

FOIA - FOIA Request

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To: <foia@nrc.gov>
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Subject: FOIA Request

FOIA/PA REQUEST
Case No.: 2007-0120
Date Rec'd: 2-14-07
Specialist: POOL
Related Case: _____

I request the referenced memo in the attached document:

Memo from E.G. Greenman, Region III to D.M. Crutchfield, NRR, dated October 22, 1990.

In addition, I request that any other documents related to TAC No. 77922 also be provided.

~ t

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

December 18, 1990

MEMORANDUM FOR: John Hannon, Director
Project Directorate III-3, NRR

FROM: Jose A. Calvo, Chief
Technical Specifications Branch,
Division of Operational Events Assessment, NRR

SUBJECT: REVIEW OF REGION III CONCERN REGARDING TECHNICAL
SPECIFICATIONS COVERING DIESEL GENERATOR TESTING
(TAC NO. 77922)

Reference: Memorandum from E. G. Greenman, Region III, to
D. M. Crutchfield, NRR, dated October 22, 1990.

By the referenced memorandum, Region III advised NRR of a series of diesel generator tests that failed to identify a degraded diesel generator at the Kewaunee Nuclear Power Plant (KNPP), and requested NRR assistance. The tests were purportedly conducted in accordance with KNPP Technical Specifications (TS), but did not involve loading the diesel generators. Consequently, the test results were not adequate to identify a diesel generator that may not have been capable of performing its intended function. Region III requested NRR to review the KNPP issue and determine what, if any changes may be required to the KNPP TS, or to TS on a generic basis to preclude future occurrences of this type. The Technical Specifications Branch has reviewed the above request and supporting documentation, and provides comments as follows.

Operability is defined in Section 1 e of the KNPP TS, and includes the requirement that a system or component be tested in accordance with Specification 4. Specification 4, in turn, requires diesel generators to be started and loaded to 2600 KW for at least one hour in order to meet the test requirements. There is nothing in the KNPP TS in Specification 3 or 4 with respect to demonstrating diesel generator operability by starting and establishing rated speed and voltage, only. Loading to 2600 KW for at least one hour is also required.

Based on the above, the OTSB view is that KNPP was in violation of their TS on September 17, 1990, when they removed the 1A EDG from service without conducting a loaded operability test on the 1B EDG, and again when they removed the 1B EDG from service without conducting a loaded operability test on the 1A EDG which may have shown it to be inoperable. Further, KNPP would have been in violation of TS even if the current Standard Technical Specifications (STS) or TS for recently licensed plants were applicable to KNPP. The rationale for this OTSB view is discussed below.

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The current STS include the requirement to load a diesel generator to some predetermined value for a specified period of time in order to demonstrate operability, and, in that respect, are no different than the KNPP TS. For some recently licensed plants, however, diesel generator testing requirements

have been modified to delete the requirement to load the diesel generators in certain instances. The requirement to demonstrate diesel generator operability by starting and establishing rated speed and voltage, only, is limited to those times when a plant is in an LCO action due to a degraded ac power situation, i.e., loss of one offsite ac source, or loss of one diesel generator. The reason for not loading diesel generators when demonstrating operability under these conditions is to minimize the potential for failure of one or more diesel generators as a consequence of a transient or malfunction on the grid when the plant is already experiencing a degraded ac condition (with only one exception, diesel generators must be paralleled with the grid for loading). It is the staff's view that the lack of assurance associated with not loading the diesel generator is offset by the added assurance that the diesel generator(s) will not be damaged or lost due to grid transients when the plant is in a degraded ac situation.

At KNPP, the licensee would have been in violation of the current STS or the TS for recently licensed plants when on September 17, 1990, they failed to 1.) conduct a loaded operability run on the 1A EDG following diesel generator maintenance as well as prior to removing the 1B EDG from service, and 2.) conduct a loaded operability run on the 1B EDG prior to removing the 1A EDG from service. There are two reasons for this. First, operability must be reestablished following maintenance on a diesel generator by conducting a complete surveillance test, which was not done. Second, the 1A and 1B EDGs were tested prior to removing their redundant EDG from service, but not at load. Since there was no (known) degraded ac situation at the time, the tests to establish 1A and 1B EDG operability should have been at load.

The preceding is the OTSB interpretation of the events at KNPP. Based on the referenced memorandum, however, it appears that there may be some confusion regarding just how to interpret the existing STS in this area. Therefore, we will review the existing STS as well as the new STS, currently under development, to ensure that diesel generator testing under all conditions is adequately addressed. Also, we will consider issuing an Information Notice on this subject.

In addition to the TS interpretation, there appears to be an issue relative to operation and maintenance practices at KNPP that was not addressed. Based on the data provided, it appears that the fuel rack/injector problem existed at the time of the 1A EDG load test on September 14, 1990. The condition described (one injector stuck at approximately 50% fuel) would manifest itself in a radically different exhaust temperature for the affected cylinder as opposed to all the other cylinders. Had cylinder temperatures been monitored during

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testing, the single cylinder temperature anomaly would have been noted, and corrective action could have been initiated immediately. This, as opposed to waiting for three days with a diesel generator potentially incapable of performing its intended function. We recommend this issue be investigated further since it, also, may represent a TS violation.

If you have any questions, or require additional clarification, please contact Ed Tomlinson on extension x23150.

Signed by

Richard Lobel for

Jose A. Calvo, Chief
Technical Specifications Branch,

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DOCUMENT NAME: MEMO TO JOHN HANNON

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