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MARTIN,J.B. Region 5 (Post 820201)

SUBJECT: Requests waiver of compliance from TS 3.8.1.1, "AC Sources - Operating" to extend by 72 h,to 144 h,action statement to allow post-maint testing on repaired DG,based on 920920 failure of Div 1 EDG to carry full load,per TS SR,

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September 22, 1992
G02-92-221

Docket No. 50-397

Mr. J. B. Martin
Regional Administrator
U.S. Nuclear Regulatory Commission
Region V
1450 Maria Lane, Suite 210
Walnut Creek, CA 94596

Dear Mr. Martin:

Subject: WNP-2, OPERATING LICENSE NPF-21
REQUEST FOR WAIVER OF COMPLIANCE FOR TECHNICAL SPECIFICATION 3.8.1.1, AC SOURCES OPERATING

The Supply System is requesting a waiver of compliance from Action a of Technical Specification 3.8.1.1, AC Sources - Operating. This Action Statement requires that, in the event of an inoperable emergency diesel generator (DG), several surveillances be performed to establish the operability of other AC sources. Additionally, the Action Statement requires that the operability of the DG be restored within 72 hours. Failure to comply with the actions requires that the plant be in at least hot shutdown within the next 12 hours. The action statement was entered on September 20, 1992, at 1:47 for the reasons discussed below. The Supply System is requesting that the 72 hours action statement be extended by 72 hours (to 144 hours total) to allow for the necessary post maintenance testing on the repaired DG.

Description of Condition

On September 20, 1992, at 1:47 am, the Division 1 emergency diesel generator was declared inoperable due to a failure to carry full load within the time specified in the Technical Specification surveillance procedure. Trouble shooting revealed that a mechanical Woodward governor had failed. The failed governor has been removed and shipped to Woodward for a failure analysis. A new matched pair of governors has been installed and post maintenance testing is in progress. Initial testing revealed that the new governors have a tendency to drift apart under full load conditions. With tandem diesels on one generator, this results in one engine carrying more of the load as the other tends to carry less. There are no indications, at this time, that this situation is related to the original governor failure. As work continues on the newly installed governors, other options are being pursued. The installed governor actuators may need repair or replacement. The Supply System may elect to replace the governors. Woodward and

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the Supply System are working together to obtain another matched governor pair. With the installation of new governors comes the risk of different problems during testing. The replacement of these components can not be accomplished within the 72-hour extension requested. The actions required to balance the govenors, to set the limits, and to complete testing can not be completed prior to the expiration of the 72-hour time limit specified in the LCO Action Statement. The Supply System believes the best course of action would be to continue plant operation until the operability of the DG is restored rather than to subject the plant to a forced shutdown. Prompt action is appropriate because failure to act in a timely manner will impose an unnecessary plant shutdown for a condition that involves minimal safety reduction and, as discussed below, does not involve a significant hazards consideration. The need to request the waiver on an emergency basis could not have been reasonably avoided because the problem occurred during recent surveillance testing, and subsequently, the 72-hour LCO was entered.

Plant Status and Compensatory Actions

The Supply System is in full compliance with the other Action Statements required in the event of an inoperable DG. All offsite sources are operable and the required surveillances and verifications of other components and systems are being performed as required. Crews are working continuously, with direct management involvement, to restore DG 1. This process involves balancing the 2 engines from no load to full load conditions and establishing the limits on the mechanical governors. The DG will then be subjected to a variety of tests to demonstrate the operability of the new governors. During this process, the DG can not be declared operable, but for a majority of the time will be capable of carrying the required load upon manual adjustment by the personnel assigned to the maintenance and testing activities. Additional compensatory measures have been taken and will be continued until the completion of testing, should the waiver be granted. Maintenance activities and surveillances on Engineered Safety Features, in particular the plant AC electrical systems, will be carefully controlled so as to reduce the risk or consequences of any plant centered loss of offsite power. There are controls in place on maintenance activities in the Ashe, Benton, and plant switchyards, to further reduce the possibility of a loss of offsite power. We have communicated with the Bonneville Power Administration (BPA) and have been assured that the reliability of the grid, at this time, is very high. There are no electrical or winter storms predicted. There are no unusual loading conditions, lines out-of-service, breakers out-of-service, abnormal bus tie or substation tie configurations. The BPA has been informed of a need to control any maintenance activities on those portions of the 500, 230, and 115 KV systems that might result in high risk for disturbances on these lines or a loss of the 230 or 115 KV supply lines to WNP-2. These controls will remain in effect until DG 1 is restored. All maintenance and testing will be done in accordance with an approved Maintenance Work Request or procedure. A portable power supply has been staged near DG 1 with portable lights so that restoration activities may continue without interruption in the event of a loss of offsite power.

The Supply System will be involved during the analysis on the failed governor at the Woodward facilities. If it is determined, at any time, that this failure represents the potential for a common mode failure, the operability of the remaining two DGs will be evaluated. The design of the Woodward governor is a common equipment design and has been in use since the 1960's. There have been failures in equipment with such wide spread applications, however Woodward and the Supply System can not assess the similarity with such events at this stage of the failure analysis.

Justification of the Duration of the Waiver

Upon completion of the set up (balance and limit setting) post maintenance testing began. This testing will be followed immediately by the required Technical Specification surveillance tests. Although the projected time for the maintenance testing was originally about 8 hours and 8 more hours for the surveillance testing, the Supply System is requesting the additional time in order to allow for resolution of the problems encountered. The Supply System believes that the additional 72 hours will support the completion of the activities and avoid unnecessary plant shutdown. If, however, it is determined that the installed matched governor pair can not be sucessfully adjusted, WNP-2 will be shutdown in order to replace the components. If additional problems are identifed during the maintenance or testing activities that will prevent the restoration of DG 1 within the alloted time, the plant will be shutdown, so that the problem can be resolved. Upon restoration of DG operability, the Action Statement will be exited, regardless of remaining available time.

Safety Significance

The proposed request is not a significant safety concern because the Division 2 and Division 3 DGs are operable and the Division 1 DG will be available to carry load with manual adjustments, as discussed above. As discussed below in the No Significant Hazards discussion, the core damage frequency is only slightly increased should DG 1 be unavailable.

No Significant Hazards Consideration

The Supply System concludes that the extension of the specified Action Statement completion time does not involve a significant hazards consideration for the following reasons:

> It would not involve a significant increase in the probability or consequence of an accident. The unavailability of an onsite source can not impact the probability of the loss of offsite power or the other emergency diesels. The IPE/PRA WNP-2 model was evaluated with DG 1 unavailable. The Core Damage Frequency (CDF) increased 2.1% from 5.42E-05/yr to 5.53E-05/yr. However, as discussed above, there are times that DG 1 can be available, with manual operation, to carry load if necessary during a loss of offsite power. Thus the consequences of a loss of offsite power are not significantly increased.

It would not create the possibility of a new or different kind of accident. The actions being taken are to restore the DG 1 to an operable condition. No change in the design or operation of the equipment is being proposed. With DG 1 unavailable, the significant accident considerations involve the loss of onsite or offsite power. Both of these are previously evaluated events.

It would not create a significant decrease in a margin of safety. As written, the Technical Specifications allow the DG to be inoperable for a 72-hour period provided certain compensatory actions are taken. The actions will remain in place for the additional 72 hours requested, along with measures taken by BPA. The inoperable DG can be made available to carry emergency loads, if necessary, during the majority of the 144 hour outage time.

Environmental Considerations

The issuance of the requested waiver would have no environmental consequences because of the high reliability of the plant onsite and offsite power supplies.

Summary and Conclusions

WNP-2 is currently in a 72-hour LCO on the Division 1 DG due to the failure and subsequent replacement and testing of the Woodward governor. A waiver of compliance is being requested to allow the extension of this time limit. This request has been approved by the WNP-2 Plant Operations Committee. It is requested that the waiver be granted from 1:47 am, Wednesday, September 23 to 1:47 am, Saturday, September 26, 1992. Absent approval of the request, WNP-2 will be required to commence a plant shutdown no later than 1:47 am, September 23, 1992. All other Technical Specification requirements will remain in effect.

Sincerely,

J W Baker

J. W. Baker
WNP-2 Plant Manager (Mail Drop 927M)

MGE/bk

cc: Document Control Desk
NS Reynolds - Winston & Strawn
JW Clifford - NRC
DL Williams - BPA/399
NRC Site Inspector - 901A