

February 1, 2000  
NMP2L 1930

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

RE: **Nine Mile Point Unit 2**  
**Docket No. 50-410**  
**NPE-69**

**Subject: *Special Report***

Gentlemen:

In accordance with Nine Mile Point Unit 2 (NMP2) Technical Specification 4.8.1.1.3, we are submitting the following Special Report concerning the Division III Diesel Generator non-valid test and non-valid failure.

### **Surveillance Requirements**

Diesel generator surveillance testing is performed on a 31-day schedule. The 31-day testing interval is in conformance with Nine Mile Point Unit 2 Technical Specification Table 4.8.1.1.2-1, "Diesel Generator Test Schedule." There have been 0 valid failures in the last 20 starts and 0 valid failures in the last 100 valid tests in accordance with the test criteria set forth in Regulatory Guide 1.108, "Periodic Testing of Diesel Generator Units Used as Onsite Electric Power Systems at Nuclear Power Plants," Revision 1.

### **Description of Event**

On January 7, 2000 at 1157 hours, while performing Procedures N2-OSP-ENS-R@002 "Functional Test of Emergency Diesel Generator Load Shedding Circuit - Division I/II/III" and N2-OP-100B "HPCS [High Pressure Core Spray] Diesel Generator" on the Division III Diesel Generator, the diesel generator tripped on reverse power. This condition occurred after the diesel generator had been successfully started. The diesel generator had been paralleled to an offsite electrical bus and an operator was in the process of matching the bus load to reduce the effects of the transient when the offsite feeder breaker was tripped.

### **Cause of Event**

The reverse power condition was caused by the operator adjusting the diesel generator load in close proximity to the setpoint of the reverse power relay. Procedure N2-OP-100B that is used for diesel generator electrical load bus manipulations did not provide a cautionary statement regarding a minimum load to prevent reverse power trips of the diesel generator.

**Corrective Action**

1. Work Order 00-00129-00 was performed to troubleshoot the reverse power trip circuit and the governor control circuit. The results from the work order revealed that all equipment and setpoints were satisfactory.
2. Procedure N2-OP-100B was revised to caution the operators regarding the minimum load to prevent reverse power trips of the diesel generator.
3. Procedures N2-OSP-ENS-R@002 and N2-OP-100B were re-performed satisfactorily on the Division III Diesel Generator.

**Test/Failure Validity Determination**

The reverse power trip of the Division III Diesel Generator is a non-valid test and non-valid failure as defined in Regulatory Guide 1.108, Position C.2.e(2). The regulatory guide states that, "Unsuccessful start and load attempts that can definitely be attributed to operator error...should not be considered valid tests or failures." The reverse power trip was caused by a procedure not providing sufficient guidance to the operator when removing the diesel generator electrical load from the offsite electrical bus. This would not have affected the diesel generator's ability to perform in the emergency mode to supply power to the high pressure core spray system.

Very truly yours,



Michael F. Peckham  
Plant Manager - NMP2

MFP/CES/kap

xc: Mr. H. J. Miller, Regional Administrator, Region I  
Mr. G. K. Hunegs, NRC Senior Resident Inspector  
Records Management