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TITLE (4) Diesel Generator Air Start Piping Outside FSAR Stress Allowables Due to Apparent Original Design Deficiency																
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On March 29, 1988 with Unit 2 operating at 97% rated thermal power and Unit 3 shutdown for refuel, the Technical Staff Supervisor was notified by Sargent & Lundy architect engineers that the Unit 2 and Unit 3 Diesel Generator air start piping exceeded the code stress analysis allowables specified in the Final Safety Analysis Report (FSAR). The air start piping was determined to exceed the conservative FSAR design criteria upon completion of engineering analysis of inspection data. The piping concerns were raised in December of 1987 during an unrelated walkdown performed by Sargent & Lundy and Commonwealth Edison Boiling Water Reactor Engineering Department personnel. The identified discrepancies consisted of air start filters and air start piping for both Diesel Generator systems being attached to handrails.

The air start piping for the Unit 2 and Unit 3 Diesel Generators failed to meet FSAR piping stress requirements due to an original design deficiency. The safety significance was considered minimal since the piping stresses were calculated to be within the operability limits.

The air start piping on the Unit 2 and Unit 3 Diesel Generators will be modified to ensure that the piping stresses comply with the FSAR requirements. This is the first occurrence of piping stress deficiencies on the Diesel Generator systems at Dresden Station.

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PLANT AND SYSTEM IDENTIFICATION:

General Electric Boiling Water Reactor - 2527 MWt rated core thermal power. Energy Industry Identification System (EIIS) codes are identified in the text as [XX].

Nuclear Commitment Tracking System (NTS) tracking code numbers are identified in the text as (XXX-XXX-XX-XXXXX).

EVENT_IDENTIFICATION:

Unit 2 and Unit 3 Diesel Generator air start piping stresses exceed Final Safety Analysis Report (FSAR) requirements due to an original design deficiency.

A. CONDITIONS PRIOR TO EVENT:

Unit: 2 (3)	Event Date: March 29, 1988	Event Time: 1020 hours
Reactor Mode: N (N)	Mode Name: Run (Shutdown)	Power Level: 97% (0%)
Reactor Coolant System (RCS)	Pressure: 1000 psig (0 psig)	

B. DESCRIPTION OF EVENT:

On March 29, 1988 while Unit 2 was operating at 97% rated thermal power and Unit 3 shutdown for refuel, the Technical Staff Supervisor was notified by Sargent & Lundy (S & L) architect engineers that the Unit 2 and Unit 3 Diesel Generator air start piping [LC] exceeded the code stress allowables specified in the FSAR. Sargent & Lundy performed seismic analysis on the Unit 2 and Unit 3 Diesel Generator air start piping discrepancies found during an unrelated walkdown conducted in December of 1987 by engineers from Sargent & Lundy and Commonwealth Edison's Boiling Water Reactor Engineering Department (BWRED). S & L and BWRED Engineers discovered that air start piping and air start filters on the Unit 2 and Unit 3 Diesel Generator air start piping system. However, seismic analysis was also performed on the Unit 2/3 Diesel Generator air start piping stresses were indeed within the FSAR requirements.

C. APPARENT CAUSE OF EVENT:

This event is being reported in accordance with Title 10 of the Code of Federal Regulations Part 50 Section 73(a)(2)(ii)(B), which states that any event or condition that resulted in the condition of the nuclear power plant, including its principal safety barriers, being seriously degraded, or that resulted in the nuclear power plant being in a condition that was outside the design basis of the plant.

The air start piping for the Unit 2 and Unit 3 Diesel Generators were found not to meet the stress allowables identified in the FSAR due to an original design deficiency.

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D. SAFETY ANALYSIS OF EVENT:

The seismic analysis performed on the as-found condition of the Unit 2 and Unit 3 Diesel Generators air start piping indicated that piping analysis stresses exceeded the conservative FSAR design requirements. However, the seismic calculations also indicated that the piping stresses were within the operability limits and thus the air start piping would remain operable under all design basis events. In addition, the air start piping on the Unit 2/3 Diesel Generator was also found within the FSAR and operability limits. Consequently, the safety significance of this event was considered minimal.

E. CORRECTIVE ACTIONS:

To ensure that the air start piping for the Unit 2 and Unit 3 Diesel Generators fully comply with the FSAR requirements, Modifications M12-2-88-16 and M12-3-88-16 were initiated to modify the air start piping system. These modifications will remove the air start filters and air start piping from the handrails and mount them to new piping supports. The modification for the Unit 3 Diesel Generator is scheduled to be completed during the current Unit 3 refuel outage (237-200-88-03401). The modification for the Unit 2 Diesel Generator will be completed as soon as practical and in no case later than the completion of next Unit 2 refuel outage which is scheduled to begin in September 1988 (237-200-88-03402).

It is believed that the current level of inspection would help prevent a recurrence of this type under the present modification program. Dresden Administrative Procedure (DAP) 5-1, Plant Modification Program, was revised on December 4, 1986 to require the performance of a final field walkdown of the entire modification by the station cognizant engineer, using the installation documents as a reference.

PREVIOUS EVENTS:

F.

This is the first occurrence of piping stress analysis deficiencies on the Diesel Generator systems at Dresden Station.

G. COMPONENT FAILURE DATA:

Since there were no component failures associated with this event, this section of the report is not applicable.



Commonw th Edison Dresden Nuclear Power Station R.R. #1 Morris, Illinois 60450 Telephone 815/942-2920

April 25, 1988

EDE LTR #88-311

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

Licensee Event Report #88-001-0, Docket #050237 is being submitted as required by Technical Specification 6.6, NUREG 1022 and 10 CFR 50.73(a)(2)(ii)(B).

E.D. Eenigenburg Station Manager Dresden Nuclear Power Station

EDE/kjl

Enclosure

cc: A. Bert Davis, Regional Administrator, Region III
File/NRC
File/Numerical

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