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**BOSTON EDISON**

Pilgrim Nuclear Power Station  
Rocky Hill Road  
Plymouth, Massachusetts 02360

Warren Minkus  
57FR14593

USNRC

OFFICE OF ADMINISTRATION

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**Roy A. Anderson**  
Senior Vice President - Nuclear

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Boston Edison Company Comments on  
Proposed Revision #3 to Regulatory Guide 1.9

Reference to Draft Regulatory Guide, DG-1021, "Selection, Design, Qualification, Testing, and Reliability of Emergency Diesel Generator Units Used as Class 1E Onsite Electric Power Systems at Nuclear Power Plants"

The Boston Edison Company offers the following comments regarding proposed draft Revision #3 to Regulatory Guide (R.G.) 1.9 (Reference).

The draft is intended to provide guidance on Emergency Diesel Generator (EDG) reliability programs and degradation of EDG performance supporting proposed revisions to the existing Station Blackout Rule that are yet to be promulgated. Licensees have implemented EDG reliability programs using the guidance of NUMARC 8700, "Guidelines and Technical Bases for NUMARC Initiatives Addressing Station Blackout at Light Water Reactors". The NRC has endorsed the guidance of NUMARC 8700 as an acceptable methodology in safety evaluation reports governing Station Blackout Rule implementation. The proposed revision to R.G. 1.9 mostly includes the guidance from NUMARC 8700.

Boston Edison Company does not support the proposed revision, as the incorporation of detailed guidance from NUMARC 8700 into R.G. 1.9 does not add benefit or present substantive additional guidance for licensees.

*R. A. Anderson*  
R. A. Anderson for

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