

**Florida
Power**
CORPORATION

January 13, 1984
3F0184-17

Director of Nuclear Reactor Regulation
Attention: Mr. Darrell G. Eisenhut, Director
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
Generic Letter 83-41
Fast Cold Starts of Diesel Generators

Dear Sir:

Your Generic Letter 83-41 dated December 16, 1983, was received and reviewed by Florida Power Corporation (FPC). Responses to your questions concerning the above subject are given below.

Question 1 requested the number of times between December 1, 1982 and December 1, 1983 that each diesel generator was subjected to a fast cold start due to: (a) surveillance testing, (b) maintenance activities, and (c) actual demands. The requested information is shown in the Attachment.

Question 2 requested FPC's assessment of the effects of frequent fast cold starts on diesel generator reliability and availability, and whether or not FPC believed that they significantly degrade reliability and availability. FPC's response to Question 2 is as follows:

FPC's diesel generators are not subjected to cold fast starts as defined in Generic Letter 83-41 for surveillance testing and maintenance activities. Operability of the diesel generators is demonstrated in accordance with Technical Specification 4.8.1.1.2.a.4, that is, verifying that the diesel starts from ambient conditions and accelerates to at least 900 rpm in less than 10 seconds. However, the diesel engine coolant is normally maintained between 123°F and 152°F; and the oil temperature is maintained

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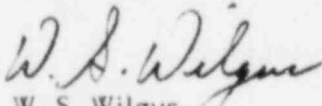
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3F0184-17
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at 110°F. Prior to surveillance or post-maintenance testing, the oil prelube pump is run for 2 minutes. Actual demands are initiated with the same initial conditions, but without prelubrication.

FPC believes that fast starts without prelubrication at ambient conditions as previously described do degrade diesel generator reliability and availability. Lubrication during starts without prelube is a concern; however, the concern is a small one inasmuch as full lubrication occurs within 10 seconds of starting. Furthermore, as shown in the Attachment, only a small percentage (9.6%) of the total starts were without prelubrication.

Sincerely,


W. S. Wilgus
Vice President
Nuclear Operations

RHT/feb

Attachment

cc: Mr. J. P. O'Reilly
Regional Administrator, Region II
Office of Inspection & Enforcement
U.S. Nuclear Regulatory Commission
101 Marietta St., N.W., Suite 2900
Atlanta, GA 30303

ATTACHMENT

<u>Diesel Generator</u>	<u>Number of Starts</u>			<u>Total</u>
	<u>Surveillance Testing⁺</u>	<u>Maintenance Activities⁺</u>	<u>Actual Demand[*]</u>	
Diesel 3A	19	3	2	24
Diesel 3B	17	8	3	28

* Without prelubrication; inadvertent starts included.

+ With prelubrication.