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The Northeast Utilities System

April 6, 2001 Docket No. 50-443 NYN-01030

United States Nuclear Regulatory Commission Attention: Document Control Desk Washington, DC 20555-0001

#### Seabrook Station Reply to Inspection Report 2000-11

North Atlantic Energy Service Corporation (North Atlantic) provides in the enclosure our alternative perspective on Inspection Report 2000-11. This letter is submitted in response to your letter of March 2, 2001 as discussed between your Mr. W. Ruland and our Mr. J. Peschel and J. Sobotka on March 12, 2001, March 16, 2001, March 19, 2001 and March 29, 2001. As discussed between Mr. Ruland and Mr. Peschel on March 12, 2001, North Atlantic does not desire a regulatory conference.

As the Inspection Report cover letter notes, North Atlantic has a view of the event significance that differs from the Special Inspection Team's view. The enclosure provides North Atlantic's assessment of specific assumptions and conclusions and the overall conclusion of the Inspection Report. North Atlantic recognizes that the Regulatory Oversight process contains some uncertainties and has evaluated the Inspection Report to provide insight and perspective based upon our analysis of the data and events. Our conclusion is that emergency diesel generator 1B was operable throughout cycle 7 and until the initiation of the failure during the refueling outage on October 29, 2000.

A combination of monthly surveillance runs, oil sample analysis and lubricating oil strainer differential pressure data throughout the operating cycle provide ample assurance that the diesel generator was operable during the cycle. The diesel generator failed following multiple fast starts conducted during the refueling outage and lubricating oil strainer differential pressure data provides uncontroverted evidence regarding the point of failure initiation on October 29, 2000. Our risk evaluation determined that this event was of low significance corresponding to the color Green.



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North Atlantic has taken prompt aggressive corrective action to address the emergency diesel generator failures.

Should you have any questions regarding this matter, please contact Mr. James M. Peschel, Manager-Regulatory Programs, at (603) 773-7194.

Very truly yours,

NORTH ATLANTIC ENERGY SERVICE CORP.

 $\overline{\phantom{a}}$ Ted C. Feigenbau

Executive Vice President and Chief Nuclear Officer

cc: H. J. Miller, NRC Region I Administrator V. Nerses, NRC Project Manager, Project Directorate 1-2 W. Ruland, NRC Region I NRC Senior Resident Inspector

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### REPLY TO INSPECTION REPORT 2000-11

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### ENCLOSURE 1 TO NYN-01030

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#### NORTH **ATLANTIC'S** ALTERNATIVE PERSPECTIVES TO **ISSUES** DESCRIBED **IN** NRC **INSPECTION** REPORT 2000-11

NRC Inspection Report 2000-11 documented the results of the NRC's Special Inspection regarding the failure of the emergency diesel generator DG-1B at Seabrook Station on November 1, 2000. This report identified a preliminary finding of white significance associated with this failure. The report also acknowledged that North Atlantic disagrees with the Special Inspection Team's determination of significance of this event and requested North Atlantic's position on significance and the bases for this position. The following provides the requested information.

Contrary to the conclusions provided in the Inspection Report, North Atlantic has evidence to demonstrate that DG-1B was in fact operable during the seventh operating cycle and that it would have successfully performed its safety function. Limited aspects of this evidence were considered by the Special Inspection Team in its review of North Atlantic's position. North Atlantic shared with the Special Inspection Team its perspectives on diesel generator operability and risk associated with this event during the Special Inspection and provided copies of Engineering Evaluations 010001 and 01003 to the Special Inspection Team. Additional perspectives regarding each of these issues are provided below.

#### DG-1B Operability During Cycle 7/Ability to Meet 24-Hour Mission Time

North Atlantic documented its determination of operability of DG-lB in Engineering Evaluation (EE) 010001 (see Attachment A). This evaluation also concluded that DG-1B would have successfully functioned for at least 96 hours if it had been called upon to perform its safety function during the operating cycle. Inspection Report 2000-11 indicates that while it is possible that DG-1B may have functioned for its 24-hour mission time, there exists no certainty that this was in fact the case. The Inspection Report further describes what the Special Inspection Team believes to be considerable uncertainty in the run time estimates. However, the Special Inspection Team did not quantify the uncertainties, rank them in order of significance or influence, or eliminate those that were not applicable. Inspection Report 2000-11 identified seven factors of uncertainty that were considered non-conservative since they would be expected to increase the estimated plant risk. North Atlantic's alternative perspectives to these non conservative factors are addressed below.

#### Inspection Report 2000-11 Non-Conservative Factors

#### 1. DG-1B Out of Service during Shutdown

Special Inspection Team Position: The risk determination does not quantify or consider the risk associated with having the emergency diesel generator out-of-service while the plant was in a shutdown (below Mode 2) condition.

North Atlantic Position: This statement is incorrect. Engineering Evaluation 01003 describes the significance determination for the November 1, 2000 DG-1B failure (refer to Attachment B). This evaluation explicitly addresses the risk associated with the failure of DG-1B during the outage and concluded that the event risk was insignificant in that it was equivalent to a significance determination of Green.

In conclusion, this component of uncertainty is not applicable.

2. Failure was Random and Independent

Special Inspection Team Position: The licensee's event evaluation team determined that the failure mechanism was random and independent. The risk assessment did not include a random DG failure during the past operating cycle.

North Atlantic Position: The North Atlantic PRA model is designed to calculate the risk impacts due to random failure of the modeled components. Random diesel failures are modeled in terms of both demand failures (i.e., start failures) and operating failures (i.e., run failures). North Atlantic used the November 1, 2000 failure to update the diesel failure frequencies in the PRA model.

The discussion on random failure in the event evaluation report means that without detailed knowledge of the physical condition of the engine, it is not easy to predict, in advance, the failure in any one piston or cylinder. However, this does not mean that once the failure has occurred that it is not possible to accurately determine the circumstances around the failure and determine how long the engine would have been capable of operating for in a design basis event.

In conclusion, the ability to use the failure information to determine how long the engine would have been capable of operating for eliminates this component of uncertainty.

3. Potential for a Common-Mode Failure

Special Inspection Team Position: The potential for a common-mode failure of the DG-1A was not reflected in the assessment. The licensee's event evaluation team identified several causal factors (i.e., method of testing and maintaining the emergency diesel generators in a standby condition) that were common to both emergency diesel generators.

North Atlantic Position: North Atlantic also believes that it is important to consider the potential common mode effects. As a result, common cause potential was evaluated and described in EE 01003. As described in EE-010001, the DG failure mechanism was a combination of a latent condition (i.e., component wear as a result of testing, etc.) and a transient condition (e.g., fast starts). Without either sufficient wear as an initial condition, or the thermal transient that triggers the latent condition, no failure is likely to occur. Inspection of the DG-1A revealed less wear than that observed with DG-lB. This is most likely due to the fewer start cycles and run time experienced by DG-lA versus DG-1B. The reduced wear on the DG-1A renders it unlikely that a common mode failure would occur during the window of the DG-1B failure. In conclusion, this component of uncertainty has minimal influence given the empirical examination evidence of the DG-1A.

#### 4. Insufficient Surveillance and Lubricating Oil Test Data

Special Inspection Team Position: NAESCO's surveillance and lubricating oil test data were insufficient to demonstrate that the emergency diesel generator would have functioned for the required PRA 24-hour mission time during the last operating cycle. The monthly surveillance test runs were typically about 3 to 4 hours in length, which is far less than the 24-hour run time. In fact, the emergency diesel generator operating parameters were essentially normal during the initial portion of the October 29, 2000, 24- hour run. However, the operators were required to secure the diesel generator later in the test due to elevated lubricating oil strainer differential pressure readings.

North Atlantic Position: Implicit with this component of uncertainty, the Special Inspection Team appears to be making the argument that the DG failure would only have manifested itself during the longer (i.e., 24-hour) runs and not the shorter monthly surveillance runs. However, the Special Inspection Team has not provided a factual basis for this belief. As described in EE 010001 and above, the failure was the result of the combination of the latent condition of the diesel generator and a thermal transient. The shorter monthly surveillances experience The shorter monthly surveillances experience essentially the same thermal transients experienced during the 24-hour runs in that they both involve fast starts and rapid loading of the DGs. It is recognized that the 24-hour TS runs are somewhat more stressful on the diesel generators than the monthly surveillances since the engines are loaded to 110% in the first two hours of operation. However, this loading, as the loading experienced during the monthly surveillances, is significantly greater than the loads that would be experienced during a design basis event. Notwithstanding, for both the monthly and 24-hour TS surveillances, after the DG's have reached equilibrium temperature the thermal transient is over and the engine operates in a steady state equilibrium condition. As a result, there is far less potential for differential thermal growth of the piston skirt or engine components, and therefore, no apparent failure initiation mechanism.

Inspection Report 2000-11 notes that the DG-1B operating parameters were essentially normal during the initial portion of the October 29, 2000, 24-hour run. This normal operation was due to the fact that the failure was first initiated on that date as evidenced by the first occasion in the operating cycle of an increase in lubricating oil strainer differential pressure beyond the normal band of 2 to 4 psid (refer to EE-010001). In other words, the engine start on October 29 was the thermal transient that initiated the failure process. Lubricating oil strainer differential pressure started increasing as this run progressed as material from the failing piston and cylinder began being deposited on the strainer.

As noted in EE-010001, the DG-1B Technical Specification surveillance tests conducted during the operating cycle and the lubricating oil samples analyzed during the operating cycle verified that the engine was functioning normally. These surveillance tests provide assurance that the engine was operable.

In conclusion, this component of uncertainty is not applicable.

#### 5. Lubricating Oil Samples

Special Inspection Team Position: Lubricating oil analysis samples taken after the October 29, 2000, run indicated a significant wear particle concentration. The previous lube oil results were obtained on July 26, 2000, for the DG-1B, which was prior to the postulated diesel generator failure.

North Atlantic Position: As described in EE-010001 and above, the DG-1B lubricating oil strainer differential pressure remained in the normal band (approximately 2 to 4 psid) during the entire operating cycle and through the start of the refueling outage (which began on October 21, 2000), up to the 24-hour run on October 29, 2000. This provides evidence that the failure had not been initiated until after the October 29, 2000 run. In conclusion, this component of uncertainty is not applicable.

6. Estimation of Run Time on October 29, 2000

Special Inspection Team Position: NAESCO calculated that the DG-1B would have operated for close to 16 hours during the October 29, 2000 surveillance while the NRC inspectors calculated that DG-1B would have operated for 15.5 hours during this surveillance test. This minor difference affected the postulated failure date for DG-1B. The difference was attributed to NAESCO's calculation, which used an assumed value for the initial strainer d/p, whereas the NRC inspector's calculation relied solely on data recorded during the 24-hour surveillance test. NAESCO's approach introduced a non-conservative bias into their final diesel generator run time determination.

North Atlantic Position: Notwithstanding the differences in the calculations described above, the magnitude of the difference between North Atlantic's and the Special Inspection Team's run time estimate is insignificant at best. In fact, both calculations validate one another and demonstrate that this component of uncertainty is of minimal significance.

7. DG-1B Recovery

Special Inspection Team Position: The final diesel generator failure event was determined to be unrecoverable, whereas NAESCO's Plant Risk Assessment (PRA) model assumed that diesel generator failures are recoverable within a specified period of time.

North Atlantic Position: While the Special Inspection Team is incorrect regarding North Atlantic's PRA model assuming all diesel generator failures are recoverable (refer to EE-01003), they are correct that the final DG-1B failure was non-recoverable. However, the Special Inspection Team's risk evaluation is not based on the final failure of the engine, which occurred on November 1, 2000, but rather on the October 29, 2000 run when the engine first started to fail and the strainers exhibited increased differential pressure. The October 29, 2000 run which was terminated due to increasing lubricating oil strainer differential pressure was recoverable. Recovery was accomplished by changing the strainers. DG-1B was run after the October 29, 2000 shutdown four times for a total loaded run time of 24 hours 23 minutes before the crankcase overpressurization event on November 1, 2000. Hence, the engine demonstrated that it would have run for more than its mission time following recovery after the onset of the failure on October 29, 2000.

It is recognized that after the strainers were replaced following the October 29, 2000 run, the strainers and lubricating oil were replaced on October 30, 2000. However, the latter strainer and oil replacement is inconsequential to the ability to run for 24-hours following recovery. Specifically, the engine ran loaded for a total of 19 hours 34 minutes after October 29, 2000 before the strainer differential pressure reached 7 psid on October 30, 2000, when the engine was shutdown to replace the strainers. The observed strainer loading rate was significantly less than that seen during the October 29, 2000 run. Even if one conservatively assumes the Special Inspection Team's calculated strainer loading rate from the October 29, 2000 run, it is unlikely that the low lubricating oil pressure trip setpoint would have been reached prior to exceeding the 24-hour mission time. Hence, DG-1B demonstrated that it would have run in excess of the 24 hour mission time following recovery from the shutdown on October 29, 2000. In conclusion, this component of uncertainty is not applicable.

#### Inspection Report 2000-11 Conservative Factors

Inspection Report 2000-11 also identified two factors of uncertainty that were considered conservative since they would be expected to decrease the estimated plant risk. North Atlantic's perspectives on these conservative factors are discussed below.

1. Correction for Engine Start Cycles

Special Inspection Team Position: The risk assessment did not correct the assumed diesel generator failure date for the number of start cycles placed on the unit after the unit entered Mode 2. The diesel generator wear would also be expected to be a function of the number of start cycles experienced. The diesel generator was started nine times between the start of the refueling outage (OR07) that started on October 21, 2000, and the diesel generator run on October 29, 2000.

North Atlantic Position: The Special Inspection Team did not attempt to quantify or rank the significance of this uncertainty. Engineering Evaluation 010001 quantified the impact of engine starts on wear by using data from both the engine designer and the former chief engineer for Coltec. Specifically, engine wear associated with each start was determined to be equivalent to that of approximately 8 to 10 hours of full load operation. The engineering evaluation concluded that the nine starts during the outage prior to the shutdown on October 29, 2000 were equivalent to 72 hours of loaded run time. Adding this to the actual/estimated run time provides for a total loaded run time of over 96 hours.

The above determination is consistent with the guidance provided by the NRC Staff in NUREG 1366, "Improvements to Technical Specification Surveillance Requirements." Specifically, NUREG-1366 indicates that fast starts and rapid loading can cause rapid piston and cylinder liner wear.

In conclusion, fast starts of emergency diesel generators are a significant component of uncertainty that warrants quantification.

#### 2. Successful Runs following October 29, 2000

Special Inspection Team Position: The emergency diesel generator was run successfully after the October 29, 2000, shutdown three times (of loaded durations between 1 and 13 hours) for a total of 19 hours and 44 minutes before the test run on November 1, 2000, which culminated in the overpressurization event. The diesel engine lubricating oil was changed and the strainer was cleaned once and replaced once between these runs. This illustrates that the diesel generator had some load capability while the cylinder/piston degradation was in progress.

North Atlantic Position: As clarification to the above, the engine actually ran loaded for a total of 20 hours 52 minutes during this time frame. Additionally, if one does not exclude the last run on November 1, 2000, the engine ran for total 24 hours 23 minutes from the October 29, 2000 shutdown. The Special Inspection Team recognized that this illustrates that the diesel generator had some load capability while the cylinder/piston degradation was in progress. However, the aforementioned load carrying capability should not be minimized since more than 23 hours of the total loaded run time was with loads at or above the values stated in the Technical Specifications, which exceed the loads expected during actual accident conditions.

In conclusion, the fact that the engine was capable of running at load in excess of 24 hours following the October 29, 2000 shutdown is significant in that the engine was sufficiently robust to continue to perform as designed.

#### Conclusion on Uncertainties

As demonstrated above, of the seven components of uncertainty that were described in Inspection Report 2000-11 as non-conservative, after analysis, two have negligible affect and five were not applicable regarding their affect on DG-1B run time and therefore risk. Of the conservative uncertainties, the successful runs following the engine shutdown on October 29, 2000 demonstrate that the DG-1B was recoverable. The other conservative uncertainty regarding fast starts of emergency diesel generators is a significant component of uncertainty that warrants consideration. When quantified, this component of uncertainty demonstrates that the DG-1B would have been capable of operating at load for at least 96 hours after the plant had been shutdown for the refueling outage. This is significantly in excess of the engine's 24-hour mission time. This component of uncertainty dominates the other uncertainties described in the inspection report. Given that the Special Inspection Team found that the engine would have been capable of operating at load for 23 hours and 51 minutes, the lack of impact of the non conservative uncertainties, and the significance of the affect engine starts have on the calculated run time, North Atlantic believes that the DG-1B was capable of operation for greater than 24 hours.

#### Risk Associated with this Event

North Atlantic determined the risk from this event utilizing the NRC's Significance Determination Process. Our evaluation, as provided in Attachment B, shows this event to be of low significance and a classification of Green.

Inspection Report 2000-11 also provided an assessment of the risk associated with the DG-1B failure. The Special Inspection Team determined that the engine would have been capable of operating at load for 23 hours and 51 minutes after the plant had been shutdown for the outage. The difference between this run time and the 24-hour mission was 9 minutes. Fault exposure time was determined to be the number of days from the last monthly DG-1B surveillance where the engine ran at load for at least 9 minutes and the date that the plant shutdown for the refueling outage. Since the last monthly DG-1B surveillance occurred three days prior to the refueling outage, the Special Inspection Team assumed three days of fault exposure time.

According to the new oversight program, the method of determining fault exposure time when there is uncertainty involved is to use one-half the time from the last successful surveillance run (T/2 approach). However, the Special Inspection Team did not consider using the T/2 method from the last successful monthly surveillance that was conducted three days prior to the refueling outage. No basis is provided for why this option was not explored.

North Atlantic believes that if a fault exposure time is to be assumed, it is appropriate to utilize the T/2 method using the last monthly surveillance. As described in the uncertainty analysis above, the root cause of the engine failure is the non-uniform thermal growth of the piston. The Special Inspection Team agreed with this cause in Inspection Report 2000-11. The non-uniform thermal growth is caused by the thermal transient that is established during the initial engine start and load sequence. The shorter monthly surveillances experience essentially the same thermal transients experienced during the 24-hour runs in that they both involve fast starts and rapid loading of the DGs. As a result, the failure experienced by DG-1B would be manifested by either monthly or 24-hour surveillances.

#### Conclusions on Risk

This event is of low risk significance and is a classification of Green.

### ATTACHMENT A TO NYN-01030

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#### EMERGENCY DIESEL GENERATOR B OPERABILITY DURING CYCLE 7

By

Jeffrey Sobotka - Seabrook Station

January 26, 2001

Engineering Evaluation

EE- 010001, Revision 00

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#### 1.0 PURPOSE

This Engineering Evaluation demonstrates that the B Train emergency diesel generator (EDG) was operable and capable of performing its safety function throughout operating cycle 7. It also demonstrates that EDG-B would have functioned during a design basis accident for a period of time greater than the engine's PRA mission time. This evaluation examines degraded conditions that were identified with this engine during the seventh refueling outage.

#### 2.0 BACKGROUND

During two attempts at performing a 24-hour surveillance run on the B-train EDG within the seventh refueling outage (OR-07), the lubricating oil strainer differential pressure increased<br>repidly forcing premature termination of the surveillance attempts. A third attempt at rapidly forcing premature termination of the surveillance attempts. completion of the 24-hour surveillance run was made on November 1, 2000. During the attempted run, the control room received high crankcase pressure and vibration alarms and operators initiated an emergency shutdown of the engine. While coasting down, the engine experienced a crankcase explosion that filled the room with smoke. Subsequent investigation revealed that the number seven piston and cylinder liner were damaged. EDG-B failed after reactor fuel was offloaded from the core and placed in the spent fuel pool.

The following sections will address the degraded condition identified with EDG-B and address their impact on engine operability.

#### 3.0 DISCUSSION

#### 3.1 Licensing Basis/PRA Considerations

The licensing basis of the plant is that the EDGs, assuming a single failure, are required to run until offsite power is recovered and then the total electrical system is utilized in unison to provide reliable long term AC power to mitigate an accident. The Station's licensing basis assumes no immediate operator action is required to ensure that the long-term supply of AC power is provided. Seabrook Station is a four-hour coping plant in accordance with the analysis and evaluation performed pursuant to 10CFR50.63, "Loss of all alternating current power," and based upon the three offsite lines and the robust switchyard design, offsite power is assumed to be recovered in the four hour period. This assumption is consistent with the Electric Power Research Institute data (NSAC-203) that provides a median loss of offsite power to nuclear plants of one hour for the period from 1980 to 1993.

The Seabrook Station PRA has a loss of offsite power recovery probability of 0.999 at 24 hours. The EDG's have a mission time of 24-hours according to the PRA. The 24-hour mission time is used for sequences initiated by a weather related loss of offsite power. The mission time for all other loss of offsite power events is 6 hours based on actual data. Seabrook Station mission times are based on NSAC-203 (1993) with data specialization for Seabrook Station specific characteristics.

#### 3.2 EDG-B Operability

#### 3.2.1 EDG-B Failure Mechanism

An investigation was conducted immediately following the November 1, 2000 emergency shutdown of EDG-B. An inspection revealed damage to the engine's number seven piston and cylinder. The cylinder liner was scuffed/scored and it revealed heavy bonding of aluminum from the piston skirt. The piston skirt exhibited galling and the cylinder liner exhibited significant bore polishing (i.e., lack of adequate surface finish).

An investigation was conducted to determine the most probable cause of the failure and the most likely failure scenario for EDG-B. The investigation determined that the damage in the number seven cylinder was attributed to non-uniform thermal growth of the piston skirt which resulted in scoring and transfer of aluminum piston skirt material onto the cylinder liner. Scoring and aluminum deposition on the cylinder liner affected the ability of the cylinder liner to retain lubricating oil and impacted the operation of the piston rings particularly in the lower ring travel area. The heat generated by the scuffing and scoring caused the piston skirt to grow further, resulting in increased interference with the liner and eventual failure.

The following are the most important factors that lead to the failure.

#### Fast Starts

A fast diesel generator start is defined as when the engine starts and accelerates from zero speed to generator rated frequency and voltage in less than ten seconds without pre-lubrication. Fast starting promotes aggressive wear that degrades the long-term service life of the piston and liner. During OR-07, EDG-B was fast started a total of 13 times prior to its failure.

#### Rapid Loading

Rapid loading is defined as application of 100 percent of rated load within approximately 10 minutes of breaker closing. Rapid loading contributes to additional stress on the engine's power parts by not allowing enough time for the parts to come to thermal equilibrium, thereby reducing clearances between the piston and cylinder liner. Nearly every EDG loading profile since plant startup has been a rapid load in that the load is applied approximately evenly up to 100 percent in a ten-minute period after the breaker is closed.

#### High Loading

High loading is defined as operation at greater than 100 percent of rated load. High loading contributes to additional engine stress and wear by increasing internal cylinder brake mean effective pressure (BMEP) and temperatures. BMEP is the average pressure in the cylinder over<br>the engine cycle. The wear of the engine piston rings and cylinder liner surfaces is The wear of the engine piston rings and cylinder liner surfaces is approximately proportional to the square of the BMEP. With 110 percent of rated load, the engine wear rate would be about 121% of the wear rate at rated load. During OR-07, EDG-B was loaded to 110% of rated load on four separate occasions within a relatively short period of time.

#### Long Duration between Runs

Long duration between runs, particularly when there is no pre-lubrication of the cylinder when<br>the engine is started, allows oil to drain down the cylinder wall. Engine designers and the engine is started, allows oil to drain down the cylinder wall. manufacturers indicate that most engine wear occurs within the first few seconds of an engine start when there is only minimal lubricating oil film established between wear surfaces. Since the Seabrook Station EDGs were typically started after about 30 days of being maintained in standby condition, increased wear between the pistons and liners was likely to have occurred.

### Cylinder Liner Surface/Carbon Polishing

The design basis for the diesel engine cylinder liner surface finish is to produce a surface that retains a sufficient quantity of oil on the surface to produce an adequate hydrodynamic lubricating film to minimize friction between the piston rings and the liner. An overly smooth surface will allow oil to readily drain off the surface, while a surface that is too rough will promote ring wear.

For a Pielstick 2.3 engine, the specified cylinder liner surface finish for a new liner should range between 80 to 120 micro-inches, rms. The surface finish is established by the manufacturer by a honing process or by etching the liner surface.

Profileometer measurements were taken during inspections of each cylinder liner within EDG-B. These inspections measured the surface finish in micro-inches, rms at the top and bottom of the ring travel at the 0°, 90°, 180° and 270° locations. In addition the inspections recorded any indications of scuffing/scoring and aluminum transfer.

An average profilometer reading was determined for the top ring reversal and bottom ring reversal areas of each cylinder. For all cylinders, the average top reading is lower than the bottom indicating a greater degree of surface finish and less wear on the bottom of each cylinder as compared with the top. This is to be expected due to the effect of hard carbon packing on the top land of the piston. This is the region on the side of the piston above the top piston ring up to the piston crown.

The EDG-B cylinder profilometer readings revealed wear. The average profilometer readings in the top ring reversal area varied between 10 and 47 micro-inches, rms, with seven liners having a finish smoother than 20 micro-inches, rms. Liner finishes smoother than 20 micro-inches, rms are considered well worn.

#### Temperature difference between standby conditions and operating conditions

Non-uniform heating causes the aluminum piston skirt to expand at a higher rate than the cylinder liner when the engine is rapidly loaded. The piston skirt is aluminum, which has a coefficient of thermal expansion approximately twice that of the cast iron cylinder liner. The

cylinder liner was maintained approximately 50'F lower by the keepwarm system than the normal operating temperature. Following engine start, the jacket water temperature initially drops below the keepwarm temperature and then rapidly increases as the engine is loaded. This condition results in a reduced clearance between the piston skirt and the liner during startup and loading. These reduced clearances facilitated contact between the piston skirt and the cylinder liner.

#### 3.2.2 EDG-B Operability during Operating Cycle 7

EDG-B was fully operable and capable of performing its safety-related function throughout cycle 7. Prior to OR-07, there was no indication of a degrading trend in EDG-B performance as evidenced by: surveillance testing, oil analysis results, engine analyzer data, and lube oil strainer differential pressure. Evidence supporting the conclusion that EDG-B was operable during the operating cycle is described below.

#### Surveillance Testing during the Operating Cycle

EDG-B successfully completed its Technical Specification (TS) required monthly surveillance testing during cycle 7. TS 4.8.1.1.2 requires each EDG to be demonstrated operable at least once per 31 days by verifying the EDG starts from standby conditions and attains a generator voltage and frequency of 4160+/-1.2 Hz within 10 seconds after the start signal. This TS also requires that the generator to be synchronized and loaded to greater than or equal to 5600kW and less than or equal to 6100kW, and operates with a load greater than or equal to 5600kW and less than or equal to 6100kW for at least 60 minutes. In practice, the EDG's are run for approximately three to four hours at loaded conditions during these surveillances to ensure the engines reach equilibrium temperature. A total of 19 surveillance runs were conducted between June 1999 to October 2000 and equated to approximately 80 hours of total run time. In summary, the surveillance testing conducted demonstrates that EDG-B was operable during the operating cycle.

The monthly TS surveillance tests, which are similar to other facilities TS surveillances, assure the necessary quality of the EDGs are maintained, that facility operation will be within safety limits, and that the TS limiting conditions for operation will be met. These monthly surveillances would have been sufficient to identify engine degradation had the failure mechanism been initiated during the operating cycle. As stated earlier, the failure mechanism was the non-uniform thermal growth of the piston skirt, which resulted in scoring and transfer of aluminum piston skirt material onto the cylinder liner. The thermal transient was initiated by the numerous fast starts conducted during the refueling outage. Since the failure was directly linked to engine starts and rapid loading, the numerous monthly operability surveillances challenged the engine from a thermal transient perspective such that they would have identified any degradation had it been present.

#### Surveillance Testing/Maintenance Runs during the Refueling Outage OR-07

During the seventh refueling outage (OR-07) that started on October 21, 2000, the EDG-B was run multiple times for both TS required surveillance testing and maintenance activities. Specifically, the EDG-B was operated 13 times with a total run time of approximately 45 hours before it failed on November 1, 2000. The 13 runs were comprised of seven attempted or completed TS surveillance runs (ESF testing and 24-hour endurance runs) and six maintenance runs. Refer to Table 1 for a detailed description of these runs and Appendix A for details on the loading for these runs as obtained from the Main Plant Computer.

As stated above, the monthly TS surveillance testing established operability of the EDG-B during the operating cycle, with the last surveillance being successfully completed on October 18, 2000, which was approximately three days before the start of the refueling outage. During the outage, three Engineered Safety Features (ESF) tests were conducted including the loss of offsite power test, Safety Injection actuation test, and the loss of offsite power test in conjunction with a Safety Injection actuation. The ESF tests are the design bases tests for the EDGs because they include a simulated loss of offsite power, fast start of the EDGs and loading per the emergency power sequencer in accordance with the loads specified in the Updated Final Safety Analysis Report (UFSAR). These tests provide verification of operability in accordance with the design basis and provide conclusive evidence that EDG-B was operable during the seventh operating cycle.

Also conducted during outages is the 24-hour endurance run, which involves loading the engine to 110% of load (greater than or equal to 6363kW and less than or equal to 6700 kW) for the first two hours with the remaining 22 hours at full load. It is believed that EDG-B started to fail during the first attempted 24-hour run on October 29, 2000 based on increased lubricating oil strainer differential pressure. Subsequent runs further degraded the EDG culminating in failure of the engine. Notwithstanding, through the first run on October 29, 2000 that initiated the failure, and which was voluntarily terminated due to lubricating oil strainer differential pressure, the EDG was successfully started and ran nine times for a total of 19.9 hours during the refueling outage.

#### Oil Analysis

EDG lubricating oil is routinely analyzed by a laboratory approximately every quarter to determine if there are any adverse trends that can compromise engine operability. During cycle 7, the EDG-B lubricating oil was analyzed on August 1999, November 1999, February 2000, May 2000, and July 2000. Review of the oil analysis results indicates no adverse trends associated with these samples. Specifically, the wear particle counts in these samples ranged from approximately 13.4/ml to 32.1/ml, which is considered normal for this engine. Refer to Table 2 for the oil analysis results.

The first indication of engine degradation was noted in an oil sample taken after the first attempt to complete the 24-hour run on October 29, 2000. The total wear particle count had increased about tenfold above the count in the last sample taken on July 27, 2000, i.e., from 26.1/ml to 219.0/ml. The actual engine run time was approximately 30.2 hours with a total of 12 starts in between taking of those samples. The particle count doubled to a value of 447/ml in a subsequent sample taken on October 30, 2000. The engine ran approximately 20.56 hours with two starts in between taking of the October 29, 2000 and the October 30, 2000 samples. In

summary, oil analysis results conclusively demonstrate that engine failure was initiated during the refueling outage.

#### Lubricating Oil Strainer Differential Pressure

EDG-B lubricating oil strainer differential pressure remained within a normal range of approximately 2 to 4 psid throughout cycle 7. This is depicted on Figure 1. No lubricating oil strainer replacements or cleanings were required during the cycle. Prior to OR-07, the last time the strainers were replaced was in March 1997.

In contrast, rapid increases in lubricating oil strainer differential pressure were noted during the first attempt to complete the 24-hour surveillance run made on October 29, 2000. During the 7 hour 50 minute run, the differential pressure increased from approximately 4 psid to 13 psid. The strainer elements were then replaced with cleaned elements. Similarly, a differential pressure increase was noted during the third attempt to complete the 24-hour surveillance run. During a 22-hour period, the strainer differential pressure increased from 2 psid to 7 psid. The strainer elements were replaced again, the lubricating oil was changed, and the engine failure occurred shortly thereafter during the fourth attempt at the 24-hour run on November 1, 2000. Figure 2 depicts the EDG-B lube oil strainer differential pressure that was recorded each hour during OR-07 through the first attempt at the 24-hour run on October 29, 2000. This further demonstrates that the engine failure was initiated during the refueling outage.

#### Engine Analyzer Data

Engine signature analysis is periodically performed on the EDG's. This includes the following data by cylinder: average indicated power, peak-firing pressures, exhaust temperature, etc. A review of signature analysis data during the operating cycle did not identify any significant, abnormal operating conditions in cylinder number seven or any other cylinder within EDG-B.

During OR-07, engine signature analysis was conducted at 1045 AM on the first attempt to complete the 24-hour run on October 29, 2000. This analysis was conducted approximately 26.56 hours of engine run time before the crankcase explosion event on November 1, 2000. A review of the engine analysis results (refer to Appendix B) did not identify any significant, abnormal operating conditions in cylinder number seven or any other cylinder within EDG-B. This indicates that the failure was in the very initial stages of development at that time. MPR Associates Inc. reviewed this data and concluded that the indicated power, peak firing pressure, and exhaust temperature balance of the engine were all good at 15%, 93 psi, and 100 degrees F. They noted that while the peak firing pressure spread of 93 psi exceeds the vendor limit of 70 psi, this is a very stringent requirement, with limits of 150 psi more typical for large diesel engines. Cylinder number 7 had lower than lower than average indicated power (IMEP of 233 psi vs 244 psi average) and peak firing pressure (1303 psi vs 1322 psi average) and higher than average cylinder exhaust temperature (900F vs 870F average). However, none of these deviations from average is of concern as all of the cylinder number seven values are within normal ranges and the variation represents normal variation across the cylinders of the engine.

#### 3.2.3 Analysis

Based on the evidence presented above, it is concluded that the EDG-B did not fail until after it was taken out of service for the refueling outage and specifically on October 29, 2000. Therefore, based upon EDG-B successfully performing its surveillance requirements and operating satisfactorily during maintenance runs prior to October 29, 2000, it is concluded that it would have been capable of running for an extended period of time if called upon to do so. Rough estimates can be made to bound the minimum time that EDG-B would have operated for after it was removed from service during the refueling outage. Two models and three sensitivity cases for determining this are presented below.

#### Model 1

The first model determines the cumulative amount of time that EDG-B ran at load during the refueling outage up to the point that the engine would have tripped on low lubricating oil pressure as a result of strainer clogging due to accumulation of wear products. This is a very simplistic model that is overly conservative, and therefore potentially misleading in that it ignores the influence of the multiple engine starts and thereby the failure mechanism. However, it does provide the minimum bounding estimate. From October 24, 2000 through the first attempted 24-hour run on October 29, 2000, EDG-B was started a total of nine times with a total run time of 19.9 hours. Approximately 15.8 hours of this run time was with the engine loaded (some maintenance runs were conducted with the engine unloaded). During the first attempted 24-hour run on October 29, 2000, EDG-B ran for approximately 7 hours, 27 minutes (7.45 hours), at load before operators shut the engine down due to lubricating oil strainer differential pressure (during the course of the run the differential pressure increased from 4 psid to approximately 13 psid). However, had operators not taken action to shut the engine down, it is estimated based on the rate of strainer loading and the relationship between strainer differential pressure and engine oil pressure, that the engine would have been capable for running at load for another 8.5 hours. This would provide for a total loaded run time during the first 24-hour run October 29, 2000 of 15.966 hours.

The above estimate utilized an Excel program to extrapolate the strainer data collected during that run to roughly estimate when the engine would have tripped on low lubricating oil pressure. To more accurately model the entire run on October 29, 2000, the extrapolation included an estimate of the initial strainer differential pressure from the start of the run along with actual strainer readings taken during the run. This analysis also accounted for the auxiliary, lubricating oil positive displacement pump, which starts prior to an engine trip on low lubricating oil pressure, such that the strainer differential pressure can reach 50 psid before the engine trips. Refer to Figure 3 for a depiction of the strainer differential pressure associated with the first 24hour run on October 29, 2000. While there are some uncertainties associated with the extrapolation, such as accuracy of gauges, lubricating oil pressure trip setpoints, auxiliary oil pump start and relief pressure, etc., it provides a rough estimate of how long the engine would have operated for successfully during that run.

Accounting for the time the engine ran loaded prior to October 29, 2000 (8.36 hours), and the estimate of time the engine would have run on October 29, 2000 prior to a low lubricating oil pressure trip (15.96 hours), the cumulative minimum run time would have been approximately 24.33 hours. This is in excess of the engine's 24-hour mission time. This is a very conservative estimate since the cumulative run time during the refueling outage included multiple starts and stops, which are directly linked to the failure of the engine, whereas performing its safety function would have required only one start and multiple hours of operation at steady-state, thermal equilibrium conditions.

As stated above, the determination of how long the EDG-B would have successfully run on during the first 24-hour run on October 29, 2000 was predicted based on an extrapolation of being the function of the strainer differential pressure readings taken during the run. For this run, lubricating oil strainer differential pressure readings taken during the run. lubricating oil strainer differential pressure was considered the most limiting factor as this would have caused the engine to trip on low lubricating oil pressure long before any other plausible failures would have occurred. Other failure scenarios are not credible due to the robust nature of the engine. Specifically, the engine failure was initiated during the first 24-hour run on October 29, 2000. Following the termination of this run, the engine ran at load for an additional 24.38 hours until the point that it experienced the crankcase explosion. Hence, after the failure was initiated, the engine ran at load for a total of 31.38 hours without a perceptible decline in performance.

#### Model 2

The second model for estimating the minimum time that EDG-B would have run during OR-07 is more realistic in that it accounts for the wear incurred by fast engine starts and correlates this with normal wear as a result of run time. Fairbanks-Morse provided general operating information developed by SEMT, the Pielstick engine designer, that provides a rough estimate of wear associated with starts. This information acknowledges that wear depends on many parameters and that the following correlation is only a very rough estimate.



During operating cycle 7, EDG-B keep-warm temperatures were approximately 43 degrees C for the water jacket, and 51 degrees C for the lubricating oil. According to the chart above, this provides and equivalent wear of 15 hours per fast start assuming a pre-lubricated condition. A prior chief engineer for Coltec who is currently a contractor for Fairbanks-Morse indicated that the numbers provided in the table may be too high. He provided information based on his recollection of testing that each fast start is equivalent in engine wear to approximately 8 to 10 hours of normal operation at full load.

During the refueling outage, EDG-B was fast started a total of 13 times prior to its failure. Nine of these starts occurred before the initiation of the failure, which was during the first attempt at completing the 24-hour run on October 29, 2000. Multiplying the 9 fast starts by 8 hours results in approximately 72 hours of equivalent normal operation at load. If this value is added to the cumulative loaded run time determined from the first model described above, it results in 96.33 hours of loaded run time, which significantly exceeds the engine's mission time.

#### Sensitivity Case 1

It is clear that there is some degree of additional wear incurred by fast starts. Even if one questions the specific correlation between fast starts and run time there is no impact on the ability of the engine to run at load for the 24-hour mission time. As a sensitivity case, if the correlation between starts and wear is reduced by a factor of four such that each start correlates to only 2 hours of normal operation at load, this would equate to 18 hours of normal loaded engine operation. When added to the 24.33 hours of cumulative loaded run time described above, this results in a run time of 42.33 hours, which is still significantly in excess of the engine's mission time.

#### Sensitivity Case 2

Similarly, if one accounts for the only time the engine was loaded to Technical Specification values (which are higher than the maximum accident load) there is no impact. Specifically, the engine ran for approximately 9 hours during the refueling outage at TS load (more than two hours were at 110% load) through the termination of the October 29, 2000 run. Adding the time that the engine would have continued to run for on October 29, 2000 as determined by the second methodology above, results in 17.9 hours. Further adding 2 hours per start results in 35.9 hours, which is longer than the engine's mission time.

#### Sensitivity Case 3

As a last sensitivity case, the 8 hours of equivalent wear per start is reduced by an order of magnitude, or a factor of ten (i.e., 0.8 hours per start). Note that this is almost a factor of 20 less than the estimates published by the engine's designer. Accounting for the cumulative run time at Technical Specification load values from Sensitivity Case 2, the result is 25.1 hours. These sensitivity cases clearly demonstrate that reasonable engineering judgement dictates that the EDG-B would have been capable of operating at load in excess of its 24-hour mission time.

#### Consideration of Failure Mechanism

Notwithstanding the minimum bounding estimates described above, a more realistic scenario is that the EDG-B would have run for a significantly longer period of time if it had been called upon to perform during OR-07. The engine failure mechanism involves two distinct The engine failure mechanism involves two distinct components; 1) conditions that create increased wear that make the engine susceptible to failure during thermal transient conditions, and 2) the thermal transient conditions themselves that initiate the failure. The first component that establishes the latent conditions for failure is comprised of the cause elements that lead to cylinder wear and carbon polishing (e.g., fast starts, rapid loading, high loading, residual oil film on the cylinder surface due to duration between runs, and differences in standby and operating temperatures). The second condition involving the thermal transient itself, which initiates the failure, is most significantly influenced by the fast

starts, rapid loading, and high loading (i.e., 110% of load per TS testing) of the engine. Without either the latent condition for failure, or the failure initiator, the engine will continue to run reliably.

As stated above, the failure initiator is the numerous maintenance and surveillance runs and run attempts made during OR-07, which resulted in severe thermal cycling of the cylinder liners and pistons. Several of these loaded runs were made within 2 hours of termination of the previous run. At the start of one of these run attempts, the cylinder liner would likely be well below its normal operating temperature, while the piston metal temperature would still be relatively hot. Because of reduced internal clearances, contact between wearing surfaces was far more likely.

In this regard, it is believed that at the conclusion of the operating cycle, EDG-B was capable of at least nine additional fast starts (since the failure was initiated during the first attempt at completing the 24-hour run on October 29, 2000). However, had these fast starts not been performed, and the engine was called upon to perform only one fast start and an extended run at steady state conditions, it is believed that it would have successfully started and run for an extended period of time. Operation at equilibrium temperatures, such as steady state operation at accident loads, which are less than TS loads, does not provide a mechanism to aggravate the latent conditions for failure.

#### Conclusion

Based on the foregoing, it is concluded that EDG-B was operable during the operating cycle and that it would have been capable of successfully performing its safety function for an undetermined, but extended period of time during the seventh operating cycle. Additionally, while there is inherent uncertainty in predicting how long an engine would have been able to run for, the minimum bounding loaded run time calculations and sensitivity cases described above indicate that as a minimum, the EDG-B would have been capable of running at load for longer than its PRA mission time of 24 hours if it have been called upon to do so during OR-07 after it had been removed from service.

### TABLE **1 EDG-B** OPERATION **DURING** OR-07

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(1) Time at Technical Specification load is time with electrical load on EDG between 5600 to 6100 kW (TS 4.8.1.1.2). % ]

(2) Clock changed on 29 October 2000 at 0200.

Date	3/99	5/99	8/99	11/99	2/00	5/14	7/27	10/29	10/29	10/30	10/31	11/1	11/1
Event	1	OR06,						After	After	During 3rd	Post	Upstream	Down-
		oil						1 <sup>st</sup>	1 <sup>st</sup>	run <sup>4</sup>	3 <sup>rd</sup>	Of	stream
		changed						24 <sub>hr</sub>	24 <sub>hr</sub>		run <sup>5</sup>	Strainer <sup>6</sup>	Of
								run <sup>2</sup>	run <sup>3</sup>				Strainer <sup>6</sup>
Fe, ppm	58	---	18	11	11	11	12	22	23	37		4	$\overline{4}$
Al ppm	1	---		$\leq$	$\leq$ 1		$\leq$ 1	$\leq$	$\leq$ 1	$\leq$		$\leq$	$\leq$
Additives	Ok	---	Ok	Ok	Ok	O <sub>k</sub>	OK	Ok	Ok	Ok		Ok	Ok
WPC, parti cles/ml	$-$	---	$\cdots$	32	28	13	26	219	252	447		52.4	52.4
Ferrograp hy								Normal. 90% iron corrosion products. 10% Al and copper alloys	Normal. 90% iron corrosion products. 10% Al and copper alloys	Normal. 90% iron corrosion products. 10% Al and copper alloys		copper alloys plus some inorganics $(18\%)$ , 76% iron products	Copper alloys plus inorganics (23%) 75% iron products
	Maintenance Donb												

TABLE **2 EDG-B** Oil Analysis Results During Cycle 7 and OR-07

55 gal drum added  $~10-24$ 

Maintenance Done Lube oil changel

1. Routine Sample taken from dipstick on engine

- Filter was found to be improperly positioned thus there was bypass flow for some time period. 2.
- 3. Sample taken downstream of strainer.
- 4. Sample taken from crankcase
- 5. Sample taken after oil was changed following  $3<sup>rd</sup>$  run.
- 6. Samples taken upstream/downstream of strainer after 1 hr maintenance run before shutdown event

FIGURE 1 EDG-B Cycle 7 Lubricatina Oil Strainer Delta-P

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FIGURE 2 OR-07 EDG-B Lubricating Oil Strainer Delta-P

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FIGURE 3 10/29/00 EDG-B 24-Hour Run Attempt Lubricating Oil Strainer Delta-P Extrapolated Exponentially

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APPENDIX A

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![](_page_51_Picture_663.jpeg)

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![](_page_52_Picture_803.jpeg)

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![](_page_53_Picture_134.jpeg)

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### APPENDIX B

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## ATTACHMENT B TO NYN-01030

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# Significance Determination for 11/1/2000 Failure of Emergency Diesel Generator "B"

Larry Rau - Seabrook Station

February 12, 2001

Engineering Evaluation

EE - 01003

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*I ul Vanger*<br>Director of Engineering

 $\frac{2/13/2001}{\text{Date}}$ 

### **1.0 PURPOSE**

This evaluation documents the Significance Determination evaluation performed for the 11/01/2000 failure of the "B" emergency diesel generator. Significance Determination was performed using the Phase 2 and Phase 3 NRC pro

### 2.0 **BACKGROUND**

The Significance Determination Process (SDP) plays a key role in the Nuclear Regulatory<br>Commission's new Reactor Oversight Process (ROP). The SDP is used to determine risk<br>significance after an inspector has concluded that performance in one of the cornerstone areas.

The Reactor Safety Cornerstones use a 3 Phase process for SDP. Phase 1 may be described as characterization and initial screening of the finding. Phase 2 is an initial determination of significance using site specific work full probabilistic assessment. The Resident Inspector normally performs Phase 1 and 2, while Phase 3 relies on substantial interaction between the NRC Regional SRA and the licensee's PRA staff.

Instructions and considerations for performance of Phase 1 and Phase 2 evaluations are provided in Reference 1. The NRC does not currently have any publicly available guidance for conduct of a Phase 3 evaluation.

#### References:

- 1. NRC Inspection Manual IMC 0609 Significance Determination Process
- 2. "Seabrook Station Site Specific Worksheets for Use in the Nuclear Regulatory Commission's Significance Determination Process", R.M. Pulsifer to T.C.Feigenbaum, 3/27/2000.
- 3. Seabrook Station Probabilistic Safety Study 1999 Peer Review Update, SB99PR.
- 4. Seabrook Station Spent Fuel Pool Probabilistic Safety Study, March 2000.
- 5. Engineering Evaluation 01001, Emergency Diesel Generator B Operability During Cycle 7.

### **3.0 DISCUSSION**

### **3.1** Phase 2 Full Power Significance Determination

Even though NAESCO has concluded that the "B" EDG was operable throughout Cycle 7 (Reference 5), the Resident Inspector has stated that he believes that the "B" EDG was not operable after the final surveillance run of the cycle.

The full power Phase 2 significance determination was performed using the above conservative assumption. During the final run, the diesel generator breaker was opened at 0523 10/18/00. The reactor was tripped at the end of the cycle on 0352 10/21/00. The interval between the end of the surveillance run and the opening of the reactor trip breakers is less than three days.

Since the finding concerns the emergency diesel generators, Attachment A, Table 4 is used to determine that the Loss of Offsite Power initiator should be evaluated. Using an exposure time of  $\leq$ 3 days, and the Loss of O

- \* Sequence 4: EAC= 1 train,  $= 2$  ("A" EDG), HPR=Operator action= 2. Total  $= 4$
- Sequence 5: EAC=2 (same as above), EIHP=1 multi train system =  $3.$  Total =  $5$
- Sequence 6: EAC=2 (same as above), REC5=Operator action=2. Total = 4
- Sequence 7: EAC=2 (same as above), TDEFW=1 train (diverse) [note not ASD]=2,  $FB = operator action = 2. Total = 6$
- Sequence 8: EAC=2 (same as above), TDEFW=2 (same as above), REC2=Operator action under high stress= 1. Total = *5*

Entering Attachment A, Table 2 with a likelihood rating of D and the above results gives a color of GREEN. Note that even if the assumption is an exposure time of 3 to 30 days, this gives a likelihood rating of C and a res

#### **3.2** Phase 2 Shutdown

The SDP for Shutdown Operations is considerably simpler than for Power Operations.

From the outage log:

- $\bullet$  Mode 5 10/22/00 0240
- DG A ECCS Testing 10/22/00 1230
- DG B ECCS Testing 10/24/00 1047

Thus, the first DG runs were after entry into Mode 5. The case of DG operability for Modes 2 **-** 4 at the beginning of OR07 should be the same as during the previous operating cycle (i.e., the DG B was fully operable).

Review of the Shutdown SDP (Reference 1, Appendix G) indicates that the appropriate section<br>for the configuration at the time of the EDG failure is "PWR Refueling Operation RCS Level >23'<br>OR PWR Cold Shutdown or Refueling

In addition, the most restrictive Phase 2 shutdown SDP requires "3 sources of AC power including: 1 offsite and 1 onsite source." Since we had at least the "A" EDG, two offsite lines, and at least two of the RATs and UATs

## **3.3** Phase **3** Significance Determination (Online and Shutdown)

The Phase 3 evaluation addresses the risk implications of the failure to run of the Train "B" emergency diesel generator (EDG) during OR07 as well as some sensitivity cases for unavailability during power operation. Based on the fact that the failure occurred during the<br>outage and the evidence that both EDGs were operable throughout Cycle 7 (Reference 5), the risk<br>significance is based on an eval

The additional operating history of both diesels during cycle 7 and OR07 allow an updated<br>estimate of the EDG failure rate. The resultant change in the calculated at-power risk should not<br>be considered an increase in risk the true EDG failure rate.

The following paragraphs describe the actions taken to assess the results of the revised failure rate, as well as the risk implications of the failure to run of the "B" emergency diesel generator during OR07. The probabili

Five changes to the PRA were incorporated in order to reflect this failure:

- Change in the average EDG failure rate, based on this failure as well as the success data from cycle 7.
- Change in the EDG recovery potential, based on the consequences of this failure.
- Change to the common cause factor between the two EDGs.<br>• Change to the unavailability of the EDGs during rule  $\frac{7}{4}$
- **\*** Change to the unavailability of the EDGs during cycle 7.
- Change to the outage risk due to the EDG failure.

These changes were evaluated using the official RISKMAN model (SB99PR) as well as the Spent Fuel Pool PRA. The results are presented below.

#### EDG Failure Rate

The EDG failure rate in the RISKMAN model is divided into three terms - fail to start, fail to run<br>for the first hour, and failure to run after the first hour. The two RUN terms help to account for<br>the difference in data f

![](_page_60_Picture_112.jpeg)

Note the recent failure doubles the number of failures for the third term, from one to two failures.

RISKMAN was used to perform a Baysian update of generic failure rates with this plant specific data:

![](_page_60_Picture_113.jpeg)

Thus, with additional cycle 7 data, the first two terms (S and R1) decreased while the third (R2) increased due to the additional failure as well as additional success data. The large increase in R2 (19%) is due the one ad made much less difference to the failure rate.

Two different EDG success criteria are used in the RISKMAN model: for LOSPSY (switchyard related events), the mission time is 6 hr; for LOSPW (weather related events), the mission time is 24hr. The changes in failure terms have different impacts:

![](_page_61_Picture_102.jpeg)

Thus, for the 6-hr mission time, the increase in EDG failure probability is about 3% while for the 24hr mission time it is 12%.

Note: the "current" EDG failure rate data is documented in Section 6.1.1 and Tables 6.1-1 and 2 of Reference 3.

#### EDG Recovery Probability

The PRA model currently contains a generic EDG recovery probability curve. With four actual failures at Seabrook Station, we can construct a simple plant-specific recovery curve. The four EDG failures with estimated recovery times:

![](_page_61_Picture_103.jpeg)

Yielding the recovery failure probabilities:

![](_page_61_Picture_104.jpeg)

The 4hr and 12 hr times are used based on battery lifetimes. This impacts only the LOSPSY since the LOSPW is assumed to last for more than 12 hrs.

Note: the current EDG recovery model is documented in Section 3.18D of Reference 3.

#### Common Cause Potential

The current PRA model includes a beta factor of 0.031 for fail to start and 0.040 for fail to run.<br>Thus, the current model includes some common cause failure potential. In order to be considered<br>a common cause failure (CCF failing at the same time. Just the presence of the same wear mechanism is not sufficient to<br>consider it a CCF. It would not be appropriate to increase either beta factor since the inspection<br>of the "A" EDG shows that the " start/runs):

![](_page_62_Picture_114.jpeg)

Since this wear mechanism is start/load related (Reference 5), one might expect that it would initially be encountered in the "B" EDG.

Note: the current CCF model is documented in Section 6.3 and Table 6-3 of the Reference 3.

Unavailability During Cycle 7<br>If one or both of the EDGs were non-functional (i.e., unable to perform its mission from a PRA standpoint) sometime during Cycle 7, then the actual "risk" during Cycle 7 would have been<br>higher than assumed based on unavailability from average maintenance and random failures. The<br>word risk is in quotes since, strictl in a historical sense by assuming we are back in Cycle 7 with no knowledge of the future beyond what we now know about the condition of the EDGs. This section addresses the potential unavailability of each EDG during Cycle

As discussed previously, the risk model includes two mission times for EDGs, 6 hr and 24 hr. We examined the data for EDG runs during Cycle 7 and OR07 for evidence that each EDG would be able to run for these mission times cycle.

Similarly, EDG "B" ran loaded for more than 37 hours during OR07, prior to the run where the failure occurred. The failure mode that occurred appears to be related to the number of fast starts/loads (i.e., a wear out failu cycle.

We have previously stated that we believe there was no unavailability of the "B" EDG during Cycle 7. However one could perform a sensitivity case using a bounding assumption for the typical fault exposure time determinati follows:

Duration =  $\frac{1}{2}$  \* (2 days, 22 hr, 29 minutes) = 35.24 hrs

Delta CDF = CDF base \* (RAW-I) \* Duration/8760

**<sup>=</sup>**4.6e-5 **\*** (6.04-1) \* 35.24/8760 **=** 9.33e-7

#### Outage Risk Assessment

A quantitative estimate of fuel damage risk for the configuration of interest is bounded by a case with all the fuel in the spent fuel pool and no permanent diesels available.

This is an evaluation of the change in CDF risk given the following bounding assumptions:

- 
- The fuel has been offloaded to the spent fuel pool.<br>• Both emergency diesels are out of service and not quickly restorable.
- One emergency AC bus is out of service.
- This configuration occurs for one month.

We can start by evaluating the condition of both EDGs out of service with the core offloaded. From the Seabrook Spent Fuel Pool PRA (Reference 4), the base case (average annual) risk is:

![](_page_63_Picture_143.jpeg)

With the fuel offloaded, the base case conditional CDF is:

![](_page_63_Picture_144.jpeg)

This is computed by changing the OFFLOAD variable from 0.02 to 1.0 i.e., assuming the SFP is<br>in the OFFLOAD condition. (Note this is significantly higher than the average baseline CDF of<br>5.7E-7/yr, which indicates that OFF expect).

If we assume the plant is in this configuration for one month per year, with average equipment unavailability, the CDF =  $1.9E-6/12 = 1.6E-7/yr$ .

With the fuel offloaded, one emergency bus and both EDGs out of service, the conditional CDF is:

![](_page_63_Picture_145.jpeg)

Again, assuming this configuration is present for one month per year, the CDF = 2.4E-7.

Thus, the increase due to bus and EDG outages is  $(2.4E-7 - 1.6E-7) = 8e-8/yr$ .

The change in outage risk due to the EDG failure is insignificant due to the plant configuration, with all the fuel in the spent fuel pool.

#### Insights and Observations

These paragraphs discuss insights obtained from these significance determinations as well as answering various questions from internal and external reviewers.

• Why does one failure have such an impact on the average risk?

The change in CDF from this one failure is due to two factors: (a) the importance of station<br>blackout to the overall risk and (b) the high reliability of the EDGs such that one additional failure<br>significantly alters the contrast to the 19% change from the actual data.

What is the Risk Significance of this event?

Based on the fact that the failure occurred during the outage and the evidence that the EDGs were<br>operable throughout Cycle 7, the risk significance is on outage risk. Since the failure of EDG "B"<br>occurred during fuel offl

Do the EDGs have different failure rates?

There are two arguments for considering the EDG data together rather than dividing it between "A" and "B". First, these machines are essentially identical in their design, operation, and start/run data. Combining the relia

Could this failure only be discovered during 24 hour run?

The various EDG reports do not conclude that the recent EDG failures would only be<br>experienced during a 24 hour run (i.e. long demand). Based on the failure analysis conducted by<br>the Event Team, it is logical to conclude that the failure occurred well before 24 hours.

### 4.0 SAFETY **SIGNIFICANCE**

There is no safety significance since the diesel generator failure occurred while the core was offloaded to the spent fuel pool. This is substantiated by the risk quantification described above.

### **5.0 CONCLUSION**

Using the NRC Significance Determination Methodology, the Phase 2 Full Power results are GREEN and the Phase 1 shutdown results would not proceed to Phase 2 (i.e. GREEN).<br>Performing a Phase 3 sensitivity case using a bound unavailability yields a delta risk of 9.3e-7, also GREEN.

The "B" EDG failure was not risk significant. There is ample evidence presented to conclude that<br>the "B" EDG was capable of performing its PRA mission at any time during cycle 7. As the<br>bounding case from section 3 above d

Timing and circumstance cannot be ignored when determining the risk significance of an event.<br>Therefore arguments of "what might have been" are invalid for this purpose. In fact, the NRC guidance for the Significance Dete

### Attachment **A**

#### **SDP** Tables (Reference 2)

### (marked up for **11/1/00 EDG** Event)

## Table **1 -** Estimated Likelihood for Initiating Event Occurrence During Degraded Period

![](_page_65_Picture_128.jpeg)

# Table 2 - Risk Significance Estimation Matrix

![](_page_66_Picture_421.jpeg)

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# Table **3 -** Remaining Capability Rating Values

![](_page_67_Picture_108.jpeg)

![](_page_68_Picture_104.jpeg)

# Table 4 - Seabrook Specific Dependency Matrix (applicable portion)

![](_page_69_Picture_153.jpeg)

# Table 5 - SDP Worksheet for Seabrook Station - LOOP (Table 2.7, Ref 2)

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![](_page_70_Picture_70.jpeg)

#### *Notes:*

1) Split fraction DGAB, Total loss of two diesel generators, is 7.5E-3.<br>2) The value assessed by the IPE (page E-97) for the failure of the TDP of EFW is 4.8E-2. For the SDP calculation, a value of 1E-1 can be used.<br>3) In

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