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DEPARTMENT OF NUCLEAR SAFETY  
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TERRY R. LASH  
DIRECTOR

June 3, 1985

DAN L. WILLIAMS  
DEPUTY DIRECTOR

Director of Nuclear Reactor Regulation  
Attention: Mr. W. R. Butler, Chief  
Licensing Branch No. 2  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

REFERENCE: Docket No. 50-461; Illinois Power Company,  
F. A. Spangenberg letter U-60016, dated May 24, 1985  
to NRC, W. R. Butler, "Periodic Testing of Diesel  
Generator Units"

In Reply Please Refer To: DOE-85-084

Dear Mr. Butler:

The Illinois Department of Nuclear Safety has reviewed the referenced letter and provides its comments herein.

Section C.2.a. of Regulatory Guide 1.108, Revision 1, was written to ensure that the design of emergency diesel generators include provisions to allow the unit to be tested on site, simulating the parameters of operation that would be expected if actual demand were to be placed on the system. The order of testing, as described in C.2.a.(5), provides for a hot restart and design-loading after the 24-hour test. "Illinois Power Company proposes to meet the intent of C.2.a.(5) by running either the 24-hour test as described in C.2.a.(3) or by running the diesel at 100% power (nominal) for a sufficient period of time to ensure that the units have reached a stabilized temperature prior to running the tests described in C.2.a.(1) and C.2.a.(2)."

Regulatory Guide 1.108, Revision 1 clearly points out the reason for the sequence of testing required in C.2.a. Illinois Power Company has not indicated their reason for requesting deviation from the Regulatory Guide.

If the 2-hour rating of the generator were used in the last 2 hours of the 24-hour test, prior to running C.2.a.(1) and C.2.a.(2), then it is possible that the temperature of the diesel generator cooling system would be hotter than the value that Illinois Power Company would assign to "stabilized temperature".

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It is also not clear from the request whether a deviation is being requested from paragraph C.2.a.(3). "Another test, which meets the requirements of paragraph C.2.a.(3) will be performed as part of a 24-hour load test." C.2.a.(3) is the 24-hour load test.

- 1.) Illinois Power Company should clearly indicate if they are requesting a deviation from performing the 24-hour test.
- 2.) If the "stabilized temperature" were the highest temperature attained during the 24-hour test prior to performing paragraphs C.2.a.(1) and C.2.a.(2), then the intent of Regulatory Guide 1.108, Revision 1 would be met, in our interpretation.
- 3.) We believe the combination of testing required by paragraphs C.2.a.(1) and C.2.a.(2), into a single test, is acceptable.

Sincerely,

  
Michael C. Parker, Chief  
Division of Engineering

MCP:bkw

cc: G. N. Wright, IDNS  
B. L. Siegel, NRC Clinton Licensing Project Manager  
NRC Resident Inspector  
Regional Administrator, Region III, U.S. NRC  
F. A. Spangenberg, IPC