



Commonwealth Edison
One First National Plaza, Chicago, Illinois
Address Reply to: Post Office Box 767
Chicago, Illinois 60690

April 26, 1983

Director of Nuclear Reactor Regulation
Attention: Mr. A. Schwencer, Chief
Licensing Branch No. 2
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: LaSalle County Station Units 1 and 2
Diesel Generator Prelube Oil Pump
Operating License NPF-11, Condition
2.C.21.b
NRC Docket Nos. 50-295 and 50-304

- References (a): LaSalle County Station Unit 1,
Facility Operating License NPF-11,
Condition 2.C.21.b.
- (b): SER Section 9.6.3.4.
- (c): C. E. Sargent letter to A. Schwencer
dated October 8, 1981.
- (d): C. E. Sargent letter to A. Schwencer
dated November 18, 1981.
- (e): C. W. Schroeder letter to A.
Schwencer dated October 6, 1982.
- (f): C. W. Schroeder letter to Director of
Nuclear Reactor Regulation dated
February 14, 1983.

Dear Sir:

Reference (a) requires, in part, that:

"A prelube pump, powered from a reliable direct current power supply, be installed in the system to operate in parallel with the engine-driven lube oil pump, or an alternative acceptable to the NRC shall be installed to preclude dry-starting of the diesel engine."

References (b) through (f) represent various iterations in the resolution of this topic. Reference (f) contained a copy of Mr. J. G. Hayden's (EMD) letter dated January 24, 1983, which provided EMD's position on prelubrication.

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April 26, 1983

During a telecon between Commonwealth Edison personnel and Dr. A. Bournia, et al, on March 1, 1983, the NRC indicated they had one remaining concern, namely:

In the January 24, 1983 letter from EMD, Item 4 is not clearly addressed as being non-applicable following the installation of MI 9644. If this is the case, obtain a statement from EMD.

Subsequently, we asked EMD clarify their prelubrication requirements. In a letter dated March 28, 1983, Mr. Hayden stated that periodic prelubrication is not required on engines equipped with the EMD MI 9644 modification. No engine bearings are subjected to marginal conditions that require prelubrications because engines with this modification are fully lubricated during first four or five revolutions at startup. The EMD letter is attached for your information.

Because the enclosed letter fully addresses the NRC's remaining concern, Commonwealth Edison Company requests that the NRC provide us with documentation of your acceptance of the EMD MI 9644 modification as an acceptable alternative to the prelube pump.

To the best of my knowledge and belief the statements contained herein and in the attachment are true and correct. In some respects these statements are not based on my personal knowledge but upon information furnished by other Commonwealth Edison and contractor employees. Such information has been reviewed in accordance with Company practice and I believe it to be reliable.

If there are any further questions in this matter, please contact this office.

One (1) signed original and forty (40) copies of this letter and the attachment are provided for your use.

Very truly yours,

C. W. Schroeder 4/26/83

C. W. Schroeder
Nuclear Licensing Administrator

lm

cc: NRC Resident Inspector - LSCS

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ELECTRO-MOTIVE



Inter-Organization

To: Memorandum
From: J. G. Hayden
Subject: ENGINE PRELUBRICATION REQUIREMENTS

Date: March 28, 1983
FILE: 164-0

Consistent with the facts presented in my letter of January 24, 1983, engines equipped with MI 9644 immersion heater systems are fully lubricated during the first four or five revolutions at startup. Because of this rapid response, no engine bearings are subjected to marginal conditions that require prelubrication. Based on extensive experience, we strongly recommend that periodic prelubrication not be attempted on engines equipped with MI 9644 immersion heater systems.

A handwritten signature in cursive script that reads 'John G. Hayden'.

John G. Hayden, Assistant
General Service Manager
Marine & Industrial

JGH/jr

cc: M. Arbuckle (S&S)
T. Boyce (S&S)
D. W. Chirikos
H. W. Falter (PSD)
M. J. Fleckenstein
G. A. Klippel
D. L. Schroder
K. J. Williams
T. G. Winfield