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ENERGY**

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United States Nuclear Regulatory Commission
Washington, DC 20555

Subject: Comments on Draft Regulatory Guide DG-1021, "Selection, Design, Qualification, Testing and Reliability of Emergency Diesel Generator Units Used as Class 1E Onsite Electrical Power Systems and Nuclear Power Plants"

Gentlemen:

Toledo Edison (TE), a subsidiary of Centerior Energy, is partial owner of and is responsible for operation of the Davis-Besse Nuclear Power Station. Toledo Edison has been authorized for power operation of the Davis-Besse Nuclear Power Station since April 1977. As a 10 CFR 50 licensee, Toledo Edison has a vested interest in any policies the U.S. NRC may adopt which can affect the management and operation of a commercial nuclear power plant.

Toledo Edison has reviewed the comments drafted on behalf of the nuclear power industry by the Nuclear Management and Resources Council (NUMARC) and endorses NUMARC's comments. In addition, Toledo Edison provides the following comments:

1. Section 2.2 contains a listing of various EDG and Safety Features Actuation System (SFAS) tests that should be performed. These tests include the Full Load Rejection Test, the 24 hour Endurance Run, the Hot Restart Test, the Test Mode Changeover Test and the Redundant Unit Test. These tests are presently not conducted at Davis-Besse and would require additional procedures and outage time to perform with no apparent benefit. Toledo Edison recommends these tests be performed only following major corrective maintenance or modification of the EDGs and not periodically.

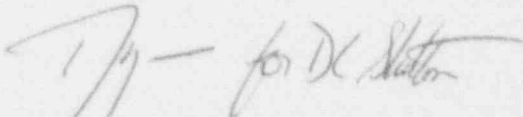
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2. The last paragraph of Section 3.2 discusses a desired EDG planned unavailability goal of 0.7 percent which includes outage times during refueling outages. This number is unrealistic since it conflicts with the stated goal of improved reliability. Toledo Edison estimates an unavailability of 1.8 percent is needed to conduct the present EDG preventive maintenance program. Minimizing EDG unavailability time to 0.7 percent would require a considerable reduction in the actual amount of preventive maintenance performed on the EDGs, especially during the refueling overhauls. This, in turn, would subject the engines to a higher probability of failure during the operating cycle, reducing the overall reliability of the engines. Therefore, a goal similar to the Institute of Nuclear Power Operations (INPO) goal of 2.5 percent is more realistic.
3. Section 3.3 of the Regulatory Guide, entitled "Recovery From a Double Trigger", would require testing the EDGs on an accelerated frequency to clear the double trigger exceedance. This conflicts with data collected which indicates that accelerated testing actually reduces EDG reliability. Based on the interval between failures, this section has the potential to require weekly testing of the EDGs for over a year. Toledo Edison recommends the actions described in Appendix D of NUMARC 87-00, "Guidelines and Technical Bases for NUMARC Initiatives Addressing Station Blackout at Light Water Reactors" be specified in the Regulatory Guide.

Should you have any questions or require additional information, please contact Mr. Robert W. Schrauder, Manager - Nuclear Licensing at (419) 249-2366.

Very truly yours,



NKP/djc

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