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#### INTRODUCTION:

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On June 1, 1988 at 1919, Diesel Generator (D/G) 2A started and loaded as designed when normal power was purposefully failed to Train 2A during an Engineered Safety Features (ESF) Blackout test. However, D/G 2A tripped on engine overspeed at 1933 prior to the termination of the Blackout test. Unit 1 then entered the Action Statement of Technical Specification (TS) 3.0.3 because the emergency power supply to the shared Vital Battery Chargers EVCA and EVCC was from D.G 2A (an alignment required by the ESF Train 2A Blackout test procedure), and the two chargers deenergized when D/G 2A tripped.

Operations (OPS) immediately restored normal power to Train 2A and restarted EVCA and EVCC Chargers. Unit 1 then exited the Action Statement of TS 3.0.3 at 1936 on June 1.

During the subsequent investigation, Mechanical Maintenance (MNT) determined that D/G 2A tripped on overspeed because all of the oil has drained out of the D/G governor causing the governor to supply excess fuel to the D/G. The oil leak occurred because a new governor actuator has been installed on an old governor oil cooler tubing maniforld block on May 31, 1988. The four new bolts which were used to join the two parts were approximately one-eighth inch longer than the old bolts, and one of the bolts had bottomed out, creating an incomplete seal between the actuator and oil cooler tubing maifold block. MNT replaced the governor aactuator using the older shorter bolts to correct the problem by 0219 on June 2, 1988. The trip of D/G 2A was classified as a Valid Failure.

Unit 1 was in Mode 1, Power Operation, at 100% power, and Unit 2 was in Mode 5, Cold Shutlown, at the time of this event.

This event has been assigned a Cause of Other because ther are several possible causes of the event. MNT personnel were following an accepted practice, which is supported by their management, in replacing only the malfunctioning portion of a component. However, because of a lack of a requirement in the spare parts program for a vendor to inform Duke Power Company of design changes, and a possible fabrication error in the manufacture of one of the bolts or actuator bolt holes, the two parts of the governor assembly which were used together were not completely compatible.

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EVALUATION:

NRC Form 366A

#### Background

The 125 volt direct current (VDC) Vital Instrumentation and Control Power system is a shared system which provides power to all class 1E 125 VDC loads that are essential to reactor control and instrumentation. The system consists of four normally independent channels of power, each consisting of a 125 VDC bus, a 125 VDC battery [EIIS:BTY], and a full capacity charger. The four batteries and associated chargers are EVCA, EVCB, EVCC, and EVCD. The associated buses are EVDA, EVDB, EVDC, and EVDD, respectively. The battery charger [EIIS:CHR] on each channel is independent and supplies power for both normal bus operation and battery Loat charging. A standby charger (EVCS) is provided to replace an inoperable charger during testing or maintenance.

TS 3/4.8.2 requires that the four direct current channels be operable and energized in Modes 1 (Power Operation), 2 (Startup), 3 (Hot Standby), and 4 (Hot Shutdown). With one 125 VDC battery and/or its normal and standby chargers inoperable or not energized, the TS requires that the associated bus must be energized from an operable battery bank within 2 hours in order to allow continued operation for up to 72 hours. With more than one battery and or normal and standby charger inoperable, the Action Statement of TS 3.0.3 applies.

The normal power supply for EVCA Charger is bud lETA through incoming feeder lEMXA, and the emergency power supply is from D/G [EIIS:DG] 1A. The alternate power supply for EVCA Charger is from bus 2ETA through alternate incoming feeder 2EMXA, and the emergency power supply for this alignment is from D/G 2A. The normal power supply for EVCC Charger is from bus 2ETA through incoming feeder 2EMXA, and the emergency power supply is from D/G 2A. The ESF Actuation Periodic Test procedure PT/2/A/4200/09A, is performed in Mode 5 (Cold Shutdown) or Mode 6 (Refueling) during each refueling outage to test the ability of the D/Gs to start and load as designed in response to a manually initiated Blackout or Safety Injection signal. The Train 2A Blackout tesc portion requires EVCA Charger power to be aligned from its alternate feeder 2EMXA and EVCC Charger power to be aligned from its normal feeder 2EMXA in order to test the worst case alignment of Vital Battery Charge, power in the event of a Train 2A Blackout.

TS 3.8.1.2 requires one offsite power source and one D/G be operable in Modes 5 and 6. A surveillance requirement of the TS requires that any Valid or Invalid Failure of a D/G be reported to the Nuclear Regulatory Commission within 30 days.

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#### Description of Event

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On May 31, 1988 at 0.33, OPS personnel started D/G 2A for an operability test and ESF test (Start No. 626). OPS personnel terminated the run after 36 minutes and classified it as an Invalid Test. During the test, while the D/G was idling, OPS personnel noted that the D/G frequency was oscillating approximately 0.6 Hertz. OPS personnel could not resolve the frequency problems during two subsequent Invalid Test runs for troubleshooting and requested MNT to investigate.

After extensive troubleshooting and discussions with the governor supplier, Woodward Governor Company, MNT personnel determined that the governor actuator was faulty and should be replaced. MNT personnel obtained an unused governor assembly from the warehouse. The governor assembly, model number EG-B35C, as received from the Woodward Governor Company contains a governor actuator and a tubing manifold block to connect the actuator to the oil cooler. Because there was no apparent problem in the installed oil cooler or tubing manifold block, and it was known to be time consuming to remove the tubing attached to the oil cooler tubing manifold block, MNT Supervisory personnel decided to install only the new governor actuator and attach it to the previously installed oil cooler tubing manifold block. Also, MNT personnel were wware that a new governor accuator had been installed on an old oil cooler tubing manifold block during maintenance on two other D/G governors with no apparent problems. Therefore, MNT personnel installed the new governor actuator and o-rings with the old oil cooler tubing manifold block, using the four bolts from the new governor assembly to connect the two parts.

OPS personnel then started D/G 2A eleven times between 2101 and 2338 on May 31, 1988 to troubleshoot the new governor actuator. All of these starts were classified as Invalid Tests. At 0159 on June 1, 1988, D/G 2A was started to perform a final test of the new governor actuator. The run was terminated due to unrelated complications. Two subsequent runs were performed for troubleshooting and all three of these runs were also classified as Invalid Tests. At 1635, D/G 2A was started for the operability test and ran for 131 minutes. After this run, OPS personnel declared D/G 2A operable. At 1919, D/G 2A started successfully on an undervoltage signal when bus 2ETA was deenergized to perform the ESF Train 2A Blackout test. D/G 2A loaded successfully but tripped 14 minutes into the test. OPS personnel classified this D/G 2A start (Start No. 644) as a Valić Failure.

Bacause of the required alignment of the shared Vital Battery Chargers for the Blackout test, both EVCA and EVCC Chargers were deenergized when D/G 2A tripped. Therefore, OPS personnel entered Unit 1 into the Action Statement of TS 3.0.3 at 1933, the time of the D/G 2A trip. OPS personnel immediately restored normal power to the two char is by reenergizing bus 2ETA. The EVCA and EVCC Chargers were restarted by 1936, and OPS personnel exited Unit 1 from the Action Statement of TS 3.0.3.

U.S. NUCLEAR RE-ULATORY COMMISSION APPROVED OMB 1/0. 3 50-0104

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MNT personnel investigating the cause of the D/G 2A trip on engine overspeed discovered that all of the oil had !eaked out of the D/G Governor causing the governor to supply excess fuel and trip the D/G on engine overspeed. They determined that one of the bolts used to connect the new governor actuator to the old oil cooler tubing manifold block had bottomed out, allowing incomplete sealing at the o-ring between the two components. Further investigation revealed that the new bolts were approximately one-eighth inch longer than the old bolts and that the oil cooler tubing manifold block which was originally attached to the new governor actuator was approximately one-eighth inch thicker than the old oil cooler tubing manifold block. After discussion with a Woodward representative, MNT personnel decided to replace the governor actuator with another new one as a precaution since the installed actuator had operated without oil. A new actuator was connected to the old oil cooler tubing manifold block, using the older shor .r bolts which had originally been supplied with the old oil cooler tubing manifold block to connect the two components. D/G 2A was then started three more times for troubleshooting and testing between 0219 and 0815 on June 2, 1988. At 0820, OPS personnel started D/G 2A (Start No. 648) for the operability test and declared it operable 72 minutes later.

## Conclusion

The Valid Failure of D/G 2A on June 1, 1988 at 1933 was the sixth Valid Failure in the last 100 valid starts of the Unit 2 D/Gs. It was the fifth Valid Failure in the last 100 valid starts and the second Valid Failure in the last 20 starts of D/G 2A.

This event has been assigned a Cause of Other because there are several possible causes for this event. The difference in the old and new oil cooler tubing manifold block and bolts was so slight that it is uncertain whether eliminating any one of the causes could have prevented the event.

MNT personnel who installed the new governor actuator on the old oil cooler tubing manifold block were following an accepted practice in replacing only the malfunctioning portion of the component. They made an incorrect evaluation of the compatibility of the two parts for several reasons. They had no reason to suspect that the two parts would be incompatible, since the part number had not changed and the same method had been used on at least two other occasions. It was not visually evident from any normal vantage point that one of the bolts had bottched out in the actuator bolt hole. The bolts we e all torqued to the specified value in the Diesel Engine Governor, Governor Oi. Cooler and Booster Servo Motor Removal And Replacement procedure, MP/0/A/7400/14. Quality Assurance (QA) personnel also visually verified that the form and fit of the new parts were correct as directed in the Quality Control Procedures Manual, Section QC-F4, Mechanical Equipment Inspection Procedure and the torque was performed according to the MNT procedure.

NGC Form 346A (9-8))	LICENSEE	EVEN	T REF	PORT	LEF	R) T	EXT	cor	NTINU	JATIO	N		U.S. NUCLEAR REGULATORY COMMISSION APPROVEC OMB NO 3 50-0104 EXPIRES 8/31:95						
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Although Woodward Governor Company has not yet been able to provide specific information on the differences in the two involved oil cooler tubing manifold blocks, a Woodward representative has acknowledged that several design changes have been made to the tubing manifold block and oil cooler design since 1976 when one of these two governors was purchased. The representative also stated that Woodward would not have informed Duke Power Company of these design changes because they would not have considered the changes to affect the function if the component was used intact. Until recently there was no requirement for a vendor supplying a Standard Stock item to inform Duke Power Company of design changes. The Standard Stock safety related components fall under the more stringent Commercial Grade program instituted in 1987. Under the new program, Duke Design Engineering personnel attempt to assure, either by inspection or with acceptable certification from a vendor, that no changes have been made in the design of a part which would affect the form, fit, or function.

Until Woodward provides more information, it cannot be determined is only one of the four bolts bottomed out in the governor actuator due to differences in the depth of the four bolt holes in the actuator from an out of tolerance fabrication error or from the allowable manufacturing tolerance.

Operations personnel verified the governor oil level to be satisfactory prior to the D/G 2A start at 1635 on June 1, 1988 as documented in a completed copy of procedure PT/2/A/4350/02A, D/G "2A" Operability Test. The governor oil level was also checked prior to other times that D/G 2A was started between the governor actuator replacement and the D/G 2A trip and was documented in the Direel Generator Operating procedure, OP/2/A/6350/02; however, all completed copies of this procedure are not retained. The OPS Engineer responsible for the Unit 2 D/Gs remembers checking the governor oil level prior to the start of D/G 2A at 1919 on June 1, 1988. Two OPS nuclear equipment operators on routine rounds also verified the governor oil level to be satisfactory between the governor actuator replacement and the D/G trip. Therefore, the oil in the governor (approximately 1 quart) evidently leaked out suddenly during the D'G 2A run began at 1919, probably due to pressure buildup in the governor during the extended run from 1635 to 1846.

A review of McGuire Licensee Event Reports for the past three years revealed no entries into TS 3.0.3 due to similar root causes; therefore, this event is not considered to be recurring.

This event is reportable to the Nuclear Plant Reliability Data System (NPRDS). A search of the NPRDS revealed many problems with diesel governors out of adjustment and a few lube problems, but no otir failures exactly like the one during this event.

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CORRECTIVE	CTTONS.					
CORRECTIVE	<u>GIM343</u> ,					
Immediate:		nel replaced the governor				
		lts to attach the new acc		ld oil	cooler	
	tubing man	ifold block by 0219 on Ju	ne 2, 1988.			
Subsequent:	Design Eng	i eering personnel are cu	rrently refind	ng the		
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		rcial Grade parts are ins				
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Planned:	1) MNT p	ersonnel will change the	Diesel Engine	Governo	<b>r</b> .	
		nor Oil Cooler and Booste				
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	and e	valuate the length of the	bolts to be u	sed to	connec	t
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	2) MNT p	erconnel udli request the	t a abanca ba	nada ta	the	
		ersonnel will request tha ard Governor Company manu				
		ng of the oil cooler tubi				on
		em Report will be submitt				
	3) MNT p	ersonnel will send the go	overnor actuato	r remov	ed fro	m
	servi	ce on May 31, 1988 to a v	vendor for fail	ure ana	lysis.	
	4) MNT p	ersonnel will request in	writing that W	oodward		
		nor Company provide a wri				
		e design of the governor	and the second			
		may have contributed to				
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		anagement personnel will				
		priate MNT personnel to e ver steps necessary to as				
		cing parts of a component		TTCA MU	en	

# SAFETY ANALYSIS:

Unit 1 was in TS 3.0.3 for approximately 3 minutes on June 1, 1988 because EVCA and EVCC Chargers were deenergized. Normal power was restored well within the one hour allotted in the TS 3.0.3 Action Statement. EVCA and EVCC Batteries were operable during this time period to provide power for the EVDA and EVDC buses. The minimum duty cycle required for the batteries is one hour according to the McGuire Final Jafety Analysis Report (FSAR); however, each battery actually can carry its normal load and that of another battery for three hours. Also, EVCB and EVCD Chargers were fully operable during this time period with normal power from Train 1B and Train 2B, respectively.

NAC Form 368A 19-83)	LICENSEE EVENT REP	ORT (LER) TEXT CON	TINUATION	ATORY COMMISSION			
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> Unit 2 was in Mode 5 during the initiation of the ESF Train 2A Blackout test. Only one D/G and one offsite power source is required by TSs to be available during Mode 5. and D/G 2B and one offsite power source were operable when D/G 2A tripped.

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No personnel injuries, radiation overexposures, or releases of radioactive material occurred as a result of this incident.

This event is considered to be of no significance with respect to the health and safety of the public.

#### DUKE POWER COMPANY P.O. BOX 33189 CHARLOTTE, N.C. 28242

HAL B. TUGKER VICE PREBIDENT NUCLEAR PRODUCTION TELEPHONE (704) 373-4531

July 1, 1988

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

Subject: McGuire Nuclear Station, Units 1 and 2 Docket No. 50-369, -370 Licensee Event Report 369/88-11

Gentlemen:

Pursuant to 10CFR 50.73 Sections (a)(1) and (d), attached is Licensee Event Report 369/88-11 concerning Init 1 entering Tech Spac 3.0.3 when two vital battery chargers were deenergized when Diesel Generator 2A tripped because of an oil leak from a diesel governer valve on June 1, 1988. This report is being submitted in accordance with 10CFR 50.73(a)(2)(1)(B) and Tech Spec 6.9.2 as directed by Tech Spec 4.8.1.1.3. This event is considered to be of no significance with respect to the health and safety of the public.

Very truly yours,

Hal B. Tucker

SEL/292/bhp

Attachment

xc: Dr. J. Nelson Grace Regional Administrator, Region II U.S. Nuclear Regulatory Commission 101 Marietta St., NW, Suite 2900 Atlan<sup>+</sup>a, GA 30323

> INPO Records Center Suite 1500 1100 Circle 75 Parkway Atlanta, GA 30339

M&M Nuclear Consultants 1221 Avenue of the Americas New York, NY 10020 American Nuclear Insurers c/o Dottie Sherman, ANI Library The Exchange, Suite 245 270 Farmington Avenue Farmington, CT 06032

Mr. Darl Hood U.S. Nuclear Regulatory Commission Office of Nuclear Reactor Regulation Washington, D.C. 20555

Mr. W.T. Orders NRC Resident Inspector McGuire Nuclear Station