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ACCESSION NBR: 8504290378 DOC. DATE: 85/04/24 NOTARIZED: NO DOCKET #
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 DENTON, H.R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Discusses rev to Tech Spec re diesel generator surveillance testing, per discussions on Generic Ltr 84-15. Actions to reduce cold fast start..., eliminate requirements leading to degradation & establish reliability described.

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 TITLE: OR Submittal: Fast Cold Starts of Diesel Generators GL-83-41 (GL-84-15)

NOTES: 05000315
 OL: 10/25/74
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April 24, 1985

AEP:NRC:0896A

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
GENERIC LETTER 84-15, PROPOSED STAFF ACTIONS TO
IMPROVE AND MAINTAIN DIESEL GENERATOR RELIABILITY

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Denton:

Pursuant to discussions with your staff, and as a follow-up to the suggestions made regarding Generic Letter 84-15, we would like to offer some ideas on the revision of the Technical Specifications associated with diesel generator surveillance testing.

In Generic Letter 84-15, Mr. Eisenhut made three recommendations in order to improve diesel generator reliability:

- o The number of cold fast starts should be reduced.
- o Requirements that would lead to degradation should be eliminated.
- o Reliability goals should be established.

Towards this same goal of improving diesel generator reliability, we feel that the following comments reflect some of the items which are acceptable with regard to that Generic Letter.

- o The diesel generator starting frequency should be as follows:
 - Start a diesel on the affected Unit(s) within 24 hours after the loss of one offsite source or one diesel, unless the lost diesel or offsite source is restored within that time.
 - Start a diesel on the affected Unit(s) within 8 hours after (1) the loss of one diesel and one offsite source or (2) both offsite sources, unless the lost diesel and/or offsite source(s) are restored within that time.
 - Loss of both diesels requires shutdown of the affected Unit within 2 hours.

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1. The first part of the report is a general description of the project and its objectives. It includes a brief history of the project and a statement of the problem to be solved.

2. The second part of the report is a detailed description of the methodology used in the study. It includes a description of the data sources, the methods of data collection, and the methods of data analysis.

3. The third part of the report is a discussion of the results of the study. It includes a description of the findings, a comparison of the findings with previous research, and a discussion of the implications of the findings.

4. The fourth part of the report is a conclusion and a list of references. The conclusion summarizes the main findings of the study and provides a final statement on the project. The references list the sources of information used in the study.

-- Start each diesel (using manufacturer's recommended low acceleration rates and pre-warming and pre-starting conditioning) once per 31 days on a staggered basis for one or zero failures in last 20 starts, or once per 15 days for 2 or more failures in last 20 starts.

- o Diesel repair time shall not exceed one week for a single outage, or a total of one month accumulated annual outage for a single diesel exclusive of that outage time related to MODES 5 and 6. If a diesel exceeds this maximum annual outage, it is fair that it be requalified. This requalification program should include both an analysis of the root causes of failure and a schedule of actions to be taken to correct the root causes.
- o Fast starts are to be required only once per 6 months.
- o If the diesel must be requalified, the requalification schedule should include a requirement of 21 starts with no failures or 28 starts with one failure.

The Technical Specifications that result from these revisions will provide the following benefits:

- o They will allow for an extended interval before engine starting after offsite power outages and/or short outages of the opposite diesel, resulting in fewer engine starts.
- o They will permit lower acceleration rates for the majority of surveillance starts, thus decreasing equipment deterioration.
- o They will include reasonable provisions for a requalification program.

In summary, there will be fewer surveillance starts, adequate maintenance time (which will encourage correction of the root causes of failures), and less-destructive starting conditions for most starts. The overall result should be not only extended engine life, but also the consequent improvement in starting reliability.

These comments are being transmitted, in lieu of submitting specific Technical Specifications, in response to Generic Letter 84-15. A Technical Specification Change Request on the diesel generators incorporating many of these comments will be transmitted at a later date as part of our Technical Specification Clarification program.

There is one further item which we would like to bring to your attention in this matter. As discussed with your staff, since we do not do cold fast starts on the Cook Plant diesels (see AEP:NRC:0896), we understand that we are not required to submit cold fast start Technical Specifications.

We would be glad to discuss any of the issues brought up in this letter (i.e., the Technical Specification clarification program or the technical merits of the ideas submitted above) at your convenience.

1. The first part of the report is a summary of the work done during the last year. It is a very good summary and gives a clear picture of the progress made. The second part is a list of the work done during the last year. It is a very good list and gives a clear picture of the progress made.

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This document has been prepared following Corporate procedures which incorporate a reasonable set of controls to insure its accuracy and completeness prior to signature by the undersigned.

Very truly yours,


M. P. Alexich 9/24/25
Vice President 9/24/25

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cc: John E. Dolan
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