



**Wisconsin
Electric**
POWER COMPANY

Point Beach Nuclear Plant
6610 Nuclear Rd. Two Rivers, WI 54241

VPNPD-94-018
NRC-94-012

(414) 755-2321

February 9, 1994

Mr. John Martin
Regional Administrator
U.S. NUCLEAR REGULATORY COMMISSION, REGION III
801 Warrenville Road
Lisle, IL 60532-4351

Dear Mr. Martin:

DOCKETS 50-266 AND 50-301
REQUEST FOR ENFORCEMENT DISCRETION
LIMITING CONDITIONS FOR OPERATION
POINT BEACH NUCLEAR PLANT UNITS 1 AND 2

The purpose of this letter is to document the basis for a request from Wisconsin Electric Power Company, licensee for Point Beach Nuclear Plant, for enforcement discretion. This request for enforcement discretion is made pursuant to the guidelines of Section VIII of the enforcement policy (10 CFR Part 2, Appendix C), as modified in the March 17, 1993, Federal Register Notice (58 FR 14308).

REQUIREMENT FOR WHICH ENFORCEMENT DISCRETION IS REQUESTED

The Limiting Condition for Operation (LCO) defined by PBNP Technical Specification Section 15.3.7, "Auxiliary Electrical Systems," Specification B.1.g allows one emergency diesel generator (EDG) to be inoperable for a period not to exceed 7 days provided the other EDG is tested daily to ensure operability and the engineered safety features associated with the EDG are operable. The failure of the operable EDG places both PBNP units into Technical Specification Section 15.3.0, "General Considerations," Specification A, which requires the operating units to be placed into hot shutdown within 3 hours. Enforcement Discretion was requested to allow sufficient time to return EDG G01 or G02 to a fully operable condition and should this action not be successful, to allow time for the orderly and sequential shutdown of both units.

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CIRCUMSTANCES SURROUNDING THE SITUATION

On February 7, 1994, at 0339 hours CST, EDG G02, the Train B EDG, was voluntarily removed from service for its annual maintenance outage as required by PBNP Technical Specification 15.4.6.A.4. This required placing both PBNP units into the LCO defined in Specification 15.3.7.B.1.g which permits one EDG to be inoperable for up to seven days provided the operable EDG is tested daily and the engineered safety features associated with the operable EDG are operable.

On February 8, 1994, at 2204 hours CST, EDG G01 was declared inoperable due to VAR fluctuations observed on the generator output during load testing of G01. The declaration of G01 inoperability, with G02 out of service, required that both units be placed in hot shutdown within 3 hours (by 0104 hours on February 9, 1994) as required by Specification 15.3.0.A.

At 2208 hours, shutdown of both PBNP Units commenced. An Unusual Event was declared at 2207 hours in accordance with our Emergency Plan due to loss of safeguards equipment requiring plant shutdown. Notification of State and Local Agency was completed on February 8 at 2219 hours. An ENS notification was made to the NRC Operations Center on February 8 at 2257 hours CST.

Efforts to troubleshoot and repair G01 were initiated immediately in parallel with efforts to recover G02 from its annual maintenance outage.

At 2320 hours CST, the power reduction was suspended with the approval of NRC Region III personnel pending completion of our request for enforcement discretion. PBNP Unit 1 power was held at 86% and Unit 2 at 85% during this time.

Upon declaring EDG G01 inoperable, immediate action was taken to determine the cause of the VAR fluctuations. We determined that the voltage fluctuations were caused by the shorting of a cable assembly within the generator. The cable which connects the exciter brushes came in contact with a rotating collector bus bar carrying current from the brushes to the generator coils. The damaged cable and bus bar on EDG G01 were replaced with identical parts from G02 which was out of service for maintenance. This repair was completed, EDG G01, load tested satisfactorily and G01 declared operable at 0244 hours CST on February 9, 1994, at which time enforcement discretion was no longer required.

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Both PBNP units were subsequently returned to 100% power. G02 remains out of service. Both units continue in the seven-day LCO in Specification 15.3.7.B.1.g for one EDG inoperable.

COMPENSATORY ACTIONS

Combustion Turbine Generator (G05), our qualified alternate AC source can be used to supply power to both the Train A and Train B safeguards buses if a loss of offsite power occurred during the duration of the enforcement discretion. G05 was successfully load tested on February 7, 1994. No work or testing that could adversely affect the operability of G05 was performed during the duration of the enforcement discretion.

We requested special consideration from our system control center to minimize requests for changes to the loading of the PBNP units, as well as to minimize any foreseeable perturbations on the 345 kV grid. All four 345 kV lines to PBNP were operable.

All work, testing and surveillance which could result in a transient on one or both PBNP Units or could affect safeguards equipment was suspended for the duration of the enforcement discretion.

SAFETY SIGNIFICANCE AND POTENTIAL CONSEQUENCES

Continued operation of both units for the duration of this enforcement discretion in excess of the 3-hour action time required by Specification 15.3.0.A did not result in an increased risk to the health and safety of the public and plant personnel.

The shutdown of both units within the 3-hour action time limit of Specification 15.3.0 places the units through simultaneous transients, placing unnecessary burden on the operating crew, and therefore increases the probability of initiating an event which could challenge the engineered safety features of the reactor protection system. Sequential shutdown of the units allows normal and orderly shutdown of each unit, minimizes the effects of the shutdown transients on the units and the burden on the operating crew.

During the time that both units are operating at power, should a loss of offsite power occur and both EDGs fail resulting in a station blackout, the combustion turbine (G05) is operable and available to provide power to the required safe shutdown loads. In addition, both units are near normal operating temperatures which allows use of the steam generators and auxiliary feedwater system for the removal of decay heat. If the units are in cold shutdown,

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a loss of decay heat removal capability by the residual heat removal system would occur until the required shutdown loads are repowered from G05.

JUSTIFICATION FOR THE DURATION OF THE ENFORCEMENT DISCRETION

We requested to hold in abeyance the required shutdown to allow repairs and return of G01 to an operable condition. Also, we requested an additional seven hours to place the first unit in hot shutdown and 10 hours to place the second unit in hot shutdown. We believe this time was sufficient to allow completion of G01 repairs and return to service testing, and to allow an orderly and sequential shutdown of both PBNP units using normal shutdown procedures and rates (15%/hour) should these repairs not be successful.

STATE NOTIFICATION STATEMENT

We notified the Public Service Commission of Wisconsin Electrical Division staff of the requested enforcement discretion at 0725 hours on February 9. This will be followed by formal notification of appropriate State of Wisconsin officials by copy of this letter in accordance with 10 CFR 50.91(b).

SUMMARY OF COMMUNICATIONS AND APPROVALS

The NRC senior resident inspector was notified on February 8 at 2215 of the inoperability of both EDGs and of our intent to request enforcement discretion.

In accordance with our Emergency Plan, State and local agencies were notified of the declaration of the Unusual Event on February 8 at 2219 CST. They were notified of the Unusual Event termination at 0416 hours on February 9, 1994, following the return of G01 to an operable condition.

The one-hour non-emergency event notification was made to the NRC Operations Center in accordance with 10 CFR 50.72 (i) (A), on February 8 at 2257 hours. A status update on the event was made to the NRC Operations Center on February 9 at 0034 hours. The Operations Center was notified of the return of G01 to service on February 9 at 0253 hours.

The PBNP Manager's Supervisory Staff (onsite nuclear safety review committee) convened and discussed this issue at approximately 2300 hours CST on February 8, 1994; concurred with the decision to request this enforcement discretion; and concurred with the content of this request.

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A telephone conference between the Nuclear Reactor Regulation (NRR) offices, NRC Region III, PBNP, and WE corporate offices was initiated and 2315 hours CST on February 8, 1994, to discuss this request for enforcement discretion.

At the beginning of our conference with NRC representatives, it was pointed out by the Manager-PBNP that as of 2208 hours CST, rampdown of both PBNP units was in progress at a rate of 15%/hour in accordance with normal shutdown procedures. Accordingly, it was requested that the requirements of the LCO be suspended for the duration of the telephone conference. This request was verbally approved by your regional representative, Mr. Robert Greger, on February 8 at 2320 hours CST. Units 1 and 2 were subsequently held at 86% and 85% power, respectively, for the duration of the enforcement discretion.

Verbal approval of this enforcement discretion was granted on February 8, at 2356 hours CST by Mr. Robert Greger, holding in abeyance the shutdown of both PBNP units until 0800 hours CST on February 9, 1994, at which time the orderly sequential rampdown of the units would be initiated if an EDG had not been restored to operable status. Three hours was granted for placing the first unit in a hot shutdown condition and additional 3 hours granted for placing the second unit in hot shutdown.

If you have any questions or require additional information, please contact us.

Sincerely,



Bob Link
Vice President
Nuclear Power

cc: NRC Resident Inspector
NRC Document Control Desk
PSCW

bcc: Anthony, Arneson, Becka, Krieser, Maxfield, Newton, Patulski,
Ulmer, Malanowski