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ACCESSION NBR:8801130163 DOC.DATE: 88/01/08 NOTARIZED: NO DOCKET #
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SUBJECT: Special rept:on 871212,diesel generator invalid test &
 invalid failure.

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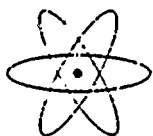
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NIAGARA MOHAWK POWER CORPORATION

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VICE PRESIDENT—NUCLEAR GENERATION

January 8, 1988

Mr. William T. Russell
Regional Administrator
United States Nuclear Regulatory Commission
Region 1
631 Park Avenue
King of Prussia, PA 19406

RE: Docket No. 50-410
SPECIAL REPORT

Gentlemen:

In accordance with Nine Mile Point Unit 2 Technical Specification 4.8.1.1.3, we are submitting the following Special Report concerning a diesel generator invalid test and invalid failure.

SURVEILLANCE REQUIREMENTS

Diesel generator surveillance testing is performed on a monthly schedule (at least once per 31 days). The monthly testing interval is in conformance with Nine Mile Point Unit 2 Technical Specification Table 4.8.1.1.2-1, Diesel Generator Test Schedule. There has been one failure in the past 20 valid tests, with 3 failures in the 51 valid tests performed since completion of the reliability demonstration under Regulatory Guide 1.108 Position C.2.a(9).

EVENT DESCRIPTION

On December 12, 1987 at 2055 hours, the Division II Diesel Generator (2EGS*EG3) was started per the Operating Surveillance Procedure N2-OSP-EGS-R002, "Operating Cycle Diesel Generator 24 Hour Run and Load Rejection Division I and II". At 0842 hours on December 13, approximately 12 hours into the surveillance test, 2EGS*EG3 tripped.

The diesel generator was then secured.

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ROOT CAUSE

Once 2EGS*EG3 was secured, a work request (WR 129163) was written to investigate and troubleshoot. This investigation revealed the failure of a speed indicating relay to be responsible for the diesel generator trip.

ACTIONS TAKEN

Having determined a failed speed indicating relay to be responsible for the diesel generator trip, a new speed indicating relay was installed.

On December 14, 1987 at 0247 hours, 2EGS*EG3 was restarted for surveillance testing per N2-OSP-EGS-R002. At 0420 hours on December 15, 1987 2EGS*EG3 was secured, following successful completion of the surveillance test. Diesel generator 2EGS*EG3 was inoperable for a total of 43.5 hours. This time for 2EGS*EG3 being inoperable (43.5 hours) is included in the total time that 2EGS*EG3 was inoperable (126 hours) due to the failure of the Woodward governor, which occurred on December 9, 1987. Failure of the Woodward governor is discussed in a separate Special Report also dated January 8, 1988.

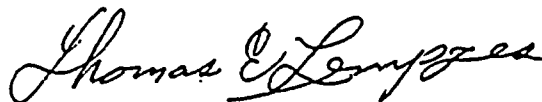
INVALID TEST / INVALID FAILURE DETERMINATION

Investigation into the premature termination of the surveillance test has determined the event to be an invalid test and invalid failure. This determination is based on the fact that during an emergency condition, failure of the speed indicating relay would not shutdown the diesel. During emergency conditions, the function of the speed indicating relay is paralleled by redundant safety-related relays in the diesel generator's control circuitry, which would maintain operation of the diesel generator on the failure of this relay.

Therefore, this failure has been determined to be an invalid test and invalid failure per Regulatory Guide 1.108 Position C.2.e.(2). This states that unsuccessful start attempts that can definitely be attributed to the malfunction of equipment that is not operative (or as in this case, not required) in the emergency operating mode should not be considered valid tests or failures.

In conformance with Technical Specification Table 4.8.1.1.2-1, diesel generator surveillance testing will continue to be performed on a monthly schedule (at least once per 31 days).

Sincerely,



Thomas E. Lempges
Vice President
Nuclear Generation

TEL/JTD/mjd

xc: Document Control Desk ✓

