

May 1, 1989

Mr. A. Bert Davis Regional Administrator U.S. Nuclear Regulatory Commission Region III 799 Roosevelt Road Glen Ellyn, IL 60137

> Subject: LaSalle County Station Units 1 and 2 Response to Inspection Report Nos.

50-373/89007 and 50-374/89007

NRC Docket Nos. 50-373 and 50-374

References (a): E.G. Greenman letter to Cordell Reed dated

March 21, 1989

(b): W.E. Morgan letter to A.B. Davis dated

April 5, 1989

Dear Mr. Davis:

This letter is in response to the special inspection conducted by Messrs. S. DuPont, R. Kopriva, D. Butler, R. Mendez, and P. Shemanski of certain activities associated with the March 2, 1989 event at LaSalle County Station Units 1 and 2. Reference (a) required a written response of the findings and conclusions associated with the March 2 event. This was transmitted in Reference (b).

Commonwealth Edison was additionally requested to respond to the unresolved items identified in Sections 5 and 6 of the inspection report. The Commonwealth Edison Company's response to the unresolved items is provided in the Attachment.

If you have any further questions regarding this matter, please direct them to this office.

Very truly yours,

Wagne & Morgan

Nuclear Licensing Administrator

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Attachment

cc: NRC Resident Inspector - LSCS P.C. Shemanski - Project Manager, NRR IEO! 11/ MAY 3 - 1990 UNRESOLVED ITEM: 373/89007-01 374/89007-01

- ... The AIT requested records relating to the testing of the OCB and the SAT. The licensee stated that the power factor test (doble test) and the travel test (timing) of the phase B 4-6 OCB had been performed but the results were not documented. The inspector was informed that oil samples from the 4-6 OCB and the Unit 2 SAT were acceptable, although no records were available for review at the site.

 Additionally, the licensee has not located the power factor testing records for the Unit 2 SAT. The lack of documented test result data associated with large electrical equipment is considered to be an unresolved item.
- ... The AIT attempted to review records relating to testing of the lightning arrester. The licensee indicated that the lightning arresters were tested by CECo Operating Analysis Department (OAD) but the data was not recorded. In addition, acceptance criteria for testing the lightning arrester was not available. The failed arrester was sent to the manufacturer (General Electric) for analysis to determine the failure mechanism. The licensee has committed to make the results available to the NRC. Since large electrical equipment is routinely tested by CECo OAD and testing data is not recorded or maintained, this is considered to be an unresolved item.

RESPONSE:

- Doble Tests of OCB 4-6 were performed on March 9, 1989, after the defective B phase bushing was replaced, and documented by System Operational Analysis Department (Attachment A).
- Travel Tests (timing) of OCB 4-6 were performed on March 7, 1989, after the defective B phase bushing was replaced and documented by Southern Division Operational Analysis Department (Attachment B).
- Oil samples from OCB 4-6 were tested and the results documented by Southern Division Substation Construction Department (Attachment C).
- Oil samples from Unit 2 SAT were tested on March 3, 1989 and the results documented by System Materials Analysis Department (Attachment D).
- The Unit 2 SAT was not power factor tested during this event.
 Insulation resistance tests (megger) and transformer turns ratio
 tests (TTR) were performed on March 3, 1989, and the test results
 documented by Southern Division Operational Analysis Department
 (Attachment E). Megger and TTR tests, and not power factor tests,
 are normally used in the diagnosis of a transformer trip out.

As per the manufacturer's instruction manual regarding the testing of lighting arresters "These arresters do not require testing ... There is no single field test which will indicate the complete operating characteristics of the arrester." (Attachment F) The replacement lightning arrester and the original lightning arrester were not tested by either Southern Division Operational Analysis Department or System Operational Analysis Department.

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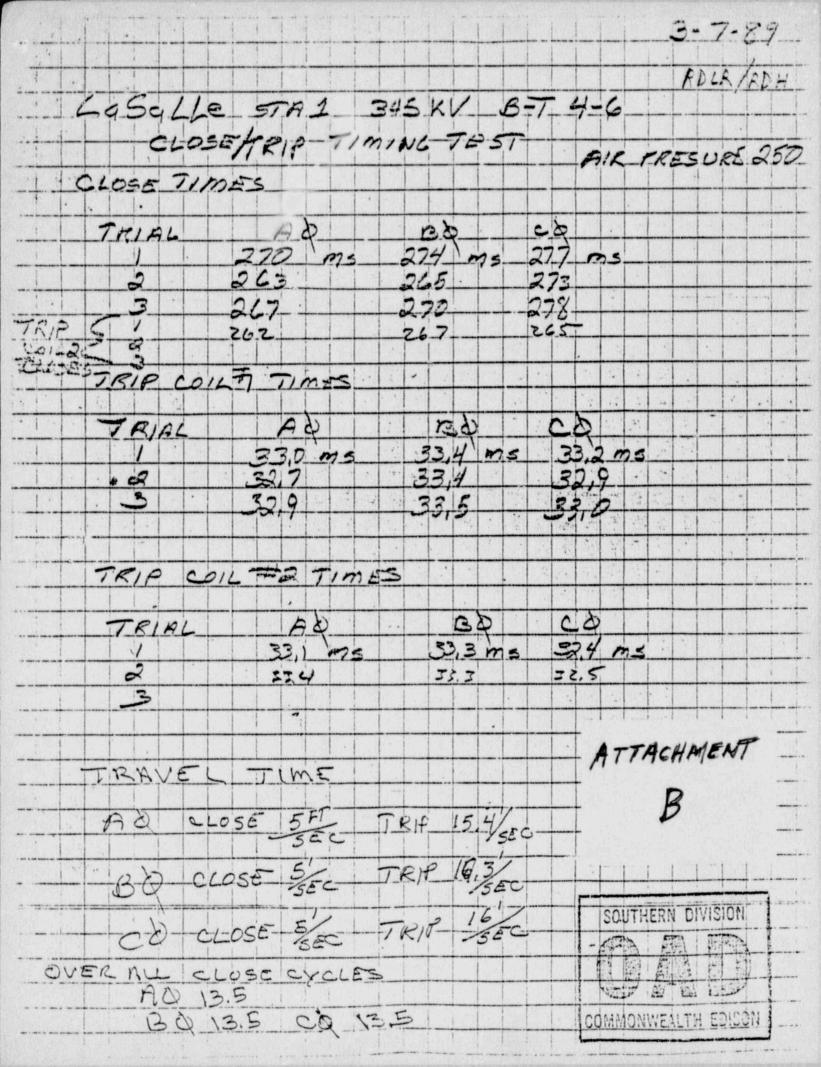
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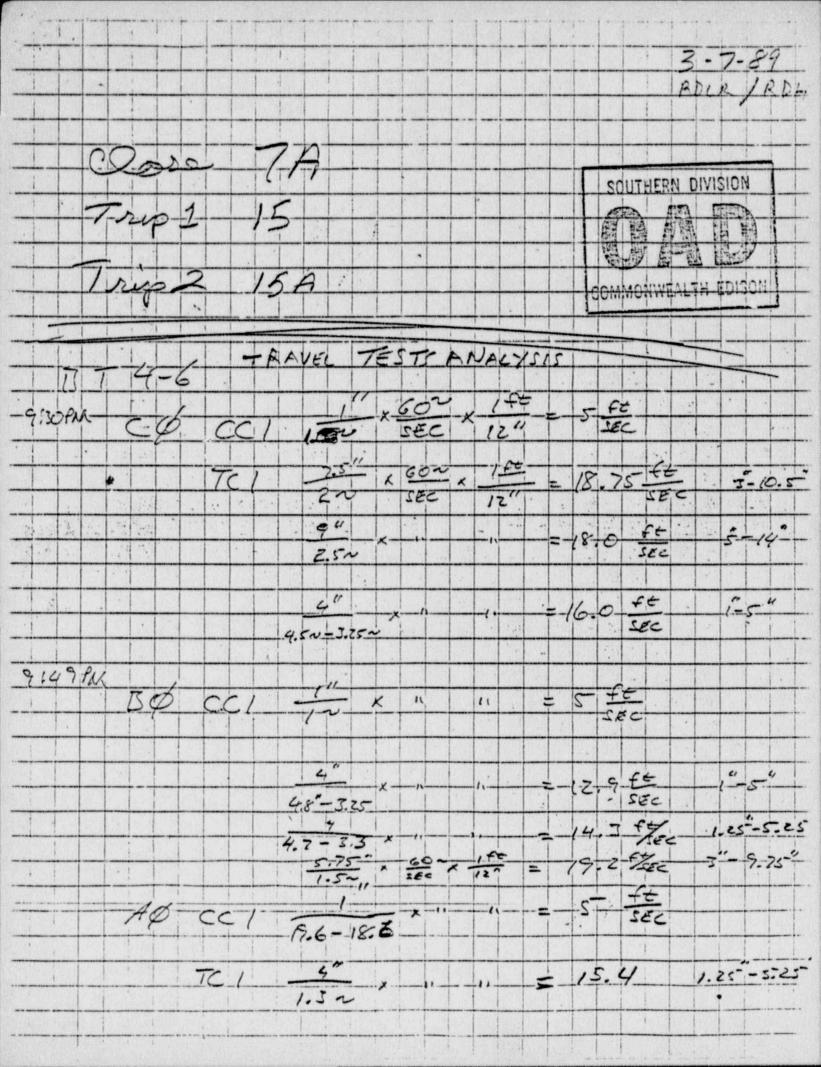
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CIRCUIT BREAKER NO. 500 AM RETURN TO FILE 217 TIME-CYCLES O LOW 2 HETCHN POPILET

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ATTACHMENT

April 11, 106

Subject: LaSalle Station AIT Report Unresolved items

50-373/89007-01, 50-374/89007-01

Mr. R. M. Hennigan:

Information regarding Southern Division Substation Construction Activities related to the March 2, 1989 trip of SAT 242 has been received from Mr. K. Faber, Southern Division Substation Construction Superintendent.

Substation Construction personnel tested the insulating oil in all three phases of 345 KV bus tie 4-6 as it was removed from and returned to the circuit breaker. Breakdown values for A, B and C phases respectively were 24 KV, 21 KV and 23 KV on removal; 32 KV, 32 KV and 33 KV on return. These tests were documented and data is on file at the Southern Division Substation Construction office.

R. B. Benvenuti

Gen. Substation Supt.
T & D Construction

RBB/mc

0142m

cc: K. E. Faber

SYSTEM MATERIALS AMALYSIS DEPARTMENT REPORT

TRANSFORMER OIL SURVEILLANCE

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Gas-in-Oil Data	Par	te Per Million By	Volume	1
Hydrogen	-50			
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Acetylene	NF		7 1 1 10 11 11	
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Carbon Dioxide	465			
Oxygen	4500			
Witrogen	78,400			
% Total Gas	7.9			
Supplemental Analysis				
Water Content, ppm				
Dielectric Strength, kV	45			

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Additional Information					
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Trip-Out	/				
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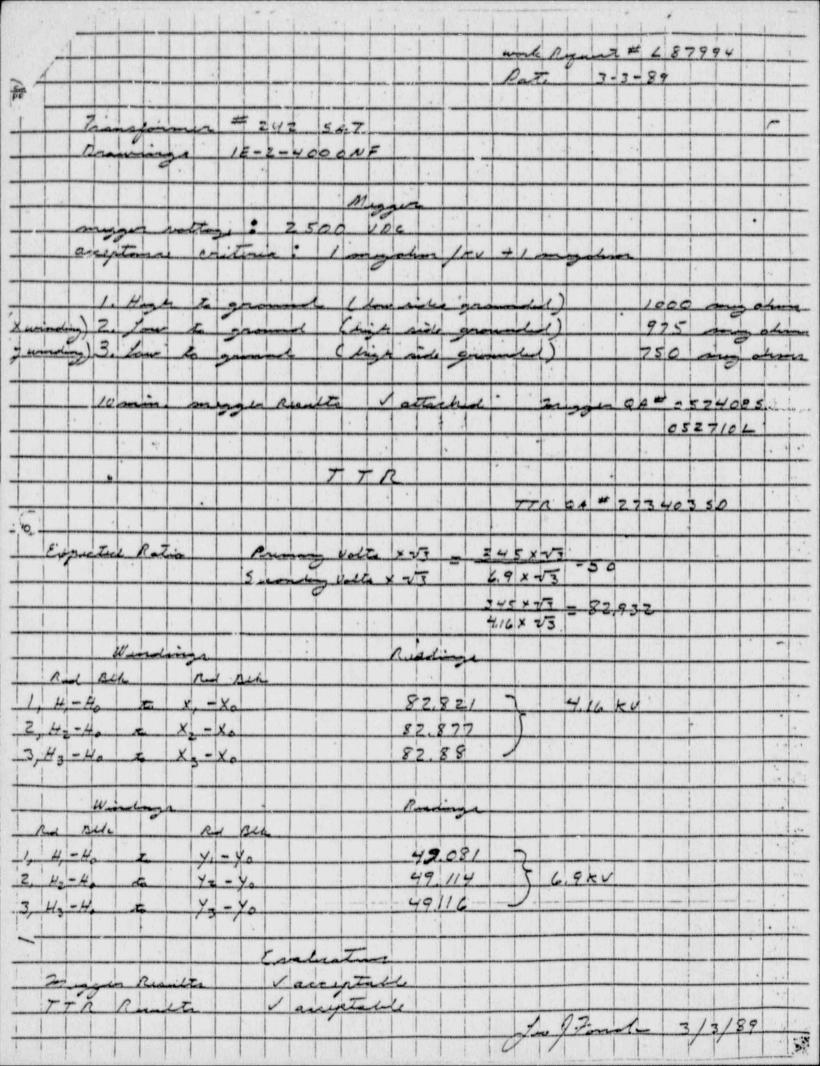
Copies to: Division Operating Manager Division OAD Engineer

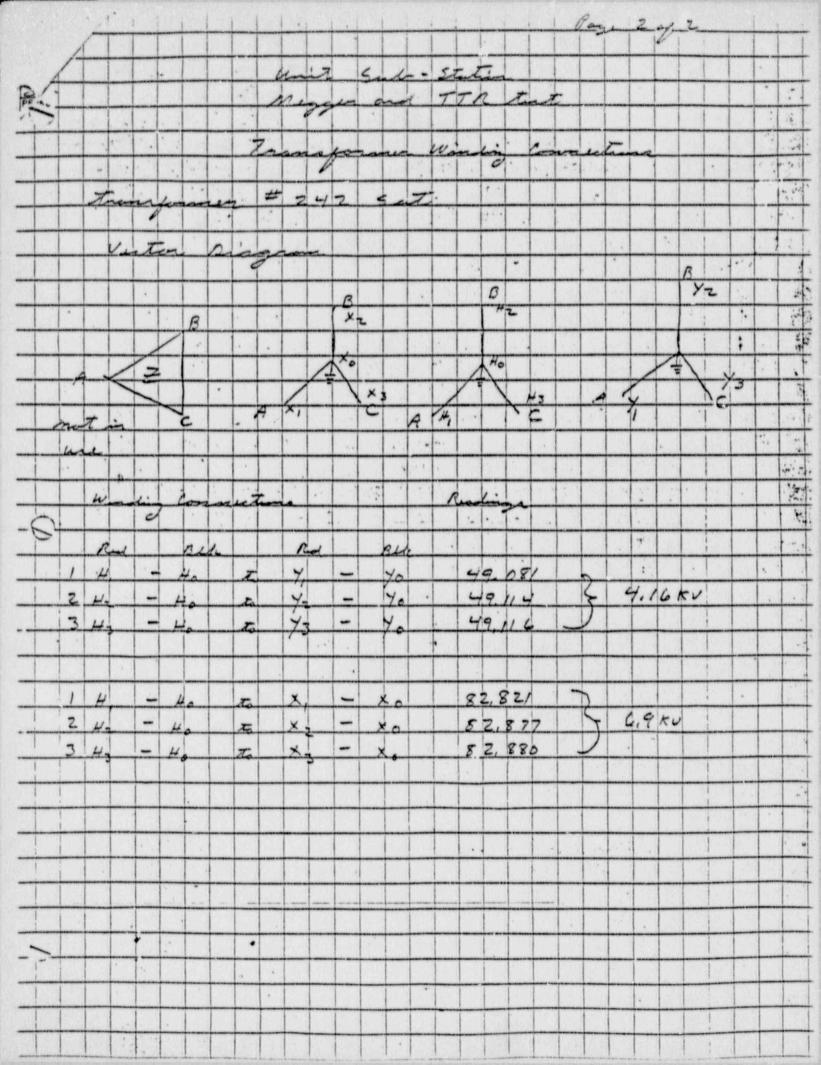
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TEN MINUTE MEGGER

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0.50	150		750
1.00	175		875
2.00	175		875
3.00	180		900
4.00	180		900
- 5.00	180		900
6.00	190		950
7.00	200		1000
8.00	200		1000
9.00	200	<u> </u>	1000
10.00	200	5	1000
0:30 SEC RATIO:		575 = 1 250 = 1	.16
CLARIZATION INDE	X (10:1 MIN F	RATIO): 1000 =	1.14
EGGER GA NO.	0527104		

TEN MINUTE MEGGER

		WORK	REQUEST
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4.00	135		675
5.00	150		750
6.00	150		750
7.00	150		250
8.00	150		750
9.00	150	¥	750
10.00	150	_5	250
60:30 SEC RATIO:		1000 =	1.14
POLARIZATION IND	EX (10:1 MIN R	ATID): (000	.75
MEGGER DA NO.	05240850		
EVALUATION: RESU	LTS: Y ACC	EPTABLE,	NOT ACCEPTABLE
		DAD ENGANEE	<u></u>

X WINDING & HIGH SIDE GROED

WORK REQUEST 487994 DATE: 3/3/89 SAT 242 EQUIPMENT NAME: A.B.C D'S TIED X WINGING EQUIPMENT NO. : X WINGING TO GRO MEGGER POINTS: DATA MEGGER VOLTAGE: 2500 VOC READING MULTIPLIER MEGOHMS MINUTES 750 0.00 0.50 800 1.00 850 2.00 3.00 4.00 5.00 6.00 7.00 8.00 3.00 10.00 300= 1.06 60:30 SEC RATIO: POLARIZATION INDEX (10:1 MIN RATIO) :

MESGER DA NO. 05240850

EVALUATION: RESULTS: ___ ACCEPTABLE,

NOT ACCEPTABLE

Y WINDING & HIGH SIDE GROED



ALUGARDII STATION ARRESTERS MODEL SLIIM-SERIES 3-312 KV MODEL SLIGE-SERIES ABOVE 312 KV

CAUTION: THE EQUIPMENT COVERED BY THESE INSTRUCTIONS SHOULD BE INSTALLED AND SERVICED ONLY BY COMPETENT PERSONNEL FAMILIAR WITH GOOD SAFETY PRACTICES. THIS INSTRUCTION IS WRITTEN FOR SUCH PERSONNEL AND IS NOT INTENDED AS A SUBSTITUTE FOR ADEQUATE TRAINING AND EXPERIENCE IN SAFE PROCEDURES FOR THIS TYPE OF EQUIPMENT.

The ALUGARD II Station Arrester is of singlephase design, suitable for outdoor service. Three arresters are required for three-phase installations. Smaller, lower-rated models are simpped assembled, while the larger, higher-rated models consist of four to six individual units which must be assembled. The arresters require no testing before being placed in service, and are completely self-supporting.

Each ALUGARD II arrester unit contains a number of THYRITE valve and alurite gap elements permanently scaled in a porcelain housing provided with pressure-relief construction. Metal end fittings, comented to the housing, provide a means for bolting the arrester units together or to a foundation.

APPLICATION

Arresters are designed to limit surge voltages to a safe value by discharging the surge current to ground, and to interrupt the power-frequency follow ourrent. The ability to interrupt power-follow current is limited to applications where the power-frequency voltage at the arrester never exceeds the arrester's continuous or short-time rating. In case of doubt concerning application, consult your local General Electric Company representative.

INSTALLATION

INITIAL INSPECTION

ALUCARD II arresters are designed to withstand severe shipping shocks. In addition, each unit is shipped in a carefully designed container. If the crate or carton shows signs of rough handling upon receipt, the porcelain housing should be inspected for chips or cracks. If damage is apparent, the arrester should not be installed. Claims for such damage should be registered immediately with the common carrier.

The model number and commuous voltage rating of each complete arrester are identified on the name-plate which is attached to the lower endfittings. The nameplate information should be checked against the shipping memorandum. Hat any time it is necessary to correspond with the General Electric Company, complete nameplate data should be furnished in order to expedite replies.

LCCATION

. Install the arrester slectrically as close as practicable to the apparatus being protected. Keep line and ground connections short and direct.

FOUNDATION

The footings of all outdoor piers or supports should extend below the frost line and be elevated above the ground line sufficiently to meet personnel safety requirements.

ASSEMBLY

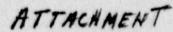
Single-unit Arresters

Each arrester, except those requiring grading rings, is shipped completely assembled. When grading rings are needed, bolt them securely on the line and before electrical connections are made.

All sin -unit ratings can be suspension mounted if the line immertion is made to the top of the arrester. ? top cap of each standard ALUGARD II unit has provisions for attaching an insulator clevis fitting. Special ALUGARD II arresters rated 258 kV and below can be supplied for rigid suspension mounting from station structural members.

Install the arrester on the foundation, using care to see that it is perpendicular, shimming under one or two feet if necessary. It is important that all three feet rest solidly on the foundation before the foundation bolts are drawn down to avoid unnecessary stresses in the castings. Tighten the bolts firmly. The opening for pressure-reliaf should be oriented so as to minimize damage to adjacent equipment by incondescent gases in the remote event of arrester failure.

These instructions do not purport to cover oil details or variations in aquipment not to provide for every possible contingency to be not in connection with installation, Sparkition or requirements. Should have information by descript arrival particular proplems area which are not covered afficiently for the purchaser's purposes, the matter around be referred to the General States.





Multi-unit Arresters

It is important that the individual arrestor units
be erected in the exact order specified on the outline drawing shipped with each arrester. The model
number of the arrester unit is given on the unit
nameplate which is attached to the bottom endoasting. The base unit also bears the larger arrester
by nameplate.

Install the base unit on the foundation, using care to see that it is perpendicular, shimming under one or two feet if necessary. It is important that all three feet rest solidly on the foundation before the foundation bods are drawn down to avoid unnecessary stresses in the castings. Tighten the bolts firmly. The opening for pressure-relief should be oriented so as to minimize damage to adjacent equipment by incandescent gases in the remote event of arrester failure.

Select the next unit carefully by reference to the outline drawing and bolt it securely to the base unit. The end fittings are carefully affixed at the factory to assure parallelism, so no further shimming should be required provided it was carefully done when the base unit was installed.

The line terminal cap has a central lifting hole and it may be used, if desired, as an aid to erection by bolting it temporarily to each unit in turn.

Be sure to install the grading rings at the points called for on the curline drawing.

LINE AND GROUND CONNECTIONS

Connect the arrester ground to the apparatus ground and the main station ground, utilizing a reliable common ground network of low resistance.

Connection to the line should be made through a suitable line connector. Line connections should be made in such a manner that no excessive mechanical stress is placed on the arrester. When connecting the arrester to an energized line, it is imperative that a quick, positive, continuous action be made to avoid possible damage to the arrester.

CAUTION: ALWAYS BE CERTAIN THAT THE GROUND CONNECTION IS FERMLY MADE BEFORE CONNECTING THE ARRESTER TO AN ENERGIZED LINE. IF AN INSULATING UNIT IS USED AT THE GROUND END TO PERMIT USE OF A DISCHARGE COUNTER, THE DISCHARGE COUNTER MUST BE CONNECTED (OR THE INSULATING UNIT SHORTED OUT) BEFORE CONNECTING THE ARRESTER TO AN ENERGIZED LINE.

CLEARANCE

The term "clearance" means the actual distance between any parts of the arrester at line potential and any object at ground potential or other phase potential. Clearances listed in the appropriate outline print packed with each arrester are the minimum recommended for conventional outdoor substations. Arresters rated 96 kV and below may be enclosed completely using the same clearance values. The values shown are suitable for altitudes up to 3300 feet (1000 meters). At higher altitudes, add 3 percent for each additional 1000 feet of elevation. The arrangement of the foundation plans shown on the outlines can be modified if proper clearances are maintained.

ALTITUDE

3-48 kV models 9111M arresters can be used from 0-18,000 feet altitude.

50-512 kV arresters can be used from 0-10,000 feet altitude. ALUGARD II arrester sealing would allow these units to be applied to 18,000 feet, but they must be limited to 10,000 feet because reduction of air density increases the possibility of external flashover on these 9L11MHA series arresters.

ALUGARD II arresters; \$1163 series can be used from 0-10,000 feet altitude.

PERIODIC INSPECTION AND MAINTENANCE

Before inspecting or handling, disconnect the arrester from line and, as a safety precaution, ground the line end. Remove this temporary ground before recommenting the arrester onto the line.

ALUCARD II arresters require no special care. They may be hot-washed, subject to the usual care and techniques used in bot-washing insulation to avoid external flashover.

These arresters do not require testing, and no test which applies power voltage in excess of maximum arrester voltage rating should be made without consulting the General Electric Company. There is no single field test which will indicate the complete operating characteristics of the arrester.

PORCELAIN TOP UNITS

Porcelain top arrosters with center line terminals are available and are particularly suited for use in metal cubicles. These arresters can be mounted in any position when installed in a reasonably clean and dry indoor location.

DISCHARGE COUNTERS

An insulating base is required when installing a discharge counter with arresters. Both of those are accessories and are described in Handbook Section 5926. Install the discharge counter and insulating base as shown on the outline drawing furnished with the counter.

GENERAL PLECTRIC COMPANY, PROTECTIVE EQUIPMENT PRODUCTS DEPARTMENT, PITTSTIELD, MASS. 81201

The following report details the analysis of the lightning arrester which was sent to the manufacturer (General Electric) to determine the failure mechanism.

On Monday, April 10, 1989, Gregg Mathewson of System Electrical Engineering Department witnessed in the teardown of the subject lightning arrester in the GECo factory in Pittsfield, Massachusetts.

On the day of the incident at LaSalle Station visible external evidence was found to indicate that the arrester had failed internally. The area around the top expulsion port was darkened and metalic splatter was found on the porcelain at the area of the top expulsion port. No evidence of external flashover to the base of the arrester was found. It was surmised by all at the size that the arrester failed internally.

However, upon disassembly of the arrester at the factory, no evidence of internal failure was found. The internal spark gaps were all intact. Also, the top and bottom expulsion ports and seals were intact and had not operated.

The factory inspection conclusively indicated that the arrester had not failed internally (Attached).

On Thursday, April 13, 1989, Messrs. L.R. Yule and R.F. Cameron of the System Electrical Engineering Department met with Steve Samolinski from LaSalle Station Technical Staff. The area around the SAT 242 transformer was inspected in an attempt to locate flash marks on grounded objects near the SAT 242 transformer CO lightning arrester. A brass nozzle on the deluge system near the CO arrester showed definite signs of recent flashover burning as viewed through a 50 power telescope.

It is our conclusion that an external CO to ground flashover occurred from the CO arrester top can and grading ring to the grounded deluge system brass nozzle. It is further postulated that conductive debris was blown across this area to cause the flashover. (The air clearance is too great to cause flashover in air for the protective level of this lightning arrester.) Attached is a copy of weather data obtained from LaSalle Station indicating that the wind direction at the 33 foot level was from the East at a speed of approximately 22 MPH the proper direction to support this postulation.

Additionally, the following clarification needs to be made in reference to Page 15 of the AIT report concerning this incident. In the second paragraph of Section 4 of the report, it states that this incident caused a "catastrophic" failure of the lightning arrester. It should be noted that the utility industry generally reserves the word "catastrophic" when applied to arrester failures to indicate the arrester porcelain was shattered and . Trewn over the area of the incident. This clarification is made so as to identify that there was not a violent failure of the lightning arrester.

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GENERAL ELECTRIC'S FORMAL REPORT ON

THE DISASSEMBLY AND INSPECTION OF

THE 9L11MHA264 ALUGARD STATION ARRESTER

MEMORANDUM

Disassembly and inspection of an Alugard 9L11MHA264 agrester returned from service by Commonwealth Edison Co. S/N 48007. Date Code L76

This report discusses observations and conclusions made during disassembly of the arrester with the customer representative Mr. Gregg Mathewson present on 4/10/89.

Description of the unit, including past history.

The subject arrester was installed on phase C of the unit 2 Sys. Aux. Tr. 242 of the LaSalle County Generating Station. In approximately 1984 it was found that the Tr.142 and 242 arresters had been installed and operated since installation without the proper grading rings and at that time corrective action was taken. The lack of a grading ring will result in higher than normal voltage across the upper gaps causing some degradation in the sparkover characteristics, a higher than normal operating temperature of the upper grading rods, and a likelihood of internal corona in the internal upper portion of the arrester at normal operating voltage. On 02-28-89, at 23:02 Hrs the station tripped on differential. Note that the arrester is outside of the differential zone, so an arrester failure should not cause differential tripping. The station record showed that for 18 sec. before tripout there was a ground current indication of >= 200 amps. The record showed a pole disagreement on breaker opening. The event oscillogram shows 4.5 cycles of fault current coincidental with a collapse of the C phase voltage and in addition a half cycle collapse of the B phase voltage just prior to breaker opening. The fault current is listed on the oscillogram as 4875 amps although the available was stated to be 46 Ka. Upon inspection of the station after the event the upper end of this C phase arrester was "smoked up" in the vicinity of the pressure relief port indicating operation of the upper pressure relief port (See attached photo #1). Also noted was a cracked bushing on the breaker. The breaker was repaired. the arrester replaced, and the station was then reenergized successfully. At the time of the event there was reported to be some rain and the temperature was probably about 40F.

Disassembly of the arrester

A visual inspection confirmed extensive "smoking" of the upper end of the housing in the area of the pressure relief port so it was assumed without further investigation that venting had indeed occurred and the arrester was then opened by melting off the lower end casting. The lower gasket was found in the proper position and in excellent condition (Photo # 2) and there was no burning or arc marks of any kind on the lower aluminum sealing plate (Photo # 3). The lower three arrester sections were removed through the bottom end and found to be in generally very good condition with no indication of any failure arc (Photos # 4,5,6). The only deterioration noted was that the nylon washers used to

secure the epoxy glass clamping rods had become brittle from oxidation to the point where they mechanically gave way and released the tension in the stack assemblies. The effect of this was that the stacks tended to fall apart when removed from the housing as seen in the photos; however, there would be no adverse effect in the erect unopened arrester because the compression springs in the assembly act to captivate everything in place. That is, the tie rods only serve the purpose of facilitating arrester assembly and stabilizing the internal parts during shipment. The grading capacitors in this Arrester were Erie units, code 05266, with the brown encapsulant introduced to cure the problem with ozone imbrittelment experienced with some of the earlier red units. As expected they showed no degradation even though there was obviously much ozone present as evidenced by the yellow color of the nylon washers.

The upper end casting was melted off next to facilitate removal of the upper internal unit and to inspect the gasket seal and lead pressure relief diaphram. This gasket was also in excellent shape and the seal had not been violated. That is, the lead pressure relief diaphram had not ruptured or vented in any way. Photo # 7 shows the interior of the upper and lower sealing systems as they were when removed and photos # 8 and 9 are of the inside and outside faces respectively of the disassembled parts of the upper sealing and pressure relief system.

At this point then it was obvious that this arrester had not failed and must not have contributed to the event. The arrester contained 44 gaps and, counting from the bottom, gaps 1, 11, 21, and 44 were removed, tested for sparkover, and dissected. The results of the tests were:

Gap #	R.N. Start	<u>s.o.</u>	Normal S.O.
1 11 21	6.0 Kv 7.5 Kv 7.5 Kv	13.5-14.5 9.03-9.15 8.97-9.03	Approx 14 Approx 9.1 Approx 9.1
44	8.0 Kv	13.6-14.1	Approx 14

The test values are essentially normal, indicating little or no deterioration and this would be expected from the fine appearance of the internal parts. Particularly significant are the results on gaps 11 and 21 which are control gaps and are in as good as new condition. The end plates were then removed from the gaps revealing, as seen in photo # 10, that the electrodes and arc chambers were also like new. In fact a close inspection of these parts indicate that either the arrester never experienced a discharge or, at the worst, any operations it did see were very benign.

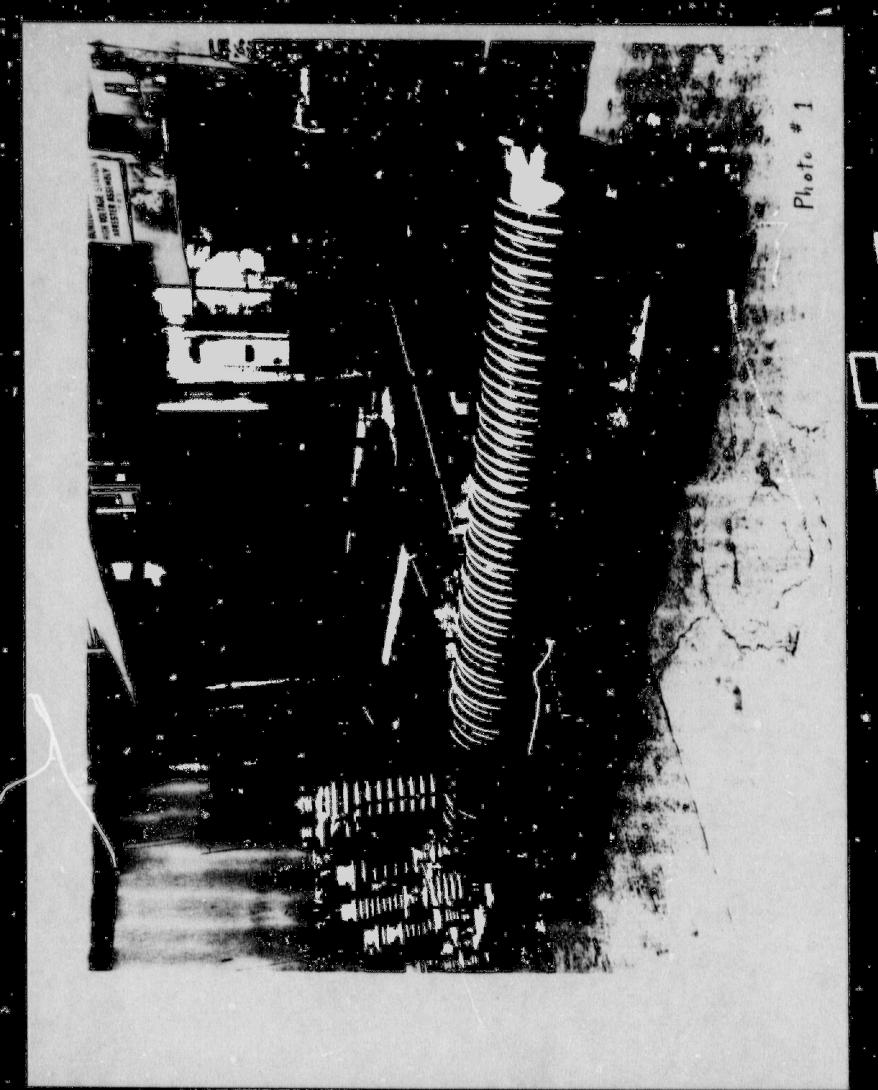
Photos # 11 and 12 show decails of the arc damage to the upper housing and in particular photo # 11 reveals that although of course a high current arc did contact the housing it did not significantly mark the top petticoat and hence could hardly have originated anywhere near the upper relief vent. There was considerable residue deposited on the housing which appeared to be primarily organic and with numerous splatters of copper. The organic deposit led to speculation that the arc may have involved a loose insulated

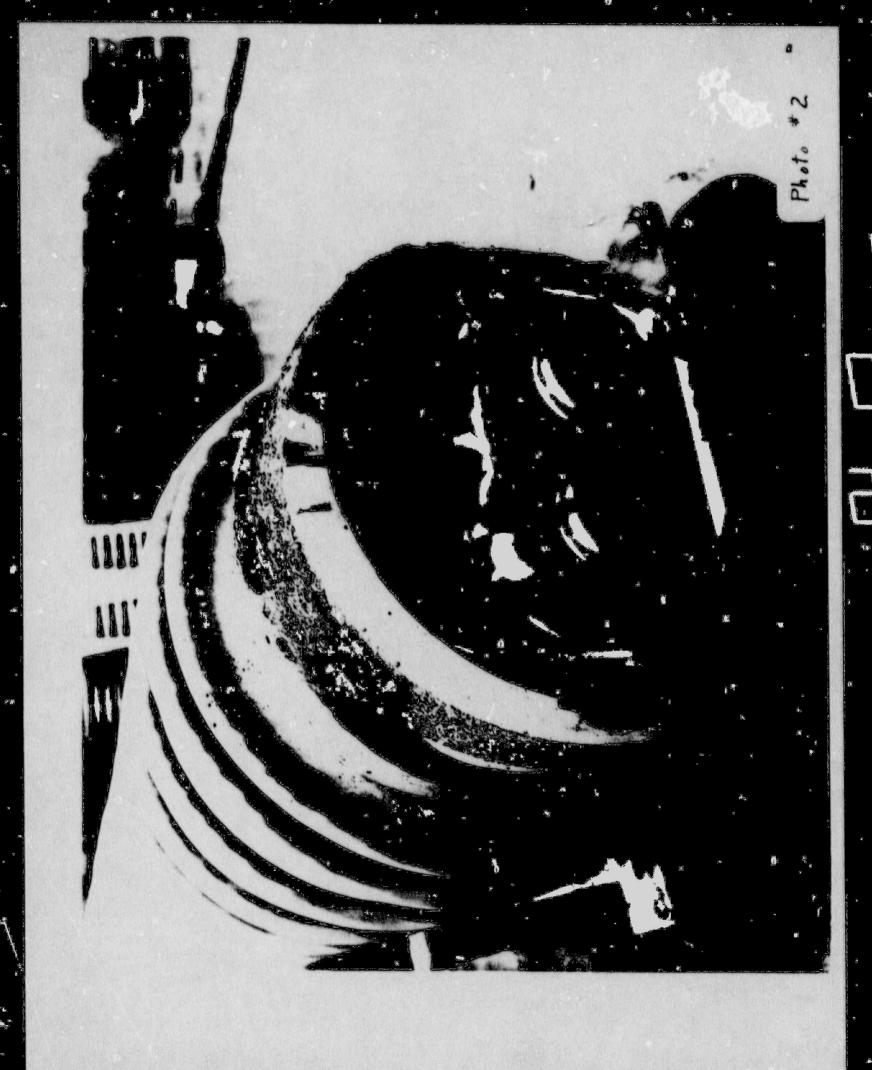
lead and Mr Mathewson took some wipes from the surface to see if it could be identified by chemical analysis. Photo # 13 of the upper end fitting shows evidence of small arc marks or splatters but no evidence of a high current arc termination. Photo # 14 is of one of the grading ring mounting ears of the upper end fitting and shows an indication that a heavy current may have flowed between the casting and the grading ring mounting strap. Perhaps the external arc current flowed through the arrester drop lead then to the casting and the grading ring and then off the ring to some adjacent object.

Summary

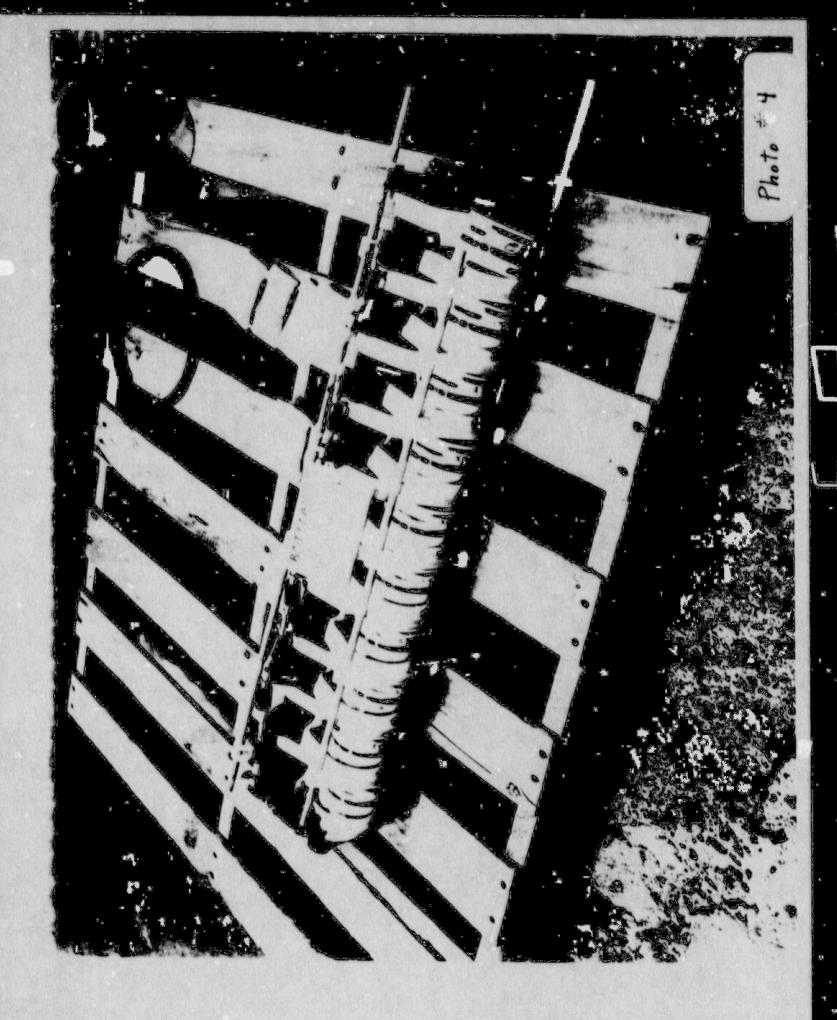
The arrester had not failed and did not vent and therefore is not considered to be the cause of the event. The internal parts were in excellent condition except for severe exidation of some organic parts, particularly the nylon tie rod retaining washers. The washers at the upper end were in far worse shape than those at the lower end probably both because operation without a grading ring would cause internal corona in the upper part and thus generate ozone which is a strong oxidizer and also because the upper parts would be the warmest, also enhanced by the lack of a grading ring. It must be emphasized however that in spite of the severe oxidation of some organics the writer does not believe that this had any significant effect on the reliability and viability of the arrester. All of the important parts including the gaps, grading circuits, valve elements, and seals were essentially unaffected. It is the writers recommendation that the lack of grading rings should not be considered as having compromised the reliability of the remaining arresters.

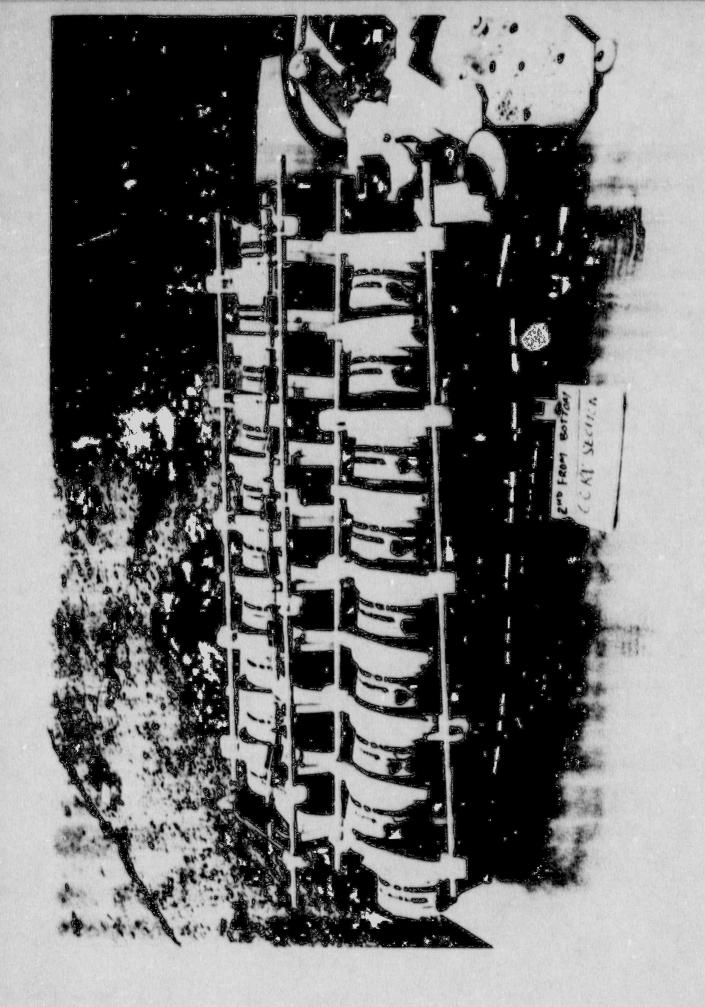
> J S Kresge (consultant)

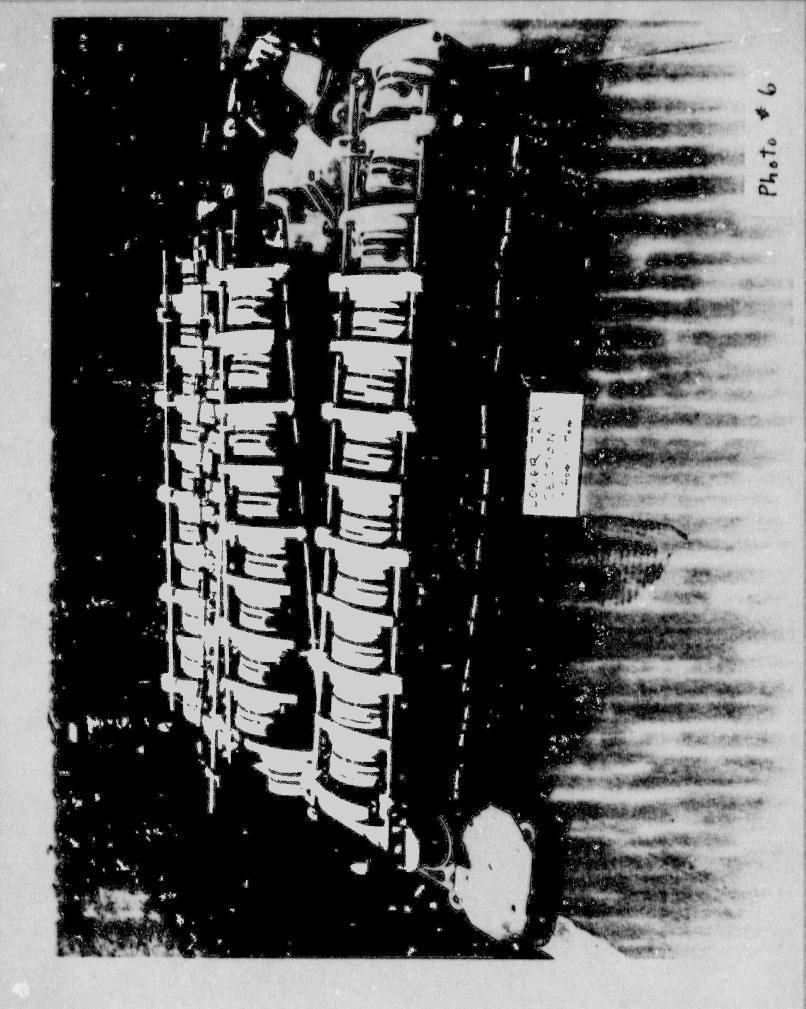


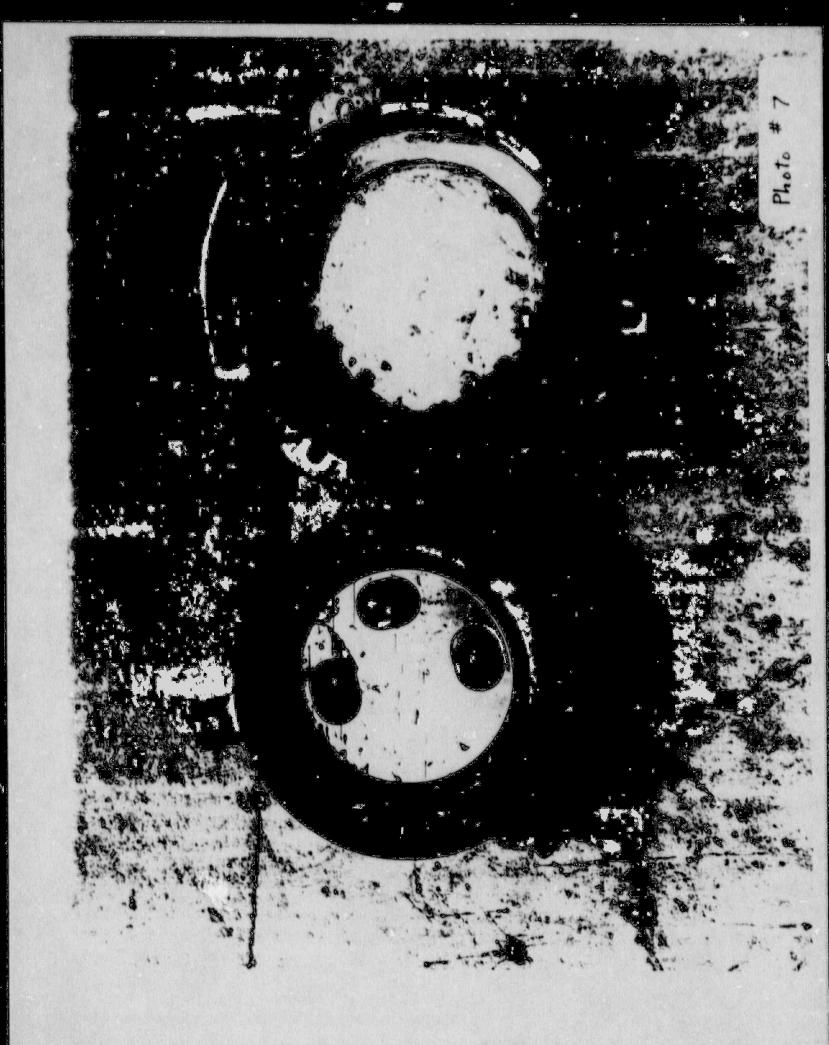
















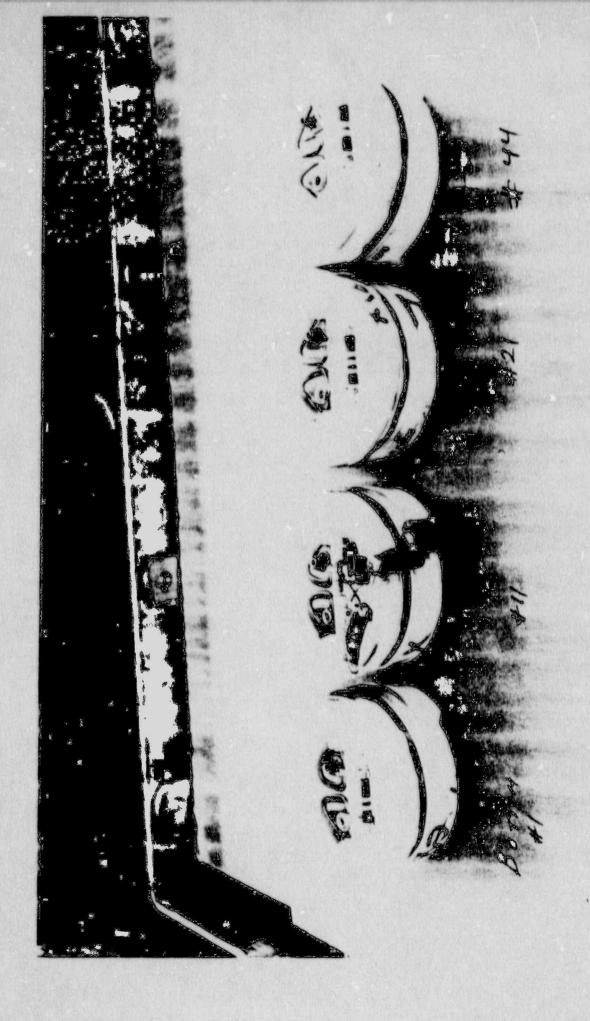






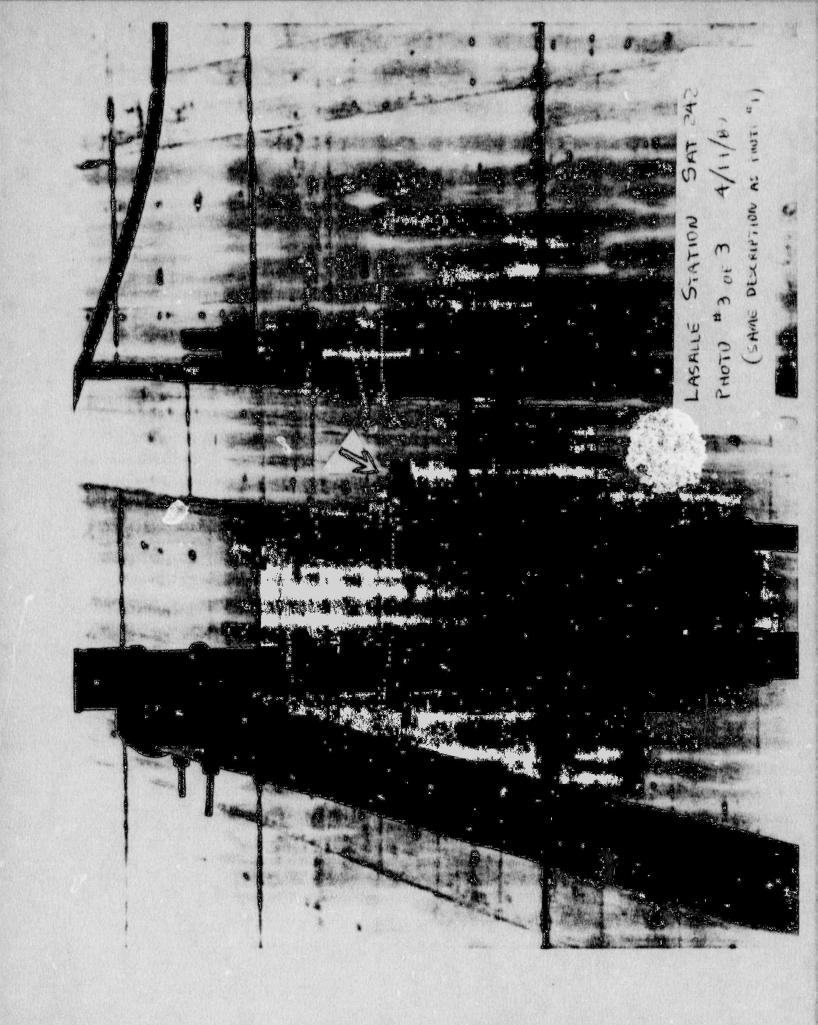


PHOTO # 1 = 3 4/14/89

DELUGE BUBON INVOLVED IN CA
LIGHTNING ARRESTER EXTERNAL
FLASHOVER.

SAT 242 4/14/89 STATION PHOTO #2 0F3 LA SALLE

SAME DESCRIPTION AS P. TOTIL



UNRESOLVED ITEM: 373/89007-02 374/89007-02

... The AIT discussed with the licensee, the availability of reliable sequence of event information. The licensee had no formal policy to ensure that when one unit's process computer was on alternate power supply for UPS maintenance that the other unit's process computer was not out of service for maintenance or on its alternate power supply. This would also apply to the Hathaways. The licensee has initiated an action item to review the AIT's concern. Review of the licensee's actions is considered an unresolved item.

RESPONSE:

The policy for the Process Computer and Hathaway sequence of events recorders Power Supply (PS) has been revised. The status of each PS will be recorded in the shiftly operator rounds package. If the PS is in bypass, a work request will be initiated or verified to be outstanding to ensure the problem is corrected. PS work requests which require the PS to be placed in bypass will be classified as priority B1. If the work requires the Unit to be placed in a different condition to complete the work (e.g., Unit must be in shutdown), the work will be performed at the next opportunity of sufficient duration. An engraved sign will be placed by the Hathaways power supply breaker requiring that the shift supervisor be notified prior to changing over to the alternate supply.