William T. O'Connor, Jr. Vice President, Nuclear Generation

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10 CFR 50.73

January 25, 2005 NRC-05-0003

U.S. Nuclear Regulatory Commission Attention: Document Control Desk Washington D C 20555-0001

Reference: Fermi 2 NRC Docket No. 50-341 NRC License No. NPF-43

Subject: Licensee Event Report No. 2004-004, "Automatic Reactor Shutdown Due to Automatic Voltage Regulator Failure"

Pursuant to 10 CFR 50.73(a)(2)(iv)(A), Detroit Edison is hereby submitting the enclosed Licensee Event Report (LER) No. 2004-004. This LER documents a December 4, 2004 event where a failure of the generator exciter automatic voltage regulator (AVR) resulted in a main generator trip with subsequent main turbine trip and automatic reactor shutdown.

No commitments are being made in this LER.

Should you have any questions or require additional information, please contact Mr. Norman K. Peterson of my staff at (734) 586-4258.

Sincerely,

William D. O'Con

D. P. Beaulieu cc: E. R. Duncan NRC Resident Office Regional Administrator, Region III Supervisor, Electric Operators, Michigan Public Service Commission

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NRC FC	NRC FORM 366 U.S. NUCLEAR REGULATORY COMMISSIO						SSION	APPRO	VED BY OMB: No.	3150-0104			Expires	6/30/2007	
(6-2004) LICENSEE EVENT REPORT (LER) (See reverse for required number of digits/characters for each block)							Estimat request licensin estimate Nuclear e-mail t and Re Budget, collectio not con	Estimated burden per response to comply with this mandatory collection request: 50 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the Records and FOIA/Privacy Service Branch (T-5 F52), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internel e-mail to infocollects@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202 (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to Impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.				collection d into the ing burden F52), U.S. by internet information ement and information NRC may			
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	ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) On December 4, 2004, at 0417 hours EST, during startup from the tenth refueling outage, the reactor scrammed														

On December 4, 2004, at 0417 hours EST, during startup from the tenth refueling outage, the reactor scrammed from 60% power as a result of the actuation of an Automatic Voltage Regulator (AVR) trip relay. The AVR experienced an interruption of the communications link between the digital AVR and the power converter thyristors of the generator exciter. The AVR trip resulted in a main generator trip with subsequent main turbine trip and reactor scram. The reactor protection system (RPS) performed as expected, and all rods were fully inserted into the core. Reactor water level reached a low of 136 inches above top of active fuel and recovered to normal automatically without operator intervention. Subsequent to the event, the main steam isolation valves (MSIVs) remained open and reactor water level was maintained in the normal band of 173 to 214 inches. Reactor water was supplied by the condensate and reactor feedwater systems, and the resultant reactor steam was sent to the condenser via the turbine bypass lines. Pressure control was maintained by the turbine bypass valves. Reactor dome pressure peaked at about 1010 psig. With reactor pressure maintained below the Safety Relief Valve (SRV) setpoints, none of the SRVs lifted. Reactor water Level 3 isolations occurred as expected. These included isolation Group 4 (Residual Heat Removal Shutdown Cooling and Head Spray), Group 13 (Drywell Sumps), and Group 15 (Traversing In-core Probe System) isolations.

The plant was restarted on December 5, 2004. Required circuit board replacements, the addition of noise suppression devices, AVR software changes, and associated testing were completed, and the unit was synchronized on December 8, 2004.

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NRC FORM 366A			U.S. NUCLEA	AR REGULATORY	COMMISSION
(1-2001)	SEE EVENT	REPORT	(LER)		
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17. NARRATIVE (If more space is required, use addit	ional copies of NRC	: Form 366A)			
Initial Plant Conditions:					
Mode1Reactor Power60 percent					
-				,	
Description of the Event					
On December 4, 2004, at 0417 hours EST, from 60% power as a result of the actuation AVR experienced an interruption of the cor thyristors of the generator exciter [TL]. Th turbine [TA] trip. A reactor scram occurred reactor protection system (RPS) [JD] perfor Reactor water level reached a low of 136 in without operator intervention. Subsequent and reactor water level was maintained in th the condensate [SD] and reactor feedwater as [SG] via the turbine bypass lines. Pressure pressure peaked at about 1010 psig. With r setpoints, none of the SRVs lifted. Reactor isolation Group 4 (Residual Heat Removal Group 15 (Traversing In-core Probe System A 4-hour notification of this event was mad hours EST on December 4, 2004 (EN 4124). The AVR is part of the main generator excit conditions of load within set tolerances. Th consisting of a 5200 KVA excitation transfe control cubicle (AVR unit), and a field supp generator output voltage and reactive power response to feedback signals from the generator excitation to the main generator field through	a of an Automat nmunications li e AVR trip result as designed from the AVR trip result as designed from the as expected to the event, the the normal band systems [SJ], ar control was ma eactor pressure water Level 3 i Shutdown Cool a) isolations. He to the NRC ir 3). tation system the this is achieved be ormer, a rectified pression cubicles r flow by direct rator output terri-	ic Voltage R nk between t ilted in a mai om the turbir d, and all roo of active fue e main steam of 173 to 21 nd the resulta intained by t maintained by t solations [JN ing and Head n accordance nat maintains by using a clo r cubicle (po . The static variation of ninals. Excit t to the rectif	egulator (AVR) [F the digital AVR and in generator [TB] to the control valve fast ds were fully inser l and recovered to isolation valves (I 4 inches. Reactor nt reactor steam w the turbine bypass below the Safety R A] occurred as exp d Spray), Group 13 with 10 CFR 50.7 generator output w bed loop static exc over converter thype excitation system of the generator excit tation power is obt ier cubicle. The re	G] trip relay ad the power of rip and subset st closure sign ted into the co- normal autor MSIVs) rema water was su vas sent to the valves. Reac elief Valve (Sected. These B (Drywell Su 2(b)(2)(iv)(B voltage under citation system ristor unit), and controls the normal attion current attion current attion current	. The converter quent main nal. The ore. natically ined open pplied by condenser tor dome SRV) included imps), and ) at 0507 varying m excitation nain in he le supplies
cubicle. The controls for the static excitation system control cubicle and microprocessor based th thyristor converter bridges (rectifier cubicle voltage control (AVR), generator field curre protective functions, and a programmable la processing redundancy. An integral part of communicates between the display panel ar electronic control modules and the Field Br	nyristor triggerin es). Each process ent (manual vol ogic controller, the AVR confi- ad modules in b	ng units, loca ssing unit con tage regulato providing a o guration is a oth voltage r	ated in each of three ntains the software or), excitation syste dual channel desig local area network egulator racks, the	e forced air c for generato em monitorin n for complet (LAN), whi rectifier con	cooled r output g and te ch verter
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U.S. NUCLEAR REGULATORY COMMISSION

# LICENSEE EVENT REPORT (LER)

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coaxial cabling connections between each interface/termination point and operates using an 'ARCnet' signal token passing communication system. The excitation system can provide full rated excitation with only two of the three converter thyristor bridges in service. This allows for continuous service if one bridge fails during normal operation.

Under normal conditions, the excitation control starts up with one channel selected in AVR mode. If a failure occurs in the operating channel, a transfer to the remaining AVR channel occurs automatically. If the second AVR channel fails, a transfer to the manual regulator should occur automatically.

An investigation of the unit trip was initiated immediately after the event. Extensive troubleshooting was performed. The vendor representative was included in these activities, and an engineering consultant performed an independent evaluation of electromagnetic interference issues of the ARCnet communications network that initiated the AVR trip.

A temporary modification had been installed in a module of each thyristor converter unit in order to correct a condition that was discovered during troubleshooting associated with the September 3, 2004 AVR scram. Three thyristor converter units were replaced during the November 2004 refueling outage to eliminate the temporary modification. This involved the replacement of several sub-component boards in each converter unit, including each of three ARCnet coupler communication boards of a later design than the original ARCnet coupler communication boards of a later design than the original ARCnet coupler communication boards would enhance the robustness of the ARCnet communication system, the failure of which was the most probable cause of the September 3, 2004 scram. The three new ARCnet coupler communication circuit boards were expected to provide improved interrupt handling and superior immunity to ARCnet communication errors. However, about 4-1/2 hours after synchronization of the generator during plant restart, an AVR ARCnet communication related alarm was received, shortly followed by a blocking and isolation of one of the three thyristor converter units. A subsequent failure in a second converter unit resulted in a main generator trip and subsequent main turbine trip and reactor scram.

The plant was restarted on December 5, 2004. Required circuit board replacements, the addition of noise suppression devices, AVR software changes, and associated testing were completed, and the unit was synchronized on December 8, 2004.

### Cause of the Event

The apparent cause was an incompatibility of new ARCnet communication circuit boards with the original system design. A temporary modification had been installed in a module of each thyristor converter unit in order to correct a condition that was discovered during troubleshooting associated with the September 3, 2004 AVR scram. Three thyristor converter units were replaced during the November 2004 refueling outage to eliminate that temporary modification. All three thyristor converter units were replaced at that time, including each of three ARCnet coupler communication boards in those units. Those boards were of a later design than those installed in the previous thyristor converter unit, and it was thought that the newer boards would enhance the robustness of the ARCnet communication system. However, the configuration of the system was not formally controlled in accordance with the site policies and procedures, and a formal equivalency evaluation was not performed on the thyristor converter replacement. The three new ARCnet coupler communication boards were determined to be incompatible with the original system design. Ostensibly, the three new ARCnet coupler communication circuit

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boards were designed to provide improved interrupt handling and superior immunity to ARCnet communication errors. Nevertheless, communication problems did occur which resulted in the blocking and isolation of one of the three thyristor converter units. A subsequent failure in a second converter unit resulted in an AVR trip, as designed. The AVR trip resulted in a main generator trip with subsequent main turbine trip and reactor scram.

## Analysis of the Event

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The AVR has no safety related function. The AVR, Generator, and Turbine trips functioned as designed. The reactor scrammed as designed from the turbine control valve fast closure signal. The plant response to the turbine trip was as expected and was enveloped by the more severe turbine trip without bypass transient described in the UFSAR. There was no challenge to the integrity of the reactor coolant system or the main steam system. The lowest reactor water level during the transient was measured to be 136 inches above top of active fuel which is below the reactor water Level 3 isolation trip setpoint. Reactor water Level 3 isolations occurred as expected. These included isolation Group 4 (Residual Heat Removal Shutdown Cooling and Head Spray), Group 13 (Drywell Sumps), and Group 15 (Traversing In-core Probe System) isolations. The highest reactor pressure received was about 1010 psig which is below the safety relief valve setpoints; 5 each at 1135, 1145, and 1155 psig. Subsequent to the unit trip reactor pressure was adequately controlled using the main turbine bypass valves, and reactor water level was controlled using the condensate and feedwater systems.

Therefore, since the generator, turbine and reactor protection systems performed as designed, and since plant response was enveloped by the UFSAR transient analyses, there was no undue risk to the health and safety of the public as a result of this event.

#### **Corrective Actions**

ARCnet coupler communication (0672) circuit boards were replaced with the original circuit boards.

Ferrite beads were added to the ARCnet coaxial signal cables to filter out high frequency noise and reduce susceptibility to internally and externally generated electronic noise. This modification reduced measured noise levels on the shield of the ARCnet communication system by about 50%.

Software changes were made to incorporate a 2-second time delay to eliminate unnecessary channel changeover or excitation trips due to communication interruption. A single ARCnet communication alarm was replaced by six separate alarms to better identify the origin of a communication problem.

This event has been documented in the Fermi 2 corrective action program, CARD 04-26443. The compatibility of all of the interconnected AVR systems subcomponents is being evaluated under this CARD. Fermi 2 programs are also being evaluated to determine whether changes should be made that could preclude a problem of this type in the future. Any further corrective actions identified as a result of these evaluations will be tracked and implemented commensurate with the established processes and priorities of the corrective action program.

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#### **Additional Information**

A. Failed Components:

Component: ARCnet coupler communication boards Function: ARCnet communication system Manufacturer: ABB Brown Boveri Model Number: 0672 Failure Cause: Incompatible replacement ARCnet coupler communication board

B. Previous LERs on Similar Problems:

LER 04-002 describes a similar event that occurred on September 3, 2004. That failure was attributed to a failure or failures of the original Channel 1 processor (Type PP C322) module and/or the combination input/output data module (Type UA C326) located in the plant relay room. The current event was associated with the replacement of the three SCR Controller units located in the vicinity of the SCRs, or more specifically, the apparent incompatibility in replacement ARCnet Coupler communication boards (Type 0672) within those units. Although both of these events involve the ARCnet communication subsystem of the AVR, the current event was not a repeat of the earlier event since the current event was caused by incompatible replacement parts and involved different components than those involved in the original failure.