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April 3, 2014

PG&E Letter DCL-14-029

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

Docket No. 50-323, OL-DPR-82 Diablo Canyon Unit 2 <u>Licensee Event Report 2-2014-001, Lightning Arrester Failure Resulting in</u> <u>Reactor Trip</u>

Dear Commissioners and Staff;

Pacific Gas and Electric Company (PG&E) submits the enclosed Licensee Event Report (LER) in accordance with 10 CFR 50.73(a)(2)(iv)(A).

This is the initial LER submittal. PG&E will submit a supplemental LER describing event cause and corrective actions no later than July 3, 2014.

PG&E makes no new or revised regulatory commitments (as defined by NEI 99-04) in this report.

This event did not adversely affect the health and safety of the public.

Sincerely,

Bary S. All

Barry S. Allen

mjrm/4557/50607203 Enclosure cc/enc: Peter J. Bamford, NRC Project Manager Marc L. Dapas, NRC Region IV Administrator Thomas R. Hipschman, NRC Senior Resident Inspector INPO Diablo Distribution

NRC FORM 366 U.S. NUCLEAR REGULATORY COMMISSION							APPROVED BY OMB: NO. 3150-0104 EXPIRES: 01/31/2017									
(01-2014)									Estimated lessons la comments (T-5 F53),	Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Serv comments regarding burden estimate to the FOIA, Privacy and Information Collections Brand (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mai						
	LICENSEE EVENT REPORT (LER) (See Page 2 for required number of digits/characters for each block)									to Infocollects Resource@nc.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 OVIB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.						
	1. FACILITY NAME								2. DOCKET NUMBER 3. PAGE							
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			20.2201(b)				20.2	203(a)(3	,)(i)	50.73(a)(2)(i)(C)			50.73(a)(2)(vii)			
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FACILITY						12. LIC		CONTAC	T FOR T	HIS LER		TEL			UGE 4163 LOGE	
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ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) On February 2, 2014, at 1129 PST, a failure of the Diablo Canyon Power Plant, Unit 2, Phase B, 500 kV lightning arrester resulted in a direct short to ground and actuated the 500 kV tie line current differential relay																
The actuation of the 500 kV tie line current differential relay opened the Unit 2 generator output breakers to																
isolate the generator, which then actuated a turbine trip. Since Unit 2 was operating above the 50 percent power permissive, the reactor protection system initiated a Unit 2 reactor trip. Plant equipment responded as designed.																
This is the initial Licensee Event Report (LER) for this event. Pacific Gas & Electric will submit a supplemental LER describing event cause and corrective actions no later than July 3, 2014.																
There were no personnel injuries, no offsite radiological releases, and no damage to safety-related equipment associated with this condition. This condition did not have an adverse effect on the health and safety of the public.																

NRC FORM 366A (01-2014) LICENSEE EVENT RI CONTINUATION	APPROVED BYOMB: NO.3150-0104 EXPIRES: 01/31/2017 Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned a re incorporated into the licensing process and fed back to industry Send comments regarding burden estimate to the FOIA, Privacy and Information Collections Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington ,DC 20555-0001, or by internet e-mail to <u>Infocollects Resource@nrc.gov</u> , 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 no required to resoond to the information collection.						
1.FACILITY NAME	2.DOCKET	6. LER NUMBER	3. PAGE				
Diablo Canyon Power Plant, Unit 2	05000 323	YEAR SEQUENTIAL REV NUMBER NO.					
	03000 323	2014 - 001 - 00	2 OF 4				
NARRATIVE							
I. <u>Plant Conditions</u>							

At the time of the event, Diablo Canyon Power Plant (DCPP) Units 1 and 2 were in Mode 1 (Power Operation) at approximately 100 percent reactor [RCT] power with normal operating reactor coolant temperature and pressure.

II. Description of Event

A. Background

DCPP is equipped with a Class IE alternating current (AC) electrical power distribution system [EB] that is divided into three load groups. The power sources for this system consist of two physicallyindependent offsite sources and multiple onsite standby power sources (three diesel generators (DGs) [DG] for each unit). These systems have independent controls, independent protection, and separate switchyards, transmission lines, and tie-lines to the plant. In the normal alignment, the power produced at DCPP is transmitted offsite via the 500 kV system [EL] and also feeds normal onsite loads via the auxiliary transformer [XFMR]. Backup power is available immediately via the 230 kV system [EK] and startup transformer. In the event of a loss of 230 kV power, backup power is available from onsite DGs. The AC electrical power sources provide sufficient capacity, capability, redundancy, and reliability to ensure the availability of necessary power to engineered safety systems so that the fuel, reactor coolant system [AB], and containment [NH] design limits are not exceeded.

Each phase of the main bank transformers has an associated lightning arrester (LA) connected to the 500 kV line between the transformer high voltage bushing and the first transmission line tower out from the transformer yard. The LAs are designed to protect the high voltage winding of its associated transformer against impulse and switching surges on the transmission line.

B: Event Description

On February 2, 2014, while experiencing a rainstorm, failure of Phase B 500 kV LA occurred resulting in a direct short to ground and actuated the 500 kV tie line current differential relay. The actuation of the 500 kV tie line current differential relay opened the Unit 2 generator output breakers to isolate the generator, which then actuated a turbine trip. Since Unit 2 was operating above the 50 percent power permissive, the reactor protection system initiated a Unit 2 reactor trip. Plant equipment responded as designed. All three Unit 2 auxiliary feedwater (AFW) pumps [P] started, the containment fan [FAN] cooling units started and ran in slow speed, and the standby auxiliary saltwater train started, all as expected. All three Unit 2 DGs remained in standby and were operable throughout the event.

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Diablo Canyon Power Plant, Unit 2		05000 323	YEAR	SEQUENTIAL NUMBER	REV NO.	3 OF 4			
			2014	- 001 -	00	· ·			
NARRATI	VE								
(C. Status of Inoperable Structures,	Systems, or Co	mponents	that Contribu	uted to f	the Event			
	N/A								
1	D. Other Systems or Secondary Fu	inctions Affected							
	None								
	E. Method of Discovery								
	Annunciators in the control room alerted licensed control room operators of the 500 kV system problem.								
	F. Operator Actions								
	Plant operators verified appropriate plant trip response using Emergency Operating Procedure (EOP) E-O, "Reactor Trip or Safety Injection," and EOP E-O.1, "Reactor Trip Response."								
(G. Safety System Responses								
	Vital buses transferred from aux	viliary power to st	artup pow	/er as design	ed.				
III. (Cause of the Problem								
	Pacific Gas and Electric (PG&E) is supplemental Licensee Event Repo complete. PG&E has been working as well as appropriate corrective ac	conducting a roo ort (LER) docume g with the LA ver ctions.	ot cause e enting the idor and ir	valuation (RC results of this ndustry exper	CE) and s invest rts to de	l will submit a igation once it is etermine the cause			
IV. /	Assessment of Safety Consequence	es							
There were no safety consequences as a result of this event. The transfer of plant loads to startup occurred as designed. Equipment necessary for Unit 2 decay heat removal was available and operated as required by plant design. Unit 1 remained at full power and all of its vital buses remained powered by auxiliary power. Therefore, the event is not considered risk significant and did not adversely affect the health and safety of the public.									

NRC FORM 366A (01-2014) LICENSEE EVENT REPORT (LER) U.S. NUCLEAR REGULATORY COMMISSION CONTINUATION SHEET

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NARRATIVE

V. Corrective Actions

Once the RCE is complete, PG&E will take corrective actions as prudent, and describe the corrective actions in a supplemental LER to the NRC. As an interim action, PG&E replaced all three Unit 2 LAs with a different design that features a longer creepage distance.

VI. Additional Information

A. Failed Components

None. This will be updated as appropriate pending the RCE findings.

B. Previous Similar Events

On October 11, 2012, at 12:08 PDT, the DCPP Unit 2 500 kV line differential relay actuated, resulting in a unit trip. The 500 kV coupling capacitor voltage transformer (CCVT) bushing experienced a flashover to ground, resulting in a unit trip and turbine trip. With the turbine tripped and Unit 2 operating above the 50 percent power permissive, the reactor protection system initiated a reactor trip as designed. All plant equipment, including the auto-start of the AFW system, responded as designed.

At the time of the event, the environmental conditions consisted of light rain. PG&E determined that the causes of the bushing failure were inadequate insulator material performance and inadequate engineering design practices. Additionally, an unintended AFW pump restart occurred following this event as a result of a procedure deficiency that was created when the procedure was not revised following a plant modification. PG&E revised the procedure and supporting documents and performed tailboards with the procedure writing staff on use of the supporting documents to identify all changes required by a plant modification. CCVTs have now all been relocated to the switchyard and are no longer at the transformer location.

On July 10, 2013, at 09:50 PDT, while performing the periodic hot-washing of the 500 kV insulators, a flashover of the Phase A 500 kV to ground across the Phase A LA occurred and actuated the 500 kV differential relay. The actuation of the 500 kV differential relay opened the Unit 2 generator output breakers to isolate the generator, which then actuated a turbine trip. Since Unit 2 was operating above the 50 percent power permissive, the reactor protection system initiated a Unit 2 reactor trip. All plant equipment responded as designed.

DCPP staff determined the root cause of this event to be the hot-washing of the Phase A transmission line string insulators (500 kV dead-end insulators) with inadequate controls for oversight of supplemental PG&E transmission line personnel, and on-line maintenance risk analysis, that resulted in a conductive overspray, which induced an external arc around the LA insulation resulting in flashover. The corrective action to prevent reoccurrence involves the development and implementation of a maintenance strategy for 500 kV dead-end insulators to ensure they remain adequately contamination free, structurally sound, and minimize risk to DCPP.