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March 19, 1993

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U.S. NUCLEAR REGULATORY COMMISSION
Mail Station P1-137
Washington, DC 20555

Gentlemen:

DOCKETS 50-266 AND 50-301
LICENSEE EVENT REPORT 92-004-03
IMPROPER SEQUENCING OF EMERGENCY SAFETY FEATURES
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

Attached is Supplement 3 to Licensee Event Report 92-004-00, "Improper Sequencing of Emergency Safety Features, Point Beach Nuclear Plant, Units 1 and 2." This supplement is provided to clarify our original submittals. Changes from Supplement 2 of the LER are indicated by margin bars in the left hand margin.

If you have any questions, please contact us.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Bob Link', is written over a faint circular stamp.

Bob Link
Vice President
Nuclear Power

TGM/jg

cc: NRC Resident Inspector
NRC Regional Administrator, Region III

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LICENSEE EVENT REPORT (LER)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, D.C. 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)

Point Beach Nuclear Plant, Unit 1

DOCKET NUMBER (2)

0 5 0 0 0 2 6 6 1 OF 09

PAGE (3)

TITLE (4)

Improper Sequencing of Emergency Safety Features

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES	DOCKET NUMBER(S)
05	15	92	92	004	03	03	19	93	PBNP Unit 2	050003011
THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5. (Check one or more of the following) (11)										
OPERATING MODE (9)		N		20.402(b)		20.405(c)		50.73(a)(2)(iv)		73.71(b)
POWER LEVEL (10)		000		20.405(a)(1)(i)		50.36(c)(1)		50.73(a)(2)(v)		73.71(c)
				20.405(a)(1)(ii)		50.36(c)(2)		50.73(a)(2)(vi)		OTHER (Specify in Abstract below and in Text, NRC Form 366A)
				20.405(a)(1)(iii)		X 50.73(a)(2)(i)		50.75(a)(2)(viii)(A)		
				20.405(a)(1)(iv)		50.73(a)(2)(ii)		50.73(a)(2)(vii)(B)		
				20.405(a)(1)(v)		50.73(a)(2)(iii)		50.72(a)(2)(x)		

LICENSEE CONTACT FOR THIS LER (12)

NAME

T. J. Koehler, Manager-Maintenance & Engineering

TELEPHONE NUMBER

AREA CODE

414 755-1232

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC

SUPPLEMENTAL REPORT EXPECTED (14)

EXPECTED SUBMISSION DATE (15)

MONTH DAY YEAR

YES (If yes, complete EXPECTED SUBMISSION DATE)

X NO

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

ABSTRACT

On May 15, 1992, Operations Refueling Test 3 (ORT-3), "Safety Injection Actuation with Loss of Engineered Safeguards AC," was performed on Point Beach Nuclear Plant, Unit 1. This test is performed in accordance with Point Beach Nuclear Plant Technical Specification Section 15.4.6, "Emergency Power System Periodic Tests," Specification A.2. This test is conducted to ensure that, following the initial start signal, the emergency diesel generators will automatically start and assume required loads in less than the time periods listed in the Point Beach Final Safety Analysis Report (FSAR), Section 8.2.3, "Emergency Power." The loading sequence requirements in FSAR Section 8.2.3 are conservative with respect to the assumed start times in the PBNP FSAR Chapter 14, "Safety Analysis." During subsequent review on June 11-12, 1992, of ORT-3 test data for Unit 1 and the November 2, 1991, test results for Unit 2, nuclear relays were determined to have measured setpoints greater than the Technical Specification acceptance criteria due to the wrong acceptance criteria being included in the procedure. All start times remained bounded by the start times assumed in the FSAR.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 60.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-630), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
Point Beach Nuclear Plant, Unit 1	05000266	92	004	03	02	OF 09

TEXT (If more space is required, use additional NRC Form 366A's) (17)

EVENT DESCRIPTION

On May 15, 1992, Operations Refueling Test (ORT) 3, "Safety Injection Actuation with Loss of Engineered Safeguards AC," was performed as required by Point Beach Nuclear Plant Technical Specification Section 15.4.6, "Emergency Power System Periodic Tests," Specification A.2. This test verifies the ability of a diesel generator to automatically start, shed load, and sequence vital loads onto the safeguards buses as a result of a loss of AC power to the safeguards buses concurrent with a simulated safety injection signal. At the time of the ORT-3 test, the acceptance criteria in the PBNP Technical Specifications specified that the diesel generator automatically start and that the appropriate loads sequence on in less than the times listed in the Point Beach Nuclear Plant updated Final Safety Analysis Report (FSAR) Section 8.2.3, "Emergency Power."

The analysis and review of the ORT-3 test data completed on May 19, 1992, determined that Service Water Pump P-32C started at 20.5 seconds vice the maximum specified time of 15 seconds. The time delay relay for P-32C was tested and adjusted to within the ORT-3 acceptance criteria. Containment Ventilation Fan 1-W1B1 started at 53.1 seconds vice the maximum specified time of 35 seconds. The time delay relay for 1-W1B1 was replaced and adjusted to within the ORT-3 acceptance criteria.

On June 11, 1992, during preparation of this LER, we determined that the criteria used to analyze the ORT-3 test results contained tolerance bands on the required start times. The tolerances procedurally defined in ORT-3 were inconsistent with the Technical Specification criteria which required the relay start times to be established at values less than those contained in the PBNP FSAR. A complete review of the most recent Unit 1 ORT-3 test conducted on May 15, 1992, and Unit 2 ORT-3 test conducted on November 2, 1991, was performed. From this review, we determined that Service Water Pump P-32C had started at 15.5 seconds (rather than the 20.5 seconds determined in the original analysis) which was within the procedural acceptance criteria, but outside the acceptance criteria specified in the Technical Specifications. Three relays, in addition to the relays for Containment Ventilation Fan 1-W1B1, had measured setpoints which did not conform to the Technical Specification and ORT-3 acceptance criteria. These three relays were the Unit 1 and Unit 2 time delay relays associated with Service Water Pump P-32D and the Unit 1 time delay relay associated with Service Water Pump P-32F. In addition, one test of the Unit 1 time delay relay for Service Water Pump P-32B met the Technical Specification criteria, but did not meet the ORT-3 procedural acceptance criteria. These four relays were tested and adjusted to conform to ORT-3 procedural tolerances. Following the adjustment of these relays, all relays satisfied ORT-3 procedural acceptance criteria. However, at the time of the test, a total of

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
Point Beach Nuclear Plant, Unit 1	05000266	92	004	03	03	OF	09

TEXT (If more space is required, use additional NRC Form 356A's) (17)

26 safeguards relays remained outside the Technical Specification requirement, to sequence on in times less than those defined in the PBNP FSAR.

As a result of the discovery of this plant configuration, Wisconsin Electric requested an NRR Waiver of Compliance from the requirements of PBNP Technical Specification Section 15.4.6, "Emergency Power System Periodic Tests," Specification A.2. This waiver was verbally granted on the evening of June 11, 1992, and followed by our formal request in letter dated June 12, 1992.

On August 9, 1991, Wisconsin Electric had requested a change to the PBNP Technical Specification 15.4.6.A.2 to eliminate the requirement to sequence on safeguards loads in less than the times specified in the PBNP FSAR. In conjunction with this change, we proposed to specify appropriate tolerances on the safeguards load sequence times in the PBNP FSAR. The license amendment authorizing this change to PBNP Technical Specification 15.4.6.A.2 was issued by the NRC on June 10, 1992, and received on June 12, 1992. The issuance of this license amendment and associated FSAR revision, which occurred on June 12, 1992, authorized operation in the discovered plant configuration and established compliance with license conditions.

SYSTEM AND COMPONENT DESCRIPTION

The safeguards logic racks contain time delay relays (nine per train) used to time the start of the equipment in the safeguards sequence. The time delay relays are actuated with a safety injection signal, when the safeguards buses are re-energized and have adequate voltage. This ensures that the safeguards loads will start in sequence and will not attempt to start on a dead bus. This, in turn, provides assurance that the emergency diesel generators do not attempt to re-energize safeguards buses with major loads connected and ensures that the starting of major loads does not overlap. Each of these conditions could result in an overload and subsequent failure of the diesel generator and the loss of one train of safeguards equipment.

The time delay relays are AGASTAT Model 2412PE for the containment ventilation fan and AGASTAT Model 2412PD for the service water pump.

SAFETY ASSESSMENT

The start time for the containment ventilation fan was compared to the start times assumed in the safety analyses contained in the Point Beach Nuclear Plant FSAR, Chapter 14. For Containment Ventilation Fan 1-W1B1, that start time was compared to the start times assumed in the large break Loss of Coolant Accident (LOCA) analysis and the containment capability analysis. These are the bounding accident scenarios for this

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 600 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (F-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
Point Beach Nuclear Plant, Unit 1	0500026692	00	04	03	04	OF 09	

TEXT (If more space is required, use additional NRC Form 366A's) (17)

component. For the LOCA analysis, it is conservative to assume an early start time for the containment ventilation fans, since this will lower the containment pressure and consequently maximize the LOCA blowdown transient. The earliest assumed start time for containment recirculation fan coolers in the LOCA analysis is 35 seconds. In the containment capability analysis, an assumed later containment ventilation fan start time is more conservative, since it will demonstrate that the containment structure can withstand higher internal pressures. The containment capability analysis assumes the containment fan coolers begin providing heat removal after 60 seconds. The actual time delay for the start of Containment Ventilation Fan 1-W1B1 measured during ORT-3 was 53.1 seconds following bus re-energization (58.7 seconds following the loss of AC power). Therefore, the start time for the containment ventilation fan, measured during the performance of ORT-3, is bounded by the LOCA and containment capability analyses.

Safeguard(s) loads failing to meet the specified sequence times may result in the simultaneous starting of multiple loads at essentially the same time. This could result in a transient overload of a diesel generator resulting in the loss of one safeguards train. With the safeguards bus energized, a containment spray pump will sequence on ten seconds after a containment high pressure signal. One identified instance of the simultaneous starting of three safeguards loads occurred during the Unit 1 ORT-3 test. In this instance, a service water pump, a containment ventilation fan, and a containment spray pump could have simultaneously started. The total horsepower required by these three loads is 650 HP, which is less than the that of one safety injection pump. This is also less than the normal case assumed in the transient loading analysis for the PBNP diesel generators of an SI pump in the accident unit starting simultaneously with a component cooling water pump in the unaffected unit (950 HP total). The simultaneous starting of these loads will not result in an overload of diesel generator.

Operation with safeguards relay setpoints established within defined tolerances did not result in a safety significant hazard. The establishment and implementation of appropriate tolerances in the load sequence times provides assurance that the diesel generator and safeguard loads will function as designed and analyzed in the FSAR. This safety assessment was delineated in our August 9, 1991, Technical Specification Change Request 146 and resummairized in our June 12, 1992, Waiver of Compliance request. Therefore, the health and safety of the public and plant personnel were not endangered.

CAUSES AND CONTRIBUTING FACTORS

PBNP Technical Specification 15.4.6.A.2 requires that a test be performed to demonstrate the ability of a diesel generator to automatically start, shed load, and sequence vital loads onto the

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
Point Beach Nuclear Plant, Unit 1	0500026692	—	004	—	03	05 OF 09	

TEXT (If more space is required, use additional NRC Form 366A's) (17)

safeguards buses on an actual loss of AC power to the safeguards buses concurrent with a simulated SI signal. The Technical Specifications required that vital loads sequence on in less than the times listed in FSAR Section 8.2.3. This LER has summarized the ORT-3 test results for the tests conducted during the 1992 Unit 1 refueling outage and the 1991 Unit 2 refueling outage, which demonstrated nonconformance with the Technical Specification requirements as they existed at the time of the tests. The causes and contributing factors to these nonconforming conditions were:

1. ORT-3 acceptance criteria were inconsistent with the Technical Specification acceptance criteria. In 1985, the Technical Specification page containing Specification 15.4.6.A.2 was retyped to incorporate Amendments 91 and 95 to DPR-24, PBNP Unit 1, and DPR-27, PBNP Unit 2, respectively. Those amendments incorporated unrelated administrative changes to Technical Specification Section 15.4.6. During the retyping, the requirement that the sequence times be less than the times listed in the FSAR was inadvertently omitted. In mid-1990, this error was found and corrected. During that time period, the specification was interpreted as allowing a tolerance to be applied to the FSAR times as long as adequate assurance was maintained that multiple loads would not attempt to start concurrently and that start times would remain within accident analyses assumptions. These tolerances were specified in the acceptance criteria contained in ORT-3. When the specification was corrected, we inadvertently did not update ORT-3.
2. ORT-3 test procedure acceptance criteria were deficient in that all acceptance criteria were not included. A review of the ORT-3 acceptance criteria determined that the Unit 1 ORT-3 test procedure did not contain acceptance criteria for the start times for Service Water Pumps P-32D, P-32E, and P-32F. This contributed to not immediately recognizing the out-of-tolerance start time for P-32D during the Unit 1 test. These pumps are shared equipment, powered from Unit 2 buses. Likewise, the Unit 2 ORT-3 test procedure did not contain acceptance criteria for Service Water Pumps P-32A, P-32B and P-32C. These pumps are shared equipment, powered from Unit 1 buses. All other shared equipment is appropriately covered in the test procedures.
3. Failure to identify the need for acceptance criteria for shared components in both the Unit 1 and Unit 2 ORT-3 procedures. An evaluation was performed in 1989 which developed the ORT-3 acceptance criteria. This evaluation failed to recognize that components shared by both PBNP units would be required to function under accident conditions in one unit.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 60.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (F-630), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)

DOCKET NUMBER (2)

LER NUMBER (6)

PAGE (3)

YEAR

SEQUENTIAL
NUMBERREVISION
NUMBER

Point Beach Nuclear Plant, Unit 1 0 5 0 0 0 2 6 6 9 2 - 0 0 4 - 0 3 0 6 OF 0 9

TEXT (If more space is required, use additional NRC Form 366A's) (17)

4. One time delay relay was determined to require replacement. Other nonconforming relays required adjustment to account for setpoint drift.

CORRECTIVE ACTIONS

The following corrective actions have been taken or are planned to address this event:

1. A Temporary Waiver of Compliance from the requirements of Technical Specification 15.4.6.A.2 was requested and granted on June 11, 1992. This Waiver of Compliance authorized operation in the discovered plant condition until the Technical Specification amendment requested August 9, 1991, was received. The amendment was received on July 12, 1992, and implemented along with the appropriate FSAR changes.
2. Subsequent to the discovery in June 1991 of the omission in the Technical Specification of the appropriate acceptance criteria, a Technical Specification change was requested on August 9, 1991, to allow the implementation of the appropriate tolerance bands. This change was approved on June 10, 1992, and implemented along with the appropriate changes to the PBNP FSAR on June 12, 1992.
3. Revisions have been made to the ORT-3 test procedures for each unit to include all applicable acceptance criteria. The revised procedures were issued on July 20, 1992.
4. Maintenance Work Requests were issued for investigation into the cause of the failures and to replace, test, and adjust the time delay relays as necessary. The results of these investigations and corrective actions taken are summarized below:

Unit 1 TDR-17, the time delay relay for Containment Ventilation Fan 1-W1B1, actuated outside the tolerances applied to the relay setpoint, but within the required Technical Specification acceptance criterion during three of the last four ORT-3 tests. In response to the two previous ORT-3 tests, which identified tolerance deviations for this relay, the time delay relay setpoint was adjusted and tested satisfactorily. Because of the large setpoint shift identified during the May 15, 1992, test and the previously required adjustments, we determined that the relay was no longer suitable for continued operation. TDR-17 relay was replaced on May 19, 1992; adjusted; and tested satisfactorily.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 60.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)

DOCKET NUMBER (2)

LER NUMBER (6)

PAGE (3)

YEAR SEQUENTIAL REVISION
NUMBER NUMBER NUMBER

Point Beach Nuclear Plant, Unit 1 0 5 0 0 0 2 6 6 9 2 - 0 0 4 - 0 3 0 7 OF 0 9

TEXT (If more space is required, use additional NRC Form 306A's) (17)

Service Water Pump P-32B was timed during the Unit 1 ORT-3 testing to start at 18.9 seconds. The minimum acceptable start time per ORT-3 is 19 seconds. During subsequent testing on June 11, 1992, prior to adjustment, the time delay relay (TDR-14) was found to actuate at 20.8 seconds, which is within the present ORT-3 acceptance criteria additional tests were within the acceptance criteria.

Unit 1 TDR-23, the time delay relay for Service Water Pump P-32C, was adjusted on May 19, 1992, and tested satisfactorily. Our initial data analysis concluded this relay to be in nonconformance with acceptance criteria. The maintenance history on the PBNP computerized data base for this relay was reviewed. No previous history of setpoint shifts was identified. Continued use of this relay is considered acceptable.

During the Unit 1 ORT-3 test, P-32D was timed to start at 22.2 seconds. Since Appendix C to the Unit 1 ORT-3 procedure did not contain acceptance criteria for the start time, this was not immediately recognized to be out of tolerance. On June 11, 1992, the time delay relay (TDR-24) was subsequently tested and found at 22.4 seconds. The relay was adjusted to 20.3 seconds and verified to be set at the proper time.

Service Water Pump P-32D was timed during the Unit 2 ORT-3 testing to start at 22.3 seconds vice the maximum time allowed by Technical Specifications of 20 seconds. Reanalysis of the Unit 2 test data on June 11, 1992, determined the pump to have started at 21.7 seconds, which is within the procedural acceptance criteria. Based on the initially determined 22.3 second time delay, the time delay relay (TDR-24) was tested on June 11, 1992, and a 22.2 second start time for the pump was found. 22.2 seconds is within the $\pm 5\%$ relay tolerance of 21.7 seconds. The time delay relay was adjusted and verified at 20.42 seconds.

The time delay relay (TDR-15) for Service Water Pump P-32F was not tested during the Unit 1 ORT-3 test. The pump was out of service at the time of the test. This relay was subsequently tested on May 19, 1992, and found to be set at 28.6 seconds, which exceeds the procedure required start time. The timed delay relay for P-32F was adjusted on May 19, 1992, and verified at 24.5 seconds.

5. Because the late starting of loads could potentially exceed the accident analyses assumptions and could potentially result in the overload of an emergency diesel generator resulting in the loss of a safeguards train, an evaluation of safeguards time delay relay application and operating history was performed. This evaluation

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 500 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1) Point Beach Nuclear Plant, Unit 1	DOCKET NUMBER (2) 0 5 0 0 0 2 6 6	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		9 2	0 0 4	0 3	0 8	OF	0 9

TEXT (If more space is required, use additional NRC Form 366A's) (17)

was completed on August 31, 1992. We have determined that the AGASTAT Model 2400 series relays installed at PBNP are adequate. However, we have concluded that system reliability can be enhanced by replacement of the AGASTAT 2400 relays. Modifications are being initiated to replace the existing relays. These modifications are presently expected to be performed during 1994 for both units.

6. Under contract with Sargent and Lundy, we have developed the capability to evaluate the transient response of the PBNP diesel generators to changes in the load starting sequence. Actual test data was used to validate the accuracy of this diesel generator model. Initial calculations predicting the diesel generator response to the present load sequence, including the simultaneous starting of a service water pump and containment spray pump, were received on August 4, 1992. These calculations verified the capability of the diesel generator to respond to the present loading sequence.
7. Administrative Procedure PBNP 3.2.1, "Technical Specification/Safety-Related Surveillance," adequately addresses the review of PBNP procedures for identifying changes in response to proposed Technical Specification amendments. The requirements of PBNP 3.2.1 have been reemphasized to responsible personnel and should prevent further recurrence.
8. QP 6-9, "Technical Specification and Bases Changes," was issued on September 28, 1992. This procedure provides guidance for the development of Technical Specification and bases changes and includes identifying related procedure changes early in the process. In addition, outstanding Technical Specification Changes were reviewed, required procedure changes identified, and the responsible groups notified of the required changes on August 31, 1992.
9. Quality Assurance Procedure QP 6-8, "FSAR Revisions," was revised and issued on September 11, 1992. The procedure includes requirement for the originator to determine if a Technical Specification or other operational requirement will be affected by the proposed change.

REPORTABILITY

This event is being reported in accordance With the requirements in 10 CFR 50.73(a)(2)(i)(B), "The licensee shall report any operation or condition prohibited by the plant's Technical Specifications."

GENERIC IMPLICATION

There are no known generic implications to this event.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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FACILITY NAME (1)

DOCKET NUMBER (2)

LER NUMBER (6)

PAGE (3)

Point Beach Nuclear Plant, Unit 1

0500026692-004-0309 OF 09

TEXT (If more space is required, use additional NRC Form 366A's) (17)

SIMILAR OCCURRENCES

Occurrences of out-of-specification time delay relays related to the use of improper acceptance criteria were documented in LER 92-004-00 dated July 10, 1992, for PBNP Units 1 and 2, and in NRC Inspection Reports 50-266/90010 and 50-301/90010 dated June 28, 1990.