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July 22, 2011

PG&E Letter DCL-11-083

U.S. Nuclear Regulatory Commission ATTN: Document Control Desk Washington, DC 20555-0001 10 CFR 50.73

Docket No. 50-275, OL-DPR-80 Diablo Canyon Unit 1 <u>Licensee Event Report 1-2011-005-00</u> <u>Emergency Diesel Generator Actuations Upon Loss of 230 kV Startup Due to</u> <u>Electrical Maintenance Testing Activities</u>

Dear Commissioners and Staff:

Pacific Gas and Electric Company submits the enclosed Licensee Event Report (LER) regarding the Diablo Canyon Power Plant Unit 1 emergency diesel generator actuations after 230 kV startup power was lost due to maintenance activities. This LER is submitted in accordance with 10 CFR 50.73(a)(2)(iv)(A) and 10 CFR 50.73(a)(2)(v)(D).

There are no new or revised regulatory commitments in this report.

These events did not adversely affect the health and safety of the public.

Sincerely, James R. Becker

dnpo/50405004/50405010 Enclosure cc/enc: Elmo E. Collins, NRC Region IV Michael S. Peck, NRC Senior Resident Inspector James T. Polickoski, NRR Project Manager Alan B. Wang, NRR Project Manager INPO Diablo Distribution

A member of the STARS (Strategic Teaming and Resource Sharing) Alliance Callaway • Comanche Peak • Diablo Canyon • Palo Verde • San Onofre • South Texas Project • WolfCreek

NRC FORM 366	U.S. NUCLEAR	REGULA	TORY C	COMMIS	SION A	PPROVE	D BY OMB: NO.	3150-01	04		EXPIR	.ES: 10	0/31/2013
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5. EVENT DATE	6. LER NUMBE	R	7. R	REPORT	DATE	Τ	8. OT	HER FA	CILITIE	S INVO			
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At the time of the events, the Unit 2 Sixteenth Refueling Outage (2R16) was ongoing and scheduled 230 kV system testing was being performed on the 230 kV electrical protection equipment. On May 26, 2011, at 0226 PDT, and again on May 27, 2011, at 1212 PDT, while personnel were performing testing on Unit 2 to verify functionality of the 230 kV electrical protection equipment, Unit 1 lost 230 kV startup power.

The isolation of the offsite standby power source, and subsequent loss of power to startup feeder breakers for the 4.16 kV operating buses, caused all Unit 1 emergency diesel generators (EDGs) to start in standby mode. For both events, all Unit 1 EDGs started as designed, and were shutdown and returned to auto with no problems observed. Startup Transformers 1-1 and 1-2 were returned to service, and Unit 1 startup power was declared operable. Startup power on Unit 2 was cleared due to the maintenance activities being performed; therefore, it was unaffected by the events.

On May 26, 2011, at 0957 PDT, and on May 27, 2011, at 1712 PDT, Pacific Gas & Electric (PG&E) made 8 hour nonemergency reports (Reference NRC Event Notification 46894 and 46900) in accordance with 10 CFR 50.72(b)(3)(iv)(A).

PG&E preliminarily concluded that human performance deficiencies during testing activities associated with the 230 kV electrical protection equipment caused the loss of 230 kV startup power.

NRC FORM 366A (10-2010) LICENSEE EVENT REPORT (LER) <sup>U.S. NUCLEAR REGULATORY COMMISS CONTINUATION SHEET</sup>						
1. FACILITY NAME	2. DOCKET		6. LER NUMBER		3. PAGE	
Diablo Canyon Power Plant Unit 1		YEAR	SEQUENTIAL NUMBER	REV NO.		

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NARRATIVE

# I. PLANT CONDITIONS

When the events occurred, Unit 1 was in Mode 1 (Power Operation) at approximately 100 percent power.

# II. DESCRIPTION OF PROBLEM

# A. BACKGROUND

The Diablo Canyon Power Plant (DCPP) electrical systems are designed to ensure an adequate supply of electrical power to all essential auxiliary equipment during normal operation and under accident conditions. Nonvital 4.16 kV alternating current (AC) auxiliary buses are energized by either of the offsite power sources. Vital AC buses [EA][BU] have an additional available source: onsite power delivered by diesel generators. The electrical systems are designed so that failure of any one electrical device will not prevent operation of the minimum required engineered safety feature (ESF) equipment.

General Design Criteria (GDC) 17 states, in part,

"An onsite electric power system and an offsite electric power system shall be provided to permit functioning of structures, systems, and components important to safety. The safety function for each system (assuming the other system is not functioning) shall be to provide sufficient capacity and capability to assure that (1) specified acceptable fuel design limits and design conditions of the reactor coolant pressure boundary are not exceeded as a result of anticipated operational occurrences and (2) the core is cooled and containment integrity and other vital functions are maintained in the event of postulated accidents."

DCPP offsite power is supplied by two systems that are physically and electrically separated and independent of each other: a 230 kV system and a 500 kV system. This satisfies requirements established by General Design Criteria (GDC) 17. The 230 kV system provides startup power and is immediately available following a loss-of-coolant accident (LOCA) to assure that core cooling, containment integrity, and other vital safety functions are maintained. To make power available to the vital 4.16 kV buses, the 230 kV system provides power to Startup Transformer (SUT)[EA][XFMR] 1-1 (230 kV to 12 kV), energizing the 12 kV bus which then feeds SUT 1-2 (12 kV to 4.16 kV). The 500 kV system provides for transmission of the plant's power output, and is also available as a delayed access source of offsite power after the main generator is disconnected.

To produce onsite power, each unit has three emergency diesel generators (EDGs)[EK][DG] which supply power to the 4.16 kV vital AC buses when power is unavailable or when a degraded voltage condition exists. After EDGs have started, they will supply power to their respective vital bus if the buses are deenergized. If the vital buses are not deenergized, the EDGs will continue to run in standby mode, ready to provide power if required. The EDGs will also start in standby mode on loss of startup power availability.

NRC FORM 366A (10-2010)		ENSEE EVENT REPORT (LER) <sup>U.S. NUCLEAR REGULATORY COMMISSION CONTINUATION SHEET</sup>					
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Diablo Canyon Power Plant Unit 1	05000 275	YEAR	SEQUENTIAL NUMBER	REV NO.	3	OF	5

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NARRATIVE

#### **B. EVENT DESCRIPTION**

At the time of the events, the Unit 2 Sixteenth Refueling Outage (2R16) was ongoing and scheduled 230 kV system testing was being performed on the 230 kV electrical protection equipment. On May 26, 2011, at 0226 PDT, and again on May 27, 2011, at 1212 PDT, while personnel were performing testing on Unit 2 to verify functionality of the 230 kV electrical protection equipment, Unit 1 lost 230 kV startup power.

The isolation of the offsite standby power source, and subsequent loss of power to startup feeder breakers for the 4.16 kV operating buses, caused all Unit 1 EDGs to start in standby mode. For both events, all Unit 1 EDGs started as designed, and were shutdown and returned to auto with no problems observed.

SUTs 1-1 and 1-2 were returned to service and Unit 1 startup power was declared operable on May 26, 2011, at 1710 PDT for the first event, and on May 27, 2011, at 1337 PDT for the second event.

Startup power on Unit 2 was cleared due to the maintenance activities being performed; therefore, it was unaffected by the events.

On May 26, 2011, at 0957 PDT, and on May 27, 2011, at 1712 PDT, Pacific Gas & Electric (PG&E) made 8 hour nonemergency reports (Reference NRC Event Notification 46894 and 46900) in accordance with 10 CFR 50.72(b)(3)(iv)(A).

C. STATUS OF INOPERABLE STRUCTURE, SYSTEMS, OR COMPONENTS THAT CONTRIBUTED TO THE EVENT

There were no inoperable structures, systems, or components that contributed to the event. All systems functioned as designed.

# **D. OTHER SYSTEMS OR SECONDARY FUNCTIONS AFFECTED**

No other systems or secondary functions were affected.

# E. METHOD OF DISCOVERY

The event was immediately known to licensed plant operators by alarms and indications received in the control room.

#### F. OPERATOR ACTIONS

Plant operators performed required surveillances, secured the Unit 1 EDGs, and proceeded to restore the availability of startup power to Unit 1.

# G. SAFETY SYSTEM RESPONSES

All Unit 1 EDGs started as designed with no problems observed.

NRC FORM 366A (10-2010) LICENSEE EVENT REPORT (LER)<sup>U.S. NUCLEAR REGULATORY COMMISSION</sup> CONTINUATION SHEET

1. FACILITY NAME	2. DOCKET	6. LER NUMBER	3. PAGE
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#### **III. CAUSE OF THE PROBLEM**

# A. IMMEDIATE CAUSE

PG&E preliminarily concluded that human performance deficiencies during testing activities associated with the 230 kV electrical protection equipment caused the loss of 230 kV startup power. The event on May 26, 2011, appears to have been caused by personnel attaching test equipment to terminals associated with the incorrect 230 kV protection system circuit (incorrect current transformer). The event on May 27, 2011, was caused by personnel attaching test equipment to terminals associated with a 230 kV protection system relay on the incorrect unit.

#### B. CAUSE

The cause will be provided in a supplemental report following the completion of a root cause evaluation (RCE).

#### **IV. ASSESSMENT OF SAFETY CONSEQUENCES**

At DCPP, the 230 kV startup system is the only offsite power system which is designed to be immediately available to mitigate the consequences of postulated accidents; therefore, this event could have prevented fulfillment of a safety function of the offsite electric power system. However, the Class 1E onsite EDGs remained available and would have provided power following a loss of offsite power.

The voltage on operating 12 kV buses was not affected by the isolation of 230 kV startup power, and the EDGs were not required since all vital buses were energized by Unit 1 auxiliary power (the Unit 1 main generator). As a result, no vital loads were affected by this event.

The increased conditional core damage probability for this event was assessed and found to be less than 4E-07.

This event had no adverse effect on the health and safety of the public.

# **V. CORRECTIVE ACTIONS**

# A. IMMEDIATE CORRECTION ACTIONS

For the May 26, 2011 event, PG&E performed troubleshooting to verify that the circuit was configured per the approved design; no issues were noted. The day and nightshift employees that perform this work were briefed on the event and on the station human performance tools that prevent such occurrences. Shortly after, with direct management oversight, the current circuit loop functional test was re-performed successfully.

For the May 27, 2011 event, PG&E re-performed the pre-job breif, focusing on roles and responsibilities, and installed barriers on all inservice relays that were not part of the testing. Management provided direct oversight, and independent verification was used for all restoration actions of the procedure.

# **B. CORRECTIVE ACTIONS TO PREVENT RECURRENCE (CAPRs)**

CAPRs will be detailed in a supplemental report following the completion of a RCE.

NRC FORM 366A (10-2010)

# LICENSEE EVENT REPORT (LER)<sup>U.S. NUCLEAR REGULATORY COMMISSION CONTINUATION SHEET</sup>

1. FACILITY NAME	2. DOCKET	e	6. LER NUMBER	UMBER		3. PAGE	
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NARRATIVE

**VI. ADDITIONAL INFORMATION** 

A. FAILED COMPONENTS

All components functioned as designed.

**B. PREVIOUS SIMILAR EVENTS** 

A previous event occurred during 2R16 when personnel were modifying a panel that houses 230 kV electrical protection equipment. During modification, there was a similar loss of 230 kV startup power and EDG actuation on Unit 1 (See ML11820377, Licensee Event Report submitted on June 30, 2011). This event is also being reviewed as part of the RCE scope.

# SUBMITTAL PROCESSING CHECKLIST

P	G&E Letter No. (e.g., DCL, DIL, etc.)	
Sı	Ibject: LER 1-2011-005-00, EMERGENCY DIESEL GENERATO JPON LOSS OF 230 KV STARTUP DUE TO MAINTENANCE	
Ta	rget Submittal Date: 7/19/11 Firm Submittal Date: 7/25	///N/A 🖂
Fil	e Location: S:\RS\ RA\LER\ 2011	
		Initial <sub>/</sub> Date
1.	References & bases identified for factual information.	DP 1 7/1/11
2.	Outgoing Correspondence Screen (RS-2) completed & commitments captured per XI4.ID1.	DR 1 7/15/11
3.	RS Manager's concurrence for release obtained.	DP 17/15/11
4.	Record of Review Checklist completed & signed per XI1.ID1.	DP 17/19/11
5.	Clerical reviews completed. Draft # 1 0.01 / 7/18	
	Draft # 2 004/7[19 Final (on signatory letterhead)	and right
6.	Peer Review Checklist (RS-4) completed.	DP 17/19/11
7.	<ul> <li>Provide this checklist, the final letter &amp; enclosures, Record of Review Checklist, &amp; Outgoing Correspondence Screen to signatory.</li> <li>For <i>FIRM</i> submittals, was 2 days met?</li> <li>Yes X</li> <li>No X</li> <li>N/A X</li> </ul>	DP 17/11
8.	Will entire submittal, including enclosures, be placed in RS & ACTS libraries and EDMS? Yes X No I If <b>NO</b> , complete form RS-1A, indicating where the enclosures, etc. will be maintained.	DP 1712411
9.	Indicate RMS access level. Check one box only.	
B	<ul> <li>Reg Regular</li> <li>"D" Proprietary</li> <li>"B" Personnel Record</li> <li>"A" Security Safeguards Information (SSI)</li> <li>RMS folder name</li></ul>	
	SSI safe in RS Manager's office.	DP 17/2/11
10.	Place copy of this checklist (including RS-1A, if applicable), the submittal & enclosures, Record of Review Checklist, & the Outgoing Correspondence Screen in the RMS (fireproof) file cabinet (or the SSI safe, if applicable).	DP 1 7/2/11
11.	Deliver this checklist (including RS-1A, if applicable), original of signed submittal & enclosures, Outgoing Correspondence Screen, & Record of Review Checklist to clerks.	DP 1 7122/11
12. JIP	Tracking documents (i.e., NCR ACTs or AEs) have been updated for submittal completion (including the LERtemplate.ppt, if the submittal is an LER). N/A • LERtemplate.ppt is located at S:\RS\DCISC\LERs\LERtemplateYYYY.ppt	DP 7/12/14
13.	Verify commitment entry on NCR ACTs or AEs within 15 days. N/A	DP 17122/11

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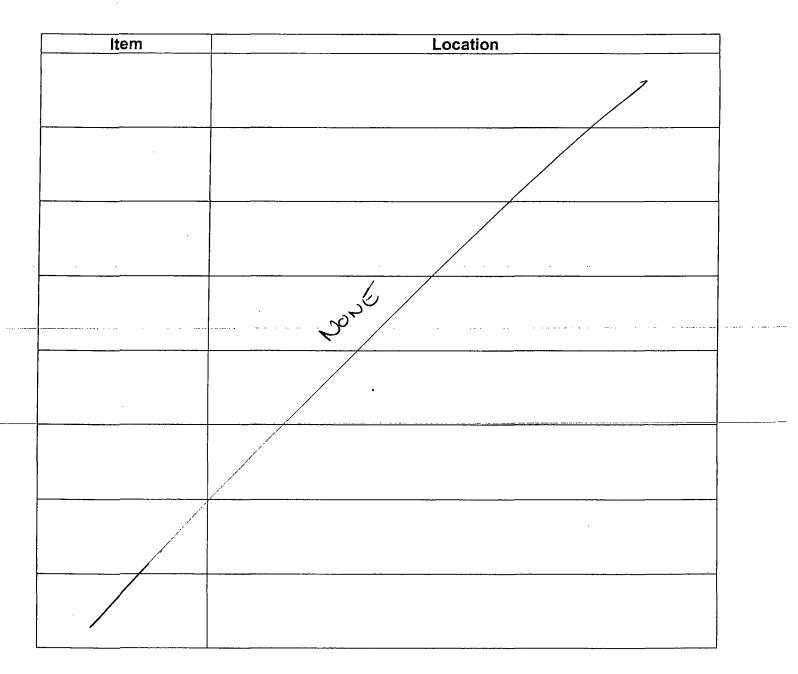
# SUBMITTAL PROCESSING CHECKLIST – Supplement

Identify the enclosures, etc. (e.g., proprietary, personal, or SSI) that will **NOT** be filed in the RS and ACTS libraries, or EDMS, and where the actual documents will be maintained.

Examples:

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Enclosure 1 (Personal information)	NRC 396 forms are retained by Learning Services and the DCPP Medical Facility.
Enclosure 3 (Diskette)	The diskettes are maintained by Radiation Protection.
Entire Document	The complete proprietary version of this document is available in the PG&E Law Department in San Francisco.



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**Regulatory Submittal - Record of Review Checklist** 

Submi	ttal Title: LER 1-2011-005-0	•					
Target	ed Submittal Date: 7/22/11	EV STARTOP DUE TO MAIN Firm Submittal Date: <u>717</u>		(E-7F	STING		
_	ry Reviewers	<u>Name</u>	Com	nents	<u>Reso</u>	lved	
			Yes	No	Yes	No	
Lead <sup>-</sup>	Fechnical Reviewer:	DIONYSIOS PETTAS		$\bowtie$			
Lead <sup>-</sup>	Fechnical Manager:	THOMAS BALDWIN	X		$\bowtie$		
Direct	or Review: SITE SERVICES	STEVEN DAVID	X		X		
	ttal Lead Management:	STEFAN					
Indepe	endent Technical Reviewer:	() D-0, 10.07	$\bowtie$		X		
Cross	Discipline Reviewer(s):	-					
	Operations:						
X	Maintenance:	JOHN MALINTYRE	X		M		
X	Engineering:	RYAN WEST	K		X	Ц	
	Site Services:			Ц			
	Quality:				Ц	Ц	
	Law:						
	Chemistry & Env Ops:						
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			Yes	No	Yes	No	-
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# PEER REVIEW CHECKLIST LICENSING SUBMITTAL

(To be performed on final draft only.)

PG&E Letter No. (e.g., DCL, DIL, etc.)

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DCL-11-083

ITEM	DESCRIPTION	INITIAL
Cover Letter	Correct signatory letterhead (Ref. XI1.ID2)	giv
	Full names used for signatory & cc list; right people listed	fu
	Title correct	gus
	Letter number verified against outgoing correspondence log	gur
	Letter number appears on all pages	NA
	Enclosure(s) – the word is correctly placed on the cover letter if required.	gu
	All pages numbered, except first page	But
	Date correct and appears on all pages (month, day, and year)	fue
	Address and docket number(s) correct	gu
	Text reviewed for obvious errors	and
	TS and/or 10 CFR references correct	Jun .
	If affidavit required or NOV response, verify Law Department has reviewed	MA
All Submittals	Text reviewed for obvious errors	gue
	Revision bars included (if applicable)	NA
	TS and/or 10 CFR references correct	gro
	References to other documents correct (e.g., DCLs, FSAR, etc.)	gnt
	Submittal addresses the specific regulation requirements	gno
	Enclosures labeled	MA
Outgoing	Letter number and title correct	gus
Correspondence	FSAR Update Review – one box checked.	gro.
Screen (RS-2)	Commitment implemented before or after LA receipt (LARs/RAIs only)	NA
	Commitment(s) quoted verbatim (& clarifications made if needed)	NA
	Tracking Document – SAPN / Task / Order / Operation	gue
	Assigned To - Name & Organization Code	m
	Commitment Type - Firm or Target & Due Date	hr
2	Outage Commitment - Y or N indicator & Applicable Outage	Siv
	PCD Commitment - Y or N indicator & Implementing Documents	- jus
LER Forms	LER number correct; consistent with cover letter	- gus
(NRC Form 366)	LER number & docket number(s) on first & remaining pages	\$vo
(NRC Form 366a)	Title consistent with cover letter & Outgoing Correspondence Screen (RS-2)	Sil
(11100000)	Dates correct on first page header (month, day, & year)	Riv
	Dates & times consistent with 10 CFR 50.72 ENS reports made	gin
	Dates & times consistent with other source documents	Buh
	Dates & times consistent with other source documents	- In
	Page numbers correct & all pages accounted for	- And
	Abstract word count IAW NRC Form 366	AND.
	IEEE 803 codes entered and correct	Bub
Procedure Submittals		- AN
Filing Instructions	Procedure revision numbers current using EDMS (e.g., EPIP) Filing instructions clear (Per RS-1A, if applicable)	gut
		grot .
ROR Checklist	Record of Review Checklist completed and signed	- gue Ins
Final Draft	All discrepancies resolved with Lead Licensing Engineer	

\* Enter N/A where not applicable.

I have reviewed this submittal for the items initialed above. This submittal is ready for the signatory.

Performed by

7-19-11

# OUTGOING CORRESPONDENCE SCREEN (Remove prior to NRC submittal)

Document: PG&E Letter DCL-11-083

Subject: <u>Emergency Diesel Generator Actuations Upon Loss of 230 kV Startup Due to Electrical</u> <u>Maintenance Testing Activities</u>

File Location: S:\RS\CLERICAL\DCLS - FINAL\DCL-11-083\DCL-11-083.DOC

FSAR Update Review	
Utilizing the guidance in XI3.ID2, does the FSAR Update need to be revised? Yes No	· ·
If "Yes", submit an FSAR Update Change Request in accordance with XI3.ID2 (or if this is an LAR, process in accordance with WG-9)	

Statement of Commitment: Issue a supplement LER

	AR or NCR	AE or ACT
Tracking Document:	50412203	Task 18
	NAME	ORGANIZATION CODE
Assigned To:	D. Pettas	NRN
	FIRM OR TARGET	DUE DATE:
Commitment Type:	9/15/11	9/15/11
	YES OR NO	IF YES, WHICH? (E.G., 2R9, 1R10, ETC.)
Outage Commitment?	No	
······································	YES OR NO	IF YES, LIST THE IMPLEMENTING DOCUMENTS (IF KNOWN)
PCD Commitment?	No	
	YES OR NO	IF YES, LIST PCD NUMBER (e.g., T35905, etc.)
Duplicate of New NCR Commitment in PCD?	No	
	YES OR NO	IF YES, LIST PCD NUMBER, AND CLARIFY TO CLERICAL HOW COMMITMENT TO BE REVISED
Old PCD Commitment being changed?	No	CLARFT TO CLERICAL HOW COMMITMENT TO BE REVISED