DEC 15 1983

MEMORANDUM FOR: Thomas M. Novak, Assistant Director
for Licensing, DL

FROM: L. S. Rubenstein, Assistant Director
for Core and Plant Systems, DSI

SUBJECT: REVIEW OF THE PROPOSED TECHNICAL SPECIFICATION CHANGE FOR WNP-2 REGARDING REDUCTION IN COLD FAST START SURVEILLANCE TESTING OF DIESEL GENERATORS

In accordance with your request of December 14, 1983, the Power Systems Branch has reviewed the Washington Public Power Supply System's submittal regarding proposed revisions to Unit 2 Technical Specifications. The Technical Specification changes involve reduction in the number of required fast cold start surveillance tests of diesel generators. All surveillance testing not required to be a fast cold start will be preceded by an engine prelube period and/or other warmup procedures recommended by the diesel generator manufacturer. We find the proposed Technical Specification change to be acceptable based on the following justification.

The DSI staff has for sometime had under review and assessment the method of diesel generator testing. The present method of testing does not take into consideration those manufacturer recommended preparatory actions such as prelubrication of all moving parts and warmup procedures which are necessary to reduce engine wear, extend life and improve availability. The existing standard technical specifications require cold fast starts for surveillance testing which in many engine designs and operating practices subject the diesel engine to undue wear and stress on engine parts. Nuclear industry related groups such as INPO and American Nuclear Insurers have expressed concern based on operating experience that cold fast start testing results in incremental degradation of diesel engines and that, if proper procedures covering warmup prelubrication, loading/unloading etc. were taken, an improvement in reliability and availability would be gained. While the requirements for cold fast starts is based on the EDG's functional requirements in response to a LOCA coincident with a loss of offsite power preliminary analysis indicates that two (2) fast starts per year is a sufficient number to assure the required DG reliability under design basis

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conditions. Thus, it is the staff's technical judgement that an overall improvement in diesel engine reliability and availability can be gained by performing diesel generator starts for surveillance testing using engine prelube and other manufacturer recommended procedures to reduce engine stress and wear.

We, therefore, recommend that the Washington Public Power Supply System be given the opportunity to institute technical specifications for WNP Unit 2 for surveillance testing which permit diesel engine prelube and other manufacturer recommended procedures. The technical specifications should retain the demonstration of fast start testing on a 184 days basis. This is consistent with the proposed staff resolution of the fast cold start issue. The number and period of surveillance tests specified in the Standard Technical Specifications remain unchanged. Though unlikely, should final resolution of this issue result in changes to this position with respect to diesel generator surveillance testing, we will so inform the licensee. This action is being taken on a plant specific interim basis pending final approval of Generic Issue B-56, dealing with surveillance testing of diesel generators. It is our conclusion that the health and safety of the public will be improved by these improved testing methods and, therefore, are acceptable.

Original signed by
L. S. Rubenstein

L. S. Rubenstein, Assistant Director
for Core and Plant Systems
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