

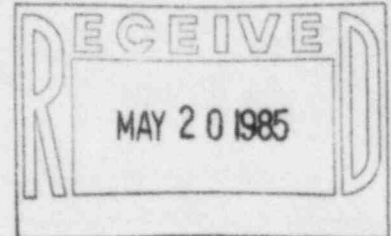


KANSAS GAS AND ELECTRIC COMPANY

GLENN L. KOESTER  
VICE PRESIDENT - NUCLEAR

May 17, 1985

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



KMLNRC 85-118  
Re: Docket No. STN 50-482  
Ref: (1) KMLNRC 85-097 dated 4/29/85  
from GLKoester, KG&E, to RDMartin, NRC  
(2) KMLNRC 85-099 dated 5/1/85  
from GLKoester, KG&E, to RDMartin, NRC  
(3) KMLNRC 85-106 dated 5/9/85  
from GLKoester, KG&E, to RDMartin, NRC  
Subj: Special Report 85-004

Dear Mr. Martin:

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

The References transmitted Special Reports 85-001, 85-002, and 85-003 respectively.

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

Yours very truly,

Glenn L. Koester  
Vice President - Nuclear

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**SPECIAL REPORT 85-004**

**DIESEL GENERATOR INVALID FAILURE**

On April 19, 1985, at approximately 0257 an invalid failure of diesel generator (D/G) "A" occurred due to an operating error.

On April 19, 1985, at approximately 0255 CST, D/G "A" was started to perform periodic testing in accordance with surveillance procedure STS KJ-005A, "Manual/Auto Start, Synchronization, and Loading of Emergency Diesel Generator NE01". Shortly thereafter, the Operator secured the diesel because, by his measurements, the generator required 12.48 seconds to attain the specified frequency (60Hz), and the Acceptance Criteria of STS KJ-005A state that the generator must attain 60 Hz in a time of less than or equal to 12 seconds.

An investigation into this failure was initiated. The system line-up and air pressure were verified to be proper. It was determined that the operator had measured the time required for the generator to stabilize at 60 Hz instead of measuring the time required for the generator to initially reach 60 Hz, as required by procedure.

At approximately 0306 CST, D/G "A" was restarted per STS KJ-005A. The diesel met the acceptance criteria for a successful start. It was subsequently paralleled, loaded and run for 62 minutes. STS KJ-005A was completed satisfactorily at approximately 0425 CST.

The plant was in Mode 4 during this event. Technical Specification 3.8.1.1 requires that two diesel generators shall be operable. If one diesel generator is inoperable, Action Statement a., in part, requires verification of the operability of the other A. C. sources within one hour and restoration of the inoperable A. C. source to operable status within 72 hours. In this instance, D/G "A" was unavailable for approximately ninety minutes during the time from the termination of the initial test until the successful surveillance test was completed. During this time, verification of the operability of the remaining A. C. sources was performed, thus satisfying the Technical Specification Action Statement.

This event is considered to be an invalid failure based on the criteria provided in Regulatory Guide 1.108. The start attempt at 0257 which was classified as unsuccessful can definitely be attributed to operating error and thus an invalid failure per Regulatory Position C.2.e.(2).

This Special Report will be added to Operations Required Reading to emphasize the importance of close adherence to procedural steps.

An independent verification of each of the emergency diesel generator's operational history has recently been completed. The results of this review indicated that the numbers of valid successful tests previously described in Special Reports 85-001, 85-002, and 85-003 were based on information that had not been completely verified. The numbers of valid successful tests, as of April 19, 1985, are as follows.

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There have been seven (7) valid successful tests of D/G "A" since the completion of preoperational testing on D/G "A". During the same time period, including the invalid failure discussed in this report, five (5) invalid failures and no valid failures have occurred in D/G "A". There have been six (6) valid successful tests of D/G "B" since the completion of preoperational testing on D/G "B". During the same time period, four (4) invalid failures and no valid failures have occurred on D/G "B".

The diesel generator testing frequency of at least once per 31 days was not affected by the independent verification or invalid failure described in this report. 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.