CCN 92-14045

PHILADELPHIA ELECTRIC COMPANY

PEACH BOTTOM ATOMIC POWER STATION

R. D. 1, Box 208

DELTA, PA 17314

(717) 456-7014

KEN POWERS
PLANT MANAGER

April 16, 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:	2-92-002
Revision Number:	00
Event Date:	03/11/92
Report Date:	04/10/92
Facility:	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)(i).

Sincerely,

Ken Powers

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

IE22

NRC FORM 366 (5-89) U.S. NUCLEAR REGULATORY COMMISSION

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
Peach Bottom Atomic Power Station - Units 2 and 3	0 5 0 0 0 2 7 7	1 OF 0 3

TITLE (4): Emergency Diesel Generator Slow Start due to an Unprimed Fuel Oil Filter caused by a less than adequate post Maintenance Test

EVENT DATE (5)			LER NUMBER (6)				REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR		SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER (8)
0 3	1 1	9 2	9 2	---	0 0 2	--- 0 0	0 4	1 0	9 2	Peach Bottom - Unit 3	0 5 0 0 0 2 7 8
											0 5 0 0 0

OPERATING MODE (9)		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)			
	N	20.402(b)	20.405(c)	50.73(a)(2)(iv)	73.71(b)
POWER LEVEL (10)	1 0 0	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 (Specify in Abstract below and in Text, NRC Form 366A)
		20.405(a)(1)(iii)	X 50.73(a)(2)(i)	50.73(a)(2)(viii)(A)	
		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	TELEPHONE NUMBER
	AREA CODE
Albert A. Fulvio, Regulatory Engineer	7 1 7 4 5 6 - 7 0 1 4

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)		EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
YES (If yes, complete EXPECTED SUBMISSION DATE)	X				

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

On 3/11/92 at 1025 hours, during the performance of a weekly Emergency Diesel Generator (EDG) Surveillance Test, the E-3 EDG started in 13 seconds instead of the 10 second time requirement specified in the Updated Final Safety Analysis Report. 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. This was due to a less than adequate post maintenance test. No actual safety consequences occurred as a result of this event. Subsequently, the fuel oil filters were adequately primed when the engine was run and E-3 EDG satisfactorily tested for operability. Other EDG fuel oil filters were verified to be properly primed. Controls will be generated to include the necessary actions to ensure that the fuel filters are properly primed to prevent future occurrences. Training will be conducted. Information tags were hung on all EDG fuel oil filters as an interim action. There were no previous similar events identified.

Requirements of the Report

This report is being submitted pursuant to 10 CFR 50.73 (a)(2)(i) 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 satisfactorily 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.

Analysis of Event

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 power 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.