamental weakness. The pattern of poor seating could indicate poor QA/QC procedures in manufacturing. The scuffing or scoring of the chrome is common and of little concern. PNL considers TUGCO's actions appropriate and adequate for these components to serve their intended functions.

The intake manifold flanges (02-375) on both Train A and Train B engines were found to have broken corners and, on Train B, the bolt holes were found to be elongated. No explanation was presented in TUGCO's comprehensive report (George August 15, 1984), but in a subsequent telephone communication to NRC and PNL, TUGCO noted that the corner breaks were minor and of no significance to the serviceability of the flanged connection. On the basis of this explanation, PNL concludes these components are serviceable.

Both standby air distributors (02-442A) on the Train A engine exhibited "excessive wear" and were replaced. This raised the concern of PNL, in that a similar inspection of Train B was not conducted. In a later telephone communication to NRC and PNL, TUGCO advised that the condition of the components was subsequently checked with the Owners' Group due to uncertainty on inspection standards. TUGCO was advised that the wear encountered was normal; hence, Train B was not inspected.

PNL noted that failure of a starting air distributor would compromise engine reliability. Because the wear was deemed excessive at the time by TUGCO inspection personnel, after only 67 starts onsite, PNL remains concerned and recommends that distributors on Train B be inspected before the Train B engine can be considered qualified for nuclear service.

4.2.2.3 Defective Components That Will Not Significantly Affect Engine Operability/Reliability

PNL has reviewed the significant indications reported by TUGCO (see Table 4.3) and believes that the actions taken by TUGCO are adequate. PNL concludes that the repaired and replacement parts will serve their intended function in the Train A and Train B engines.

5.0 PROPOSED MAINTENANCE, INSPECTION AND SURVEILLANCE PROGRAM

While evaluating the Owners' Group Program Plan, PNL recognized that a comprehensive maintenance and surveillance (M/S) program would be a key aspect of the overall effort to assure future TDI diesel engine operability and reliability, and so stated in its formal review of the OGPP (Pacific Northwest Laboratory June 1984). Recognizing that the Owners' Group Program Plan had not yet specifically addressed M/S activities, PNL recommended that the Owners' Group develop a definitive M/S program (in consultation with TDI), and that detailed plans based on those Owners' Group recommendations be developed for each engine installation by the individual owners.

The need for an enhanced M/S plan was further identified for nuclear stations seeking licensing actions prior to the completion of all elements of the OGPP (Pacific Northwest Laboratory June 1984, Sec. 4.0). Some elements of such an enhanced M/S plan were initially identified by PNL in letters of April 16 and 17, 1984, to C. Berlinger at NRC (dealing specifically with Mississippi Power & Light's Grand Gulf Nuclear Station). The features of the enhanced M/S program suggested by PNL were subsequently incorporated by the NRC staff in a letter to MP&L dated April 25, 1984, re: "Evaluation of the TDI Diesel Generator Reliability for Power Operations at GGNS."

In a letter (Youngblood August 2, 1984), NRC requested that TUGCO describe their enhanced M/S program. This section reviews TUGCO's response. This review responds to the information supplied to date by TUGCO. The review is not intended to address the broader issue of adequate surveillance and maintenance that is being addressed by the Owners' Group. It is considered likely that additions/modifications to the M/S program will be required following the OG recommendations.

5.1 MAINTENANCE AND INSPECTION PLAN

TUGCO has reviewed the OGPP Phase I M/S recommendations and revised their CPSES Unit 1 M/S schedules as documented in George (August 15, 1984).

TABLE 5.1. Comparison of TUGCO's Proposed Maintenance Plan: Items That Should Be Incorporated into TUGCO's Plan

<u>Component</u>	<u>NRC Guidance (April 25)</u>	<u>TUGCO Proposal (August 1)</u>	<u>PNL Recommendations</u>
Foundation & Foundation Bolting		Check for bolt preload NOTE: Sole plate and grout to be inspected at this time (every refueling outage)	Concur with TUGCO
Engine Block and Base	Visually inspect after 24 hours operation or monthly	(not listed by TUGCO, but committed to OG plan)	Visually inspect daily during operation; with intensely lighted inspection monthly, while operating. Eddy current tests as specified by OG. Inspection of the camshaft support in the galleries at times of maintenance.
Crankshaft	Hot and cold every 6 months; hot within 15 minutes of shutdown	Hot and cold deflection measurement (every refueling outage)	Once each refueling cycle; hot to start in 15 minutes, complete within 30 minutes
Main Bearing Shells		Visual exam and dimensional verification of thickness. NOTE: The procedure for this inspection includes cleanliness and bolt preload requirements (every 2nd refueling outage)	Sampling and inspection procedure to be developed from Owners Group and/or two highly loaded bearings at every 2nd refueling outage.
Connecting Rods	Visually inspect and retorque after 24 starts, 50 hours of operation, or 6 months, whichever is first	(Not listed by TUGCO)	Visual surface inspection of external surface and bolt preload check each 200 hours or 9 months, whichever is first

TABLE 5.1. (contd)

Component	NRC Guidance (April 25)	TUGCO Proposal (August 1)	PNL Recommendations
Connecting Rod Bearing Shells		Measure bearing clearance, bump method. NOTE: Inside of engine will be examined for abnormal conditions during this time (every refueling outage)	Pull 2 sets of pistons-examine conrod bearings (at first refueling outage) Measure bearing clearance (every refueling outage)
Pistons		(not listed by TUGCO)	Pull 2 sets of pistons for examination; all others visual bottom side exam (boroscope) (first refueling outage)
Cylinder Liner		Boroscope inspection (every refueling outage)	Visual (every refueling outage) Measure/record (every disassembly/overhaul)
Cylinder Heads	Air-roll 4 hours after engine runs and each day thereafter	(not listed by TUGCO)	Air-roll 4 to 8 hours after engine runs, and again after 24 hours and prior to planned starts. Inspect four heads at first refueling.
Cylinder Valve Springs and Hydraulic Lifters		Visual exam for proper operation and adjustment (every refueling outage)	Concur with TUGCO
Rocker Arms, Push Rods, Tappets, Cams, Camshaft	Visually check after pre-operational testing and after each 24 hours of operation	Visually check at each refueling outage	Visually check (at each refueling outage)

5.4

TABLE 5.1. (contd)

<u>Component</u>	<u>NRC Guidance (April 25)</u>	<u>TUGCO Proposal (August 1)</u>	<u>PNL Recommendations</u>
Gear Train		1) Visual check of lube oil spray jets and visual exam of gears (every refueling outage) 2) dimensional verification of backlash and thrust (every 2nd refueling outage)	Visual (every outage) Backlash and thrust (every 2nd refueling outage)
Turbocharger		1) Teardown, check rotor float and stationary nozzle ring bolts (after 40 auto starts or 100 starts or first refueling outage, whichever comes first) 2) Teardown, includes visual exam of all major components verification of bearing running clearances, blue check of thrust bearing and replacement of nozzle ring bolts (every 3rd refueling outage)	Concur with TUGCO
Air Start Valves		Teardown, with visual examination; verify valve seat contacting; refurbish as required. Each refueling cycle	Concur with TUGCO
Air Start Distribution Filter		Inspect; clean. Replace as required each month.	Concur with TUGCO

TABLE 5.1. (contd)

Component	NRC Guidance (April 25)	TUGCO Proposal (August 1)	PNL Recommendations
Studs and Fixtures	Spot check 25% monthly for torque	Air start valve capscrews 100%, re-torque after a minimum of 8 hours of running whenever bolts are disturbed	Check 100% of air starts valve capscrews and 25% of all other items at each refueling outage
Jacket Water Pump			Train A and B - disassemble/ examine for shaft galling, worn wear rings, warped backing plate (first refueling outage)
Lube Oil Duplex Filter		Drain sludge or water each 3 months. Inspect, clean; replace as required at pressure drop of 20 psig, or each refueling cycle, whichever is first	Concur with TUGCO
Lube Oil Check	Check for water following pre-operational tests, then weekly or after 24 hours of operation whichever is first. Check monthly for contaminants and water in sump; check filters	Sample. This sample is taken during the monthly surveillance test at the inlet to the lube oil filter. NOTE: Sample sent off-site for full spectro-chemical analysis (monthly)	Check for water following pre-operational tests, then monthly or after 24 hours of operation, whichever is first. Check for chemical and particulate contamination on same schedule. The sample should be collected while the engine is running. Check filter pressure drop hourly during operation

9.5

The maintenance items noted in Table 5.2 are considered to be good practice. PNL feels they should be carefully considered by TUGCO in establishing its maintenance plan; however, PNL is not recommending that NRC require TUGCO to incorporate them into its maintenance program. These items are:

- fuel injection pump
- fuel injection nozzle
- fuel pump and governor linkage
- governor
- air start valve admission valve strainer
- intake air filter
- fuel oil drip tank
- fuel oil filter; fuel oil duplex strainer (02-455B)
- fuel oil duplex strainer (02-825E)
- lube oil sump tank
- lube oil heat exchanger
- lube oil keep warm filter
- lube oil strainer
- jacket water system
- jacket water heat exchanger
- engine performance.

Since issuing their Comprehensive Report (George August 15, 1984), TUGCO has informed NRC and PNL that a comprehensive M/S plan will be published shortly by the Owners' Group. TUGCO will adopt it, as appropriate, in lieu of their current proposal. PNL believes that this should be reviewed with the idea, as a minimum, of incorporating the PNL recommendations outlined in Tables 5.1 and 5.2 if they are not included in the OG plan.

The following sections provide PNL recommendations and the supporting discussion relative to the M/S plans presented in Table 5.1 *where PNL recommendations differ from TUGCO plans.*

5.1.2.1 Engine Block and Base

TUGCO provides no maintenance plan for the engine block and base.

A vee engine has three primary structural components: the base, the crankcase, and the cylinder block. The history of problems in the population of TDI engines as reported by the Owners' Group, and relevant analyses by TDI and the Owners' Group, lead PNL to conclude that there is no significant likelihood of failures to occur in the base and crankcase in external locations where they are visibly discernible. However, there has been a substantial history of cracks on the top of the cylinder block, some of which are visibly

TABLE 5.2. Comparison of TUGCO's Proposed Maintenance Plan: Items to be Considered in Establishing TUGCO's Plan

<u>Component</u>	<u>NRC Guidance (April 25)</u>	<u>TUGCO Proposal (August 1)</u>	<u>PNL Recommendations</u>
Fuel Injection Pump		Teardown, includes visual exam, verification of dimensions and refurbishment as required (every 2nd refueling outage)	Verify calibration/operation (every 3rd refueling outage)
Fuel Injection Nozzles		Teardown, includes visual exam of contact surfaces, setpoint verification and refurbishment as required	Check popping pressure and spray pattern characteristics (every refueling outage)
Fuel Pump and Governor Linkage		Inspect and lubricate (yearly)	Inspect and lubricate (monthly)
Governor		Change oil (every refueling outage)	Concur with TUGCO
Air Start Admission Valve Strainer		Inspect; clean as required each 3 months	Concur with TUGCO
Intake Air Filter		Inspect, clean; replace as required; each 6 months	Concur with TUGCO
Fuel Oil Drip Tank		Drain and clean; each refueling outage	Check monthly; drain and clean as required
Fuel Oil Filter; Fuel Oil Duplex Strainer (02-455B)		Inspect, clean. Replace as required. At pressure drop of 20 psig or each refueling, whichever comes first	Concur with TUGCO

5.8

TABLE 5.2. (contd)

<u>Component</u>	<u>NRC Guidance (April 25)</u>	<u>TUGCO Proposal (August 1)</u>	<u>PNL Recommendations</u>
Fuel Oil Duplex Strainer (02-825E)		Inspect, clean as required (each refueling cycle)	Concur with TUGCO
Fuel Oil Transfer Pump Strainer		Inspect, clean as required. At pressure drop of 7 psig or each refueling cycle, whichever comes first	Concur with TUGCO
Lube Oil Sump Tank		Clean and inspect each refueling cycle	Concur with TUGCO
Lube Oil Heat Exchanger		Inspect, clean as required. Every 2nd refueling cycle	Concur with TUGCO
Lube Oil Keep Warm Filter		Inspect, clean or replace as required. At pressure drop of 20 psig or each refueling outage, whichever is first	Concur with TUGCO
Lube Oil Strainer		Drain sludge or water each 3 months. Inspect, clean; replace as required at pressure drop of 20 psig, or each refueling cycle, whichever is first	Concur with TUGCO

5.9

TABLE 5.2. (contd)

<u>Component</u>	<u>NRC Guidance (April 25)</u>	<u>TUGCO Proposal (August 1)</u>	<u>PNL Recommendations</u>
Jacket Water System		Check pH, conductivity and corrosion inhibitor each month	Concur with TUGCO
Jacket Water Heat Exchanger		Inspect, clean as required each 2nd refueling	Concur with TUGCO
Engine Performance		Cold compression check; maximum firing pressure check. Each refueling.	Concur with TUGCO

discernible and/or detectable by NDE methods without head removal. The Owners' Group generic issue report (FaAA-84-15-12) calls for careful surveillance of this surface on certain engines, but at unspecified intervals.

TUGCO did not address the routine inspection/maintenance of the engine block and base.

In light of the history of block cracks at CPSES, the FaAA analysis, and the unresolved status of indications at 4R and 5R (Train A) and 1R and 4R (Train B), PNL agrees with TUGCO that there remains legitimate reason to maintain enhanced surveillance of the blocks, at least through the first opportunity for heads-off reinspection and until a more definitive resolution of the problem is established by the Owners' Group and TUGCO. Furthermore, because of the problems encountered in the inline engines, PNL feels it would be prudent to inspect the cylinder block camshaft gallery in the vicinity of the camshaft support at each maintenance interval.

PNL Recommendation

In addition to the inspections recommended by the OG and committed to by TUGCO, PNL recommends routine daily visual inspection of the block and box external surfaces during operating periods, with a more thorough inspection under strong lighting at least monthly. These should be conducted while the engine is operating.

PNL also recommends that, at the first refueling outage, the respective indications noted in Trains A and B should be reinspected for propagation, and that OG recommendations for heads-on eddy-current testing (or approved substitute) be followed (to which TUGCO has committed).

5.1.2.2 Crankshaft Deflection Checks

TUGCO proposes hot and cold crankshaft deflection checks each refueling outage, but does not commit to a time after engine shutdown to initiate and complete these checks.

Two purposes are accomplished in crankshaft deflection checks:

- detection of gradual shifts in shaft support internal to the engine (most likely being significant bearing deterioration)

- detection of changes in external engine support, as in the concrete foundation, or a shift of shims between the foundation rails and the engine base plate. (The foundation will change shape with prolonged engine operation, tending to hump toward the middle due to thermal growth, which must be corrected by appropriately shimming the engine. It may also undergo long-term permanent change as chemical processes continue within the concrete.)

PNL Recommendations

PNL recommends that TUGCO take hot and cold deflection readings at every refueling outage. The hot deflection checks should be taken immediately after the 24-hour preoperational testing, so as to reflect representative operational foundation temperatures. The hot checks should be initiated within 15 to 20 minutes after shutdown, and completed as rapidly as possible, preferably within 1/2 hour, starting with the last throw of the engine (generator end). Such a schedule, although strenuous, is deemed achievable.

5.1.2.3 Main Bearing Shells

TUGCO proposes to inspect all shells at every second refueling outage. PNL recommends a sampling inspection following disassembly/overhaul.

In general, the main bearing shells on the CPSES engines have not been a problem area. Four bearing halves were replaced due to linear and galling indications; the remainder were deemed acceptable for use. TUGCO proposed a visual exam and dimensional verification of all bearing thicknesses every second outage. This is not consistent with the amount of disassembly being proposed on other components of the engine that have to be removed for access to the main bearings.

PNL therefore feels that, although the TUGCO proposed maintenance is acceptable, this frequency and magnitude of inspection may engender unwarranted engine unavailability. PNL feels the maintenance plan should be developed as a function of experience in this application. Factors taken into account should recognize the greater than normal function of wear due to minimal lubrication that occurs during the starting and stopping cycles of the engine.

PNL Recommendations

A sampling and inspection program should be developed from the Owners' Group information. For the interim, two highly-loaded bearings (identified in FaAA reports as Bearings 5 and 6) should be inspected at each second refueling outage. Associated caps and saddles should be checked also.

5.1.2.4 Connecting Rods

TUGCO provides no maintenance plan for the connecting rods. PNL recommends visual inspection of connecting rod boxes and checks of bolt preload every 200 hours of operation or 9 months, whichever is first.

In light of the history in the TDI engine population (however limited) of connecting rod link-rod box cracking, bolting problems (viz., some galling, some preload relaxation, some failures), and fretting along contact areas of the serrated teeth, some regular visual inspection and bolt retorquing (or equivalent checking) is deemed warranted. The relevant Owners' Group generic issue report (FaAA-84-3-14) recommends that the interval on bolt retorquing not exceed 200 hours of operation at full load (i.e., manufacturer's rated load), 248 hours at 85% load, or 285 hours at 75% load. In making that recommendation, FaAA provided no differentiation between connecting rods having 1-1/2-inch bolts and those with 1-7/8-inch bolts. Although the history of 1-1/2-inch bolting is reportedly better, it apparently is not totally devoid of problems (either experientially or analytically). Thus, even by the Owners' Group's own analysis, the establishment of an enhanced surveillance plan is deemed prudent.

TUGCO does not propose any surveillance for the connecting rods or bolting systems. Recognizing that TUGCO reassembled the connecting rods before verification of tooth contact could be made, it is recommended that a definite surveillance plan (e.g., external inspection and checking bolt torque) should be in effect.

PNL Recommendation

PNL recommends visual inspection of all rod box external surface areas and bolt preload check each 200 hours of operation after post-inspection reassembly or 9 months, whichever occurs first.

As compared to NRC's original proposal and the Owners' Group recommendations, this approach should conservatively address the load levels for LOOP and LOCA events for CPSES's units, as well as all preoperational testing following engine reassembly, and the possible impacts of low-cycle fatigue associated with a multitude of starts. At the same time, this revised pattern will reduce the cumulative downtime required, thereby enhancing engine availability.

5.1.2.5 Connecting Rod Bearing Shells

TUGCO proposes to measure bearing clearance at every refueling outage. PNL recommends a sampling inspection of bearings themselves, as well as bearing clearance, at each refueling outage.

The Owners' Group Phase I design review report (FaAA-84-3-1) concluded that the bearings were adequate at site loads for up to 38,000 hours, or ten times the lifetime expected usage. TUGCO, in turn, has based its inspection criteria on these findings. PNL is not in complete agreement with this philosophy due to the duty cycle of the engines and the high number of starts they will experience.

Each engine start effectively influences the rate of wear (increased) between 10 to 100 times the normal rate of wear on the bearings. In addition, putting the engines on high loads soon after starting also increases bearing wear rate more than does a more relaxed load application. Thus, the bearing wear may easily exceed the predicted rate. TUGCO's approach, therefore, requires modification to allow for visual inspection of bearing sets that may be suffering from galling, wiping, cavitation or load-induced damage. This can be a sensitive area with aluminum bearings.

PNL Recommendations

PNL recommends inspecting these bearings (two sets of pistons) by visual and radiography methods at the first refueling outage; obtaining product oil contamination analyses; and monitoring bearing clearance at every refueling outage.

5.1.2.6 Pistons

TUGCO provides no maintenance plan for the piston skirts. PNL recommends a sampling inspection at the first refueling outage.

The family of piston skirts (AN, AH, AF, AE) in the R-4 series of engines has experienced various types of failures. The Owners' Group discovered this history when the structural integrity of the AF and AE piston skirts was investigated by Failure Analysis Associates (FaAA-84-2-14). TUGCO's EDG units were originally furnished with type AH piston skirts, which have subsequently been replaced with AE skirts. Several of the new retrofitted and installed AE pistons required relief grinding due to crack/linear indications. The AE piston experience is limited to one location in Alaska, which has not been subjected to a full inspection with documented results.

TUGCO did not address maintenance level or interval.

PNL Recommendations

PNL recommends that two sets of pistons (four pistons) be disassembled at the first refueling outage and inspected for crack indications per procedures recommended by the Owners' Group.

5.1.2.7 Cylinder Liners

TUGCO proposes boroscope inspection at every refueling outage. PNL concurs and recommends dimensional check for wear at every disassembly.

Cylinder liners now installed in CPSES Unit 1 were machined and honed prior to installation of the type AE piston skirts. In addition, dimensional verification was satisfactory. Pending the Phase II report by Failure Analysis Associates on the liners, they are considered acceptable.

However, TUGCO did not indicate any measurement of wear on the liners. Because liner wear provides an important indication of engine operability and reliability, it should be monitored whenever possible.

PNL Recommendations

All liners should be visually inspected at each refueling outage, to check for any scuffing or metal deposition. In addition, the liners should be measured for wear at every disassembly, and the dimensions recorded for trend analysis.

5.1.2.8 Cylinder Heads

TUGCO provides no maintenance plan for the cylinder heads. PNL recommends a schedule of engine air-rolls to detect water leakage.

Air-rolling the engine is done to detect water in the cylinder, which would indicate a cracked cylinder head (or liner), with water not drained to crankcase. Any substantial water accumulation in a cylinder could lead to severe damage to head, piston, crankshaft, and/or bearings on engine startup, and could seriously impact engine operability. TUGCO has not addressed this in their proposal.

PNL Recommendations

PNL recommends a schedule for air-rolling, as follows:

- an initial air-roll at least 4 hours (but not over 8 hours) after engine shutdown
- a second air-roll approximately 24 hours after shutdown
- thereafter, an air-roll immediately prior to any planned engine operation.

The basis for the change from the earlier NRC guidance, based on PNL recommendations (which called for air-rolling the engine every 24 hours), is the recognition that, if a leak of substantial, detectable proportions has not occurred within the first 24 hours of cooldown, it is unlikely that one will develop before the next engine operation. However, because it is still possible, although not likely, for a small leak to seep and accumulate (i.e., the water be retained by the piston rings), it remains prudent to check for the presence of water before any planned start.

The desirability of air-rolling the engine was further substantiated recently by the occurrence of just such a leak, detected by barring-over the engine, at Grand Gulf Nuclear Station.

PNL also recommends removal of four heads and visual and LP inspection of the firedeck at first refueling.

5.1.2.9 Rocker Arms, Push Rods, Cams, Camshaft

TUGCO proposes visual checks at each refueling outage. PNL concurs, differing slightly from NRC guidance.

Engine operability is affected by defects in push rods, cams, tappets, and other similar components and their supporting structures. Some of these components at CPSES have shown indications. Hence, regular visual inspection is needed, although few operating hours are anticipated. The difference between the NRC guidance (after 24 hours of operation) and the TUGCO proposal is not considered significant, in light of the low wear rate or limited likelihood of structural failure for these components, for two reasons: 1) all parts will have been inspected recently and 2) in the opinion of the PNL consultants, very little change in the condition of these parts is expected during the 50- to 200-hour operating time involved in the CPSES operation.

PNL Recommendations

PNL considers the TUGCO proposal acceptable.

5.1.2.10 Fuel Injection Pumps

TUGCO proposes refurbishment at every second refueling outage. PNL recommends in addition a calibration/operation check at each third refueling outage.

Fuel injection pumps on the CPSES Train A and B engines have not been a source of problems. TUGCO proposes to completely disassemble all pumps at every second refueling outage. Due to the precision and close-tolerance nature of the fuel injection pumps, they can easily be damaged during a disassembly, thus requiring replacement of parts when otherwise unnecessary. Fuel injection pumps can be checked for proper operation and calibration at any reliable diesel service center; faulty or questionable pumps can then be put aside for

disassembly. It is important to note that the same test should be performed on all pumps after reassembly, should they be disassembled.

PNL Recommendations

PNL does not otherwise object to pump inspection every second refueling cycle, but suggests TUGCO verify calibration and operation of all fuel injection pumps at every third refueling outage. Should other tests or operating surveillance (i.e., cylinder firing pressure or exhaust temperature) indicate a potential fuel pump problem, verification of the suspect pump should be performed at that indication.

5.1.2.11 Fuel Injection Nozzles

TUGCO proposes refurbishment as required. PNL recommends that "popping" pressure and spray pattern checks be performed at each refueling outage.

Fuel injection nozzles are similar to injection pumps, in that very close tolerances are encountered; thus, they are also susceptible to damage during maintenance inspection. Proper testing of the nozzles for leakage, "popping" pressure, and spray pattern would give a complete indication of the status of each nozzle. Then, only nozzles giving questionable results would need to be disassembled. The same tests should still be performed on all nozzles after reassembly, should they be disassembled.

PNL Recommendations

PNL recommends checking "popping" pressure and spray pattern of all fuel injection nozzles at every refueling outage. Should operating surveillance (i.e., cylinder exhaust temperature) indicate a potential fuel injection nozzle problem, the suspect nozzle should be tested and, as necessary, disassembled.

5.1.2.12 Fuel Pump and Governor Linkage

TUGCO proposes yearly inspection/lubrication. PNL recommends weekly inspection and monthly lubrication.

Rusted/pitted fuel pump and governor linkage can result in unstable engine load and speed response. Considering the potential for high humidity

TUGCO was not able to identify the cause of these damages but did replace all damaged parts. Based on the coincident damage experienced on the pumps on each engine, this event is being considered specific to the CPSES Unit 1 engines. The damage could have been sustained at the factory during testing and/or during startup due to incorrect system commissioning.

PNL Recommendations

Because of the critical nature of this pump and the history of the above problems, PNL recommends that the pumps be disassembled and inspected and repaired as necessary at the first refueling outage.

5.1.2.15 Lube Oil Checks

TUGCO proposes a monthly surveillance check at the inlet to the filter. PNL recommends more definitive checks for water and other contaminants after 24 hours' operation or monthly, whichever is first.

Lube oil checks serve two main functions:

- They reveal any water in the oil, indicative of cracks in water-bounded components or leakage past lower liner seals. Such water can lead to lubrication failures, with potential major damage.
- They reveal abnormal wear of bearings and related engine parts.

It is important to collect and analyze samples with sufficient frequency that adverse conditions are detected early enough to avoid either engine damage or engine outage (and possibly consequential reactor shutdown). PNL basically agrees with TUGCO's proposal with the following modification.

PNL Recommendations

PNL recommends the following pattern:

- Check for water contamination after preoperational testing, and then monthly or after 24 hours of operation, whichever comes first; collect the sample from the bottom of the sump tank, preferably about 4 hours after engine shutdown, at the time of the engine roll-over.
- Check for chemical and particulate contamination and imbalance near the close of preoperational testing, and then monthly or after

24 hours of operation, whichever comes first; collect the sample (before the filter) while the engine is running, immediately prior to shutdown.

- Check differential pressure across all filters and strainers hourly during engine operation.

5.2 OPERATIONAL SURVEILLANCE PLAN

5.2.1 Elements and Rationale

Operational surveillance is necessary to ensure safe and efficient operation of the diesel engine. By monitoring and recording various engine parameters, trends in degradation may be noted, thus allowing preventive maintenance. In addition, trend monitoring permits engine shutdown prior to major engine failure. A listing of recommended parameters and frequency of surveillance is presented in Table 5.3.

5.2.2 PNL Evaluation

NRC's guidance was for continuous monitoring and hourly recording of exhaust temperature, including the pre-turbine temperatures. TUGCO has proposed recording of exhaust temperatures on the half hour, without mention of pre-turbine temperatures.

PNL's consultants deem it very desirable to monitor the turbine inlet temperature for these reasons:

- Monitoring would avoid the possibility of such temperatures exceeding the limits set by the turbocharger manufacturer.
- It is possible for the "average" inlet pre-turbine temperature to exceed the "average" temperature measured at the individual cylinder outlet (the latter reflects a time-averaged combination of true exhaust temperature and a much lesser quantity of cooler "scavenging air" that occurs during valve overlap in the exhaust/intake strokes). This higher actual turbine inlet temperature results from three possible conditions: 1) The pulse of hot exhaust and the subsequent, lesser pulse of cool air may not mix, even though two

TABLE 5.3. Diesel Engine Operating Surveillance Parameters and Frequency

Component	NRC Guidance	TUGCO Proposal	PNL Recommendations			
Lube Oil Inlet Pressure to Engine	Monitor continuously, record hourly	Log every 30 minutes	Log every 60 minutes			
Turbocharger Oil Pressure	↓	↓	↓			
Pump						
Fuel Oil Filter/Strainer ΔP						
Lube Oil Filter/Strainer ΔP						
Jacket Water Pressure						
Crankcase Vacuum						
Engine Speed						
Stack Temperature (RB, LB)						
Lube Oil Temperature						
Jacket Water Temperature (In, Out)						
Lube Oil Sump Level						
Room Temperature						
Engine Cylinder Temperature (all)						
Kilowatt Load						
Engine Hourmeter						
Exhaust Temperature Inlet to Turbo (RB, LB)				Monitor continuously, record hourly	Not Proposed	
Fuel Oil Transfer Pump Strainer ΔP				---	Log every 30 minutes	Log every 60 minutes unless pump is auto/duplexed and alarmed
Starting Air Pressure (RB, LB)				---	Log every 30 minutes	Check hourly
Fuel Oil Day Tank Level	---	Log every 30 minutes	Check hourly			
Manifold Air Pressure (RB, LB)	Monitor continuously record hourly	Not Proposed	Log every 60 minutes			
Manifold Air Temperature (RB, LB)	---	Not Proposed	Log every 60 minutes			
Visual Inspection for Leaks, etc.		Not Proposed	Check hourly			

cylinders are involved with each manifold; 2) exothermic chemical reactions tend to continue after the cylinder exhausts, even with proper firing timing; and 3) any inappropriate timing of fuel injection can lead to continuing flame propagation during exhaust.

- Plots of pre-turbine temperatures for TDI DSRV-16 engines show that, at full load and overload (i.e., the TDI rating of 7000 and 7700 kW, respectively), the temperatures of even properly-timed engines can approach 1200°F (the reported upper limit allowed by the turbocharger manufacturer).
- Vanes have been found damaged and missing on the CPSES turbochargers; the same finding has been noted elsewhere on similar engines in nuclear service. Because the mechanism of the vanes' damage and disappearance has not been identified with certainty, it is important to avoid influences toward thermally induced failures.

PNL Recommendations

Table 5.3 lists those parameters that TUGCO plans to use to monitor engine performance. PNL and NRC recommend the continuous monitoring and/or hourly recording of turbocharger inlet exhaust temperatures, manifold air pressure, and manifold air temperature. The TUGCO program to log the various parameters at 30-minute intervals is acceptable but considered in excess of normal 1-hour intervals.

5.3 STANDBY SURVEILLANCE PLAN

5.3.1 Elements and Rationale

Standby surveillance is important to ensure the reliability of the diesel engines. The parameters monitored on a "secured" engine show that it is prepared for rapid startup and load acceptance. The two factors that contribute most to this are engine temperature and lubrication. Thus, by keeping the engine warm and all oil passages pressurized, the time lag associated with load acceptance is minimized. In addition, a ready supply of quality compressed air is required for starting the engine. Patterns of standby surveillance of the engine are shown in Table 5.4.

TABLE 5.4. Diesel Engine Standby Surveillance Parameters and Frequency

Component	NRC Guidance	TUGCO Proposal	PNL Recommendations
Starting Air Pressure	---	Every 4 hours	Visual check every 8 hours; log every 24 hours
Lube Oil Temperature (In, Out)	---	↓	↓
Jacket Water Temperature (In, Out)	---		
Lube Oil Sump Level	---		
Fuel Oil Day Tank Level	---		
Room Temperature	---		
Test Annunciators	---		Every 8 hours; log every 24 hours
Check Alarm Clear	---	Daily	Daily
Check Operation of Comp. Air Traps	---	↓	↓
Operation of Fuel Rack	---		
Governor Oil Level	---		
Inspect for Leaks	---		
Air Butterfly Valve and Cylinder	---	Weekly	Weekly
Check Internals of Block and Base for Leaks	---	Monthly	At each refueling outage
Keepwarm Oil Filter ΔP	Daily	---	Weekly
Test Jacket Water for pH, Conductivity, Corrosion Inhibitor	---	At each refueling outage	After adding make up water, or monthly
Cylinder Compression/Peak Pressure	---	At each refueling outage	At each refueling outage
Air Start Distributor Filter	---	Monthly	Monthly
Air Start Admission Valve Strainer	---	Every 3 months	Every 3 months

5.3.2 PNL Evaluation

NRC's guidelines for standby surveillance recommend a daily check of lube oil filter differential pressure. The TUGCO proposal covers several parameters to be monitored every 4 hours, but does not mention the lube oil filter. It is felt that the 4-hour monitoring cycle is more than necessary for a standby engine; the parameters may be checked visually every 8 hours and recorded daily. Two points regarding the lube oil filter are important:

- Entrained water will tend to plug some filter media (or weaken others), and so would gradually change pressure drops.
- The continuous keep-warm flow through the filters will (purposefully) continually "polish" the oil, with gradual buildup of contaminants in the media; the material scavenged out thereby itself helps filter even finer particles as time continues.

Thus, it remains valid to monitor oil filter pressure drops during standby. However, the difference between a daily check (per NRC guidance) and a weekly check is not deemed significant; the latter is considered acceptable.

PNL Recommendations

PNL recommends a weekly check of all oil filter pressure drops during standby. The hourly check during sustained engine operation remains important. Otherwise, the TUGCO proposal is acceptable, with certain additions and clarifications recommended above and shown on Table 5.4.

5.4 PNL CONCLUSIONS

PNL concludes that the TUGCO-proposed M/S activities require modification to provide adequate assurance of engine reliability/operability. The recommended modifications, with supporting rationale, are delineated in the preceding subsections (5.1, 5.2, 5.3). With those modifications, the TUGCO-proposed M/S program is considered acceptable through the first refueling cycle. As the Owners' Group Program Plan and related M/S activities become fully developed and accepted by NRC, it may be appropriate for TUGCO to modify their plan still further.

6.0 ENGINE TESTING

This section reviews and evaluates the engine testing program identified by TUGCO. Included are post-inspection tests prescribed by the information provided in an NRC letter (Youngblood August 2, 1984), and routine/periodic testing in accordance with NRC Regulatory Guide 1.108, Revision 1. This section also provides an evaluation of data concerning onsite starts of the CPSES Unit 1 engines prior to the disassembly and inspections.

6.1 TUGCO REPORTED POST-INSPECTION TESTING

TUGCO reports they have conducted engine break-in runs, calibration runs, and preoperational tests following reassembly of the Train A and Train B engines. The detailed preoperational tests were done in conformance with NRC Regulatory Guide 1.108, Revision 1, and as specified in the applicable sections of the NRC letter (Youngblood August 2, 1984). Detailed results of the post-inspection tests are not yet available; however, TUGCO did report certain failures/observations and actions taken to resolve them. These are listed in Table 6.1.

TABLE 6.1. Preoperational Test Results

<u>Reported Failures/Observations</u>	<u>Planned TUGCO Resolution</u>
Fuel injection pump failure on Train A led to manual engine shutdown.	Effort initiated to determine cause; initial findings are that top bolts were improperly torqued; all pumps were checked for proper torque.
The phase metering potential for the Train A engine was lost for about 1 minute.	Determined to be caused by failed solder joints on two of four screw-in type fuse holders; all such screw-in holders were replaced with new cartridge-type holders on both engines.
Pneumatic tubing associated with Train A engine protective trip function was found to have corrosion.	All pneumatic tubing on both Train A and B engines will be replaced with stainless steel tubing prior to fuel loading.

TUGCO also reports that, since engine assembly in Spring 1984, the Train A engine has undergone 45 starts and has accumulated 100 hours of operation (load not stated). The Train B engine has undergone 54 starts and 84 additional hours of operation (load not stated).

TUGCO reported that all testing on the diesel generators was done at or below 5.8 MW, except for approximately one-half hour of load rejection testing at 7 MW. TUGCO reports that testing below 5.98 MW provides assurance that the cylinder BMEP will be below 185 psig.

6.1.1 PNL Evaluation

PNL believes TUGCO's plans regarding post-inspection testing should include two elements:

1. The engine manufacturer's recommended post-reassembly tests.
2. The testing specified in NRC Regulatory Guide 1.108, Revision 1, as modified by NRC post-inspection testing requirements specified in Youngblood (August 5, 1984).

The modifications mentioned in Item 2 above include the following tests:

- Ten modified starts to 40% load. (A modified start is a start including turbocharger prelube and a 3- to 5-minute loading to the specified load and run for a minimum of 1 hour.)
- Two fast starts to a load greater than or equal to the maximum emergency loads the engine will experience but not greater than a load corresponding to 185 psig BMEP. (A fast start simulates an ESF signal with the engine in ready-standby status.)
- One 24-hour run at a load greater than or equal to the maximum emergency loads the engine will experience but not greater than a load corresponding to 185 psig BMEP.

TUGCO did not report on tests to the manufacturer's recommendations (Item 1 above). However, PNL assumes that appropriate engine manufacturer's required testing was accomplished and that the TUGCO post-reassembly test report will provide these results.

With respect to the reported failures or observations (corrosion) by TUGCO, PNL believes these are routine and that the reported actions are appropriate. PNL assumes that the fuel injection pumps for both engines (not just Train A) were checked for proper torque. This should be verified by TUGCO.

TUGCO did not report whether all post-assembly starts for both engines were successful. This will be confirmed by TUGCO in a detailed supplement to their earlier submittal (George August 15, 1984).

PNL has learned that half-hour load rejection tests requiring engine operation at 7 MW will not be repeated. These tests required cylinder pressures well in excess of the 185 psig BMEP currently evaluated as acceptable for these engines, pending completion of the Owners' Group Program. On this same topic, PNL finds that the TUGCO analysis showing that the 185-psig BMEP limitation corresponds to 5.98 kW did not consider the generator efficiency. Using an estimated efficiency of 0.96, PNL calculates that the 185-psig BMEP limit corresponds to 5.74 MW. Engine testing should be limited to this value.

6.1.2 PNL Conclusions

Based on its review, PNL concludes that TUGCO's post-inspection testing on the Train A and B engines is compatible with NRC requirements. In addition, PNL has learned that TUGCO has informed NRC that the manufacturer's recommended testing has also been performed.

PNL concludes that TUGCO has taken appropriate action regarding the reported failure and observations (corrosion) occurring during post-reassembly testing. PNL also concludes that the final disposition of these items should be supplied in the TUGCO submittal to NRC describing post-inspection test results. PNL concludes that no future testing above cylinder pressures of 185 psig BMEP (corresponding to a load limit of 5.74 MW) should be performed without prior NRC approval.

In summary, PNL concludes that post-inspection testing of both Unit 1 engines has been satisfactorily completed. This conclusion is conditional upon the receipt and satisfactory review of the TUGCO post-inspection report, confirmation regarding testing per TDI specifications, and limits on future test loads as stated above.

6.2 REVIEW AND EVALUATION OF ENGINE STARTS

PNL has reviewed the data sheets documenting the onsite starts of CPSES Unit 1 diesel engines that were run prior to engine disassembly and inspection. The Train A engine was started 67 times between September 29, 1982, and March 29, 1983. The Train B engine was started 83 times between September 16, 1982, and May 31, 1983.

During these tests the Train A engine experienced eight abnormal engine shutdowns. Two of these shutdowns were attributed to operator error, two were attributed to errors in the procedures, two were a result of miscalibration of the high vibration trip, and two were caused by a field ground relay trip (the field ground relay trip would be overridden in an emergency).

The Train B engine experienced nine abnormal shutdowns during these tests. Two that TUGCO has classified as "unsatisfactory engine response" include 1) a low oil pressure trip caused by an incorrectly installed foot valve in the auxiliary lube oil pump and 2) a short in the DC power supply caused by a blown-out indicator light. Of the remaining seven, two were a result of an incorrectly calibrated high vibration trip, and five shutdowns were attributed to operator error.

These data fully corroborate Section 3.1 of TUGCO's August 15, 1984, submittal, which identifies only two instances of unsatisfactory engine response. In both instances, PNL feels the cause of the unsatisfactory performance has been identified and appropriate corrective action has been taken.

7.0 OVERALL CONCLUSIONS

7.1 GENERAL CONCLUSION

In general, PNL and its consultants conclude that the two TDI DSRV-16-4 diesel engines at the Comanche Peak Steam Electric Station Unit 1 will have the needed operability and reliability to fulfill their intended emergency power function, at least to the time of the first reactor refueling outage.

This conclusion is predicated upon the known results of the completed extended operational tests and subsequent inspections. It also reflects PNL's current knowledge and evaluation of the ongoing Owners' Group investigation on specific, generic component issues. It is also contingent upon satisfactory completion and documentation of all actions recommended in this TER and identified in the August 15, 1984, submittal from TUGCO to NRC. These actions are summarized in Section 7.3. The PNL conclusions pertaining to the operability of the Train A and B engines are contingent upon TUGCO's timely implementation of all OG recommendations and plant-specific items that may result from the CPSES-specific DR/QR investigations.

7.2 LONG-TERM APPLICABILITY

In Section 1.2 of this TER, PNL expressed its opinion and rationale that it cannot responsibly reach conclusions on the operability and reliability of the Comanche Peak Train A and Train B standby engines beyond the first refueling outage. Hence, throughout this report, PNL has expressed its conclusions in such terms as "until the first reactor refueling outage." This constraint has been predicated upon all evidence available to PNL, including preliminary elements of the OGPP and the TUGCO evaluations as applicable to these specific engines. When these analyses are completed and appropriately implemented, and when operational results on these engines (under enhanced surveillance and maintenance) and on others in the general population of equivalent TDI engines are accumulated, it may then be possible to draw unconstrained, long-term conclusions.

It is not PNL's intent, however, in expressing this constraint to imply any inherent unreliability or inoperability of these engines, either specifically at CPSES or in general nuclear standby service.

7.3 LICENSING CONSIDERATIONS

The conclusion stated in Section 7.1 reflects PNL's careful evaluation of all TUGCO and Owners' Group submittals. Specific considerations have been addressed in Sections 3.0 through 6.0 of this TER and reference should be made thereto for PNL's component-specific conclusions and recommendations. PNL assumes that TUGCO will agree to modifications or additions to their August 15 submittal that appear in these sections.

Certain considerations warrant emphasis. They relate to TUGCO commitments and to recommendations made by PNL. The conclusion by PNL regarding the Train A and Train B operability and reliability to serve as nuclear standby emergency power supplies throughout the first refueling cycle is predicated on an understanding that a technical review of all TUGCO submittals concerning open items described below will not raise unanticipated problems. The open items are presented in four categories: 1) general; 2) open items specifically identified by TUGCO in Section 10.0 of the August 15, 1984, submittal; 3) open items mentioned by TUGCO in the August 15, 1984, submittal but not addressed in Section 10.0 of that submittal; and 4) concerns raised by PNL to be addressed by TUGCO prior to PNL concluding that the engines are ready for nuclear service.

7.3.1 General Considerations

The following items relate to TUGCO's conformance with the ongoing Owners' Group Program and certain significant NRC and PNL requirements and recommendations. They are:

- PNL understands that TUGCO will implement all relevant Owners' Group recommendations in a timely manner.

- Should any remaining inspections, further testing, DR/QR findings at CPSES, or functional occurrences at other plants reveal adverse conditions or results not currently expected, modifications of the PNL conclusions may be warranted.
- PNL assumes that TUGCO will resubmit to NRC a revised surveillance and maintenance plan incorporating changes and additions such as those identified in Section 5.0 of this report.
- PNL understands that engine testing and emergency service requirements TUGCO now foresees for the CPSES will not exceed the engine load corresponding to a BMEP of 185 psig (5740 kW).

7.3.2 TUGCO Open Items Identified and Addressed

The items identified below are listed in George (August 15, 1984, Section 10.0) as Open Items for CPSES Unit 1. TUGCO has agreed to close out and document these items prior to fuel loading.

7.3.2.1 Crankshaft Open Items

- crankshaft main journal oil hole inspection for both CPSES Unit 1 engines
- crankshaft torsiongraph test for one engine
- evaluation by the Owners' Group of the TDI recommendation for running of crankshafts for 15 minutes at 150 rpm following each major overhaul, in light of the Owners' Group recommendation to run at 450 rpm at all times.

7.3.2.2 Cylinder Block Open Items

- TUGCO review of an additional Phase I supplementary report by the Owners' Group on cylinder block strain gauge testing on the Train A engine at CPSES Unit 1
- TUGCO review of an additional Phase I supplementary report by the Owners' Group on cylinder block metallurgical testing at all sites
- establishment of CPSES Unit 1 cylinder block top eddy-current inspection intervals based on the above.

7.3.2.3 Fuel Oil Injection Tubing Open Items

- Installation of shrouded SAE-1010 high pressure fuel oil injection tubing for both CPSES Unit 1 engines
- eddy-current inspection of newly installed tubing for flaws
- visual inspection of newly installed tubing for leaks during engine operation
- modification of tubing affected by the 10 CFR Part 21 report of September 21, 1983.

7.3.2.4 Connecting Rod Open Items

- TUGCO review of an additional Phase I supplementary report by the Owners' Group on connecting rod strain gauge testing at another site
- evaluation of CPSES Unit 1 connecting rod inspection requirements based on the above.

7.3.2.5 Turbocharger Open Items

- Modification of the CPSES Unit 1 turbocharger lube oil drip systems to the recommendations specified by TDI following the 10 CFR Part 21 report by the Owners' Group on design review of turbocharger vanes and capscrews.

7.3.2.6 Additional Open Items

- Replacement of 16 remaining original exhaust manifold bolts on Train B with new TDI socket head types
- replacement of pneumatic tubing for engine protective functions with stainless steel tubing
- TUGCO review of the CPSES Unit 1 Phase 2 report by the Owners' Group
- re-evaluation by the Owners' Group of the recommendation for destructive testing of push rods on a sample basis
- detailed evaluation of CPSES Unit 1 diesel generator preoperational testing

- cylinder block (Section 3.2.2), both Trains A and B - completion of acceptable OG analyses and reports on indications that are formally under OG review, and submission of details on an acceptable plan of monitoring and evaluation based on these results
- crankshaft (Section 3.2.3), both Trains A and B - submission of evaluation of hot and cold shaft deflection tests
- connecting rods (Section 3.2.4 and Section 5.1.2.4), both Trains A and B - submission of a satisfactory plan for enhanced monitoring and inspection of cross-joint bolting and/or rod box surfaces and/or rack teeth
- connecting rods (Section 3.2.4), both Trains A and B - submission of a letter to NRC confirming information provided by telephone regarding removal of burrs and sharp edges on bolt holes, TDI factory "blueing in" of rod racks, and final preparation of rod rack surfaces
- cylinder liners (Section 3.2.7), both Trains A and B - confirmation of satisfactory material per analyses being conducted by FaAA
- starting air distributor (Section 4.2.2.2), Train B - completion of a satisfactory inspection
- surveillance and maintenance program (Section 5.0) - submission of a revised program with appropriate modifications to accommodate PNL comments.

