

02 MAR 1989

Mr. Alexander Marion
Nuclear Management and Resources Council
1776 Eye Street, N.W.
Suite 300
Washington, D.C. 20006

Subject: Comments on NUMARC 87-00, Appendix D dated January 3, 1989

Dear Mr. Marion:

Enclosed are copies of comments received from the Electrical Systems Branch of NRR and E. V. Lofgren of SAIC based on their review of NUMARC's Appendix D dated Jan. 3, 1989. These comments reflect the need to further address many of the topics identified for follow-up in my meeting summary for meetings held on January 25-26, 1989. We do not expect to transmit any further comments on this document at this time.

Since the March 13, 1989 closure date for comments on Regulatory Guide 1.9, Proposed Revision 3, is only a few days away, we would prefer that another meeting not be scheduled before receipt of NUMARC's comments on RG 1.9, Rev. 3 so that both Appendix D differing views and public comments on RG 1.9, Rev. 3 can be reviewed and then discussed in an integrated manner.

We note that NUMARC 87-00, Appendix D dated November 20, 1987, states: "The reliable operation of on-site emergency AC power sources should be ensured by a reliability program. For emergency diesel generators, such a program might be comprised of the following elements (or equivalent):" Also, Regulatory Guide 1.155, "Station Blackout," Section 1.2 states: "The reliable operation of onsite emergency ac power sources should be ensured by a reliability program designed to maintain and monitor the reliability level of each power source over time for assurance that the selected reliability levels are being achieved. An EDG reliability program would typically be composed of the following elements or activities (or their equivalent):"

It is clear from this nearly identical language, and the discussions held during the resolution of the Station Blackout safety issue, that both parties were committed to implementation of an adequate EDG reliability program. However, use of language such as: "This appendix provides guidance on actions that may be implemented as appropriate to ensure..." in your opening paragraph in the Jan. 3, 1989, draft does not reflect previous understandings and commitments. We suggest that you reconsider continued pursuit of such language and guidance. For example, it would be more effective to define what the elements of an EDG reliability program should be comprised of, to identify surveillance and maintenance actions proven effective in achieving the industry-wide levels of EDG reliability achieved, and to provide guidance as to how such levels can be sustained.

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Please call me after you have reviewed the enclosures so that we can mutually schedule a date for the next meeting.

Sincerely yours,

~~Original signature~~

Aleck W. Serkiz, Senior Task Manager
Reactor and Plant Safety Issues Branch
Division of Safety Issue Resolution
Office of Nuclear Regulatory Research

Enclosures: As stated

cc: w/Enclosures

T. Speis, RES
R. W. Houston, RES
W. Minners, RES
A. Thadani, NRR
F. Gillespie, NRR
S. Crockett, OGC
F. Rosa, NRR/SELB

J. Craig, NRR/SPLB
E. Lofgren, SAIC
A. Payne, Jr., SNL
M. McGarry, BCP&R
J. Gaertner, EPRI
H. Wyckoff, EPRI

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