



**Commonwealth Edison**  
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November 18, 1981

Mr. A. Schwencer, Chief  
Licensing Branch #2  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Subject: LaSalle County Station Units 1 and 2  
Generator Lubrication System  
Modification of the Diesel  
NRC Docket Nos. 50-373 and 374

Reference: Mr. C.E. Sargent's letter of October 8, 1981,  
to Mr. A. Schwencer on proposed changes  
to the LaSalle Technical Specification.

Dear Mr. Schwencer:

In a conference call with Mr. A. Bournia on October 22, 1981, we discussed how our proposed modification to the diesel generator lubrication system would correct the lubrication problem described in SER Section 9.6.3.4 and that a prelube pump would not be needed. In this section you are requiring a prelube pump because when the diesel is started, a momentary lack of lubrication occurs at the various moving parts until the engine-driven lube pump reaches full speed. Mr. Bournia agreed that our proposed modification which is described in our letter of October 8, 1981, would correct this problem for the moving parts in the lower part of the engine such as the crankshaft bearings. However, he doubted that our modification would correct this problem for the upper engine moving parts such as the valve rocker arm assemblies and camshaft. He requested that we either install the prelube pump or at least provide for intermittent lubrication of these parts unless the equipment manufacture did not recommend it.

After our telephone conversation with Mr. Bournia, we asked EMD which built the diesel engines and Stewart and Stevenson which furnished the diesel generators for their comments on his proposals. For diesel generators subject to emergency fast starts, they do not recommend installing the prelube pump in addition to the modification that we are installing. The modification described in EMD Maintenance Instruction (M.I.) 9644 will provide for continuous lubrication

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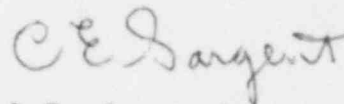
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of the lower engine parts which are the most critical and will keep the oil coolers and filters full. Therefore, as soon as the engine starts, the upper engine parts will get oil and wear on these parts is minimized. They do not recommend continuous lubrication of the camshaft and rocker arm assemblies when the diesel is not running because oil could flow down along the valve stems into the cylinder and cause a hydraulic lock. Starting the diesel with a hydraulic oil lock will damage it. They also advised against providing intermittent lubrication of these parts because an operator error or equipment malfunction could result in a hydraulic oil lock and it would not improve the reliability of the diesel.

Since the only modification to the lubrication system that EMD and Stewart and Stevenson recommends is the one described in EMD M.I. 9644, we ask that you accept our proposed modification as satisfying the requirements of SER Section 9.6.3.4. We are confident that this modification will correct this lubrication problem and will protect the moving parts of the diesel during both emergency and manual starts.

If you have any questions, please address them to this office.

Very truly yours,



C.E. Sargent  
Nuclear Licensing Administrator

cc: Resident Inspector - LSCS

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