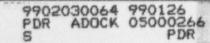
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power to the Unit 2 Train " B" safeguards relay rack, which provides power to this auto start function, was danger tagged. During the EDG functional test, the emergency power supply to 2A06 is considered inoperable. While investigating this condition, we determined that the Unit 2 Train " A" safeguards relay racks were also danger tagged. As a result, the automatic start signal for the Train " A" service water pumps upon GO1 or GO2 output breaker closure to bus 2A05 was also not functional.

With the standby emergency power supply to both Unit 2 safeguards buses 2A05 and 2A06 out of service the provisions of TS 15.3.0.B concerning "limitations beyond those specified in the permissible conditions of the LCO" became applicable to Unit 1. This is reportable in accordance with 10 CFR 50.73(a)(2)(I)(B). Upon discovery, the danger tags for the Unit 2 Train "A" safeguards rack were cleared and the equipment reenergized.



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# LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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		1998	- 029 -	00	

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

### Event Description:

On December 27, 1998, at approximately 0430 CST, while returning Emergency Diesel Generator (EDG) G04 to service following performance of its monthly functional test, TS-84, "Emergency Diesel Generator G04 Monthly," we discovered that the automatic start feature for the Train "B" service water pumps (P-32C, D and E) was not functional (CR 98-4173). This feature is designed to start the Train "B" service water pumps upon closure of the G03 or G04 EDG output breaker to bus 2A06, the Unit 2 Train "B" 4.16KV Safeguards Bus. This feature failed to function because the power to the Unit 2 Train "B" safeguards relay rack, (2C-166/167), which provides power to this auto start function, was danger tagged deenergized while conducting main control board wire separation activities. Because the G04 EDG is not dependant on service water for cooling, this auto start feature is not required for 2A06 standby emergency power operability when aligned to G03 or G04, or G04 operability specifically.

While investigating this condition, we determined that the Unit 2 Train "A" safeguards relay racks (2C-156/157) were also danger tagged deenergized on this same tag out (2-DT-98-1697). As a result, the automatic start signal for the Train "A" service water pumps (P-32 A, B, and F) upon GO1 or GO2 output breaker closure to bus 2A05, Unit 2 Train "A" 4.16KV Safeguards Bus, was not functional. Since this feature is required for 2A05 standby emergency power operability, the standby emergency power to 2A05 and EDG GO2 were declared inoperable and a seven day LCO entered in accordance with Technical Specification (TS) 15.3.7.B.1.g for Unit 1 at 0444 CST. This condition existed from the time the tag out of the Train "A" safeguards relay rack was placed at approximately 0600 on December 23, 1998. Point Beach Unit 1 was operating at 100% power and Unit 2 was in a refueling shutdown and defueled. GO1 remained operable due to its alignment to 1A05 for supply of emergency power. GO3 also remained operable and aligned to 1A06 for supply of emergency power.

At 0148, EDG G04 had been declared out of service for the TS-84 functional test mentioned above and a seven day LCO was entered per TS 15.3.7.B.1.f for standby emergency power supply to 2A06 out of service for Unit 1. (This LCO was exited at 0432 CST when the G04 EDG was returned to service.) At that time, it was not recognized that the emergency standby power to 2A05 was also out of service. With the standby emergency power supply to both Unit 2 safeguards buses 2A05 and 2A06 out of service the provisions of TS 15.3.0.B concerning "limitations beyond those specified in the permissible conditions of the LCO" became applicable to Unit 1. This is reportable in accordance with 10 CFR 50.73(a) (2) (I) (B) as, " any operation or condition prohibited by the plant's Technical Specifications." This condition existed from 0148 CST until 0432 CST December 27, 1998, when G04 was returned to service.

Subsequent to 0444 CST when the standby emergency power to 2A05 was declared out of service, G02 was tested satisfactorily and returned to service at 1219 CST on December 27. The tag out on the Unit 2 Train "A" safeguards rack was removed and the rack reenergized. The auto start feature for the "A" train service water pumps was tested satisfactorily and the Unit 1 seven day LCO per TS 15.3.7.B.1.g was exited.

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#### Cause:

The cause of this event was the failure to recognize the full significance of deenergizing the Unit 2 safeguards relay racks. The licensee's staff did not recognize the significance of this tag out in that it disabled the automatic start feature for the service water pumps upon closure of the EDG GO1 and GO2 output breaker to 2A05. This tag out resulted in standby emergency power to 2A05 becoming inoperable, which should have resulted in a seven day LCO being entered per TS 15.3.7.B.1.g. Additionally, the inoperability of 2A05 should have prevented the entry into TS 15.3.0.B by the removal for testing of GO4.

#### Corrective Actions:

Upon discovery that the automatic start feature for service water pumps for G01 and G02 output breaker closure to 2A05 was not functional, a seven day LCO was entered. The EDG G02 was functionally tested in accordance with TS 82. The danger tags for the Unit 2 Train " A" safeguards rack were cleared and the equipment reenergized. The service water automatic start feature was tested satisfactorily.

An apparent cause investigation was completed which identified and recommended corrective actions. These included programatic expectations concerning the required detail in evaluation and work plan documentation to include adequate detail to provide direction for tag out development.

A root cause evaluation is being conducted (RCE 98-214) to identify why the equipment tag out process failed to identify the significance and ultimate operability impact of this event. Corrective actions identified under this root cause evaluation will be tracked to completion under the PBNP corrective action program.

#### Component and System Description:

The Point Beach Muclear Plant, Unit 1 and 2, has four emergency diesel generators, GO1 through GO4, which provide standby emergency power to the 4.16 KV safeguards buses. GO1 and GO2 are "A" train EDGs and are normally aligned to provide the standby emergency power to the "A" train safeguards buses (1A05 and 2A05) in Unit 1 and 2 respectively. GO3 and GO4 are "B" train EDGs and are normally aligned to the "B" train safeguards (1A06 and 2A06) in Units 1 and 2 respectively. GO1 and GO2 are dependent on the service water system for cooling. GO3 and GO4 are cooled via a closed cycle cooling system through air cooled radiators.

The service water system at PBNP includes six service water pumps. Three service water pump motors are supplied by A Train 480V safeguards buses (P32A and B on 1B03 and P32F on 2B03 fed from 1A05 and 2A05 respectively) and three are supplied by B Train 480 V safeguards buses (P32C on 1B04 and P32 D and E on 2B04 fed from 1A06 and 2A06 respectively). Any three service water pumps are capable of providing the necessary cooling capacity for the essential loads for an accident affected unit and supply service water for the normal operation of the unaffected unit loads.

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The automatic start feature for the service water pumps is designed to start the Train "A" service water pumps when the output breakers for GO1 or GO2 close to 1A05 or 2A05. This feature is considered to be required for 1A05 or 2A05 standby emergency power operability. Closure of the output breakers for GO3 or GO4 to 1A06 or 2A06 will start the "B" Train service water pumps. However, since the service water system is not required for GO3 or GO4 operability, this feature is not required for operability of 1(2)A06 standby emergency power.

### Safety Assessment:

In the event of a design basis accident the SW system provides cooling to essential heat exchangers and coolers. Any three SW pumps are capable of providing the necessary cooling capacity for the essential loads for an affected unit (Unit 1 in this case) and supply service water for the unaffected unit (Unit 2 in this case). In addition to the auto start functions discussed above, sensed undervoltage on the Unit 1 4160 V safe guards buses (1A05 and 1A06) would result in the start of the "A" and "B" train service water pumps. During this event, closure of an EDG output breaker onto either the 2A05 or 2A06 safe guards bus would not start any service water pumps. Three service water pumps would start and run even with loss of 2A05 and 2A06 since they receive their power from 1A05 and 1A06.

Additional service water pumps can be started as necessary. The operations crew is directed by Emergency Operating Procedure, EOP-0, "Reactor Trip or Safety Injection," Step 9, to start pumps as necessary after the initial safety injection EDG loading sequence is complete. This direction is invoked only if less than four pumps are running after the initial EDG loading sequence is complete.

A safety injection signal from Unit 1 would have started the required service water pumps to respond to an emergency with the above deficiency in place.

During the short time that G04 was inoperable during its test and G02 was considered inoperable due to the loss of automatic service water start based upon the 2A05 auto start control power isolation, the plant was in a condition prohibited by Technical Specifications. The time in this condition was less than the shutdown time required by Technical Specification 15.3.0.B.

Therefore, the health and safety of the public or plant personnel was not compromised by the event which is described in this LER.

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Similar Occurrences:						
A review of recent LERs (past	two years) id	lentified the	e follo	owing events	3:	
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