December 23, 2008

**ULNRC-05579** 

U.S. Nuclear Regulatory Commission Attn: Document Control Desk Mail Stop P1-137 Washington, DC 20555-0001



10CFR50.73(a)(2)(iv)(A)

Ladies and Gentlemen:

DOCKET NUMBER 50-483
CALLAWAY PLANT UNIT 1
UNION ELECTRIC CO.
FACILITY OPERATING LICENSE NPF-30
LICENSEE EVENT REPORT 2008-005-00
REACTOR MANUALLY TRIPPED DUE TO "B" MAIN FEED PUMP
TRIPPING ON LOW LUBE OIL PRESSURE

The enclosed licensee event report is submitted in accordance with 10CFR50.73(a)(2)(iv)(A) to report an event in which the "B" main feedwater pump turbine was tripped due to low lube oil pressure. As a result of the loss of one main feedwater pump, the reactor was manually tripped.

This letter does not contain new commitments.

Sincerely,

John T. Patterson

Plant Director

**EMF** 

Enclosure

IE22 NER ULNRC-05579 December 23, 2008 Page 2

cc: Mr. Elmo E. Collins, Jr.
Regional Administrator
U.S. Nuclear Regulatory Commission
Region IV
612 E. Lamar Blvd., Suite 400
Arlington, TX 76011-4125

Senior Resident Inspector Callaway Resident Office U.S. Nuclear Regulatory Commission 8201 NRC Road Steedman, MO 65077

Mr. Mohan C. Thadani (2 copies)
Licensing Project Manager, Callaway Plant
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Mail Stop O-8G14
Washington, DC 20555-2738

ULNRC-05579 December 23, 2008 Page 3

# Index and send hardcopy to QA File A160.0761

# Hardcopy:

Certrec Corporation

4200 South Hulen, Suite 422

Fort Worth, TX 76109

(Certrec receives ALL attachments as long as they are non-safeguards and may be publicly disclosed.)

<u>LEREvents@inpo.org</u> (must send the <u>WORD</u> version of the LER to this address)

# Electronic distribution for the following can be made via LER ULNRC Distribution:

- A. C. Heflin
- F. M. Diya
- D. W. Neterer
- T. E. Herrmann
- L. S. Sandbothe
- S. A. Maglio
- S. L. Gallagher
- L. M. Belsky (NSRB)
- T. B. Elwood
- D. E. Dumbacher (NRC)
- B. A. Brook (WCNOC)
- Ms. Diane M. Hooper (WCNOC)
- Mr. Dennis Buschbaum (TXU)
- Mr. Scott Bauer (Palo Verde)
- Mr. Stan Ketelsen (PG&E)
- Mr. Wayne Harrison (STPNOC)
- Mr. John O'Neill (Pillsbury Winthrop Shaw Pittman LLP)

Missouri Public Service Commission

Records Center (INPO)

l .						E	Estimated burden per response to comply with this mandatory collection request: 50 hours. Reported lessons learned are incorporated into the									
LICENSEE EVENT REPORT (LER)							. 1	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 internet 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								
(See reverse for required number of digits/characters for each block)							c r	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.								
1. FACIL								2		DOCKET NUMBER 3. PAGE						
		lant Unit	t 1						050	000 483		1	OF 5			
	. тітье Reactor manually tripped due to "B" Main Feed Pump tripping on low lube oil pressure															
5. E	VENT D	ATE	6. l	LER NUMBER		7. R	REPORT D	ATE			OTHER FAC	CILITIES INV				
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NO.	MONTH	DAY	YEAR	FACILITY NAME				DOCKET NUMBER			
11	11	2008	2008	- 005 -	00	12	23	2008	FACILITY	NAME			DOCKET	IUMBER		
9. OPER	ATING	MODE	11,	. THIS REPOF	RT IS	SUBMITTI	ED PURSI	UANT TO	TO THE REQUIREMENTS OF 10 CFR§: (Check all that apply)							
20.2201(b) 1				☐ 20.2203(a)(3)(i) ☐ 20.2203(a)(3)(ii) ☐ 20.2203(a)(4) ☐ 50.36(c)(1)(i)(A)			□ 50.73(a)(2)(i)(C)       □ 50.73(a)(2)(vii)         □ 50.73(a)(2)(ii)(A)       □ 50.73(a)(2)(viii)         □ 50.73(a)(2)(ii)(B)       □ 50.73(a)(2)(viii)         □ 50.73(a)(2)(iii)       □ 50.73(a)(2)(ix)(				)(A) )(B)					
10. POWER LEVEL			□ 20.2203(a)(2)(ii)       □ 50.36(c)         □ 20.2203(a)(2)(iii)       □ 50.36(c)         □ 20.2203(a)(2)(iv)       □ 50.46(a)			50.36(c)(1) 50.36(c)(2) 50.46(a)(3) 50.73(a)(2) 50.73(a)(2)	) )(ii) )(i)(A)	☐ 50.73(a)(2)(v)(A) ☐ 73.71(a)(4 ☐ 50.73(a)(2)(v)(B) ☐ 73.71(a)(5 A) ☐ 50.73(a)(2)(v)(C) ☐ OTHER B) ☐ 50.73(a)(2)(v)(D) Specify in A				71(a)(5)	act below 366A			
					1	2. LICENS	SEE CONT	FACT FO	R THIS L	.ER						
facility na T. B. E				egulatory A	_				TELEPHONE NUMBER (Include Area Code) (573) 676-6479							
			13. COM	IPLETE ONE L	LINE F	FOR EAC	Н СОМРО	NENT F	AILURE [	DESCRIBE	ED IN THIS	REPORT				
CAUS	3E	SYSTEM	COMPON	NENT FACTU		REPORTABLE TO EPIX		CA	USE	SYSTEM COMPONE		MANU- FACTURE		ORTABLE DEPIX		
В		SL	PCV				Y									
		14	. SUPPL	EMENTAL RE	POR	T EXPECT	ΓED				XPECTED	МОМТН	DAY	YEAR		
	YES (If yes, complete 15. EXPECTED SUBMISSION DATE)							NO		MISSION DATE						
ABSTRA	CT (Lim	it to 1400	spaces, i	i.e., approxima	ately 1	5 single-s <sub>l</sub>	paced type	ewritten li	ines)							

On 11/11/2008, while operating at 97-percent reactor power, with power increasing following Refuel 16, the "B" main feedwater pump (MFP) turbine tripped. Since the loss of one MFP at greater than 80-percent power challenges the plant's ability to maintain steam generator (SG) water levels to support continued plant operations, the reactor was manually tripped per plant operating procedures.

All control rods fully inserted during the event and all safety systems responded as designed. Operation of the Auxiliary Feedwater system restored SG levels. Operation of the main steam supply system provided the heat sink for decay heat removal following shutdown. No primary relief valves or main steam relief valves lifted during the event. No primary to secondary leakage existed. No radioactive material was released. This event was considered an uncomplicated reactor trip.

The cause was that the o-rings in the MFP lube oil strainer were a material susceptible to swelling in petroleum-based lubrication systems. An o-ring originally located in one of the MFP lube oil basket strainers swelled, became dislodged, and traveled into a MFP turbine bearing oil supply pressure regulating valve. The corrective actions to prevent recurrence included identification of a replacement for the o-rings. The correct o-rings were installed in both strainers for the "A" and "B" MFP turbine oil system.

(1-2001)

# LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)	DOCKET (2) NUMBER (2)	LER NUMBER (6)			PAGE (3)		
Callaway Plant Unit 1		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
Canaway Flant Onit 1	05000483	2008	- 005 -	00	2	OF	5

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

All times are approximate and Central Standard Time unless otherwise stated.

#### DESCRIPTION OF THE REPORTABLE EVENT

#### A. REPORTABLE EVENT CLASSIFICATION

10CFR50.73(a)(2)(iv)(A) requires reporting of any event or condition that resulted in a manual or automatic actuation of any of the systems listed in 10CFR50.73(a)(2)(iv)(B). The systems listed below are relevant to this LER:

- (1) Reactor protection system (RPS) including: reactor scram or reactor trip; and
- (6) PWR auxiliary or emergency feedwater system.

#### B. PLANT OPERATING CONDITIONS PRIOR TO THE EVENT

The plant was in MODE 1, Power Operation, at 97-percent reactor power at the time the event occurred.

# C. STATUS OF STRUCTURES, SYSTEMS OR COMPONENTS THAT WERE INOPERABLE AT THE START OF THE EVENT AND THAT CONTRIBUTED TO THE EVENT

No structures, systems, or components were inoperable at the start of the event which contributed to the event.

#### D. NARRATIVE SUMMARY OF THE EVENT, INCLUDING DATES AND APPROXIMATE TIMES

On November 11, 2008, startup activities from Refuel 16 were underway at the Callaway Plant. The main feed pump (MFP) turbine "B" lube oil cooler outlet strainer [EIIS system: SL, component: STR] was switched over to the opposite side of the duplex strainer arrangement as part of the in-service leak test, which was completed at 1534. At 1846.33, reactor power had been increased to approximately 97-percent when annunciation was received that the "B" MFP turbine [EIIS system: SJ, component: TRB] was experiencing low lube oil pressure. Subsequently at 1846.36, the "B" MFP turbine tripped on low lube oil pressure. Annunciation for low lube oil pressure for a MFP turbine occurs at 5.5 psig; a MFP turbine trips on lube oil pressure below 4 psig.

The function of the MFPs is to supply Secondary Plant feedwater to the steam generators (SG) [EIIS system: AB, component: SG] for conversion to saturated steam during power operations. The loss of one MFP at power levels greater than 80 percent challenges the ability to maintain SG water levels at the required levels to support continued plant operations. As directed by plant operating procedure OTO-AE-00001, "Feedwater System Malfunction," the reactor was manually tripped at 1846.40.

All control rods fully inserted during the event and all safety systems responded as designed. An Auxiliary Feedwater (both motor-driven and turbine-driven) [EIIS system: BA, component: P] actuation and a Main Feedwater Isolation [EIIS system: SJ, component: ISV] actuation occurred as expected. Because these systems responded properly during this event, no additional operator actions or use of other systems/components as a backup function were required, and the plant operators were able to

(1-2001)

#### LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)	DOCKET (2) NUMBER (2)	· L	ER NUMBER (6)			PAGE (3	)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			7
Callaway Plant Unit 1	05000483	2008	- 005 -	00	3	OF	5

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

maintain safe shutdown conditions. Operation of the Auxiliary Feedwater system restored SG levels, and use of the Main Steam Supply System [EIIS system: SB] provided decay heat removal following shutdown. This event was considered an uncomplicated reactor trip.

On November 12, 2008, corrective maintenance was initiated to determine the cause of the low "B" MFP turbine bearing oil pressure. Maintenance technicians found two pieces of an o-ring lodged in the "B" MFP turbine bearing oil supply pressure regulating valve [EIIS system: SL, component: PCV] during disassembly. Engineering determined that the two pieces of o-ring that were recovered formed a complete o-ring that had been dislodged. The regulating valve could not operate properly due to a piece of o-ring that was pinched between the disk and the seat of the valve, resulting in low oil pressure to "B" MFP turbine. Evidence indicates that the o-ring originated from one of the "B" MFP basket strainers. The exact time the o-ring entered the system could not be determined.

The installed o-rings were made of Ethylene Propylene Diene Monomer (EPDM), which is considered to be unsatisfactory for petroleum products; the preferred material is Buna-N (Nitrile). In this situation, the EPDM o-ring had swelled and became dislodged. New o-rings made of Buna-N (Nitrile) were subsequently installed in both "B" MFP Basket Strainers. The plant was restored as indicated above and the forced outage ended on November 12, 2008.

On November 13, 2008, corrective maintenance was initiated to change out the EPDM o-rings in the "A" MFP basket strainers. Maintenance found that the o-ring on the west strainer was intact and not swollen; however, the o-ring on the east strainer was showing characteristics of swelling. These o-rings were installed in January 2005. New o-rings made of Buna-N (Nitrile) were installed in the "A" MFP basket strainers.

#### E. METHOD OF DISCOVERY OF EACH COMPONENT, SYSTEM FAILURE, OR PROCEDURAL ERROR

Given the annunciation of low lube oil pressure for the "B" MFP turbine at the onset of this event, the condition was self-revealing. Causal factors, as well as a root cause, were discovered through the use of a seven-step root cause analysis. It was determined that the pressure regulating valve was experiencing some blockage. Upon disassembly of the valve, the o-ring was discovered.

## II. EVENT DRIVEN INFORMATION

# A. SAFETY SYSTEMS THAT RESPONDED

All safety systems functioned as designed. The motor-driven Auxiliary Feedwater actuation, turbine-driven Auxiliary Feedwater actuation, and main feedwater isolation actuation occurred as expected.

### **B. DURATION OF SAFETY SYSTEM INOPERABILITY**

No structures, systems, or components were inoperable during the event which contributed to the event.

(1-2001)

## LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)	DOCKET (2) NUMBER (2)	LER NUMBER (6)			PAGE (3)		
	1	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
Callaway Plant Unit 1	05000483	2008	- 005 -	00	1	OF	5

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

#### C. SAFETY CONSEQUENCES AND IMPLICATIONS OF THE EVENT.

As directed by plant operating procedures, a manual reactor trip was initiated in response to the loss of one non-safety grade MFP. A reactor trip is considered an ANS Condition II event which is defined as a condition, that once corrected, will allow the plant to return to operation.

The event actuated safety grade systems that responded as designed and which fulfilled their intended safety functions. Because these systems responded properly during this event, no additional operator actions or use of other systems/components as a backup function were required. The plant operators were able to maintain safe shutdown conditions. Operation of the Auxiliary Feedwater system and main steam supply system adequately removed decay heat following the shutdown. No release of radioactive material was associated with this event.

## III. CAUSE(S) OF THE EVENT AND CORRECTIVE ACTION(S)

This event was evaluated using a seven-step root cause analysis process. The reactor trip was caused from a series of events beginning with one causal factor, a one-time receipt of incorrect o-ring material from the original equipment manufacturer (OEM). Engineering analysis at that time confirmed that the o-rings supplied by the OEM were made of EPDM material. An engineering evaluation that was then performed permitted use of the material based on what had been supplied. Use of this incorrect material was identified as the root cause since it has been confirmed that EPDM is incompatible with petroleum-based lubrication systems. The EPDM o-rings installed in the MFP lube oil basket strainers swelled, dislodged, and degraded the performance of a MFP turbine lube oil pressure regulating valve that ultimately led to the manual trip of the plant.

The cause was that the o-rings in the MFP lube oil system were a material susceptible to swelling in petroleum-based lubrication systems. Specifically, an o-ring swelled, got into the MFP lube oil system, and traveled into a MFP turbine bearing oil supply pressure regulating valve. The Corrective Actions to Prevent Recurrence (CATPRs) included identification of a replacement for the o-rings for the strainer baskets. The correct o-rings were installed in both strainers for "A" and "B" MFP turbine oil system.

Action identified from the extent of cause evaluation is to assure that correct material is being purchased for the Callaway Plant. Procurement controls are being modified to ensure that o-rings having the correct critical characteristics (i.e., size, material, and hardness) are obtained.

## IV. PREVIOUS SIMILAR EVENTS

Operating Experience (OE) was reviewed and it was determined that there have been no reactor trips due to incompatible materials at Callaway.

There were no forced outages since the completion of Refuel 14 (November 2005) that impacted either MFP.

(1-2001)

٧.

# LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)	DOCKET (2) NUMBER (2)	L	ER NUMBER (6)			PAGE (3	)
Calloway Plant Unit 4		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
Callaway Plant Unit 1	05000483	2008	- 005 -	00	5	OF	5

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

## ADDITIONAL INFORMATION

The system and component codes listed below are from the IEEE Standard 805-1984 and IEEE Standard 803A-1983, respectively.

System:

AB, Reactor Coolant System (PWR)

Components:

SG, Generator, Steam

System:

BA, Auxiliary/Emergency Feedwater System (PWR)

Components:

Components:

P, Pump

System:

SJ, Feedwater System ISV, Valve, Isolation

TRB, Turbine

System:

SL, Feedwater Pump Turbine Lube Oil System

Components:

PCV, Valve, Control, Pressure

STR, Strainer