



Nuclear Management Company, LLC

NPL 2000-0517

November 30, 2000

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

10 CFR 50.73

Ladies/Gentlemen:

DOCKET NUMBER. 50-301
LICENSEE EVENT REPORT 301/2000-003-00
FAILURE TO COMPLY WITH LCO ACTION STATEMENT
TO START REDUNDANT STANDBY EMERGENCY POWER SUPPLY
POINT BEACH NUCLEAR PLANT UNIT 2

Enclosed is Licensee Event Report 301/2000-003-00 for the Point Beach Nuclear Plant Unit 2. This report is provided in accordance with 10 CFR 50.73(a)(2)(i)(B), as "Any operation or condition prohibited by the plant's Technical Specifications." This report documents the failure to perform a requirement of Limiting Condition for Operation (LCO) statement TS15.3.3.B.1.g. Specifically, this LCO permits the standby emergency power to a safeguards bus to be out of service provided that the redundant standby emergency power supply is started within 24 hours before or after entry into this LCO. Although the bus out of service condition exceeded 24 hours, a start of the standby emergency power supply was not accomplished within that time frame.

New commitments in this event report are identified in the corrective action section by italics.

Please contact us if you require additional information concerning this report.

Sincerely,

Dan Cole
Manager,
Site Assessment

Enclosure

CWK/tat

cc: NRC Resident Inspector PSCW
NRC Regional Administrator INPO Support Services
NRC Project Manager

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|---|--------|-----------|-----------------------|-----------------------|-------------------------------------|--|-----------|--------------|--------------------------------------|--|--|---|------------------|------|---|---------------------------|--|---|--|--|--|--|--|--|--|--|--|--|--|
| NRC FORM 366 (4-95) | | | | | | U.S. NUCLEAR REGULATORY COMMISSION | | | | | | APPROVED BY OMB NO. 3150-0104 EXPIRES 04/30/98 | | | | | | | | | | | | | | | | | |
| <h2 style="margin: 0;">LICENSEE EVENT REPORT (LER)</h2> <p style="margin: 10px 0;">(See reverse for required number of digits/characters for each block)</p> | | | | | | | | | | | | | | | | | | ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. REPORTED LESSONS LEARNED ARE INCORPORATED INTO THE LICENSING PROCESS AND FED BACK TO INDUSTRY. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (T-6 F33), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT | | | | | | | | | | | |
| FACILITY NAME (1) Point Beach Nuclear Plant, Unit 2 | | | | | | | | | | | | DOCKET NUMBER (2) 05000301 | | | | PAGE (3) 1 of 4 | | | | | | | | | | | | | |
| TITLE (4) Failure To Comply With LCO Action Statement To Start Redundant Standby Emergency Power Supply | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 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 NAME | | | | DOCKET NUMBER | | | | | | | | | | | | | | | | |
| 11 | 01 | 2000 | 2000 | - 003 | - 00 | 11 | 30 | 2000 | | | | | 05000 | | | | | | | | | | | | | | | | |
| OPERATING MODE (9) | | | N | | | THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11) | | | | | | | | | | | | | | | | | | | | | | | |
| POWER LEVEL (10) | | | 0 | | | 20.2201(b) | | | 20.2203(a)(2)(v) | | | <input checked="" type="checkbox"/> | 50.73(a)(2)(i) | | 50.73(a)(2)(viii) | | | | | | | | | | | | | | |
| | | | | | | 20.2203(a)(1) | | | 20.2203(a)(3)(i) | | | <input type="checkbox"/> | 50.73(a)(2)(ii) | | 50.73(a)(2)(x) | | | | | | | | | | | | | | |
| | | | | | | 20.2203(a)(2)(i) | | | 20.2203(a)(3)(ii) | | | <input type="checkbox"/> | 50.73(a)(2)(iii) | | 73.71 | | | | | | | | | | | | | | |
| | | | | | | 20.2203(a)(2)(ii) | | | 20.2203(a)(4) | | | <input type="checkbox"/> | 50.73(a)(2)(iv) | | OTHER | | | | | | | | | | | | | | |
| | | | | | | 20.2203(a)(2)(iii) | | | 50.36(c)(1) | | | <input type="checkbox"/> | 50.73(a)(2)(v) | | Specify in Abstract below or in NRC Form 366A | | | | | | | | | | | | | | |
| | | | | | | 20.2203(a)(2)(iv) | | | 50.36(c)(2) | | | <input type="checkbox"/> | 50.73(a)(2)(vi) | | | | | | | | | | | | | | | | |
| LICENSEE CONTACT FOR THIS LER (12) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| NAME Charles Wm. Krause, Senior Regulatory Compliance Engineer | | | | | | | | | | | | TELEPHONE NUMBER (Include Area Code) (920) 755-6809 | | | | | | | | | | | | | | | | | |
| COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| CAUSE | SYSTEM | COMPONENT | MANUFACTURER | REPORTABLE TO EPIX | CAUSE | SYSTEM | COMPONENT | MANUFACTURER | REPORTABLE TO EPIX | | | | | | | | | | | | | | | | | | | | |
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| SUPPLEMENTAL REPORT EXPECTED (14) | | | | | | | | | | EXPECTED SUBMISSION DATE (15) | | MONTH | DAY | YEAR | | | | | | | | | | | | | | | |
| YES (If yes, complete EXPECTED SUBMISSION DATE). | | | | | <input checked="" type="checkbox"/> | NO | | | | | | | | | | | | | | | | | | | | | | | |
| ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16) On November 1 during a review of the station log, the licensee discovered that contrary to the action statement of Technical Specification (TS) LCO 15.3.7.B.1.g, the standby emergency power to Point Beach Nuclear Plant Unit 2 Train "A" safeguards bus had been out of service for a period of more than 24 hours without starting of the redundant standby emergency power supply within 24 hours before or after entering the LCO. This is a condition prohibited by the TS and reportable pursuant to 10 CFR 50.73. The apparent cause of the condition was incomplete tracking of the LCO conditions. A complete evaluation of the root cause for this event is in progress. Unit 2 was shutdown and defueled at the time of this event. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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| | | YEAR | SEQUENTIAL NUMBER | REVISION NUMBER | |
| Point Beach Nuclear Plant, Unit 2 | 05000301 | 2000 | - 003 | - 00 | 2 OF 4 |

TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

Event Description:

On November 1, 2000, at approximately 2330 CST, the Duty Shift Supervisor (DSS), while conducting a review of the station log, observed that the plant staff had failed to comply with a requirement of Technical Specification (TS) Limiting Condition for Operation (LCO) 15.3.3.B.1.g. This LCO permits the normal power supply or standby emergency power supply to the Unit 2 safeguards electrical busses, 2A05 and 2B03, to be out of service for a period not exceeding seven days provided the required redundant engineered safety features are operable and the required redundant standby emergency power supplies are started within 24 hours before or after entry into the LCO and every 72 hours thereafter. The review of the logs identified that on October 30, 2000, at 0527, the standby emergency power to busses 2A05/2B03 had been declared out of service. This declaration was made because the circuit for the automatic "A" Train service water pump start on emergency diesel generator breaker closure to 2A05 was disabled while completing a modification to DC power distribution panel D-22. The service water pump auto start circuit is required for 2A05 standby emergency power operability because of the shared service water system at PBNP.

Normally the standby emergency power supply for 2A05/2B03 is emergency diesel generator (EDG) G-02. With the standby emergency power for this bus out of service declared out of service, the redundant backup emergency power supply for Train "B" was EDG G04. Under the applicable LCO, this EDG should have been started within 24 hours before or after the bus out of service declaration. Unit 2 was in refueling shutdown and defueled at the time of this event.

The TS 15.3.3.B.1.g LCO for standby emergency power to 2A05/2B03 was exited at 1905 CST on November 1, 2000, upon completion of the modification work package. At that time the emergency standby power had been out of service for approximately 37.5 hours. Upon discovery of this condition at 2330 CST, a review of the station logs for 24 hours before and after the original declaration of entry in the LCO confirmed that a start of the G04 EDG had not been done. A condition report was written (CR 00-3475) and the condition identified as reportable in accordance with 10 CFR 50.73(a)(2)(i) as "any operation or condition prohibited by the plant's Technical Specification." Since the plant was no longer in the LCO at the time of this discovery, starting of the redundant standby emergency power supply was no longer a requirement. The G04 EDG was subsequently tested in accordance with procedure TS-84, "Emergency Diesel Generator G04 Monthly," on November 6, 2000. This periodic surveillance test of the G04 EDG was successfully and no operational problems were identified.

Cause:

A root cause evaluation of the circumstances which resulted in this missed LCO action statement is being conducted. The failure to conduct the appropriate emergency standby power supply EDG start within the 24 hour window was an operations licensed operator oversight. Entry into and exit from the LCO was being tracked in accordance with plant procedure NP 10.1.1, "Tech Spec LCO Entry and Tracking," using the appropriate Action Statement Log Sheet (PBF-9133). However, identification and tracking of this LCO action requirement was not accomplished. This oversight and inadequate tracking may have been exacerbated by the large number of other LCOs entered, exited or tracked during this time period in support of ongoing outage maintenance and modifications.

LICENSEE EVENT REPORT (LER) **TEXT CONTINUATION**

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TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

Corrective Actions:

As mentioned previously, a root cause evaluation is being conducted to identify the factors and conditions which resulted in this oversight. Corrective actions identified as a result of this evaluation will be assigned to the appropriate work groups and tracked to completion under the licensees corrective action program.

The G02 and G04 EDGs have been run successfully subsequent to this event with no failures.

Component and System Description:

The standby emergency power for the safe guards electrical busses at the Point Beach Nuclear Plant is provided by four emergency diesel generators which are shared by the two units. Two Train "A" and two Train "B" EDGs are normally available. The two Train "A" EDGs, G01 and G02, are normally aligned as standby emergency power; G01 to the Unit 1 Train "A" 4160 volt bus (1A05) and G02 to the Unit 2 Train "A" 4160 volt bus (2A05). The two Train "B" EDGs, G03 and G04, are likewise, normally aligned as standby emergency power, G03 to the Unit 1 Train "B" 4160 volt bus (1A06) and G04 to the Unit 2 Train "B" 4160 volt bus (2A06).

The two "A" Train EDGs automatically provide power to their respective safeguards buses if normal power from the 4160 V switching buses, 1A03 or 2A03, is lost. G02 normally supplies the emergency standby power source for 2A05. To enhance flexibility and to support EDG maintenance and inspections, G01 is manually connectable to provide emergency standby power to 2A05, and G02 is manually connectable to provide emergency standby power to 1A05. Additionally, if G01 or G02 is out of service, the other "A" Train EDG may be placed in a mode that will allow it to automatically provide power to 1A05 or 2A05 or both, if either or both buses lose power. The G03 and G04 EDGs have the same capabilities in the "B" Train. Additional information concerning the electrical systems at PBNP may be found in FSAR Chapter 8.

Safety Assessment:

As discussed, Unit 2 was in a refueling shutdown condition and defueled. PBNP Unit 1 was operating at 100% power during this event. Although the service water system at PBNP is a shared system with three Train "A" pumps and three Train "B", the loss of DC power to the Unit 2 safeguards Train "A" relays would not have affected the automatic start of the "A" Train service water pumps on a Unit 1 safety injection signal and the service water pumps would have operated properly. If an under voltage (UV) condition had occurred on the 2A05 bus, the G02 EDG would have started and re-energized that bus; The "A" Train service water pumps would not have received their start signal. However, in this event, G02 EDG would have performed its function because adequate service water supply was available to support that EDG operations. Under these circumstances, the safety significance of this failure to complete an LCO action statement was therefore, negligible. This event did not involve degradation or loss of a component or system related safety function and is not considered a safety system function failure.

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System and Component Identifiers:

The Energy Industry Identification System component function identifier for each component/system referred to in this report are as follows:

| <u>Component/System</u> | <u>Identifier</u> |
|--|-------------------|
| Medium Voltage Power System - Class 1E | EB |
| Emergency Onsite Power Supply System | EK |
| ESF Actuation System | JE |
| Service Water System | BI |
| Pump | P |
| Breaker | BKR |

Similar Occurrences:

A review of recent LERs (past three years) identified no similar or related events which involved the failure to complete an LCO action statement requirement.