



South Texas Project Electric Generating Station P.O. Box 289 Wadsworth, Texas 77483

October 25, 2004  
NOC-AE-04001808  
File No.: G25  
STI: 31800105

U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
One White Flint North  
11555 Rockville Pike  
Rockville, MD 20852

South Texas Project  
Unit 1  
Docket No. STN 50-498  
Licensee Event Report 01-04-005

Standby Diesel Generator 12 Not Being Declared Inoperable While the  
Auxiliary Feedwater Pump 12 Breaker Cell Switch was Being Replaced

Pursuant to 10CFR50.73(a)(2)(i)(B), the South Texas Project submits the attached Licensee Event Report 01-04-005 regarding Standby Diesel Generator 12 not being declared inoperable while the Auxiliary Feedwater Pump 12 breaker cell switch was being replaced. Specifically, Technical Specification 3.8.1.1.b was not met and the associated conditional ESF power availability surveillance was not performed.

This event did not have an adverse effect on the health and safety of the public.

There are no new commitments contained in this event report. Resulting corrective actions will be handled in accordance with the STP Corrective Action Program.

If there are any questions on this submittal, please contact S. M. Head at (361) 972-7136 or me at (361) 972-7800.

A handwritten signature in black ink, appearing to read "Gary Parkey".

Gary Parkey  
Vice President, Generation

jal/

Attachment: LER 01-04-005

IE22

cc:

(paper copy)

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## LICENSEE EVENT REPORT (LER)

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

Estimated burden per response to comply with this mandatory collection request: 50 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the Records and FOIA/Privacy Service Branch (T-5 F52), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to [infocollect@nrc.gov](mailto:infocollect@nrc.gov), and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

## 1. FACILITY NAME

South Texas Unit 1

## 2. DOCKET NUMBER

05000 498

## 3. PAGE

1 OF 4

## 4. TITLE:

Standby Diesel Generator 12 Not Being Declared Inoperable While the Auxiliary Feedwater Pump 12 Breaker Cell Switch was Being Replaced

5. EVENT DATE			6. LER NUMBER			7. REPORT DATE			8. OTHER FACILITIES INVOLVED	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NO.	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
08	18	2004	2004	- 05 -	00	10	25	2004		05000
										05000

## 9. OPERATING MODE

1

## 11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFRs: (Check all that apply)

- |   |   |   |  |
|---|---|---|--|
| <input type="checkbox"/> 20.2201(b)         | <input type="checkbox"/> 20.2203(a)(3)(i)             | <input type="checkbox"/> 50.73(a)(2)(i)(C)  | <input type="checkbox"/> 50.73(a)(2)(vii)        |
| <input type="checkbox"/> 20.2201(d)         | <input type="checkbox"/> 20.2203(a)(3)(ii)            | <input type="checkbox"/> 50.73(a)(2)(ii)(A) | <input type="checkbox"/> 50.73(a)(2)(viii)(A)    |
| <input type="checkbox"/> 20.2203(a)(1)      | <input type="checkbox"/> 20.2203(a)(4)                | <input type="checkbox"/> 50.73(a)(2)(ii)(B) | <input type="checkbox"/> 50.73(a)(2)(viii)(B)    |
| <input type="checkbox"/> 20.2203(a)(2)(i)   | <input type="checkbox"/> 50.36(c)(1)(i)(A)            | <input type="checkbox"/> 50.73(a)(2)(iii)   | <input type="checkbox"/> 50.73(a)(2)(ix)(A)      |
| <input type="checkbox"/> 20.2203(a)(2)(ii)  | <input type="checkbox"/> 50.36(c)(1)(ii)(A)           | <input type="checkbox"/> 50.73(a)(2)(iv)(A) | <input type="checkbox"/> 50.73(a)(2)(x)          |
| <input type="checkbox"/> 20.2203(a)(2)(iii) | <input type="checkbox"/> 50.36(c)(2)                  | <input type="checkbox"/> 50.73(a)(2)(v)(A)  | <input type="checkbox"/> 73.71(a)(4)             |
| <input type="checkbox"/> 20.2203(a)(2)(iv)  | <input type="checkbox"/> 50.46(a)(3)(ii)              | <input type="checkbox"/> 50.73(a)(2)(v)(B)  | <input type="checkbox"/> 73.71(a)(5)             |
| <input type="checkbox"/> 20.2203(a)(2)(v)   | <input type="checkbox"/> 50.73(a)(2)(i)(A)            | <input type="checkbox"/> 50.73(a)(2)(v)(C)  | <input type="checkbox"/> OTHER                   |
| <input type="checkbox"/> 20.2203(a)(2)(vi)  | <input checked="" type="checkbox"/> 50.73(a)(2)(i)(B) | <input type="checkbox"/> 50.73(a)(2)(v)(D)  | Specify in Abstract below<br>or in NRC Form 366A |

## 10. POWER LEVEL

100%

## 12. LICENSEE CONTACT FOR THIS LER

FACILITY NAME

Joe Loya

TELEPHONE NUMBER (Include Area Code)

361-972-7922

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

CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX

## 14. SUPPLEMENTAL REPORT EXPECTED

☐ YES (If yes, complete 15. EXPECTED SUBMISSION DATE)☒ NO

## 15. EXPECTED SUBMISSION DATE

MONTH DAY YEAR

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

In August 2004, during a work review of the Cell Switch Replacement Project a question was identified regarding the declaration of Sequencer and Standby Diesel Generator (SDG) inoperability during any associated cell switch maintenance. Subsequently, an investigation was initiated regarding this issue. The results of this investigation identified one case in November 2003 where an affected diesel generator had not been declared inoperable due to cell switch maintenance.

On Monday, November 3, 2003 at 0300, Auxiliary Feedwater (AFW) pump 12 was declared inoperable in order to perform planned maintenance and Technical Specification action statements 3.7.1.2.a and 3.3.3.5.b were entered. At approximately 0815 on November 4, 2003, work start was granted to commence work to replace the cell switches in the AFW breaker cubicle. The SDG output breaker is inoperable in this condition due to its inability to recognize the AFW pump breaker as not closed. This prevents automatic closure capability of the SDG output breaker during an emergency start.

There is no documented evidence that SDG 12 was considered inoperable during this time period (i.e. while the cell switch replacement in the AFW breaker cubicle was in progress). Additionally, there is no evidence of entry into the required Technical Specification 3.8.1.1.b or performance of the associated ESF Power Availability surveillance.

Therefore, pursuant to 10CFR50.73(a)(2)(i)(b), this event is reportable due to Technical Specification 3.8.1.1.b not being entered and the corresponding failure to perform the associated conditional ESF Power Availability surveillance.

The root cause of this event is inadequate communication to those Senior Reactor Operators responsible for the configuration management (Control Room) and work implementation processes of this condition where AFW Pump breaker maintenance affects Diesel Generator operability.

This condition resulted in no personnel injuries, no offsite radiological releases, and no damage to safety-related equipment.

There were no challenges to plant safety.

**LICENSEE EVENT REPORT (LER)**

1. FACILITY NAME	2. DOCKET	6. LER NUMBER			3. PAGE		
South Texas Unit 1	05000 498	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	2	OF	4
		2004	05	00			

**I. DESCRIPTION OF REPORTABLE EVENT**

**A. REPORTABLE EVENT CLASSIFICATION**

This event is reportable pursuant to 10CFR50.73(a)(2)(i)(B) as an operation or condition prohibited by Technical Specifications.

**B. PLANT OPERATING CONDITIONS PRIOR TO THE EVENT**

South Texas Project Unit 1 was in Mode 1 operating at 100% power.

**C. STATUS OF STRUCTURES, SYSTEMS, OR COMPONENTS THAT WERE INOPERABLE AT THE START OF THE EVENT AND THAT CONTRIBUTED TO THE EVENT**

Unit 1 Auxiliary Feedwater (AFW) Pump 12 ("B" Train) was declared inoperable at 0300 on 11/03/2003 for planned pump breaker cell switch replacement. The maintenance was successfully completed and AFW Pump 12 was subsequently declared operable at 2005 on 11/04/2003. The AFW pump cell switch maintenance rendered the Standby Diesel Generator (SDG) 12 output breaker inoperable. Therefore, during the time the AFW pump breaker cell switch work was in progress, SDG 12 should also have been considered inoperable.

The diesel output breaker is inoperable in this condition due to its inability to recognize the AFW pump breaker as not closed. This prevents auto closure capability of the SDG 12 output breaker during an emergency start.

**D. NARRATIVE SUMMARY OF THE EVENT, INCLUDING DATES AND APPROXIMATE TIMES**

In August 2004, during a work review of the Cell Switch Replacement Project, a question was identified regarding the declaration of Sequencer and SDG inoperability during any associated cell switch maintenance. Subsequently, an investigation was initiated regarding this issue. The results of this investigation identified one case in November 2003 where an affected diesel generator had not been declared inoperable due to cell switch maintenance.

On Monday, November 3, 2003 at 0300, AFW pump 12 was declared inoperable in order to perform planned maintenance and Technical Specification action statements 3.7.1.2.a and 3.3.3.5.b were entered. At approximately 0815 on November 4, 2003, work start was granted to commence work to replace the cell switches in the AFW breaker cubicle. The SDG output breaker is inoperable in this condition due to its inability to recognize the AFW pump breaker as not closed. This prevents automatic closure capability of the SDG output breaker during an emergency start.

There is no documented evidence that SDG 12 was considered inoperable during this time period (i.e. while the cell switch replacement in the AFW breaker cubicle was in progress). Additionally, there is no evidence of entry in to the required Technical Specification 3.8.1.1.b or performance of the associated ESF Power Availability surveillance.

Therefore, pursuant to 10CFR50.73(a)(2)(i)(B), this event is reportable due to Technical Specification 3.8.1.1.b not being entered and the corresponding failure to perform the associated conditional ESF Power Availability surveillance.

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		2004	05	00	

E. THE METHOD OF DISCOVERY OF EACH COMPONENT OR SYSTEM FAILURE, OR PROCEDURAL OR PERSONNEL ERROR

This condition was identified during a historical review and comparison of LCO entries versus Maintenance Rule unavailability.

II. COMPONENT OR SYSTEM FAILURES

A. FAILURE MODE, MECHANISM, AND EFFECTS OF EACH FAILED COMPONENT

N/A

B. CAUSE OF EACH COMPONENT OR SYSTEM FAILURE

N/A

C. SYSTEMS OR SECONDARY FUNCTIONS THAT WERE AFFECTED BY FAILURE OF COMPONENTS WITH MULTIPLE FUNCTIONS

N/A

D. FAILED COMPONENT INFORMATION

N/A

III. ANALYSIS OF THE EVENT

A. SAFETY SYSTEM RESPONSES THAT OCCURRED

N/A

B. DURATION OF SS SAFETY SYSTEM TRAIN INOPERABILITY

Standby Diesel Generator 12 was inoperable from approximately 0815 hours on 11/04/2003 until 2005 hours on 11/04/2003.

C. SAFETY CONSEQUENCES AND IMPLICATIONS

This event did not adversely affect the safety of the public or station personnel. There was no release of radiation as a result of this incident.

IV. CAUSE OF THE EVENT

The root cause of this event is inadequate communication to those Senior Reactor Operator's responsible for the configuration management (Control Room) and work implementation processes of this condition where AFW Pump breaker maintenance affects Diesel Generator operability.

**LICENSEE EVENT REPORT (LER)**

1. FACILITY NAME	2. DOCKET	6. LER NUMBER			3. PAGE
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		2004	05	00	

**V. CORRECTIVE ACTIONS**

1. Subsequent to this incident, the work control process has been revised. Changes include the assigning of a single Work Week Coordinator the majority of the duties that were previously handled by a Unit Supervisor/Work Start Authority, the Work Week Coordinator, and the Work Week Scheduler. This organizational change greatly enhances communication between the planners, schedulers and the control room.
2. This incident is included in the Lessons Learned portion of Licensed Operator Requalification training discussing the importance of work package review prior to approving ECOs or work start for maintenance packages.
3. The constructive discipline policy was applied to the Work Start Authority who provided work start approval for the maintenance package discussed in this incident.

**VI. PREVIOUS SIMILAR EVENTS**

1. CR 01-2281: Failed to complete ESF Power Availability surveillance, within one hour of entry into Technical Specification 3.8.1.1.
2. CR 02-5899: The requirement to perform ESF Power Availability surveillance for was not met.
3. CR 04-2237: The one hour time requirement to verify operability of offsite power sources satisfying the requirements of TS 3.8.1.1.b was not met during an ECO execution that made Standby Diesel Generator 11 inoperable.