

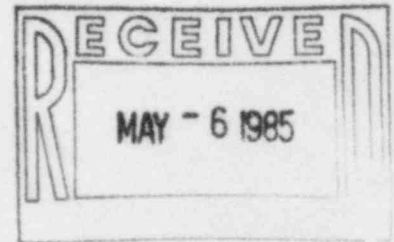


KANSAS GAS AND ELECTRIC COMPANY

GLENN L. KOESTER
VICE PRESIDENT - NUCLEAR

May 1, 1985

Mr. R.D. Martin, Regional Administrator
U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011



KMLNRC 85-099
Re: Docket No. STN 50-482
Subj: Special Report 85-002

Dear Mr. Martin:

The enclosed Special Report is submitted pursuant to
Technical Specifications 6.9.2 and 4.8.1.1.3.

If you have any questions concerning this matter, please
contact me or Mr. Otto Maynard of my staff.

Yours very truly,

Kent R Brown
for Glenn L. Koester
Vice President - Nuclear

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Enc.

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DIESEL GENERATOR INVALID FAILURES

On April 1, 1985, at approximately 0524 CST, an invalid failure of diesel generator (D/G) "A" occurred during periodic testing due to unnecessarily restrictive acceptance criteria listed in the governing procedure. At approximately 1212 CST another invalid failure of D/G "A" occurred due to a personnel error.

On April 1, 1985, at approximately 0524 CST, surveillance testing was performed on D/G "A" per surveillance procedure STS-KJ-005A, "Manual/Auto Start, Synchronization, and Loading of Emergency Diesel Generator NE01." The diesel was secured and the surveillance was terminated shortly thereafter because the diesel did not attain the proper speed within the time frame specified in the acceptance criteria of the surveillance procedure. The procedure specified that the diesel should reach at least 514 rpm within 10 seconds after start. During this test the diesel required 10.7 seconds to attain the required speed. Investigations into this failure to meet the procedural acceptance criteria for engine speed revealed that the requirement listed in the existing surveillance procedure was more restrictive than that found in the Surveillance Requirement of Technical Specification 4.8.1.1.2. The Technical Specification Surveillance Requirement specifies that the diesel must attain 514 rpm in less than or equal to 12 seconds whereas the surveillance procedure specified that the diesel must attain 514 rpm in less than or equal to 10 seconds. Temporary Procedure Change Form #MA 85-658 was issued to revise the acceptance criteria of STS KJ-005A to agree with the requirements of the Technical Specification.

At approximately 1212 CST, STS KJ-005A was recommenced utilizing the revised acceptance criteria. D/G "A" was started and subsequently secured due to an operator failing to measure the time required for D/G "A" to reach the required frequency, speed, and voltage, as required by STS KJ-005A.

D/G "A" was restarted at approximately 1249 CST. The diesel generator attained the required speed and frequency within 12 seconds of start. Therefore the revised acceptance criteria were met satisfactorily by this start. The diesel was loaded satisfactorily and subsequently secured at approximately 1414 CST. STS KJ-005A was completed satisfactorily.

The plant was in Mode 5 throughout this testing sequence. D/G "B" was available for service during this time, thus satisfying the Technical Specification Limiting Condition for Operation 3.8.1.2. Although the restrictive acceptance criteria of STS KJ-005A were not originally met, the Surveillance Requirements of Technical Specification 4.8.1.1.2 were satisfied during the first start attempt and thus D/G "A" was available for service throughout this time period.

These events are considered to be invalid failures of D/G "A" based on the criteria provided on Regulatory Position C.2.e of Regulatory Guide 1.108. The first test of D/G "A" was terminated before completion due to an error in an approved procedure and is classified as an invalid failure under Regulatory Position C.2.e.(2). The second test was terminated prior to completion due to an operating error and therefore it can be classified as an invalid failure per Regulatory Position C.2.e(4).

The unnecessarily restrictive acceptance criteria in procedure STS KJ-005A have been revised per Temporary Procedure Change Form MA 85-658 and a permanent change has been initiated. In order to prevent recurrence of similar personnel errors, this Special Report will be added to the Required Reading for Operations personnel to emphasize the importance of adhering to the steps specified in approved procedures.

There have been nine valid successful tests of both D/G "A" and D/G "B" during the time period between the completion of preoperational testing and the occurrence of these failures. Prior to the occurrence of the invalid failures documented in this report, D/G "A" had experienced three invalid failures since completion of preoperational testing. One invalid failure occurred prior to receipt of the fuel load license and the other two invalid failures are discussed in Special Report 85-001. Three invalid failures of D/G "B" occurred prior to receipt of the license. No valid failures of either diesel generator have occurred.

These events had no impact on the diesel generator surveillance testing frequency of at least once per 31 days. This is in conformance with the specifications of Regulatory Position C.2.d.(1) of Regulatory Guide 1.108 and Technical Specification Table 4.8-1 which require the test interval to be not more than 31 days if the number of failures in the last 100 valid tests is one or zero.