



**CENTERIOR  
ENERGY**

**PERRY NUCLEAR POWER PLANT**

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VICE PRESIDENT - NUCLEAR

December 12, 1994  
PY-CEI/NRR-1889L

United States Nuclear Regulatory Commission  
Document Control Desk  
Washington, D.C. 20555

Perry Nuclear Power Plant  
Docket No. 50-440  
LER 94-022

Gentlemen:

Enclosed is Licensee Event Report 94-022 concerning the Failure to Perform Diesel Generator Testing Utilizing Staggered Test Basis.

If you have questions or require additional information, please contact Mr. James D. Kloosterman, Manager - Regulatory Affairs, at (216) 280-5833.

Very truly yours,

CRE:sc

Enclosure: LER 94-022

cc: NRC Project Manager  
NRC Resident Inspector Office  
NRC Region III

150048

Operating Companies  
Cleveland Electric Illuminating  
Toledo Edison

9412160182 941212  
PDR ADOCK 05000440  
S PDR

JE22

## LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

## FACILITY NAME (1)

Perry Nuclear Power Plant, Unit 1

## DOCKET NUMBER (2)

05000 440

## PAGE (3)

1 OF 4

## TITLE (4)

Failure to Perform Diesel Generator Testing Utilizing Staggered Test Basis

EVENT DATE (5)			LER NUMBER (6)			REPORT NUMBER (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
11	11	94	94	-- 022 --	00	12	12	94	FACILITY NAME	DOCKET NUMBER
										05000
										05000
OPERATING MODE (9)		1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)							
POWER LEVEL (10)		100	20.402(b)		20.405(c)		50.73(a)(2)(iv)		73.71(b)	
			20.405(a)(1)(i)		50.36(c)(1)		50.73(a)(2)(v)		73.71(c)	
			20.405(a)(1)(ii)		50.36(c)(2)		50.73(a)(2)(vii)		OTHER	
			20.405(a)(1)(iii)		X 50.73(a)(2)(i)		50.73(a)(2)(viii)(A)		(Specify in Abstract below and in Text, NRC Form 366A)	
			20.405(a)(1)(iv)		50.73(a)(2)(ii)		50.73(a)(2)(viii)(B)			
			20.405(a)(1)(v)		50.73(a)(2)(iii)		50.73(a)(2)(x)			

## LICENSEE CONTACT FOR THIS LER (12)

## NAME

Denzel A. Housley, Compliance Engineer

## TELEPHONE NUMBER (Include Area Code)

(216) 280-5520

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

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS

## SUPPLEMENTAL REPORT EXPECTED (14)

YES

(If yes, complete EXPECTED SUBMISSION DATE)

X

NO

EXPECTED  
SUBMISSION  
DATE (15)

MONTH DAY YEAR

## ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

On November 11, 1994, as the result of a continuing review of an operational experience item, it was determined that testing of the diesel generators did not meet the definition of Staggered Test Basis as required by Technical Specification Surveillance Requirement 4.8.1.1.2.a. At the time of discovery of this event, each diesel generator had been tested within 31 days as required by Technical Specifications with the latest test being performed on the Division 2 diesel generator November 9, 1994. Therefore, the diesel generators were operable and no immediate surveillance testing was required.

The root cause of this event was a failure of the surveillance test program to properly schedule diesel generator testing in accordance with the Technical Specification definition of Staggered Test Basis. Performance of diesel generator testing in the past was not scheduled utilizing the Staggered Test Basis, but was only based on individual diesel generator surveillance frequencies.

As a result of this event, surveillance testing intervals for the diesel generators have been revised to ensure that testing will conform to the Staggered Test Basis as defined by the Technical Specifications.

**LICENSEE EVENT REPORT (LER)**  
**TEXT CONTINUATION**

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7-14), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
Perry Nuclear Power Plant, Unit 1	05000 440	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	2 OF 4
		94	- 022 -	00	

TEXT (If more space is required, use additional copies of NRC Form 365A) (17)

**I. Introduction**

On November 11, 1994, as the result of a continuing review of an operational experience item, it was determined that testing of the diesel generators [EP] did not meet the definition of Staggered Test Basis as required by Technical Specification Surveillance Requirement 4.8.1.1.2.a. At the time of discovery of this event, the plant was in Operational Condition 1 at approximately 100 percent rated power. This event is being reported under the requirement of 10CFR50.73(a)(2)(i).

**II. Description of Event**

Due to a recent operational experience review event involving staggered testing of diesel generators at a nuclear power plant, a review of plant diesel generator surveillance testing was initiated to determine compliance with staggered testing requirements. On November 11, 1994, this review discovered that testing of the diesel generators did not meet the definition of Staggered Test Basis required by Technical Specification Surveillance Requirement 4.8.1.1.2.a.

Technical Specification Surveillance Requirement 4.8.1.1.2.a requires that the Division 1, 2, and 3 diesel generators be demonstrated Operable in accordance with the frequency specified in Table 4.8.1.1.2-1 on a Staggered Test Basis. The Technical Specification definition for Staggered Test Basis requires that a test schedule be established by dividing the specified test interval into three equal subintervals and testing one diesel generator at the beginning of each subinterval. Technical Specification 4.8.1.1.2.a is the only Technical Specification that requires testing on a Staggered Test Basis.

Based on the current number of test failures, Table 4.8.1.1.2-1 requires each diesel generator to be tested once per 31 days. Therefore, by applying the requirement for the Staggered Test Basis, a plant diesel generator must be tested every ten days.

The recent surveillance testing of the diesel generators was examined and identified that the Division 1 diesel generator testing had been completed on October 21, 1994, and staggered testing of another diesel generator had not been performed within ten days. Additionally, past testing of the diesel generators had not been performed in accordance with the staggered testing requirements.

**LICENSEE EVENT REPORT (LER)**  
**TEXT CONTINUATION**

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FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
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		94	- 022 -	00	

TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

At the time of discovery of this event, each diesel generator had been tested within 31 days as required by Technical Specifications with the latest test being performed on the Division 2 diesel generator November 9, 1994. Therefore, the diesel generators were operable and no immediate surveillance testing was required.

**III. Cause of Event**

The root cause of this event was a failure of the surveillance test program to properly schedule diesel generator testing in accordance with the Technical Specification definition of Staggered Test Basis. Performance of diesel generator testing in the past was not scheduled utilizing the Staggered Test Basis, but was only based on individual diesel generator surveillance frequencies.

**IV. Safety Analysis**

Staggered testing of the diesel generators reduces the maximum time between any two diesel generator required tests from 31 days (if the diesel generators were tested on the same day) to 10 days. This requirement could minimize the time that a common problem with the diesel generators could go undetected.

Staggering the testing of the diesel generators is operationally difficult and requires additional diesel generator starts to re-establish the staggered schedule following diesel generator maintenance or following diesel generator testing to comply with Technical Specification action requirements. Staggered testing has negligible impact on component reliability and has no impact on failure frequency. The requirement to perform diesel generator testing on a Staggered Test Basis is being removed as part of the Improved Technical Specifications.

Although the requirements for the Staggered Test Basis in the surveillance testing of the diesel generators has not been complied with, the ability of the diesel generators to perform their function was not affected. Testing of the diesel generators has been performed in accordance with the Technical Specification surveillance intervals and is the basis for the continued operability of the diesel generators. Therefore, this event had minor safety significance.



**LICENSEE EVENT REPORT (LER)**  
**TEXT CONTINUATION**

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TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

**V. Similar Events**

No previous similar events were identified. The failure to perform testing in accordance with staggered testing requirements had not been previously identified.

**VI. Corrective Actions**

As a result of this event, surveillance testing intervals for the diesel generators have been revised to ensure that testing will conform to the Staggered Test Basis as defined by the Technical Specifications.

Energy Industry Identification System (EIIS) codes are identified in the text as [XX].