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RELATED CORRESPONDENCE

May 14 1984  
DOCKETED  
USNRC

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

34 MAY 17 AIO:18

Before the Atomic Safety and Licensing Board  
OFFICE OF SECRETARY  
NRC BOARD SERVICE  
BRANCH

In the Matter of )

CLEVELAND ELECTRIC ILLUMINATING )  
COMPANY, et al. )

(Perry Nuclear Power Plant, )  
Units 1 and 2) )

Docket Nos. 50-440  
50-441  
(OL)

OCRE TWELFTH SET OF INTERROGATORIES TO APPLICANTS

Intervenor Ohio Citizens for Responsible Energy ("OCRE") hereby files its Twelfth Set of Interrogatories (with requests for production of documents) to Applicants on Issue #16, Diesel Generator Reliability, pursuant to the Licensing Board's Orders of December 23, 1983 (New Contention on Diesel Generators) and May 8, 1984 (Discovery About Transamerica Delaval Diesels).

Issue #16

12-1. Produce a copy of the contract with TDI for supplying the PNPP standby DGs. (OCRE is willing to accept a copy with monetary amounts deleted.)

12-2. Identify all documents Applicants intend to offer as exhibits or use in cross-examination during this proceeding pertaining to Issue #16.

12-3. List each and every failure, defect, deficiency, nonconformance, or problem occurring in TDI diesel engines; for each occurrence, state: the type of application of the diesel engine (e.g., nuclear or other stationary power source or marine propulsion unit); name of the plant ship or other facility using the

DS03

diesel engine; the rated capacity of the engine (or generator);

the type of diesel engine (e.g., straight-8 or V-16) and all other relevant design information; the number of hours of operation when the problem occurred; whether the problem occurred during type qualification testing, preservice testing, in-service testing, or actual operation; the cause(s) of the problem; and all other facts, details, and circumstances concerning the problem. Identify all relevant documentation of the problem.

12-4. Identify each and every reason why the bid of Colt Industries for manufacturing the PNPP standby diesel generators was rejected. Specifically:

(a) Identify every specification requirement which was not met by Colt, and explain why each such spec requirement could not have been conformed to the Colt bid.  
(b) Identify whether the rejection of Colt's bid was in any way based on Colt QA, reputation, reliability, or engine performance or operational experience; for each such attribute relied upon, thoroughly explain why it made Colt unacceptable and

provide documentation of Colt's unacceptable performance.

12-5. Explain what "alternate bids" were received (see Applicants' answer to OCRE Interrogatory 10-10(a)) for the manufacture of the PNPP standby DGs and explain why they were rejected; especially identify any reasons for rejection based on quality or reliability/experience concerns.

12-6. Identify each and every reason concerning QA, reputation, performance, or operational experience of Cooper Industries relied upon to justify rejection of Cooper's bid. Identify any documentation of such attributes concerning Cooper Industries.

12-7. Produce the letter of inquiry and all bids received for the manufacture of PNPP standby DGs.

12-8. Produce all corrective action requests issued by Applicants against TDI.

12-9. (a) Produce all stop work orders issued by Applicants against TDI.

(b) For each stop work order imposed, state when and why it was imposed, when it was re-

scinded, what TDI activities were affected, and what corrective actions were achieved.

12-10. Did Applicants ever place a resident inspector at TDI's facilities pursuant to SP-706 Sec. 1.05.37. If so, identify any person(s) so stationed, giving each person's full name, title, employer, and address. Produce any documented findings of any such person.

12-11. Refer to the 12-21-83 letter from Murray Edelman, CEI to James Keppler, NRC R. III re starting air check valve modifications, in which it is stated that TDI could not perform the modifications at their facility in accordance with ASME requirements.

(a) Explain why TDI could not meet ASME requirements.

(b) Is TDI certified by ASME? If so, explain what areas the ASME certification covers and how such certification is awarded.

12-12. Describe in detail the DR/OR program for the PNPP DGs; specifically, list each component which will receive a design review; detail all inspections to be performed on the DGs; identify all testing to be per-

formed; list all referenced reports or sources of information relied upon to identify components, set acceptance criteria, or otherwise define the scope of the DR/OR for PNPP; and provide a schedule for the completion of the DR/OR for PNPP including scheduled times and locations for conducting all inspections or tests on the DGs.

12-13. (a) Do Applicants intend to derate the TDI DGs at PNPP?

(b) Is derating the DGs an option in the DR/OR program? If so, explain what factors or findings would influence or favor a decision to derate the DGs.

(c) If the answer to either (a) or (b) above is affirmative, explain in detail how the derating of the PNPP DGs would be accomplished.

12-14. (a) Explain the statement at p. 3 of the Minutes of Diesel Generator Users Group Steering Committee Meeting, Oakland, CA, 11/29/83, i.e., "No decisions should be made by the User's Group that could affect diesel generator manufacturer competition in the future."

(b) Does this statement mean that the User's Group will never

find or proclaim any DG to be unreliable or of poor quality even if this is true?

(c) Explain why the User's Group chose to take this position.

12-15. Does the TDI Owners Group have any studies planned or implemented concerning vibration in TDI engines? If so, produce any plans or completed studies; discuss thoroughly any such plans or findings.

12-16. Are components supplied by subvendors (e.g., the generators) ever in the custody of TDI or are they shipped directly from the subvendor to PNPPT? Identify all components in TDI's custody, and indicate whether TDI performed any tests or inspections on the items.

12-17. Produce Agreement P-1152-3.

12-18. Explain the levels of expediting referred to in the August 10, 1978 Expediting Report, i.e., does Class 4 represent a higher level of expediting than Class 5? Explain why expedition of TDI's work was sought.

12-19. Produce GAI memorandum PY-GAI/CEI-14303.

12-20. Referring to the August 4, 1983 letter from R.M. Bonner,

CEI, to P.B. Gudikunst, Gilbert Associates, answer the following:  
(a) Describe in detail the "SWAT team" referred to; explain its purpose and list all members of the SWAT Team; give each member's full name, title, employer, and address.

(b) Describe in detail the outstanding problems referred to.

(c) Identify the consultant designated to assist in manning at Delaval, and thoroughly explain the consultant's function.

(d) Describe in detail any reports, findings, conclusions, comments, or recommendations of the SWAT Team and the consultant.

12-21. Is the task force mentioned in DAF 132 the same as the SWAT Team referred to above? If not, identify all members of the task force, giving each person's name, title, employer, and address; explain the purpose of the task force; and describe any findings, comments, conclusions, and recommendations of the task force.

12-22. On July 14, 1978 GAI issued a certificate of inspection with waiver for the shipment of the first diesel engine.

attached to the COI is a list of 6 exceptions. (Similar COIs with waiver and with similar exceptions were issued for the other 3 engines as well.) For each exception, demonstrate that resolution has been achieved, giving the date achieved, the disposition of the item, and a reference to appropriate documentation of its resolution.

12-23. Demonstrate that the crankshaft deficiencies identified in the Documentation Packages for Engines 2816/75053 and 2817/75054 (scuffs, scratches, machining errors, and nonmetallic inclusions) have been properly corrected.

12-24. Describe in detail the attempts Applicants have made to determine the cause of the excessive scuffing of LB 28 cylinder liner and the large compression differences observed in the shop test of the first engine. Also describe any findings and corrective actions made.

12-25. Describe in detail any inspections Applicants conducted on the fourth engine after the piston assembly/cylinder liner failure during the shop test to ensure that no other components were damaged by the failure; describe any findings of any such inspections. Also describe all attempts Applicants made to determine the root cause of the failure, and any corrective actions taken to avoid recurrence.

Respectfully submitted,

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'84 MAY 17 AIO:18

CERTIFICATE OF SERVICE

This is to certify that copies of the foregoing were served by deposit in the U.S. Mail, first class, postage prepaid, on the 15<sup>th</sup> day of May, 1984 to those on the service list below.

  
Susan L. Hiatt

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