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Ref. # 10CFR Part 2,  
Appendix C

C. Lance Terry  
Group Vice President

November 11, 1994

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES) - UNIT 2  
DOCKET NUMBER 50-446  
ENFORCEMENT DISCRETION FOR DIESEL GENERATOR TEST FREQUENCY

REF: TU Electric letter logged TXX-94306 from C. L. Terry  
to U.S. NRC dated November 11, 1994

Gentlemen:

In accordance with the guidance provided by 10 CFR 2, Appendix C, Texas Utilities Electric Company (TU Electric) requests that the Nuclear Regulatory Commission (NRC) exercise its enforcement discretion not to enforce Technical Specification (TS) Surveillance Requirement 4.8.1.1.2a, 4.8.1.2.2a and TS Table 4.8-1 for the CPSES Unit 2 Train B Diesel Generator. Without the requested enforcement discretion, compliance with the CPSES Technical Specifications would require Diesel Generator testing on a seven day frequency. TU Electric believes this test frequency is unnecessary and inappropriate for the diesel generator failures which have occurred at CPSES.

REQUIREMENT/REQUEST:

Surveillance Requirements (SRs) 4.8.1.1.2a and 4.8.1.2 require, in part, that each Diesel Generator be demonstrated OPERABLE (on a STAGGERED TEST BASIS) in accordance with the frequency specified in Table 4.8-1. Table 4.8-1 requires, in part, that the frequency be increased from once per 31 days to once per 7 days if the number of failures in the last 20 valid tests is greater than or equal to 2. The seven day test frequency "shall be maintained until seven consecutive failure free demands have been performed and the number of failures in the last 20 valid demands has been reduced to one." TU Electric requests that enforcement discretion be exercised such that the failure of the Unit 2 Train B Diesel Generator of October 31, 1994, be excluded from the total number of failures used to determine the Diesel Generator test frequency.

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400 N. Olive L.P. 81 Dallas, Texas 75201

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CIRCUMSTANCES:

On October 31, 1994, the Unit 2 Train B Diesel Generator was in operation for testing. It had successfully completed a start and loading above 50% for greater than one hour (one hour at 100% and two hours at 110%). During the run, a vent valve (1/4-inch) on the fuel header came free of the line it was attached to and fuel oil sprayed into the room. The diesel was shut down manually.

An event had occurred previously, at which time, the tubing which had failed was replaced with thicker tubing to make the line less susceptible to failure (see TXX-93430, dated January 14, 1994). The mode of failure is fatigue cracking which occurs due to the mass of a valve vibrating at the end of the tubing. This then stresses the rigid point of the tubing connection to the fuel piping causing failure. The tube that failed on the Unit 2 Train B Diesel Generator is the only location that uses this configuration in a vent connection. The other such vent location on Unit 2 has the vent valve connected directly to the tap off the fuel oil header and tubing is not used between the tap and the vent valve.

COMPENSATORY ACTIONS:

A design change has been initiated to remove the vent valves of concern and plug the remaining holes by November 15, 1994. In the interim, the tubing and vent valve of concern have been removed and a short section of tubing with a cap has been installed in place of the failed tubing and vent valve. Subsequent engine runs proved that further compensatory actions are not required.

SAFETY SIGNIFICANCE AND POTENTIAL CONSEQUENCES:

The intent of these Surveillance Requirements, in part, is to identify events that result in unsuccessful runs of the diesel generator to identify when additional actions are appropriate to assure the reliability of the diesel generators. The ultimate goal is to assure a reliable diesel generator - a diesel generator that can perform its safety function when called upon to do so.

The vent valve that caused the leak has been removed from the line and the line has been capped. This event will not recur on this machine. During the test of interest, the diesel generator performed properly in all other respects. Therefore, the failure mode is precluded from recurrence.

The accelerated testing schedule is inappropriate and would be counter to safety. Generic Letter 94-01, the NRC's SER for the Inspection Requirements for Transamerica Delaval Diesel Generators, and other documents have recognized the harmful impacts of excessive testing of these diesel generators. Excessive or unnecessary testing can cause increased wear or degradation and thus contribute to a reduced reliability. The accelerated Diesel Generator testing would provide no benefit as the failure mechanism which existed is no longer credible. TU Electric has concluded that the granting of this enforcement discretion has no negative safety impact and,

in accordance with Generic Letter 94-01, would avoid unnecessary testing which is detrimental to the Diesel Generator reliability.

DURATION:

License Amendment Request (LAR) 94-017 has been submitted to revise the Technical Specifications to exclude this failure from the total number of failures used to determine test frequency. The enforcement discretion would remain in effect until the NRC has either dispositioned LAR 94-017 or the Unit 2 Train B Diesel Generator has exited the increased frequency requirement through the successful performance of additional surveillance tests.

NO SIGNIFICANT HAZARDS CONSIDERATION:

The purpose of this request is to avoid unnecessary testing and wear on a Diesel Generator. As such, this action does not impact the probability of an accident. It only impacts the consequences of an accident positively by eliminating unnecessary testing which could reduce the reliability of the Diesel Generator and therefore this enforcement discretion does not significantly increase the probability or consequences of an accident.

Similarly, remaining on the existing testing schedule and not going to accelerated testing cannot create a new kind of accident.

Avoiding unnecessary testing has no impact on failure points but may actually reduce the likelihood of Diesel Generator failure when the engine is required to perform a safety function. As a result, the requested enforcement discretion does not significantly reduce the margin of safety. This enforcement discretion does not constitute a significant hazards consideration.

ENVIRONMENTAL CONSEQUENCES:

The request only involves testing within the plant. These tests and their potential consequences are limited to the plant and will not result in any unplanned releases that could impact the environment. Although a minor impact, reduced testing will result in a reduction in the amount of the combustion products released.

CONCLUSIONS:

This activity has been reviewed and approved by the Station Operations Review Committee (SORC). TU Electric requests the NRC grant the requested enforcement discretion to avoid unnecessary testing of the Unit 2 Train B Diesel Generator. A response is requested following installation of the pipe plugs no later than the close of business on November 21, 1994.

Sincerely,

*C. L. Terry*

C. L. Terry

By:

*Roger D. Walker 11-11-94*  
Roger D. Walker  
Regulatory Affairs Manager

DRW/dw

c - Mr. L. J. Callan, Region IV  
Mr. T. J. Polich, NRR  
Mr. D. D. Chamberlain, Region IV  
CPSES Resident Inspectors (2)

Mr. D. K. Lacker  
Bureau of Radiation Control  
Texas Department of Public Health  
1100 West 49th Street  
Austin, Texas 78704