

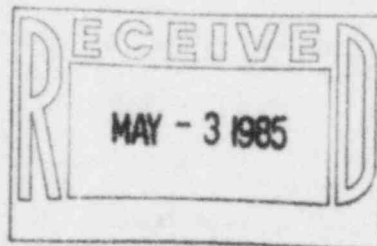


KANSAS GAS AND ELECTRIC COMPANY

GLENN L. KOESTER
VICE PRESIDENT - NUCLEAR

April 29, 1985

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



KMLNRC 85-097
Re: Docket No. STN 50-482
Subj: Special Report 85-001

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

GLK:dab

Enclosure

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SPECIAL REPORT 85-001

DIESEL GENERATOR INVALID FAILURES

On March 30, 1985, at approximately 0248 CST, an invalid failure of diesel generator (D/G) "A", NE01, occurred during post-maintenance testing. This failure is attributed to a personnel oversight resulting in inadequate venting of the fuel oil lines after maintenance was performed, and therefore is not considered a valid failure of D/G "A". At approximately 0930 on March 30, 1985, another invalid failure of D/G "A" occurred when a test was terminated intentionally due to a fuel oil leak.

On March 28, 1985, at approximately 0230 CST, Wolf Creek Work Request (WR) 91196-85 was initiated to repair a small leak in the fuel oil injector of D/G "A" that was discovered during a visual inspection. The leak was not of sufficient size to affect the availability of D/G "A". D/G "A" was tagged out per Clearance Order 85-940-KJ, and work commenced to repair the fuel oil leak. While carrying out the instructions of WR 91196-85, a pin hole was found in a weld on the return header line. The WR was revised to direct the removal of the return header and to transport it to the Maintenance Weld Shop for socket weld rework.

The rework was completed and the return header was reinstalled. On March 30, 1985, at approximately 0248 CST, D/G "A" was started to perform post-maintenance testing according to Surveillance Procedure STS KJ-005A, "Manual/Auto Start, Synchronization and Loading of Emergency Diesel Generator NE01." The diesel was secured and the STS was terminated after observing that D/G "A" did not reach rated speed, frequency or voltage within the time specified in Technical Specification Surveillance Requirement 4.8.1.1.2. This failure is attributed to the presence of air in the fuel oil lines due to the disassembly of the return header without proper venting of the lines after the subsequent reinstallation of the header as a result of an oversight on the part of personnel involved. During this test, two fuel oil fitting leaks were also observed.

WR #91196-85 was revised to provide proper venting instructions and several fittings were tightened in an attempt to eliminate the leaks. On March 30, 1985, at approximately 0931, the diesel was started in accordance with STS-KJ-005A to verify that the fuel oil leaks had been eliminated. The diesel attained rated speed, voltage and frequency within the allotted time period. After approximately 15 minutes a small leak was detected in the supply line to a fuel injection pump. The diesel was secured in order to repair the leak and the surveillance testing was suspended. The fittings were retightened. The engine was restarted at approximately 1035 CST per procedure SYS NB-201, "Paralleling Diesel Generator NE01 and Transferring NB01 Between Normal and Alternate Sources". There were no leaks detected during this run. The Surveillance testing was subsequently completed satisfactorily to meet the requirements of Technical Specification 4.8.1.2. for Mode 5, and D/G "A" was declared operable at approximately 1721 CST.

The plant was in Mode 5 during this event. Technical Specification 3.8.1.2 requires one diesel generator to be operable during Mode 5 and 6. The Limiting Condition for Operation was satisfied since D/G "B" was operable during this time period. D/G "A" was unavailable for approximately 3 days, from the time the Clearance Order was issued until the time satisfactory post-maintenance testing was completed.

These events are considered to be invalid failures of D/G "A" based on the criteria provided in Regulatory Position C.2.e of Regulatory Guide 1.108. The first test failed due to improper venting of the return header after maintenance, allowing air to be present in the fuel oil lines. This is considered to be an operating error and thus an invalid failure per Regulatory Position C.2.e.(2). The subsequent test was a successful start terminated intentionally without loading to repair a small fuel oil leak. This leak in and of itself would not have prevented the successful completion of the test. Thus this event is classified as an invalid failure per Regulatory Position C.2.e.(4).

This Special Report will be incorporated into the Required Reading List for Maintenance and Operations personnel to emphasize the necessity for proper venting techniques any time work is done on the fuel oil system if there is a possibility of any air pocket formation and to emphasize the necessity for particular diligence when tightening fittings. Due to some instances of inconsistent entries into the Diesel Generator Logs, an improved log system has been developed in order to more easily trend events.

Preoperational testing on D/G "A" was completed on January 18, 1985. There have been nine (9) successful valid tests of D/G "A" since the completion of preoperational testing and the occurrence of these two invalid failures. One invalid failure of D/G "A" occurred prior to the receipt of the fuel load and 5% power testing license. Preoperational testing on D/G "B" was completed on January 22, 1985. Nine (9) valid successful tests were performed on D/G "B" during the time period between the completion of preoperational testing and the occurrence of two invalid failures of D/G "A". Three invalid failures of D/G "B" occurred between January 22, 1985 and the receipt of the fuel load and 5% power testing license. No valid failures of either diesel generator have occurred between the completion of preoperational testing on January 18, 1985 and January 22, 1985, for diesel generators "A" and "B" respectively, and the occurrence of these two invalid failures of D/G "A" on March 30, 1985.

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 valid failures in the last 100 valid tests is one or zero.