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FACIL:50-275 Diablo Canyon Nuclear Power Plant, Unit 1, Pacific Ga 05000275
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HUG,M.T. Pacific Gas & Electric Co.
SHIFFER,J.D. Pacific Gas & Electric Co.
RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: LER 91-104-00:on 910213,DG inoperable inoperable while spent fuel crane operating w/heavy loads over fuel storage pool. Caused by lack of written guidance for control DG operability.DG satisfactorily tested.W/911010 ltr.

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RIDS/ADDS

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James D. Shiffer
Senior Vice President and
General Manager
Nuclear Power Generation

October 10, 1991

PG&E Letter No. DCL-91-243

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Re: Docket No. 50-275, OL-DPR-80
Diablo Canyon Unit 1
Licensee Event Report 1-91-014-00
Technical Specification 3.8.1.2 Was Not Met Due to Inadequate Guidance on Operability Requirements

Gentlemen:

Pursuant to 10 CFR 50.73(a)(2)(i)(B), PG&E is submitting the enclosed Licensee Event Report (LER) concerning not meeting Technical Specification 3.8.1.2 due to inadequate guidance on diesel generator operability.

This event has in no way affected the health and safety of the public.

Sincerely,

Warren Fujimoto for

James D. Shiffer

cc: Ann P. Hodgdon
John B. Martin
Phillip J. Morrill
Harry Rood
Howard J. Wong
CPUC
Diablo Distribution
INPO

DC1-91-NR-N033

Enclosure

5507S/0085K/PJT/2246

9110160186 911010
PDR ADOCK 05000275
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LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
DIABLO CANYON UNIT 1	0 5 0 0 0 2 7 5	1 OF 4

TITLE (4) TECHNICAL SPECIFICATION 3.8.1.2 WAS NOT MET DUE TO INADEQUATE GUIDANCE ON OPERABILITY REQUIREMENTS

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MON	DAY	YR	YR	SEQUENTIAL NUMBER	REVISION NUMBER	MON	DAY	YR	FACILITY NAMES	DOCKET NUMBER (S)
02	13	91	91	- 0 1 4 -	0 0	10	10	91		0 5 0 0 0
										0 5 0 0 0

OPERATING MODE (9)	N
POWER LEVEL (10)	0 0 0

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR: (11)

_X_ 10 CFR 50.73(a)(2)(i)(B)

_____ OTHER - _____

(Specify in Abstract below and in text, NRC Form 366A)

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER AREA CODE	TELEPHONE NUMBER
MARTIN T. HUG, SENIOR REGULATORY COMPLIANCE ENGINEER	805	545-4005

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFAC-TURER	REPORTABLE TO NPRDS		CAUSE	SYSTEM	COMPONENT	MANUFAC-TURER	REPORTABLE TO NPRDS	

SUPPLEMENTAL REPORT EXPECTED (14)		EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
| | YES (if yes, complete EXPECTED SUBMISSION DATE)	| X | NO				

Abstract (16)

On February 13, 1991, at 0225 PST, with the Unit 1 core offloaded (not in any operational mode), all three diesel generators were inoperable while the spent fuel crane was operating with heavy loads over the fuel storage pool.

A QA audit team identified this condition and an extensive review determined that the intent of Technical Specification 3.8.1.2(b) was not met.

The root cause of this event was lack of written guidance for control of diesel generator operability. The Technical Specification was unclear with regard to a requirement for diesel generator operability during movement of irradiated fuel within the spent fuel storage pool or crane operation with heavy loads over the spent fuel storage pool and no fuel in the reactor vessel.

Procedural guidance was issued to clarify the requirements of Technical Specification 3.8.1.2(b). This guidance requires that during fuel movement within the fuel storage pool or crane operation with loads over the fuel storage pool, at least one fuel handling building ventilation train must be capable of being powered from an operable emergency diesel generator.

I. Plant Conditions

Unit 1 was in a refueling outage (1R4) at 0% power with no fuel in the reactor vessel (not in any operational mode) and diesel generators 1-1 and 1-2 were inoperable. Diesel generator (DG) 1-3, undergoing surveillance testing, was declared inoperable due to a water jacket leak. Upon demand, DG 1-2 could have been started and manual action taken to connect DG 1-2 to its bus and cross-tie the DG 1-2 to the bus that powers one train of the fuel handling building ventilation system (FHBVS).

II. Description of Event

A. Event:

On February 13, 1991, at 0225 PST with the Unit 1 core offloaded (not in any operational mode), the three Unit 1 DGs became inoperable. At 1237 PST, irradiated fuel was moved within the spent fuel pool while the Unit 1 DGs were inoperable.

A Quality Assurance (QA) audit identified this condition and questioned whether the intent of the Technical Specifications (TS) requirements had been met.

A Technical Review Group (TRG) investigated this concern. The investigation consisted of a detailed licensing and design basis review and consultations with industry TS experts. The TRG initially concluded that the Diablo Canyon design and licensing basis was not clear on the need for DG operability during fuel movement in the Spent Fuel Building.

This concern was referred to upper management for resolution. During the review of this issue, management noted that TS 3.8.1.2(b), "Electrical Power Requirements," for Modes 5 and 6 action statements required immediate suspension of movement of irradiated fuel within the spent fuel pool and crane operation over the fuel storage pool when no power source is available. Management directed the TRG to review compliance with TS 3.8.1.2(b).

On September 11, 1991, the TRG reviewed this concern and determined that TS 3.8.1.2(b) was not applicable, since Unit 1 was not in an operational mode, however the intent of 3.8.1.2(b) was not met.

B. Inoperable Structures, Components, or Systems that Contributed to the Event:

None

C. Dates and Approximate Times for Major Occurrences:

1. February 9, 1991, 0314 PST: 1R4 core offload began.

2. February 11, 1991: DG 1-1 was declared inoperable.

3. February 12, 1991: DG 1-2 was declared inoperable.

4. February 13, 1991, 0225 PST: D/G 1-3 was declared inoperable.

5. February 13, 1991, 1237 PST: Event date. The intent of TS 3.8.1.2(b) was not met when the movement of irradiated fuel and crane operations began in the spent fuel storage pool.

6. September 11, 1991: Discovery date. TRG determined that the intent of TS 3.8.1.2(b) was not met.

D. Other Systems or Secondary Functions Affected:

None.

E. Method of Discovery:

On February 13, 1991, a QA audit team performed a review of the Unit 1 plant operating status. This review provided information which warranted further investigation of the FHBVS operability. On September 11, 1991, a TRG reviewed the findings of the QA audit team and determined that the intent of TS 3.8.1.2(b) had not been met.

F. Operator Actions:

None.

G. Safety System Responses:

None.

III. Cause of the Event

A. Immediate Cause:

The three Unit 1 DGs were inoperable during the time the crane operated with heavy loads over the spent fuel storage pool.

B. Root Cause:

The root cause of this event was lack of written guidance for control of emergency DG operability. TS 3.8.1.2(b) was unclear that a DG is required to be OPERABLE when there is movement of irradiated fuel within the spent fuel storage pool or crane operation with heavy loads over the spent fuel storage pool with no fuel in the reactor vessel.

IV. Analysis of the Event

A. Safety Analysis :

On February 13, 1991, at 0225 PST, no Unit 1 DGs were operable. DG 1-2 was inoperable due to maintenance activities, and tubing from a crank case pressure switch had been removed. The pressure switch provides an alarm for high pressure in the crankcase, which in no way affects the operation of the DG. Therefore, upon demand, DG 1-2 could have started, and after manual closing of its output breakers, could have supplied emergency power to one train of the FHBVS. On February 13, 1991, a surveillance test was run which verified that DG 1-2 could have started if needed.

Had the electrical power circuit between the offsite transmission network and the onsite class 1E distribution system become unavailable and a condition developed in which the FHBVS was required, DG 1-2 could have been started and manually cross-tied to vital bus 1F or 1H to power either train of the FHBVS. Consequently, on February 13, 1991, at 1237 PST, movement of irradiated fuel in the fuel handling building without operable DGs did not adversely affect the health and safety of the public.

V. Corrective Actions

A. Immediate Corrective Actions:

On February 13, 1991, DG 1-2 was satisfactorily tested and declared functional and available.

B. Corrective Actions to Prevent Recurrence:

Prior to 2R4 fuel offloading, procedural guidance was issued to clarify TS 3.8.1.2(b) requirements. This guidance requires that at least one train of the FHBVS is capable of being powered from an operable emergency power source during fuel movement within the spent fuel storage pool or crane operation with loads over the fuel storage pool.

VI. Additional Information

A. Failed Components:

None.

B. Previous Similar Events:

None.