

James R. Becker Site Vice President Diablo Canyon Power Plant Mail Code 104/5/601 P. O. Box 56 Avila Beach, CA 93424

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July 22, 2011

PG&E Letter DCL-11-083

U.S. Nuclear Regulatory Commission ATTN: Document Control Desk Washington, DC 20555-0001 10 CFR 50.73

Docket No. 50-275, OL-DPR-80
Diablo Canyon Unit 1
<u>Licensee Event Report 1-2011-005-00</u>
<u>Emergency Diesel Generator Actuations Upon Loss of 230 kV Startup Due to Electrical Maintenance Testing Activities</u>

Dear Commissioners and Staff:

Pacific Gas and Electric Company submits the enclosed Licensee Event Report (LER) regarding the Diablo Canyon Power Plant Unit 1 emergency diesel generator actuations after 230 kV startup power was lost due to maintenance activities. This LER is submitted in accordance with 10 CFR 50.73(a)(2)(iv)(A) and 10 CFR 50.73(a)(2)(v)(D).

There are no new or revised regulatory commitments in this report.

These events did not adversely affect the health and safety of the public.

Sincerely,

James R. Becker

dnpo/50405004/50405010

**Enclosure** 

cc/enc:

Elmo E. Collins, NRC Region IV

Michael S. Peck, NRC Senior Resident Inspector James T. Polickoski, NRR Project Manager

Alan B. Wang, NRR Project Manager

**INPO** 

Diablo Distribution

A member of the STARS (Strategic Teaming and Resource Sharing) Alliance

NRC FORM 366 (10-2010)			U.S	S. NUCI	LEAR F	REGUL	ATORY C	COMMIS	SION	Est	imated	ED BY OMB: t burden pe 80 hours. I	r respoi	nse to co	omply is lear	with this	manda	atory	0/31/2013 collection d into the
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NRC FORM 366A (10-2010)

# LICENSEE EVENT REPORT (LER) U.S. NUCLEAR REGULATORY COMMISSION CONTINUATION SHEET

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1. FACILITY NAME	2. DOCKET	CKET 6. LER NUMBER			3. PAGE		
Diablo Canyon Power Plant Unit 1	05000 255	YEAR	SEQUENTIAL NUMBER	REV NO.	2 OF 5		
	05000 275	2011	- 005 -	00	2 OF 3		

#### NARRATIVE

#### I. PLANT CONDITIONS

When the events occurred, Unit 1 was in Mode 1 (Power Operation) at approximately 100 percent power.

#### II. DESCRIPTION OF PROBLEM

#### A. BACKGROUND

The Diablo Canyon Power Plant (DCPP) electrical systems are designed to ensure an adequate supply of electrical power to all essential auxiliary equipment during normal operation and under accident conditions. Nonvital 4.16 kV alternating current (AC) auxiliary buses are energized by either of the offsite power sources. Vital AC buses [EA][BU] have an additional available source: onsite power delivered by diesel generators. The electrical systems are designed so that failure of any one electrical device will not prevent operation of the minimum required engineered safety feature (ESF) equipment.

General Design Criteria (GDC) 17 states, in part,

"An onsite electric power system and an offsite electric power system shall be provided to permit functioning of structures, systems, and components important to safety. The safety function for each system (assuming the other system is not functioning) shall be to provide sufficient capacity and capability to assure that (1) specified acceptable fuel design limits and design conditions of the reactor coolant pressure boundary are not exceeded as a result of anticipated operational occurrences and (2) the core is cooled and containment integrity and other vital functions are maintained in the event of postulated accidents."

DCPP offsite power is supplied by two systems that are physically and electrically separated and independent of each other: a 230 kV system and a 500 kV system. This satisfies requirements established by General Design Criteria (GDC) 17. The 230 kV system provides startup power and is immediately available following a loss-of-coolant accident (LOCA) to assure that core cooling, containment integrity, and other vital safety functions are maintained. To make power available to the vital 4.16 kV buses, the 230 kV system provides power to Startup Transformer (SUT)[EA][XFMR] 1-1 (230 kV to 12 kV), energizing the 12 kV bus which then feeds SUT 1-2 (12 kV to 4.16 kV). The 500 kV system provides for transmission of the plant's power output, and is also available as a delayed access source of offsite power after the main generator is disconnected.

To produce onsite power, each unit has three emergency diesel generators (EDGs)[EK][DG] which supply power to the 4.16 kV vital AC buses when power is unavailable or when a degraded voltage condition exists. After EDGs have started, they will supply power to their respective vital bus if the buses are deenergized. If the vital buses are not deenergized, the EDGs will continue to run in standby mode, ready to provide power if required. The EDGs will also start in standby mode on loss of startup power availability.

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#### NARRATIVE

#### **B. EVENT DESCRIPTION**

At the time of the events, the Unit 2 Sixteenth Refueling Outage (2R16) was ongoing and scheduled 230 kV system testing was being performed on the 230 kV electrical protection equipment. On May 26, 2011, at 0226 PDT, and again on May 27, 2011, at 1212 PDT, while personnel were performing testing on Unit 2 to verify functionality of the 230 kV electrical protection equipment, Unit 1 lost 230 kV startup power.

The isolation of the offsite standby power source, and subsequent loss of power to startup feeder breakers for the 4.16 kV operating buses, caused all Unit 1 EDGs to start in standby mode. For both events, all Unit 1 EDGs started as designed, and were shutdown and returned to auto with no problems observed.

SUTs 1-1 and 1-2 were returned to service and Unit 1 startup power was declared operable on May 26, 2011, at 1710 PDT for the first event, and on May 27, 2011, at 1337 PDT for the second event.

Startup power on Unit 2 was cleared due to the maintenance activities being performed; therefore, it was unaffected by the events.

On May 26, 2011, at 0957 PDT, and on May 27, 2011, at 1712 PDT, Pacific Gas & Electric (PG&E) made 8 hour nonemergency reports (Reference NRC Event Notification 46894 and 46900) in accordance with 10 CFR 50.72(b)(3)(iv)(A).

C. STATUS OF INOPERABLE STRUCTURE, SYSTEMS, OR COMPONENTS THAT CONTRIBUTED TO THE EVENT

There were no inoperable structures, systems, or components that contributed to the event. All systems functioned as designed.

#### D. OTHER SYSTEMS OR SECONDARY FUNCTIONS AFFECTED

No other systems or secondary functions were affected.

#### E. METHOD OF DISCOVERY

The event was immediately known to licensed plant operators by alarms and indications received in the control room.

#### F. OPERATOR ACTIONS

Plant operators performed required surveillances, secured the Unit 1 EDGs, and proceeded to restore the availability of startup power to Unit 1.

#### G. SAFETY SYSTEM RESPONSES

All Unit 1 EDGs started as designed with no problems observed.

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# LICENSEE EVENT REPORT (LER) U.S. NUCLEAR REGULATORY COMMISSION CONTINUATION SHEET

1. FACILITY NAME	2. DOCKET	(	6. LER NUMBER			3. PAGE	
Diablo Canyon Power Plant Unit 1	05000 275	YEAR	SEQUENTIAL REV NUMBER NO.		05		
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#### NARRATIVE

#### III. CAUSE OF THE PROBLEM

#### A. IMMEDIATE CAUSE

PG&E preliminarily concluded that human performance deficiencies during testing activities associated with the 230 kV electrical protection equipment caused the loss of 230 kV startup power. The event on May 26, 2011, appears to have been caused by personnel attaching test equipment to terminals associated with the incorrect 230 kV protection system circuit (incorrect current transformer). The event on May 27, 2011, was caused by personnel attaching test equipment to terminals associated with a 230 kV protection system relay on the incorrect unit.

#### B. CAUSE

The cause will be provided in a supplemental report following the completion of a root cause evaluation (RCE).

#### IV. ASSESSMENT OF SAFETY CONSEQUENCES

At DCPP, the 230 kV startup system is the only offsite power system which is designed to be immediately available to mitigate the consequences of postulated accidents; therefore, this event could have prevented fulfillment of a safety function of the offsite electric power system. However, the Class 1E onsite EDGs remained available and would have provided power following a loss of offsite power.

The voltage on operating 12 kV buses was not affected by the isolation of 230 kV startup power, and the EDGs were not required since all vital buses were energized by Unit 1 auxiliary power (the Unit 1 main generator). As a result, no vital loads were affected by this event.

The increased conditional core damage probability for this event was assessed and found to be less than 4E-07.

This event had no adverse effect on the health and safety of the public.

#### V. CORRECTIVE ACTIONS

#### A. IMMEDIATE CORRECTION ACTIONS

For the May 26, 2011 event, PG&E performed troubleshooting to verify that the circuit was configured per the approved design; no issues were noted. The day and nightshift employees that perform this work were briefed on the event and on the station human performance tools that prevent such occurrences. Shortly after, with direct management oversight, the current circuit loop functional test was re-performed successfully.

For the May 27, 2011 event, PG&E re-performed the pre-job breif, focusing on roles and responsibilities, and installed barriers on all inservice relays that were not part of the testing. Management provided direct oversight, and independent verification was used for all restoration actions of the procedure.

#### **B. CORRECTIVE ACTIONS TO PREVENT RECURRENCE (CAPRs)**

CAPRs will be detailed in a supplemental report following the completion of a RCE.

#### NRC FORM 366A LICENSEE EVENT REPORT (LER) U.S. NUCLEAR REGULATORY COMMISSION (10-2010) **CONTINUATION SHEET** 1. FACILITY NAME 2. DOCKET 6. LER NUMBER 3. PAGE SEQUENTIAL Diablo Canyon Power Plant Unit 1 YEAR NUMBER 05000 275 5 5 OF

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#### NARRATIVE

#### VI. ADDITIONAL INFORMATION

#### A. FAILED COMPONENTS

All components functioned as designed.

### **B. PREVIOUS SIMILAR EVENTS**

A previous event occurred during 2R16 when personnel were modifying a panel that houses 230 kV electrical protection equipment. During modification, there was a similar loss of 230 kV startup power and EDG actuation on Unit 1 (See ML11820377, Licensee Event Report submitted on June 30, 2011). This event is also being reviewed as part of the RCE scope.

### SUBMITTAL PROCESSING CHECKLIST

P	G&E Letter No. (e.g., DCL, DIL, etc.)	
	ubject: LER 1-2011-065-60, EMERLENCY DIESER GENERATO	
_	JPON LOSS OF 230 KV STARTUP DUE TO MAINTENANCE	TESTING PETIVITIES
Та	riget Submittal Date: 7/19/11 Firm Submittal Date: 7/25	/11 N/A 🗆
File	e Location: S:\RS\ RA\ LER\ 2011\	
		Initial <sub>/</sub> Date
1.	References & bases identified for factual information.	DP / 3/1/11
2.	Outgoing Correspondence Screen (RS-2) completed & commitments captured per XI4.ID1.	DR 1 3/15/11
3.	RS Manager's concurrence for release obtained.	DP / 7/15/11
4.	Record of Review Checklist completed & signed per XI1.ID1.	DP 1719/11
5.	Clerical reviews completed. Draft # 1 DCN / 718	
	Draft # 2 COH/7   Pinal (on signatory letterhead)	and Mall
6.	Peer Review Checklist (RS-4) completed.	DP 17/19/11
7.	Provide this checklist, the final letter & enclosures, Record of Review Checklist, &	į
	Outgoing Correspondence Screen to signatory.  • For <i>FIRM</i> submittals, was 2 days met?  Yes   No □ N/A □	DP 1 7/21/11
8.	Will entire submittal, including enclosures, be placed in RS & ACTS libraries and EDMS? Yes ★ No □	
	If <b>NO</b> , complete form RS-1A, indicating where the enclosures, etc. will be maintained.	PP 1712411
9.	Indicate RMS access level. Check one box only.	
	Reg Regular  [ ] "D" Proprietary	
	[ ] "B" Personnel Record [ ] "A" Security Safeguards Information (SSI)	
	RMS folder name (i.e., LAR, LER, etc.)	
	<ul> <li>Put in envelope with a copy of this form attached on outside and put in SSI safe in RS Manager's office.</li> </ul>	DP / 7/27/11
40	•	DP 1 7/22/11
10.	Place copy of this checklist (including RS-1A, if applicable), the submittal & enclosures, Record of Review Checklist, & the Outgoing Correspondence Screen in the RMS  (fireproof) file cabinet (or the SSI safe, if applicable)	DP 17trul
11	(fireproof) file cabinet (or the SSI safe, if applicable).	ין אנטוון
11.	Deliver this checklist (including RS-1A, if applicable), original of signed submittal & enclosures, Outgoing Correspondence Screen, & Record of Review Checklist to clerks.	DP 1 FIZZIII
12.	Tracking documents (i.e., NCR ACTs or AEs) have been updated for submittal completion (including the LERtemplate.ppt, if the submittal is an LER). N/A	,
NIA	LERtemplate.ppt is located at S:\RS\DCISC\LERs\LERtemplateYYYY.ppt	DP 7/2/11
13.	Verify commitment entry on NCR ACTs or AEs within 15 days.  N/A	DP 1712/11
	·	1

## **SUBMITTAL PROCESSING CHECKLIST – Supplement**

Identify the enclosures, etc. (e.g., proprietary, personal, or SSI) that will **NOT** be filed in the RS and ACTS libraries, or EDMS, and where the actual documents will be maintained.

Examples:

Enclosure 1	NRC 396 forms are retained by Learning Services and the DCPP
(Personal information)	Medical Facility.
Enclosure 3 (Diskette)	The diskettes are maintained by Radiation Protection.
Entire Document	The complete proprietary version of this document is available in the PG&E Law Department in San Francisco.

Item	Location
	Jones Jones

### **Regulatory Submittal - Record of Review Checklist**

Submit	tal Title: LER 1-2011-605	60 , EMERGENCY DIESEL (	GENERA	TOPL	ACTUA-	7.0017	
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<u>Prima</u>	ry Reviewers	<u>Name</u>	Comn	<u>nents</u>	Reso	lved	
		<b>~</b>	Yes	No	Yes	No	
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Lead T	echnical Manager:	THOMAS BALDWIN	X		$ \boxtimes $		
Directo	or Review: SITE SEENCES	STEVEN DAVID	X		$\mathbf{X}$		
Submit	ttal Lead Management:	STEFAN					
Indepe	ndent Technical Reviewer: 🧏	R STEPHAN BEDWARZ			X		
Cross	Discipline Reviewer(s):						
	Operations:						
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	Site Services:						
	Quality:						
	Law:						
	Chemistry & Env Ops:						
	PSRC:						
Secon	dary Reviewers	Name	Comn	nents	Reso	lved	-
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## PEER REVIEW CHECKLIST LICENSING SUBMITTAL

(To be performed on final draft only.)

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PG&E Letter No. (e.g., DCL, DIL, etc.)	DCL-11-083

ITEM	DESCRIPTION	INITIALS*
Cover Letter	Correct signatory letterhead (Ref. XI1.ID2)	gur
	Full names used for signatory & cc list; right people listed	fre
	Title correct	gus
	Letter number verified against outgoing correspondence log	gw
	Letter number appears on all pages	N <sub>A</sub>
	Enclosure(s) – the word is correctly placed on the cover letter if required.	gu
	All pages numbered, except first page	Bus
	Date correct and appears on all pages (month, day, and year)	gu .
	Address and docket number(s) correct	gu
	Text reviewed for obvious errors	gue
	TS and/or 10 CFR references correct	gn
_	If affidavit required or NOV response, verify Law Department has reviewed	MA
All Submittals	Text reviewed for obvious errors	gra
	Revision bars included (if applicable)	NA
	TS and/or 10 CFR references correct	gra
	References to other documents correct (e.g., DCLs, FSAR, etc.)	gns
	Submittal addresses the specific regulation requirements	gus
	Enclosures labeled	ŅΑ
Outgoing	Letter number and title correct	gra
Correspondence	FSAR Update Review – one box checked.	gro
Screen (RS-2)	Commitment implemented before or after LA receipt (LARs/RAIs only)	NA
, ,	Commitment(s) quoted verbatim (& clarifications made if needed)	NA
	Tracking Document – SAPN / Task / Order / Operation	gra
	Assigned To - Name & Organization Code	gra.
	Commitment Type - Firm or Target & Due Date	Jun-
7	Outage Commitment - Y or N indicator & Applicable Outage	gru
	PCD Commitment - Y or N indicator & Implementing Documents	fre
LER Forms	LER number correct; consistent with cover letter	jus
(NRC Form 366)	LER number & docket number(s) on first & remaining pages	SV4
(NRC Form 366a)	Title consistent with cover letter & Outgoing Correspondence Screen (RS-2)	gus
•	Dates correct on first page header (month, day, & year)	800
	Dates & times consistent with 10 CFR 50.72 ENS reports made	GN
	Dates & times consistent with other source documents	gu
	Dates & times consistent between abstract and narrative	Aw
	Page numbers correct & all pages accounted for	m
	Abstract word count IAW NRC Form 366	AN
	IEEE 803 codes entered and correct	m
Procedure Submittals	Procedure revision numbers current using EDMS (e.g., EPIP)	VA
Filing Instructions	Filing instructions clear (Per RS-1A, if applicable)	gov
ROR Checklist	Record of Review Checklist completed and signed	gro
Final Draft	All discrepancies resolved with Lead Licensing Engineer	gres

<sup>\*</sup> Enter N/A where not applicable.

have reviewed this submittal for the items initialed above.	This submittal is ready for the signatory.
Gack C. Hich	7-19-11
( )Performed by	Date

## **OUTGOING CORRESPONDENCE SCREEN** (Remove prior to NRC submittal)

Document:

PG&E Letter DCL-11-083

Subject: Emergency Diesel Generator Actuations Upon Loss of 230 kV Startup Due to Electrical

**Maintenance Testing Activities** 

File Location: S:\RS\CLERICAL\DCLS - FINAL\DCL-11-083\DCL-11-083.DOC

	FSAR Update Review	
١	Utilizing the guidance in XI3.ID2, does the FSAR Update need to be revised?  Yes  No  X	
ı	If "Yes", submit an FSAR Update Change Request in accordance with XI3.ID2 (or if this is an LAR, process in accordance with WG-9)	

Statement of Commitment: Issue a supplement LER

	AR or NCR	AE or ACT
Tracking Document:	50412203	Task 18
Assigned To:	D. Pettas	ORGANIZATION CODE NRN
Commitment Type:	FIRM OR TARGET 9/15/11	9/15/11
Outage Commitment?	YES OR NO No	IF YES, WHICH? (E.G., 2R9, 1R10, ETC.)
PCD Commitment?	YES OR NO NO	IF YES, LIST THE IMPLEMENTING DOCUMENTS (IF KNOWN)
Duplicate of New NCR Commitment in PCD?	YES OR NO No	IF YES, LIST PCD NUMBER (e.g., T35905, etc.)
Old PCD Commitment being changed?	YES OR NO No	IF YES, LIST PCD NUMBER, AND CLARIFY TO CLERICAL HOW COMMITMENT TO BE REVISED