

## **APPENDIX G**

**David A. Ward, Chairman ACRS,  
to Ivan Selin, NRC Chairman,  
December 20, 1991.**



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
ADVISORY COMMITTEE ON REACTOR SAFEGUARDS  
WASHINGTON, D. C. 20555

ACRSR-1455

PDR

December 20, 1991

The Honorable Ivan Selin  
Chairman  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Chairman Selin:

SUBJECT: RESOLUTION OF GENERIC SAFETY ISSUE B-56, "DIESEL  
GENERATOR RELIABILITY"

During the 380th meeting of the Advisory Committee on Reactor Safeguards, December 12-14, 1991, we reviewed the NRC staff's proposed amendment to the station blackout (SBO) rule, 10 CFR 50.63, and the corresponding revision of Regulatory Guide 1.9 that addresses resolution of Generic Safety Issue (GSI) B-56, "Diesel Generator Reliability." A meeting of our Subcommittee on AC/DC Power Systems Reliability was also held on November 20, 1991 to discuss this matter. We also had the benefit of the referenced documents.

In 1990, the staff proposed resolution of GSI B-56 by issuance of a generic letter requiring licensees to adopt the strictures of proposed Regulatory Guide 1.9, Revision 3, pertaining to the establishment of a diesel generator reliability program. The Committee reviewed this proposed resolution during its 364th meeting in August 1990, and did not support the staff's position, arguing that to do so was an "unjustified imposition of maintenance requirements on licensees, in contravention of the Commission's decision to defer issuance of a maintenance rule...." The Committee also noted that the industry was monitoring the reliability of emergency diesel generators (EDG) pursuant to the requirements of the SBO rule.

The Commission also rejected the staff's proposed resolution. Instead, it directed the staff to develop a rule using a "results-oriented" approach. The staff has done this.

In our view, the proposed rule amendment is unnecessary to ensure adequate diesel generator reliability. We continue to believe that the commitments of the licensees to monitor and maintain diesel generator reliability as specified in the SBO rule, combined with industry initiatives in this regard, are sufficient. If an EDG fails to start, it is industry practice to take appropriate

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corrective actions. We were told by the NRC staff that statistics compiled by the nuclear industry indicate that the present overall diesel generator reliability level is about 98 percent.

In the course of our discussions with the staff, we were also told that there does not now appear to be a problem with emergency diesel generator reliability, but that there might be one in the future. When asked if the proposed rule would solve a problem if one developed, the response was unclear. In a situation in which both staff and licensees have limited resources, we are reluctant to add to their burden a rule which is designed to solve a problem that does not now exist by means of a proposed solution whose results are uncertain.

In summary, we believe that additional regulation of emergency diesel generators is not warranted and the rule should not be promulgated.

Additional comments by ACRS Members James C. Carroll, Ivan Catton, and Paul G. Shewmon and by ACRS Members Thomas S. Kress and Harold W. Lewis are presented below.

Sincerely,



David A. Ward  
Chairman

Additional Comments by ACRS Members James C. Carroll, Ivan Catton, and Paul G. Shewmon

We do not agree with our colleagues' recommendation and believe that this proposed rule should be issued for public comment. In our view, it represents an appropriate approach to the closure of the station blackout rule and will formalize more reasonable technical specification surveillance testing requirements for EDGs. We further believe that the use of performance-based regulation provides a highly desirable approach to regulation, given the present maturity of the nuclear power industry.

It appears to us that licensees with good EDG maintenance programs and root cause analysis techniques will have no difficulty in staying below any of the proposed trigger values. We note that the failure of an EDG to start is not in general a random event, but an event due to some specific cause that is usually identified and corrected. Proper corrective action will generally improve the reliability of the EDG relative to the reliability it had prior to the event; i.e., the cause of failure to start should be eliminated or greatly reduced. The approach used to evaluate a plant's EDG

