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VPNPD-92-340A
NRC-92-123A

10CFR50.73

November 9, 1992

REISSUED LETTER

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

Gentlemen:

DOCKETS 50-266 AND 50-301
LICENSEE EVENT REPORT 92-004-02
IMPROPER SEQUENCING OF EMERGENCY SAFETY FEATURES
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

Attached is Supplement 2 to Licensee Event Report 92-004-00, "Improper Sequencing of Emergency Safety Features, Point Beach Nuclear Plant, Units 1 and 2." This supplement provides an update to the corrective actions taken in response to this event. This report is being resubmitted because the report submitted on November 3, 1992, was incorrectly numbered as LER 92-004-01.

If you have any questions, please contact us.

Sincerely,

Bob Lj...
Vice President
Nuclear Power

TGM/jg

cc: NRC Regional Administrator, Region III
NRC Resident Inspector

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PDR ADOCK 05000266
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LICENSEE EVENT REPORT (LER)

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 (F630), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

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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 (5)								
										PBNP Unit 2				0 5 0 0 0 3 0 1								
0	5	1	5	9	2	9	2	0	0	4	0	2	1	1	0	9	9	2	0 5 0 0 0			
OPERATING MODE (9)			THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § (Check one or more of the following) (11)																			
N			20.402(w)				20.406(e)				30.73(w)(2)(v)				73.71(w)							
POWER LEVEL (10)			20.406(w)(1)(i)				30.36(e)(1)				30.73(w)(3)(v)				73.71(e)							
0 0 0			20.406(w)(1)(ii)				30.36(e)(2)				30.73(w)(2)(vi)				OTHER (Specify in Abstract below and in Text, NRC Form 305A)							
			20.406(w)(1)(iii)				30.73(w)(2)(ii)				30.73(w)(2)(viii)(A)											
			20.406(w)(1)(iv)				30.73(w)(2)(iv)				30.73(w)(2)(vi)(B)											
			20.406(w)(1)(v)				30.73(w)(2)(iii)				30.73(w)(2)(v)											
LICENSEE CONTACT FOR THIS LER (12)																						
NAME										TELEPHONE NUMBER												
T. J. Koehler-Manager, Maintenance & Engineering										AREA CODE 4 1 4 7 5 5 - 12 3 2 1												
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)										Y 40												

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 assure 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 initial review and analysis of the test data completed on May 19, 1992, it was identified that one service water pump and one containment ventilation fan sequenced onto the emergency diesel generator in greater than the times listed in FSAR Section 8.2.3. However, the start times remained within the maximum assumed start times in the FSAR Chapter 14. During a subsequent review of ORT-3 test data for Unit 1 and the November 2, 1991, test results for Unit 2 (performed on June 11-12, 1992), additional relays were determined to have measured setpoints greater than Technical Specification criteria.

Attachment QP 16-5.1

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-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.

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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." Two equipment items, Service Water Pump P-32C (Train B) and Containment Ventilation Fan 1-W1B1 (Train A), failed to start within the specified times. All other equipment satisfactorily started within the criteria used to analyze the test results.

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 three relays, in addition to the relays for Containment Ventilation Fan 1-W1B1 and Service Water Pump P-32C, 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.

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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-430), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

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TEXT (if more space is required, use additional NRC Form 255A's) (17)

However, at the time of the test, a total of 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 a letter dated June 12, 1992.

On August 9, 1991, Wisconsin Electric 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 times for the service water pumps and containment ventilation fan were 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, the start time was compared to the

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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 (F630) U.S. NUCLEAR REGULATORY COMMISSION WASHINGTON DC 20555 AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104) OFFICE OF MANAGEMENT AND BUDGET WASHINGTON DC 20503

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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 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.

For the service water pumps, the accident analyses assume that two of the six service water pumps are restarted following a loss of off-site power. Service water is required to provide heat removal capacity for both the Emergency Diesel Generator (EDG) glycol coolers and the containment ventilation fan coolers. As noted above, the PBNP FSAR containment capability analysis assumes the containment fan cooler heat removal begins at 60 seconds following accident initiation. This is the limiting time for service water availability. The Unit 1 ORT-3 test measured the latest start time for the second service water pump, P-32D (Train B), at 22.2 seconds following bus re-energization. The Unit 2 ORT-3 test measured the latest start time for the second service water pump, P-32B (Train A) and P-32D (Train B) at 21.7 seconds following bus re-energization. Therefore, the start times for the service water pumps measured during ORT-3 met the limiting requirements of the containment capability analysis.

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. The potential for simultaneously sequencing loads onto a diesel generator occurred during both the Unit 1 and Unit 2 ORT-3 tests. The most limiting case, two service water pumps simultaneously starting, was originally reported to have occurred during the Unit 1 ORT-3 test. Service Water Pump P-32C was originally determined to have sequenced on in 20.5 seconds following bus re-energization by the diesel generator vice the 15 seconds specified. This is essentially the same time that the second service water

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pump sequences on (at 20 seconds). The total horsepower of two service water pumps is 600 HP, which is less than the 700 HP rating of one safety injection pump. Therefore, the simultaneous starting of any two loads is not expected to result in an overload of the diesel generator. Subsequent review of the Unit 1 ORT-3 results determined that P-32C started at 15.5 seconds.

With the safeguards bus energized, a containment spray pump will sequence on ten seconds after a containment high pressure signal. The simultaneous starting of a containment spray pump with any one other safeguards load, excluding a safety injection pump, will not result in overloading a diesel generator. The potential existed, based on the original analysis of the Unit 1 ORT-3 results, for two service water pumps and one containment spray pump to attempt to start at the same time. This is the limiting case for the simultaneous starting of three safeguards loads and may potentially result in a transient overload of the diesel generator and the loss of that train of safeguards equipment. The total horsepower required by these three loads is 800 HP vice the 700 HP required by a safety injection pump. This would not likely have resulted in an overload of a diesel generator. The other 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 not expected to result in an overload of a 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 provide greater assurance that the diesel generator and safeguard loads will function as designed. This safety assessment was delineated in our August 9, 1991, Technical Specification Change Request 146 and resummarized 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 safeguards buses on an actual loss of AC power to the safeguards buses concurrent with a simulated SI signal. The Technical Specification required that vital loads sequence on in less than the times listed in FSAR Section 3.2.3. This LER has summarized the ORT-3 test results for

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ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 500 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATES 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.

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TEXT (if more space is required, use additional NRC Form 364a (1/7))

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

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ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST 800 HRS FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-430) U.S. NUCLEAR REGULATORY COMMISSION WASHINGTON, DC 20555 AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104) OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503

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TEXT IF MORE SPACE IS REQUIRED, USE ADDITIONAL NRC Form 366A (17)

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.

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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 (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

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TEXT IF MORE SPACE IS REQUIRED. See additional NRC Form 366A 5/117

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. All 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.

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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 (4301) U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

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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 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. We have developed, under contract with Sargent and Lundy, 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 a requirement for the originator to determine if a Technical Specification or other operational requirement will be affected by the proposed change.

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TEXT IF MORE SPACE IS REQUIRED, use additional NRC Form 364A (1/17)

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.

SIMILAR OCCURRENCES

Occurrences of out-of-specification time delay relays related to the use of improper acceptance criteria were documented in LER 92-C04-00 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.