



**Pacific Gas and  
Electric Company**

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November 13, 2000

PG&E Letter DCL-00-143

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

Docket No. 50-275, OL-DPR-80  
Diablo Canyon Unit 1  
Licensee Event Report 1-2000-007-00  
Engineered Safety Feature Actuation – Component Cooling Water Pump Start  
Due to Personnel Error

Dear Commissioners and Staff:

PG&E is submitting the enclosed licensee event report regarding an engineered safety feature actuation, a component cooling water pump start, during surveillance testing due to personnel error.

This event was not considered risk significant and did not adversely affect the health and safety of the public.

Sincerely,

David H. Oatley

cc: Ellis W. Merschoff  
David L. Proulx  
Girija S. Shukla  
Diablo Distribution  
INPO

Enclosure

DDM/2246/A0516462

IE22

# LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) <b>Diablo Canyon Unit 1</b>										DOCKET NUMBER (2) <b>0 5 0 0 0 2 7 5</b>							PAGE (3) <b>1 OF 5</b>				
TITLE (4) <b>Engineered Safety Feature Actuation – Component Cooling Water Pump Start Due to Personnel Error</b>																					
EVENT DATE (5)			LER NUMBER (6)						REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)									
MO	DAY	YEAR	YEAR	SEQUENTIAL NUMBER			REVISION NUMBER			MO	DAY	YEAR	FACILITY NAME				DOCKET NUMBER				
<b>10</b>	<b>13</b>	<b>2000</b>	<b>2000</b>	<b>-</b>	<b>0</b>	<b>0</b>	<b>7</b>	<b>-</b>	<b>0</b>	<b>0</b>	<b>11</b>	<b>13</b>	<b>2000</b>								
OPERATING MODE (9) <b>6</b>			THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR: (11)																		
POWER LEVEL (10) <b>0 0 0</b>			<div style="display: flex; justify-content: space-between;"> <span><b>X</b> 10 CFR <b>50.73(a)(2)(iv)</b></span> <span>OTHER</span> </div> <div style="text-align: right; font-size: small;">(SPECIFY IN ABSTRACT BELOW AND IN TEXT, NRC FORM 366A)</div>																		
LICENSEE CONTACT FOR THIS LER (12)																					
<b>Roger Russell - Senior Regulatory Services Engineer</b>														TELEPHONE NUMBER AREA CODE <b>805</b> NUMBER <b>545-4327</b>							
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)																					
CAUSE	SYSTEM	COMPONENT			MANUFACTURER			REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT			MANUFACTURER			REPORTABLE TO EPIX				
SUPPLEMENTAL REPORT EXPECTED (14)														EXPECTED SUBMISSION DATE (15)					MON	DAY	YR
[ ] YES (If yes, complete EXPECTED SUBMISSION DATE)														[X] NO							
ABSTRACT (Limit to 1400 spaces i.e., approximately 15 single-spaced typewritten lines.) (16)																					
<p>On October 13, 2000, at 1714 PDT, with Unit 1 in Mode 6 (Refueling), an engineered safety feature (ESF) actuation signal initiated a trip of the auxiliary electrical power, separating vital Bus F from the offsite power. The loss of the auxiliary power source actuated an undervoltage relay, starting Component Cooling Water (CCW) Pump 1-1, an ESF component.</p> <p>On October 13, 2000, at 1918 PDT, a 4-hour nonemergency report was made in accordance with 10 CFR 50.72(b)(2)(ii).</p> <p>The root cause of the ESF actuation was personnel error by a utility licensed operator who determined that two tests could be performed simultaneously. A contributory cause was an inadequate procedure that did not include adequate precautions to prevent the inadvertent ESF actuation.</p> <p>The procedure has been revised to include a prerequisite to not perform the test when the affected diesel generator is running.</p>																					

# LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1)	DOCKET NUMBER (2)								LER NUMBER (6)						PAGE (3)		
									YEAR	SEQUENTIAL NUMBER				REVISION NUMBER			
Diablo Canyon Unit 1	0	5	0	0	0	2	7	5	2000	-	0	0	7	-	0	0	2 OF 5

TEXT

## I. Plant Conditions

Unit 1 was in Mode 6 (Refueling) at 0 percent power.

## II. Description of Problem

### A. Background

Technical Specification (TS) 3.3.5, "Loss of Power (LOP) Diesel Generator (DG) Start Instrumentation," Surveillance Requirement (SR) 3.3.5.3 requires a channel calibration of the loss of voltage input to the Emergency Diesel Generator (EDG)[EK][DG] start circuits.

Surveillance Test Procedure (STP) M-75, "4kV Vital Bus Undervoltage Relay Calibration," performs a channel calibration of the vital undervoltage relays and time delay relays as required by TS SR 3.3.5.3. The First Level Undervoltage Relays (FLUR) and Second Level Undervoltage Relays (SLUR) provide protection from degraded voltage conditions on the vital buses by initiating an engineered safety feature (ESF) signal to trip the vital bus loads, start the EDG, and transfer ESF loads to the onsite emergency power source, the EDGs.

STP M-21-A.1, "Outage and Pre-Outage Diesel Engine Analysis (Every Refueling Outage)," performs a diagnostic test of the EDGs to ensure that engine performance has not degraded. This test is performed by loading the EDG in parallel with the offsite power source while gathering diesel engine operating parameters.

### B. Event Description

On October 13, 2000, at 1714 PDT, during STP M-75 testing of vital Bus F FLURs and SLURs, with EDG 1-3 operating per STP M-21-A.1 in parallel with Bus F, STP M-75 testing initiated an ESF signal, tripping the intended offsite power supply feeder, resulting in the start of the standby Component Cooling Water (CCW) Pump 1-1.

On October 13, 2000, at 1918 PDT, a 4-hour nonemergency report was made in accordance with 10 CFR 50.72(b)(2)(ii).

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TEXT

C. Inoperable Structures, Components, or Systems that Contributed to the Event

None.

D. Other Systems or Secondary Functions Affected

None.

E. Method of Discovery

The event was immediately known to licensed plant operators by alarms and indications received in the control room.

F. Operator Actions

Plant operators halted further testing with STP M-75 pending a review of the cause of the unanticipated ESF actuation.

G. Safety System Responses

The CCW Pump 1-1 automatically started as designed in response to the ESF signal in accordance with plant configuration.

III. Cause of the Problem

A. Immediate Cause

The immediate cause was plant alignment to an operating EDG per STP M-21-A.1 in parallel with Bus F creating a condition such that when the FLUR was tripped per STP M-75, the resultant relay actuations initiated a start of CCW Pump 1-1 as designed.

B. Root Cause

Personnel error (cognitive) by a utility licensed operator who determined that the two tests could be performed simultaneously. Additional PG&E personnel responsible for scheduling and performing the test failed to identify the interaction of the two tests being performed concurrently.

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TEXT

### C. Contributory Cause

Inadequate procedure: STP M-75 did not include adequate precautions to prevent this event.

### IV. Analysis of the Event

There were no actual safety consequences involved in this event since all plant equipment operated as designed in response to the initiation of the test signal. The start of a standby CCW pump is a routine plant action performed periodically to equalize operating time of the three pumps. Plant alignment and continued operation of the CCW system was unaffected by the start of an additional pump.

Therefore, this event was not considered risk significant and did not adversely affect the health and safety of the public.

This event did not involve a Safety System Functional Failure.

The condition was evaluated using the NRC's Significance Determination Process in accordance with NRC Inspection Manual Chapter 0609 and was screened out as green.

### V. Corrective Actions

#### A. Immediate Corrective Actions

STP M-75 testing was halted, and plant personnel involved with the testing sequence performed additional review of the plant conditions necessary to perform the test without unintended ESF actuations.

#### B. Corrective Actions to Prevent Recurrence

STP M-75 has been revised to include a prerequisite to not perform this test when the affected diesel generator is running. Based upon active participation of the personnel involved during the event in the investigation and resolution, no additional corrective actions are deemed necessary.

### VI. Additional Information

#### A. Failed Components

None.

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TEXT

**B. Previous Similar Events**

None.