

APPENDIX F

**Byron Lee Jr., NUMARC,
to Kenneth M. Carr, NRC Chairman,
November 9, 1990.**



AE06-1

NUCLEAR MANAGEMENT AND RESOURCES COUNCIL

1775 K Street, N.W. • Suite 300 • Washington, DC 20006-2496
(202) 872-1287

Byron Lee, Jr.
President & Chief
Executive Officer

November 9, 1990

The Honorable Kenneth M. Carr, Chairman
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Chairman Carr:

At the November 8 meeting between the Commission and the ACRS, we became aware that the proposed resolution of Generic Issue B-56, Diesel Generator Reliability, is currently being reviewed by the Commission. We also learned that the Staff has not adopted the ACRS recommendations in its proposed resolution package. The purpose of this letter is to formally state our position that was mentioned during our October 26 briefing. It is that industry actions and performance coupled with individual licensee commitment in response to the Station Blackout Rule provide sufficient basis for closure of Generic Issue B-56.

The basis for closure is summarized by the following:

- 1) Under the Station Blackout Rule, utilities have made a docketed commitment to maintain their chosen emergency diesel generator (EDG) target reliability of 0.95 or 0.975.
- 2) Both NRC Staff and industry agree that the industry average EDG reliability since 1983 has been above 0.98. Recognizing that the intended goal of the B-56 issue was to achieve 0.95 reliability per EDG demand, it is evident that industry performance has not only achieved, but surpassed this goal.
- 3) On March 7, 1990, the NUMARC Board of Directors approved an industry initiative whereby all nuclear utilities will employ a standard set of trigger values (which have been accepted by NRC Staff) to monitor their chosen EDG target reliability.

It is our understanding that the Staff continues to pursue resolution through a generic letter invoking 10CFR50.54(f) that requests licensees to commit to prescriptive positions on monitoring and maintaining EDG reliability as proposed in Regulatory Guide 1.9, revision 3. This amounts to seeking a docketed commitment on how licensees intend to satisfy an already docketed commitment, and elevates regulatory guide positions to de facto regulatory requirements. It is truly unfortunate that both regulatory and industry resources continue to be expended on a problem that has been resolved for several years.

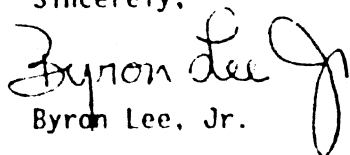
9306170127 930422
PDR PR
50 57FR14514 PDR

668

Kenneth M. Carr
November 9, 1990
Page Two

We reiterate our belief that industry actions and performance together with existing docketed commitments by individual licensees provide sufficient basis for closure of Generic Issue B-56. Please contact me should you have any questions.

Sincerely,


Byron Lee, Jr.

BLjr/ARP

cc: Commissioner Rogers
Commissioner Curtiss
Commissioner Remick

