CCN 92-14045

PHILADELPHIA ELECTRIC COMPANY

PEACH BOTTOM ATOMIC POWER STATION

R. D. 1, Box 208 DELTA, PA 17314

(717) 458-7014

April 10, 1992

Docket Nos. 50-277 50-278

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

> SUBJECT: Licensee Event Report Peach Bottom Atomic Power Station - Units 2 and 3

This LER concerns an Emergency Diesel Generator which had a slow start time due to an unprimed fuel oil filter.

Reference:	Docket Nos. 50-277 50-278
Report Number: Revision Number: Event Date: Report Date: Facility:	2-92-002 00 03/11/92 04/10/92 Peach Bottom Atomic Power Station RD 1, Box 208, Delta, PA 17314

This LER is being submitted pursuant to the requirements of 10 CFR 50.73(a)(2)(1).

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cc: J. J. Lyash, USNRC Senior Resident Inspector T. T. Martin, USNRC, Region I

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NRC Form 368 (6-60)

U.S. NUCLEAR REGULATORY COMMINSION

APPROVED SMR NO. 3150-0104

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NRC FORM S66A (6.830)

Requirements of the Report

This report is being submitted pursuant to 10 CFR 50.73 (a)(2)(1) as a result of Technical Specification (Tech Spec) 3.5.F.1 violation when one Emergency Diesel Generator (EDG)(EIIS:EK) was inoperable for a time greater than that specified in the Limiting Condition for Operation (LCO).

Unit Conditions at Time of Event

Both units were in the "RUN" mode at 100% of thermal reactor (EIIS:EA) power. There were no systems, structures, or components that were inoperable that contributed to the event.

Description of the Event

On 3/11/92 at 1025 hours, during the performance of a weekly EDG Surveillance Test (ST), the E-3 EDG started in 13 seconds instead of the 10 second time requirement specified in the Updated Final Safety Analysis Report (UFSAR). The UFSAR states that "The diesel-generators are designed to start and attain rated voltage and frequency within 10 seconds". Since the required start time was not met, this resulted in a violation of Tech Spec 3.5.F.1 because the E-3 EDG was inoperable for a time greater than that specified in the LCO. The E-3 EDG was restarted at approximately 1030 hours and the start time was acceptable. The E-3 EDG was declared inoperable on 3/11/92 at 1035 hours. After discovery of the event, a detailed investigation was performed which included a system review and a recreation of the event. This investigation concluded that the fuel oil filter was not properly primed after a fuel filter replacement on 2/27/92. Subsequently, the E-3 EDG fuel oil filters (EIIS:FLT) were adequately primed when the engine was run and E-3 EDG was satisfactorly tested for operability on 3/14/92 at 0045 hours. Subsequent test runs on the other three EDGs had start times within the 10 second UFSAR start requirement. These EDG runs ensured that the fuel oil filters were adequately primed.

Cause of the Event

The cause of the event has been determined to be that the E-3 EDG fuel oil filter was not properly primed after filter replacement on 2/27/92. A less than adequate post maintenance test (PMT) after filter replacement occurred. The PMT should have required coordination with Operations to prime the filter and either run the E-3 EDG or hang an information tag on the replaced filter. This would ensure that the EDG was not left lined up to the new filter without running the EDG.

In addition, a review of this event has identified that no programmatic controls existed to ensure that the fuel oil filter is properly primed following fuel oil filter replacement. U.S. NUCLEAR REQULATORY COMMISSION

APPROVED DHAR NO. 3150-0104

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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Analysis of Event

NRC FORM 366A

No actual safety consequences occurred as a result of this event.

The consequences are considered minimal due to the fact that the E-3 EDG would have started approximately 3 seconds late. No significant affect on core coverage capability would have existed. This is due to the availability of the other EDGs and the fact that the 3 second time delay would not have a significant effect on providing low pressure cooling from pumps which are supplied from the E-3 EDG.

If a design basis event and loss of offsite nower would have occurred in conjunction with slow E-3 EDG start time, the High Pressure Coolant Injection System (EIIS:BJ) would be available for high pressure cooling. In addition, the low pressure Core Spray (EIIS:BM) and Low Pressure Coolant Injection (EIIS:BO) systems fed from the other EDGs would have been available for adequate low pressure cooling.

Corrective Actions

After discovery of the event, an investigation identified that the fuel oil filter was not properly primed after a recent fuel filter replacement. Subsequently, the fuel oil filters were adequately primed when the engine was run and E-3 EDG was satisfactorily tested for operability.

Subsequent test runs of the other three EDGs had start times within the 10 second UFSAR start requirement. These EDG runs ensured that the fuel oil filters were adequately primed.

The event has been discussed with the involved individuals. The pertinent information from this event will be provided to the appropriate Operations personnel, Planning personnel, and technical staff members. Training will emphasize the importance of testing replaced/repaired components and the realignment of redundant components before operability can be assumed.

Information tags were hung on all EDG fuel oil filters as an interim action to provide a caution that filter priming is required after filter replacement.

In addition, controls will be generated to include the necessary actions to ensure that the fuel filters are properly primed to prevent future occurrences.

Previous Similar Events

There were no previous similar events identified which involved the start times of EDGs.