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JOSEPH W. GALLAGHER
VICE PRESIDENT
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February 26, 1988

Docket Nos. 50-277
50-278

Mr. W. R. Butler, Director
Project Directorate I-2
Division of Reactor Projects I/II
U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Subject: Diesel Generator Testing

References: (1) January 20, 1987 Application for Amendment of Facility Operating Licenses DPR-44 and DPR-56

(2) Letter, R. E. Martin, NRC, to E. G. Bauer, Jr., PECo, dated September 8, 1987

(3) Letter, J. W. Gallagher, PECo, to W. R. Butler, NRC, dated October 23, 1987

Dear Mr. Butler:

In Reference 1, Philadelphia Electric Company requested an Amendment to Technical Specification Section 1.0-Definitions. The proposed change requested deferral of a surveillance test of the emergency diesel generators, if they had been similarly tested for the other unit in accordance with the Specifications. The intent of the request was to prevent a plant shutdown for the exclusive purpose of testing the same diesel generators which had been tested for the other unit.

The NRC staff requested additional information concerning the impact of taking credit on one unit for an emergency diesel generator test performed on the other unit (Reference 2). In Reference 3, Philadelphia Electric committed to respond to the additional requests by February 28, 1988. Our responses are presented below.

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Question 1:

Assess the applicability of taking credit on one unit for a test performed on the other unit. Consider any equipment which is required by Technical Specifications to be tested, and which is dedicated to one unit, such as dedicated diesel generator follower instrumentation and equipment for each plant which controls the opening of circuit breakers to shed loads and the closing of circuit breakers to sequence on loads.

Response:

The Emergency Diesel Generator Simulated Auto Acceptance Test (ST 11.6-2 and 11.6-3) which is performed to satisfy Technical Specification Surveillance Requirement 4.9.A.1.b, was reviewed to verify that all dedicated diesel generator follower instrumentation and equipment for each plant are tested in other Surveillance Tests. This unit-specific equipment controls the opening of circuit breakers to shed loads and the closing of breakers to sequence on loads. With the exception of two relays in each loop of the core spray system logic, this unit-specific equipment is already tested in other surveillance tests which have equal or more frequent testing requirements than ST 11.6-2 and 11.6-3, and which are already required by Technical Specifications. The Core Spray Logic System Functional Tests (ST 1.4 and 1.5) which are performed every 6 months will be revised to include testing of the relays. This revision will be made by June 30, 1988.

Question 2:

Determine whether the time interval for testing this complete loop of dedicated emergency diesel generator equipment and instrumentation for each plant will meet the testing requirements of current Technical Specifications.

Response:

If the Emergency Diesel Generator Simulated Auto Acceptance Test is deferred for one unit, operability of the diesel generators will have been demonstrated by the test performed on the other unit, and operability of the follower instrumentation and equipment will have been demonstrated by the system surveillance tests (including the core spray relays when ST 1.4 and 1.5 have been revised). Even under the provisions of the proposed amendment, the complete loop of emergency diesel generator equipment and instrumentation

for each plant will meet the testing frequency requirements of the current Technical Specifications.

If you have any further questions regarding the proposed amendment or the responses provided herein, please do not hesitate to contact us.

Very truly yours,

Jay Gallagher

cc: Addressee
W. T. Russell, Adminstrator, Region I, USNRC
T. P. Johnson, USNRC Senior Resident Inspector