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PROPOSED RULE PR 50  
(57 FR 14514)

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July 9, 1992

PG&E Letter No. DCL-92-157

Mr. Samuel J. Chilk  
Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
ATTN: Docketing and Service Branch  
Washington, D.C. 20555



Re: Docket No. 50-275, OL-DPR-80  
Docket No. 50-323, OL-DPR-82  
Diablo Canyon Units 1 and 2  
Comments on the Proposed Amendment to 10 CFR 50.63, "Loss of All  
Alternating Current Power"

Dear Mr. Chilk:

In response to your request for comments on a proposed amendment to 10 CFR 50.63, "Loss of All Alternating Current Power," noticed in the Federal Register on April 21, 1992 (57 FR 14514), Pacific Gas and Electric Company provides the enclosed comments.

PG&E endorses the comments submitted by the Nuclear Management and Resources Council (NUMARC) to the NRC on July 2, 1992, on the proposed amendment to 10 CFR 50.63 and draft Regulatory Guide DG-1021, as they apply generically to the nuclear industry. Enclosed are additional comments that are more site-specific to the Diablo Canyon Power Plant.

Diablo Canyon's Technical Specifications currently contain a requirement to maintain emergency diesel generator (EDG) reliability goals and reporting requirements for not satisfying the requirement. Also, PG&E has reiterated the commitment to maintain the required EDG reliability requirements in a recent submittal to the NRC on the Station Blackout rule. Therefore, we, like NUMARC, see no need or basis for this proposed regulation.

Alternatively, we recommend the regulation be revised to include the equivalent results-oriented approach of the Maintenance Rule (10 CFR 50.65). Applying this approach would allow decreased frequency of load testing, when so justified by exceeding reliability goals, thereby increasing the overall availability of the EDGs.

Sincerely,

Gregory M. Rueger

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cc: Ann P. Hodgdon  
John B. Martin  
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Enclosure

5809S/85K/ALN/1572

ENCLOSURE

COMMENTS ON THE PROPOSED AMENDMENT TO 10 CFR 50.63  
LOSS OF ALL ALTERNATING CURRENT POWER

The following comments are provided on the proposed amendment to 10 CFR 50.63 imposing new requirements related to emergency diesel generator testing and monitoring against performance-based criteria.

**NRC Statement**

"The proposed amendments would require licensees to test and monitor emergency diesel generators (EDG) against criteria that indicate possible degradation from the EDG target levels selected for determining the specified station blackout duration." (57 FR 14514, Summary)

**PG&E Comment**

Since the COPING period determined by 10 CFR 50.63 was predicated upon the selection/commitment to an EDG reliability (0.950 at Diablo Canyon), it is our understanding that the requirement to test and monitor the EDG to said reliability was already required within 10 CFR 50.63.

Also, the Diablo Canyon Technical Specifications require testing and monitoring the EDGs against such criteria.

**NRC Statement**

"However, the SBO rule did not require licensees to monitor and maintain these reliability values." (57 FR 14514, Need for Amendment)

**PG&E Comment**

We disagree that the Station Blackout (SBO) Rule did not invoke the requirement for monitoring and maintaining the reliability value determined within the SBO Rule. Furthermore, in PG&E Letter DCL-92-084 (Revised Response to Station Blackout), dated April 13, 1992, to the NRC, PG&E has clearly committed to monitoring and maintaining the EDGs to the reliability value of 0.950. The NRC subsequently approved our April 13 submittal on May 29, 1992.

**PG&E Comment on Monitoring of EDG Performance**

For plants such as Diablo Canyon where there are more than two EDGs within a unit, the extension of the three failures to "all EDGs assigned to a nuclear unit" is unjustified and too restrictive.

In a unit with two EDGs, three failures in the last 20 demands of either EDG is justified, in that one EDG has had at least 2 failures in 20 demands.

Therefore, this failure rate would be in violation of a reliability of 0.950 (i.e., equivalent to 1 failure in 20 demands). However, at Diablo Canyon where functionally there are three EDGs for each unit, three failures occurring, one by each EDG, is 1 failure in 20 demands on each EDG; thereby, the reliability requirement of 0.950 for station blackout would still be maintained.

It is recommended that the statement "for all EDGs assigned to a nuclear unit" be deleted from this regulation. Specifically, the following should be deleted from the proposed change to § 50.63(a)(3)(i): "... or at any nuclear unit (i.e. combining the performance data for all emergency diesel generators assigned to a given nuclear unit rather than based on each individual emergency diesel generator)."

#### **PG&E Comment on Frequency of Testing**

It is noted that the pending Maintenance Rule focuses on performance-based regulation (PBR). One concept of PBR is that of potentially reducing maintenance, if the reliability goals are being met to increase the overall availability of equipment.

In applying such a concept here, it would be appropriate to decrease the frequency of EDG testing if the reliability goals are being exceeded. For example: with 1 or less failures in 40 tests, the frequency of testing should be decreased from monthly to quarterly.

In so doing, the PBR concept of reducing maintenance when reliability goals are met to increase overall availability of the component would be carried over to EDG testing. Note that one of the most significant challenges to potentially damaging an EDG is a loss-of-offsite-power event when an EDG is operating in parallel with the grid during monthly load testing. Recognizing that the ultimate goal of reliability is availability, by reducing the frequency of load testing the overall availability of the EDG can thereby be increased.

#### **PG&E Comment on Implementation**

Diablo Canyon Technical Specifications require that PG&E maintain the EDGs at 0.950 or greater reliability. If this reliability goes below 0.950, the frequency of testing must increase. In addition to writing a Special Report for any EDG failure, we must also expand this report if the number of failures exceeds 7 in the last 100. Considering these Technical Specifications, it further justifies that there is no real basis for the proposed regulation.

The proposed regulation invokes so-called TARGET reliability points. However, we already have such points clearly defined in our Technical Specifications. Although the proposed regulation TARGET points are less severe than those in the Technical Specifications, the proposed new requirements still have the appearance of unnecessary regulation. It is also unclear if these TARGET points are to be invoked within the Technical Specifications.