

U.S. NUCLEAR REGULATORY COMMISSION

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In the matter of
C.P.Co. Midland Plant
Units 1 and 2

Docket Nos. 50-329 OL
DOCKET 50-330 OL
BRANCH

BEFORE THE ATOMIC SAFETY & LICENSING BOARD

3/4/84

STAMIRIS OPLS CONTENTION ON TRANSAMERICA DELAVEL DIESEL GENERATORS

In documents dated February 13 and 15, 1984, the NRC staff has compiled findings and summarized conclusions regarding the TDI diesel generators supplied to nuclear plants. Based on these reports and conclusions, intervenor Stamiris contends that because of the problems identified with TDI emergency diesel generators, the model DSRV 12 diesel generator engines from TDI can not be relied upon to perform their requisite safety function at the Midland plant.

The February 15, 1984 (docket nos. 50-416, 50-312) document contains a 1/25/84 Policy Issue (secy-84-34) which concludes "During the course of the evaluation of the failure and the repairs of the Shoreham EDGs, information related to the operating history of TDI engines and the CA program of the manufacturer has been identified which calls into question the reliability of all TDI diesels." (p.1) Also, "The staff believes that before additional licensing action is taken to authorize the operation of a nuclear power plant with TDI engines, these issues, relating to CA, operating experience,

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and the ability of the machines to reliably perform their intended function, must be addressed. " (p.2)

The February 13, 1984 B.N. 84-021 compiles NRC TDI inspection reports from 3/79 to 7/83. These reports contain extensive notices of deviations, nonconformance, and violations of NRC regulations by TDI which confirm the failure of TDI to properly implement their QA program or to properly inform the Commission under 10CFR Part 21 of certain failures and defects. (3 violations).

The February 13, 1984 B.N.84-020 reports on a 1/26/84 TDI - NRC meeting and includes other summary reports on TDI engine's operating experience to date. The listing of significant problems to date at the San Onofre 1, Grand Gulf, and Shoreham plants, as well as non-nuclear experiences confirm the inability of the TDI generators to perform reliably and safely. (enclosure 3)

The transcript of the 1/26/84 meeting confirms the NRC's lack of confidence in the TDI generators (p21, 22) and questions the TDI owners group approach to solving the identified problems (p46). When asked by Mr. Denton whether the group had considered "just replacing the engine with one of the different design", the reply was "We don't have a group to consider replacement of design. Replacement of engine is a very long term project. This (chosen approach) is something we can do over a period of months as opposed to a period of years. "(p47)

The TDI diesel generators were installed at the Midland plant in the fall of 1979, prior to NRC approval of the then recently completed surcharge at the DGB, with the explanation that they could be removed if necessary at a later date. Unless the applicant elects to replace the questionable diesel generators, the combined effect

of the TDI generator problems with the soil related structural and differential settlement problems of the OM proceeding and the recent IOGFR 50.55(e) report 83-14 (1/13,30/ 84) results in a very unreliable back up power system. The 55(e) report indicates "requirements for differential settlement between the DGB structure and DG pedestals were not accounted for in the design of the piping, equipment, conduits, and pipe supports."

Whether considered in conjunction with the aforementioned soil settlement problems, or considered separately, the record in the Midland licensing proceedings cannot be considered complete without ASLB attention to the TDI QA and operating liability issues addressed in this contention and its supporting NRC documents. Cleveland Perry Plant Memorandum and Order (New Contentions on Diesel Generators), Cleveland Electric Illuminating Co. et al (Perry Nuclear Power Plant), LBP 83-80, 18 NRC ___ at ___, Dec. 23, 83, slip opinion at 2-5. Freeland and Memorandum; (Adequacy of Record; DeLevel Diesel Generators), Texas Utilities General Co. et al (Comanche Peak Steam Electric Stations Units 1&2), LBP 84-___, 18 NRC ___ at ___, (Jan. 31, 84), slip opinion.

In the event that this contention is accepted, intervenor requests that appropriate discovery be allowed against the parties, vendor, contractors and consultants at a time and in a manner of the Board's discretion. ORDER SCHEDULING DOCUMENT REQUESTS ON SUFFOLK COUNTY PROPOSAL SUPPORTING DIESEL GENERATOR CONTENTIONS, Long Island Light Co. (Shoreham Unit 1), slip opinion, (Feb. 2, 84)

cc: ASLB Board
OM, OL Parties
NRC Secretary

Respectfully Submitted

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