Docket No. 20210001-EI Cross-Examination Hearing Exhibit

Exhibit No.: 1

Proffered by: Public Counsel

Short title: <u>DEF's Supplemental Response to OPC's First Request to</u> <u>Produce Documents (1-4)</u>

Witness(s): <u>Gary P. Dean</u> Joseph Simpson

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchased Power Cost Recovery Clause and Generating Performance Incentive Factor Docket No. 20210001-EI

Filed: October 19, 2021

DUKE ENERGY FLORIDA, LLC'S SUPPLEMENTAL RESPONSE TO CITIZENS' <u>FIRST REQUEST TO PRODUCE DOCUMENTS (NOS. 1-4)</u>

Duke Energy Florida, LLC's ("DEF"), supplemental response to the Citizens of the State of Florida, through the Office of Public Counsel's ("Citizens" or "OPC") First Request to Produce Documents (Nos. 1-4), specifically question 4, as follows:

DOCUMENTS REQUESTED

4. Please provide the documents identified in Citizens' Interrogatory No. 8.

Response:

Please see the attached documents bearing bates numbers 20210001-DEF-000048 through 20210001-DEF-000056 provided on April 9, 2021.

Please also see the attached supplemental documents bearing bates numbers 20210001-DEF-0000156 through 20210001-DEF-000235.

Duke Energy Florida, LLC Docket No. 20210001 DEF's Suppl Response to OPC POD 1 (1-4) Q4



Root Cause Analysis Report

CRN U4 Generator Out of Phase Synchronization 12/18/2020

Revision # 0.0

PlantView Event Number: 1100300

Prepared By:	Barbara Martinuzzi	Date:	2/2/2021
Sponsor Approval:	Wayne Toms	Date:	

Regional Review Committee date:

This cause analysis evaluates important conditions adverse to quality through the use of a structured evaluation process. The information identified in this report was discovered using all the data available to the root cause evaluation team at the time of writing using the benefit of hindsight. Cause analyses performed after the fact for Duke Energy have been established as a responsive means to document and assure that conditions adverse to quality are promptly identified and corrected and, as required, to assure that actions are taken to reduce the risk of repetition of the event or condition adverse to quality.

As such, this cause analysis is not intended to make a determination as to whether any of the actions taken or the decisions made by management, vendors, internal organizations, or individual personnel prior to or at the time of the event were reasonable or prudent based on the information that was known or available at the time they took such actions or made such decisions. Any individual statement or conclusion included in the evaluation as to whether errors may have been made or improvements are warranted is based solely upon information the root cause team considered, including information and results learned after-the-fact. Nothing in this evaluation should be construed as an admission of negligence, liability, or imprudence.

Team Kick-Off Meeting Date:	1/21/2021
Date Report Completed:	2/16/2021
Root Cause Investigator(s):	Barbara Martinuzzi, Sr OE Specialist
	James C Winborne, Lead Engineer
	Joe Simpson, Manager Generation Engineering
	Doug Wood, Senior Engineer
	Gene Mullins, Interim Assignment - Leader
	Dana Christensen, Supervisor Operations

I. <u>Problem Statement:</u>

Crystal River Unit 4 generator failed to synchronize (sync) with the system when breaker closed, resulting in an out of phase event.

II. <u>Description of Incident/Issue</u>:

Crystal River Unit 4 had been in an extended outage returning to service on December 16, 2020. Unit 4 had been operating at near minimum load, having just completed the swapping from the standby boiler feed pump to the main boiler feed pump, when the turbine/generator tripped due to a boiler feed water pump control issue<mark>. Prior to returning to service on December 16, the unit 4 main boiler feed pump tripped due to low drum level. The MBFP doesn't trip due to low drum level. Also, the MBFP wouldn't be in service prior to the unit returning to service. The MBFP is put in service after the unit reaches about 250 MW.</mark>

Unit 5 was in startup operations at the time of the unit 4 turbine/generator trip. The station only has one standby boiler feed pump that is shared by both units. Since unit 5 was still one day away from being online, the decision was made to put unit 5 on hold in a safe condition and recover unit 4.

The required NERC VAR-002 AVR Alarm Status PM had been completed on unit 4. Why is this relevant?

Operations closed the exciter field breaker, turbine auto sync was selected, set breaker 3233 to close, turbine speed was set at 3602 RPM, and generator voltage verified to be within 2KV of system voltage. When the synchroscope rolled to the twelve o'clock position, all conditions were met (sync slip frequency OK, sync volts OK, sync phase angle OK), amber lights were lit, but breaker 3233 did not close and unit 4 failed to sync to the grid. A walkdown was performed and Operations found permissive 86A&B lockout relays tripped. The permissive lockout relays were reset, and a second attempt to synchronize in auto was initiated.

On the second auto attempt, when the synchroscope rolled to the twelve o'clock position, all conditions were met (sync slip frequency OK, sync volts OK, sync phase angle OK), amber lights were lit, but breaker 3233 did not close and unit 4 failed to sync to the grid a second time. Another walkdown was performed and Operations found plant lines lockout relays 3AG & AB tripped. The plant line lockout relays were reset, and a third attempt to synchronize in auto was initiated.

On the third auto attempt, when the synchroscope rolled to the twelve o'clock position, all conditions were met (sync slip frequency OK, sync volts OK, sync phase angle OK), amber lights were lit, but breaker 3233 did not close and unit 4 failed to sync to the grid for the third time in auto.

The operator green flagged the breaker and placed the sync switch in manual. The operator red flagged breaker 3233 expecting a failed synchronization allowing reposition of the sync switch handle back to auto. The operator expected nothing to happen until the auto option was selected and the synchroscope rolled to the twelve o'clock position. The operator stated that they were not attempting to synchronize in manual rather attempting to reset the synchronization circuit to permit auto synchronization. Through interviews it was noted that the auto sync option has been

Duke Energy Florida, LLC Docket No. 20210001 DEF's Suppl Response to OPC POD 1 (1-4) used since 2017 and use of the manual option would be rare. Unknown to Operations was that the manual sync check relay 25A1 had failed. The circuit was completed when breaker 3233 was red flagged causing the turbine/generator to attempt to sync to the grid out of phase at a 160degree angle. This resulted in significant damage to the generator rotor. The event also caused enough grid instability on the 230KV to trip Citrus Combined Cycle PB1 station offline (reference Plantview event #1100460).

The Beckwith Manual sync check relay model M-0359 (25A1) failed to pass bench testing. The failure mode allowed the closing contact to latch closed as far out as fifty degrees from zero. The setpoint is fifteen degrees. This relay monitors the slip frequency, voltage, and phase angle. When all three conditions are satisfied, the relay closes permitting synchronization to the grid. The relay was sent for failure analysis and a spare relay was removed from Crystal River Unit 2, bench tested and installed.

No damage was initially found to the machine during inspection, all electrical tests were satisfied, and the station went into a forced outage. During attempted start-up on January 7, a low speed centrifugal ground was found on the main generator field and the unit was placed in forced outage.

THIEHIE		
December 16, 2020	22:53	Unit 4 returned to service
December 17, 2020	19:10	Turbine/generator tripped (boiler feed water pump control issue)
December 17, 2020	22:00:12.608	First attempt to auto sync (permissive 86A&B lockouts tripped)
December 17, 2020	22:00:16.924	Second attempt to auto sync (plant line 3AG & 3BG lockout relays tripped)
December 17, 2020	22:00:20.132	Third attempt to auto sync (cause for failed auto sync unknown)
December 17, 2020	22:11:47.708	Fourth attempt (red flagged the breaker - breaker closed)
December 17, 2020	<mark>22:11:44.7340</mark>	Citrus Combined Cycle PB1 tripped (breaker open)
December 17, 2020	22:11:47.7106	Unit 4 breaker 3233 tripped open (U4 placed in forced outage)
December 18, 2020		Meeting with Turbine Generator Services
December 21, 2020		Review of substation drawings, relay operational data
December 23, 2020		Beckwith manual sync check relay replaced
January 7, 2021		Unit 4 start attempt (ground on the main field)
January 20, 2021		Beckwith manual sync check relay model M-0359 (25A1) sent for failure analysis
February 8, 2021		Beckwith completed repair evaluation report (confirmed onsite findings)

<u>Timeline</u>

III. Extent of Condition:

The Beckwith Manual Sync Check Relay model M-0359 (25A1) is typically a very solid device with little to no history of failure in decades of operation. Relay 25A1, serial #1711 was originally procured on February 28, 2002, and then relocated from the retired 230KV Crystal River substation and reinstalled in the new 230KV substation terminal house as part of the 2017-2019 fiber optic communication upgrades. The relay was last functionally tested in April 2020. The relay was sent for failure analysis following the event. The sync check relay was verified with component failure that led to mis-operation of the device. The report is included as Attachment 2.

The Beckwith model M-0193 and M-0189 auto sync check relays were tested and passed.

The plant line lockout (3AG & AB) relay panels were modified during 2017 and completed in 2019 as part of Transmission substation upgrade project, making units 4 and 5 panel light sequence and visual cues identical. Before this project, the plant line relay panel light sequence, which indicates a unit trip, was different for both units. The Operations Team Supervisor (OTS) was aware of this modification, but several operators on shift were not and did not check the plant line relay panels on initial walkdown.

Prior to the 2017-2019 fiber optic outage, the preferred method to sync unit 4 was in manual when syncing to the grid. Following the outage, the preferred method was modified to auto. It has been verified that no changes to the wiring or sync selector switch occurred during this outage. There have been no changes to the synchronization hard panel since original panel construction in 2002.

IV. Analysis:

The team utilized interviews, shift logs, shift turnover documents and the pre-job brief. Status updates and correspondence from Transmission and TGS, developed immediately after the event were examined as part of the analysis. Station electrical drawings, digital fault recorder, relay

Duke Energy Florida, LLC Docket No. 20210001 DEF's Suppl Response to OPC POD 1 (1-4) event files and substation relay schemes were reviewed along with projects and configuration changes occurring between 2017 and 2020. The Start-up procedure and Emergency Operating Procedure (EOP) were reviewed along with the generator synchronizing guide instructions and the General Electric (GE) contact table for breaker 3233/3234 control switch. Unit 5 breaker control switches were also evaluated. The Beckwith Electric Company repair evaluation report was reviewed.

V. <u>Summary of Root Cause(s)</u>:

Note: Not necessarily listed in order of significance.

A2B6C01 – Damaged, Defective or failed part

The Beckwith Manual sync check relay model M-0359 (25A1) failed in the closed position which left the circuit armed on manual operation.

A3B2C04 – Previous successes in use of rule reinforced continued use of rule

(Successful use of a rule in the past led to the wrong use of the rule or the rule being incorrectly applied.) The operator red flagged breaker 3233 expecting a failed synchronization allowing reposition of the sync switch handle back to auto. Did the operator say why they didn't reposition the synch handle one more twist to OFF? i don't like the way this is worded. i think i know what you want to say but it isn't saying that. The breaker closed before the operator had a chance to touch the switch.

VI. <u>Summary of Contributing Cause(s):</u>

Note: Not necessarily listed in order of significance.

A3B2C02 - Signs to stop were ignored and step performed incorrectly

(Most activities generate indication of status (both positive and negative). The human tendency is to focus on the indications of success rather than all the indicators. The negative indicators are the "signs to stop.") Changing priorities regarding unit operation changed multiple times in less than two hours, adding time pressure to complete the tasks and move on to additional tasks. Station was attempting to respond to meet system requirements. (unit 4 running, start-up on unit 5, unit 4 tripped, put unit 5 on hold, start-up unit 4, out of phase sync event happened, start-up unit 5). Once U4 tripped it required immediate response. No choice but to change priority from U5 start-up to U4 recovery. Agreed that there were immediate changing priorities, but was there really time pressure during the synchronizing process?

A3B3C04 - LTA review based on assumption that process will not change

(Individual believed that no variability existed in the process and thus overlooked the fact that a change had occurred, leading to different results than normally realized).

After initial voltage adjustment and verifying generator speed of 3602 RPM, no other adjustments were made to the frequency or voltage angle. Adjusting the turbine speed may have allowed the generator voltage and system voltage to align and the unit to sync to the grid in auto. Were all three permissive lights illuminated? Is more adjustment needed once the light is illuminated? If so, why? Talk through with Joe's graphs.

A3B3C06 – Individual underestimated the problem by using past events as basis

(Based on stored knowledge of past events, the individual underestimated problems with the existing event and planned for fewer contingencies than would be needed.)

Operations should have stopped when unit 4 initially tripped on low drum level and consulted the Generator Trip EOP 1. The EOP (which EOP; BFP Trip, Boiler Trip, Turbine Trip) provides steps for immediate operator response, protective relay targets, and associated alarms on the DCS alarm screen. Transformer, auxiliary transformers and relay trip schedules are also listed along with the lockout relay reset procedure. Through interviews it was noted that trips caused by the main boiler feed water pump were not uncommon and the EOP was typically not consulted for this type trip event.

Ops protocol states that we respond to unit emergencies, then refer to a procedure. "During a station transient or emergency situation (e.g. boiler leak, equipment tripping, fire, injury, etc.), Operators are expected to take prompt actions to ensure the safety of all personnel and place the station equipment in a safe and stable condition and then refer to appropriate procedures to verify correct actions have been taken." The plant had tripped three hours earlier and EOPs were never referenced. Start-up procedure was pulled, no documentation found for the sign off portions of the procedure.

service. There will be an overall revision to the start-up procedure including detailed information on relay resetting including an attachment with pictures.

A6B2C01 – Practice or "hands-on" experience LTA

(The on-the-job training did not provide opportunities to learn skills necessary to perform the job. There was not enough practice, or hands-on, time allotted.)

Additional training resources were not made available to provide adequate training for the newly restructured organization as it moved through various tier levels. CRN moved from tier 3 to tier 2 status on October 7, 2020. Experience of the OTS was less than adequate, consisting of shadowing for approximately three months and becoming full time in September 2020. Not sure how tiering impacted the event, unless you are referencing that CRN reduced supervisor positions from 11 to 6 prompting many experienced OTS to leave? The remaining and new supervisors are now responsible for Plant and FGD/WWT instead of being siloed in one area.

It isn't the OTS who is tasked with knowing how to synch the unit online. It is preferable, but not a requirement to know each technical aspect of the position being supervised.

A5B1C01 – Format deficiencies

(The layout of the written communication made it difficult to follow. The steps of the procedure were not logically grouped.) The unit 4 and unit 5 steps are intertwined even though the start-up process and unit configuration are different. CRN Startup Procedure #CRNOP/00/TBD/0004 is included as Attachment 3.

A5B2C08 – Incomplete/situation not covered

(Details of the written communication were incomplete. Insufficient information was presented. The written communication did not address situations likely to occur during the completion of the procedure.)

Page 75 of the Start-up procedure notes 'two methods of generator synchronization on Unit 4: Auto sync mode and Manual mode. Automatic is the normal mode'.

Page 76, section 13.2.2 states 'If Auto synchronization is inoperable on unit 4, then use manual sync listed in Enclosure 5'. Enclosure 5 instructions are incomplete, stopping mid step.

A5B2C01 – Limit inaccuracies

(Limits were not expressed clearly and concisely.)

A generator synchronizing guide (operator aid) for unit 5 is laminated and attached to the generator synchronization panel. The guide states 'Ensure the turbine speed is at least 3600 RPM (3602 is recommended)." Quite often, turbine speed needs to be adjusted up and down for synchronization. 3602 RPM should be a target, and not a specific setpoint. Would like clarification on if the three permissive lights are illuminated, are adjustments still needed? That doesn't seem acceptable. Joe's graphs.

A4B5C09 – Change-related documents not developed or revised

(Changes to processes resulted in the need for new forms of written communication, which were not created.) Laminated generator synchronizing guidance (operator aid) did not exist for unit 4.

VII. Extent of Cause:

Cases where the plant line breakers also serve as the Generator Synchronizing Breakers should be reviewed for output contact supervision with 25A1/A2 elements. Modifying SEL-351S Breaker 3233/3234 logic to supervise output contact equation 102 with 25A1/A2 synchronizing checks will provide a fail-safe mechanism that allows performance only one way.

VIII. <u>Repeat Event Review:</u>

There have been no similar generator events at Crystal River or in the Florida fleet within the last three years.

Corrective Actions:

Immediate & Interim Corrective Actions			
A4B5C09 – Change-related documents not developed or revised			
Corrective Action	Assignee	Due/Completion	
Describe specific actions taken or required.		Date	

		Duke Energy Field	
		Docket No. 202	210001
	DEF's Supp	Response to OPC POD	1 (1-4)
	Evaluator SHALL obtain		Q4
	concurrence from assignee or		
	supervisor		
Develop a generator synchronizing guide (operator aid) for unit 4, laminate and attach to the generator output breaker	Jamie Long	Complete	

Corrective action for Extent of Condition			
Corrective Action Describe specific actions taken or required	Assignee Evaluator <u>SHALL</u> obtain concurrence from assignee or supervisor	Due/Completion Date	
Create PMs to check synchronizing relays on a six-year period based on industry standard.	Heath McDonald	Complete	
Share technical document on lessons learned with Fleet.	Joe Simpson	5/1/2021	

Action(s) to Correct the Root Cause(s)				
Root Cause(s): A2B6C01 – Damaged, D	Root Cause(s): A2B6C01 – Damaged, Defective or failed part			
Corrective Action Assignee Due/Completic				
Describe specific actions taken or required	Evaluator SHALL obtain concurrence from assignee or supervisor	Date		
CAPR 1: Replace the Beckwith Manual Sync Check Relay model M-0359 (25A1) with a new device.	Heath McDonald	5/1/2021		
CAPR 2: Performance manage employees involved in the event as appropriate. Who was identified as requiring performance management by the team? What level? Not the RCA's team call.	Jamie Long	3/1/2021		
CAPR 3: Share this Root Cause Analysis with all employees at the station.	Wayne Toms	3/1/2021		

Action to Correct the C	contributing	Cause(s)	
Contributing Cause(s):	A3B3C04 – LTA review based on assumption that process will not change A4B2C04 – Resources not provided to assure adequate training was provided/ maintained A3B3C06 – Individual underestimated the problem by using past events as basis A6B2C01 – Practice or "hands-on" experience LTA		
Corrective Action		Assignee	Due/Completion
Describe specific actions taken or required		Evaluator <u>SHALL</u> obtain concurrence from assignee or supervisor	Date
Ensure that there is a specific lesson plan around generator synchronization and implement. Include methodical problem- solving techniques with unfamiliar situations. Two separate training tasks. Divide the problem solving training into a separate task with a later due date.		TJ Snodgrass	5/1/2021
Provide instructor led training for Operations and OTSs upon completion of the Start-up procedure and synchronizing guide revisions.		TJ Snodgrass	5/1/2021

Duke Energy Florida, LLC Docket No. 20210001 <u>uppl Response to OPC POD 1</u> (1-4)

Q4

	DE	<u>EF's Suppl Response to OPC POD 1</u>
Evaluate OTS training (technical, command	Jamie Long	5/1/2021
and control) and consider increased		
shadowing time and rotation to improve		
proficiency. OTS will be provided extended		
pay to attend all training sessions and		
simulator training with their crews.		
Extended pay to review procedures and		
shadow craft would be desired.		

Action(s) to Correct the Contributing Cause(s)			
Contributing Cause (s):	A5B1C01 – Fo	ormat deficiencies	
-	A5B2C08 – Inc	complete/situation not covered	
	A5B2C01 – Lir	mit inaccuracies	
Corrective Action		Assignee	Due/Completion
Describe specific actions take	en or required	Evaluator SHALL obtain	Date
		concurrence from assignee or	
supervisor			
Revise Crystal River Start-Up Procedure to		TJ Snodgrass	4/1/2021
add enclosures for unit specific activities.			
Revise Crystal River Start-Up Procedure to		TJ Snodgrass	4/1/2021
reference the EOP ensuring EOP steps			
have been satisfied.			
Update generator synchronizing guides		TJ Snodgrass	4/1/2021
(operator aids) on both units to reference			
3602 RPM should be a target, and not a			
specific setpoint.			

Corrective action for Extent of Cause			
Corrective Action Describe specific actions taken or required	Assignee Evaluator <u>SHALL</u> obtain concurrence from assignee or supervisor	Due/Completion Date	
Modify SEL-351S Breaker 3233/3234 logic to supervise output contact equation 102 with 25A1/A2 synchronizing checks.	Jezzel Martinez (Transmission)	3/1/2021	
Review existing facilities in Florida for extent of cause.	Joe Simpson	4/1/2021	

Effectiveness Review Action			
Insert rows for additional EREV such	as interim effectiveness review		
Corrective Action Describe specific actions required	Assignee Evaluator <u>SHALL</u> obtain concurrence from assignee or	Due Date 6 months or earlier after all actions have been completed	
EREV: Perform effectiveness review on event #1100300. Document no repeat events, procedures revised as described in the corrective actions, training completed, and Transmission corrective actions complete.	Barbara Martinuzzi	10/18/2021	

Attachments

Attachment 1: Five (5) Why Staircase

Problem Statement: Crystal River Unit 4 generator failed to synchronize (sync) with the system when breaker closed, resulting in an out of phase event.

Duke Energy Florida, LLC Docket No. 20210001 DEF's Suppl Response to OPC POD 1 (1-4) 1. Why did Crystal River Unit 4 generator have an out of phase synchronization to the grid? 1a. The operator red flagged the breaker at the wrong point in the synchronization process.

2. Why did the operator red flag the breaker at the wrong point in the synchronization process?

2a. The operator thought that it didn't matter when you red flagged the breaker.

Why did the operator think that it didn't matter when you red flagged the breaker?
 The operator understood that the synchronizing relay would not allow an out of phase synchronization.

4. Why did the operator understand that the synchronizing relay would not allow an out of phase synchronization?

4a. The operators training and experience supported this position.

4b. The operator expected the synchronization check relay to perform as designed.

5. Why did the synchronization check relay not support the operators training and experience, and not perform as designed?

5a. The synchronization check relay had failed allowing an out of phase event.

Attachment 2: Beckwith Electric Company Repair Evaluation Report



Attachment 3: CRN Startup Procedure #CRNOP/00/TBD/0004



Attachment 4: Barrier(s) that should have precluded or reduced the likelihood or significance of the incident

BARRIER(s) THAT SHOULD HAVE PRECLUDED, OR REDUCED THE LIKELIHOOD OR SIGNIFICANCE	BARRIER ASSESSMENT (HOW THE BARRIER FAILED)	CONSEQUENCES OF BARRIER FAILURE	REASON(s) for BARRIER FAILURE
OF, THE INCIDENT (Barriers that should have precluded the incident may be part of the Root Causal Train. Barriers that should have reduced the incident may be part of a Contributing Causal Train.)	(Identify whether, and in what specific manner, the barrier was missing, weak, or ineffective. Note that a barrier may fail in several different ways in the same incident. Each failure of the barrier should be considered separately.)	(Careful consideration of actual consequences of specific barrier failure is needed to help determine whether a specific failure is part of the Root Causal Train or a Contributing Causal Train.) Indicate if Barrier Failure <u>directly led to</u> or <u>contributed to</u> the Event.	(Identify immediate cause(s) of Barrier failure.) As appropriate, identify additional barrier(s) that should have prevented <u>this</u> <u>Barrier failure</u> . Apply "WHY STAIRCASE" as appropriate.
The Beckwith Manual sync check relay model M-0359 (25A1)	Relay failed in the closed position.	The relay failure armed the circuit on manual operation (directly led).	Damaged, defective or failed part
Operator red flagged the breaker at the 9 o'clock position on the synchroscope	Synchronization to the grid should occur as close to 12 o'clock as possible, but within the zone of 11 to 1 on the synchronization scope.	The operator expected a failed synchronization allowing reposition of the sync switch handle back to auto. Operator was unaware that the sync check relay failed (directly led).	Previous successes in use of rule reinforced continued use of the rule
Time pressure	Priorities changed multiple times in a short period as the station was attempting to respond to meet system requirements.	Operations should have stopped and evaluated the situation prior to continuing to attempt synchronization (contributed to).	Signs to stop were not recognized and step performed incorrectly

BARRIER(s) THAT SHOULD HAVE PRECLUDED, OR REDUCED THE LIKELIHOOD OR SIGNIFICANCE OF, THE INCIDENT (Barriers that should have precluded the incident may be part of the Root Causal Train. Barriers that should have reduced the incident may be part of a Contributing Causal Train.)	BARRIER ASSESSMENT (HOW THE BARRIER FAILED) (Identify whether, and in what specific manner, the barrier was missing, weak, or ineffective. Note that a barrier may fail in several different ways in the same incident. Each failure of the barrier should be considered separately.)	CONSEQUENCES OF BARRIER FAILURE (Careful consideration of actual consequences of specific barrier failure is needed to help determine whether a specific failure is part of the Root Causal Train or a Contributing Causal Train.) Indicate if Barrier Failure <u>directly led to</u> or <u>contributed to</u> the Event.	REASON(s) for BARRIER FAILURE (Identify immediate cause(s) of Barrier failure.) As appropriate, identify additional barrier(s) that should have prevented <u>this</u> <u>Barrier failure</u> . Apply "WHY STAIRCASE" as appropriate.
Turbine speed of 3602 RPM was considered a setpoint and not a target.	After initial voltage adjustment and verifying generator speed of 3602 RPM, no other adjustments were made to the turbine speed.	Adjusting the turbine speed greater than 3602 RPM may have allowed the generator voltage and system voltage to align and the unit to sync in auto (contributed to).	Less than adequate review based on assumption that process will not change
Operations should have stopped when unit 4 initially tripped on low drum level and consulted the Emergency Operating Procedure (EOP).	Using the startup procedure does not direct the operator to consult the EOP which provides steps for immediate operator response, protective relay targets and associated alarms on the DCS alarm screen.	Not being directed to utilize the EOP placed the operator in a skill-based scenario, outside the scope of the startup procedure, and with only knowledge to rely on. (contributed to).	Individual underestimated the problem by using past events as basis
On the job training	The amount of training did not adequately address normal, abnormal, and emergency working conditions.	Operations team supervisor experience consisted of shadowing for approximately three months. Shadowing only provides training on conditions that exist during the shadowing. (contributed to).	Practice or "hands-on" experience less than adequate

BARRIER(s) THAT SHOULD HAVE PRECLUDED, OR REDUCED THE LIKELIHOOD OR SIGNIFICANCE OF, THE INCIDENT (Barriers that should have precluded the incident may be part of the Root Causal Train. Barriers that should have reduced the incident may be part of a Contributing Causal Train.)	BARRIER ASSESSMENT (HOW THE BARRIER FAILED) (Identify whether, and in what specific manner, the barrier was missing, weak, or ineffective. Note that a barrier may fail in several different ways in the same incident. Each failure of the barrier should be considered separately.)	CONSEQUENCES OF BARRIER FAILURE (Careful consideration of actual consequences of specific barrier failure is needed to help determine whether a specific failure is part of the Root Causal Train or a Contributing Causal Train.) Indicate if Barrier Failure <u>directly led to</u> or <u>contributed to</u> the Event.	REASON(s) for BARRIER FAILURE (Identify immediate cause(s) of Barrier failure.) As appropriate, identify additional barrier(s) that should have prevented <u>this</u> <u>Barrier failure</u> . Apply "WHY STAIRCASE" as appropriate.
Procedure was not of adequate quality and did not provide clear instructions.	The unit steps are intertwined even though the start-up process and unit configuration are different. Enclosure instructions are incomplete, and limits should be a target and not setpoints.	Operator and Operations team supervisor could not rely on the procedure for guidance during the event (contributed to).	Format deficiencies Incomplete/situation not covered Limit inaccuracies Change related documents not developed or revised

Duke Energy Florida, LLC Docket No. 20210001 DEF's Suppl Response to OPC POD 1 (1-4) Q4



Root Cause Analysis Report

CRN U4 Generator Out of Phase Synchronization 12/18/2020

Revision # 0.0

PlantView Event Number: 1100300

Prepared By:	Barbara Martinuzzi	Date:	2/2/2021
Sponsor Approval:	Wayne Toms	Date:	

Regional Review Committee date:

This cause analysis evaluates important conditions adverse to quality through the use of a structured evaluation process. The information identified in this report was discovered using all the data available to the root cause evaluation team at the time of writing using the benefit of hindsight. Cause analyses performed after the fact for Duke Energy have been established as a responsive means to document and assure that conditions adverse to quality are promptly identified and corrected and, as required, to assure that actions are taken to reduce the risk of repetition of the event or condition adverse to quality.

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Team Kick-Off Meeting Date:	1/21/2021
Date Report Completed:	2/16/2021
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	James C Winborne, Lead Engineer
	Joe Simpson, Manager Generation Engineering
	Doug Wood, Senior Engineer
	Gene Mullins, Interim Assignment - Leader
	Dana Christensen, Supervisor Operations

I. <u>Problem Statement:</u>

Crystal River Unit 4 generator failed to synchronize (sync) with the system when breaker closed, resulting in an out of phase event.

II. Description of Incident/Issue:

Crystal River Unit 4 had been in an extended outage returning to service on December 16, 2020. Unit 4 had been operating at near minimum load, having just completed the swapping from the standby boiler feed pump to the main boiler feed pump, when the turbine/generator tripped due to a boiler feed water pump control issue. Prior to returning to service on December 16, the unit 4 main boiler feed pump tripped due to low drum level. The MBFP doesn't trip due to low drum level. Also, the MBFP wouldn't be in service prior to the unit returning to service. The MBFP is put in service after the unit reaches about 250 MW.

Unit 5 was in startup operations at the time of the unit 4 turbine/generator trip. The station only has one standby boiler feed pump that is shared by both units. Since unit 5 was still one day away from being online, the decision was made to put unit 5 on hold in a safe condition and recover unit 4.

The required NERC VAR-002 AVR Alarm Status PM had been completed on unit 4. Why is this relevant?

Operations closed the exciter field breaker, turbine auto sync was selected, set breaker 3233 to close, turbine speed was set at 3602 RPM, and generator voltage verified to be within 2KV of system voltage. When the synchroscope rolled to the twelve o'clock position, all conditions were met (sync slip frequency OK, sync volts OK, sync phase angle OK), amber lights were lit, but breaker 3233 did not close and unit 4 failed to sync to the grid. A walkdown was performed and Operations found permissive 86A&B lockout relays tripped. The permissive lockout relays were reset, and a second attempt to synchronize in auto was initiated.

On the second auto attempt, when the synchroscope rolled to the twelve o'clock position, all conditions were met (sync slip frequency OK, sync volts OK, sync phase angle OK), amber lights were lit, but breaker 3233 did not close and unit 4 failed to sync to the grid a second time. Another walkdown was performed and Operations found plant lines lockout relays 3AG & AB tripped. The plant line lockout relays were reset, and a third attempt to synchronize in auto was initiated.

On the third auto attempt, when the synchroscope rolled to the twelve o'clock position, all conditions were met (sync slip frequency OK, sync volts OK, sync phase angle OK), amber lights were lit, but breaker 3233 did not close and unit 4 failed to sync to the grid for the third time in auto.

The operator green flagged the breaker and placed the sync switch in manual. The operator red flagged breaker 3233 expecting a failed synchronization allowing reposition of the sync switch handle back to auto. The operator expected nothing to happen until the auto option was selected and the synchroscope rolled to the twelve o'clock position. The operator stated that they were not attempting to synchronize in manual rather attempting to reset the synchronization circuit to permit auto synchronization. Through interviews it was noted that the auto sync option has been

Duke Energy Florida, LLC Docket No. 20210001 DEF's Suppl Response to OPC POD 1 (1-4) used since 2017 and use of the manual option would be rare. Unknown to Operations was that the manual sync check relay 25A1 had failed. The circuit was completed when breaker 3233 was red flagged causing the turbine/generator to attempt to sync to the grid out of phase at a 160degree angle. This resulted in significant damage to the generator rotor. The event also caused enough grid instability on the 230KV to trip Citrus Combined Cycle PB1 station offline (reference Plantview event #1100460).

The Beckwith Manual sync check relay model M-0359 (25A1) failed to pass bench testing. The failure mode allowed the closing contact to latch closed as far out as fifty degrees from zero. The setpoint is fifteen degrees. This relay monitors the slip frequency, voltage, and phase angle. When all three conditions are satisfied, the relay closes permitting synchronization to the grid. The relay was sent for failure analysis and a spare relay was removed from Crystal River Unit 2, bench tested and installed.

No damage was initially found to the machine during inspection, all electrical tests were satisfied, and the station went into a forced outage. During attempted start-up on January 7, a low speed centrifugal ground was found on the main generator field and the unit was placed in forced outage.

December 16, 2020	22:53	Unit 4 returned to service
December 17, 2020	19:10	Turbine/generator tripped (boiler feed water pump control issue)
December 17, 2020	22:00:12.608	First attempt to auto sync (permissive 86A&B lockouts tripped)
December 17, 2020	22:00:16.924	Second attempt to auto sync (plant line 3AG & 3BG lockout relays tripped)
December 17, 2020	22:00:20.132	Third attempt to auto sync (cause for failed auto sync unknown)
December 17, 2020	22:11:47.708	Fourth attempt (red flagged the breaker)
December 17, 2020	22:11:44.7340	Citrus Combined Cycle PB1 tripped
December 17, 2020	22:11:47.7106	Unit 4 breaker 3233 tripped open (U4 placed in forced outage)
December 18, 2020		Meeting with Turbine Generator Services
December 21, 2020		Review of substation drawings, relay operational data
December 23, 2020		Beckwith manual sync check relay replaced
January 7, 2021		Unit 4 start attempt (ground on the main field)
January 20, 2021		Beckwith manual sync check relay model M-0359 (25A1) sent for failure analysis
February 8, 2021		Beckwith completed repair evaluation report (confirmed onsite findings)

<u>Timeline</u>

III. Extent of Condition:

The Beckwith Manual Sync Check Relay model M-0359 (25A1) is typically a very solid device with little to no history of failure in decades of operation. Relay 25A1, serial #1711 was originally procured on February 28, 2002, and then relocated from the retired 230KV Crystal River substation and reinstalled in the new 230KV substation terminal house as part of the 2017-2019 fiber optic communication upgrades. The relay was last functionally tested in April 2020. The relay was sent for failure analysis following the event. The sync check relay was verified with component failure that led to mis-operation of the device. The report is included as Attachment 2.

The Beckwith model M-0193 and M-0189 auto sync check relays were tested and passed.

The plant line lockout (3AG & AB) relay panels were modified during 2017 and completed in 2019 as part of Transmission substation upgrade project, making units 4 and 5 panel light sequence and visual cues identical. Before this project, the plant line relay panel light sequence, which indicates a unit trip, was different for both units. The Operations Team Supervisor (OTS) was aware of this modification, but several operators on shift were not and did not check the plant line relay panels on initial walkdown.

Prior to the 2017-2019 fiber optic outage, the preferred method to sync unit 4 was in manual when syncing to the grid. Following the outage, the preferred method was modified to auto. It has been verified that no changes to the wiring or sync selector switch occurred during this outage. There have been no changes to the synchronization hard panel since original panel construction in 2002.

IV. Analysis:

The team utilized interviews, shift logs, shift turnover documents and the pre-job brief. Status updates and correspondence from Transmission and TGS, developed immediately after the event were examined as part of the analysis. Station electrical drawings, digital fault recorder, relay

Duke Energy Florida, LLC Docket No. 20210001 DEF's Suppl Response to OPC POD 1 (1-4) event files and substation relay schemes were reviewed along with projects and configuration changes occurring between 2017 and 2020. The Start-up procedure and Emergency Operating Procedure (EOP) were reviewed along with the generator synchronizing guide instructions and the General Electric (GE) contact table for breaker 3233/3234 control switch. Unit 5 breaker control switches were also evaluated. The Beckwith Electric Company repair evaluation report was reviewed.

V. <u>Summary of Root Cause(s)</u>:

Note: Not necessarily listed in order of significance.

A2B6C01 - Damaged, Defective or failed part

The Beckwith Manual sync check relay model M-0359 (25A1) failed in the closed position which left the circuit armed on manual operation.

A3B2C04 – Previous successes in use of rule reinforced continued use of rule

(Successful use of a rule in the past led to the wrong use of the rule or the rule being incorrectly applied.) The operator red flagged breaker 3233 expecting a failed synchronization allowing reposition of the sync switch handle back to auto. Did the operator say why they didn't reposition the synch handle one more twist to OFF? i don't like the way this is worded. i think i know what you want to say but it isn't saying that.

VI. <u>Summary of Contributing Cause(s):</u>

Note: Not necessarily listed in order of significance.

A3B2C02 – Signs to stop were ignored and step performed incorrectly

(Most activities generate indication of status (both positive and negative). The human tendency is to focus on the indications of success rather than all the indicators. The negative indicators are the "signs to stop.") Changing priorities regarding unit operation changed multiple times in less than two hours, adding time pressure to complete the tasks and move on to additional tasks. Station was attempting to respond to meet system requirements. (unit 4 running, start-up on unit 5, unit 4 tripped, put unit 5 on hold, start-up unit 4, out of phase sync event happened, start-up unit 5). Once U4 tripped it required immediate response. No choice but to change priority from U5 start-up to U4 recovery. Agreed that there were immediate changing priorities, but was there really time pressure during the synchronizing process?

A3B3C04 - LTA review based on assumption that process will not change

(Individual believed that no variability existed in the process and thus overlooked the fact that a change had occurred, leading to different results than normally realized).

After initial voltage adjustment and verifying generator speed of 3602 RPM, no other adjustments were made to the frequency or voltage angle. Adjusting the turbine speed may have allowed the generator voltage and system voltage to align and the unit to sync to the grid in auto. Were all three permissive lights illuminated? Is more adjustment needed once the light is illuminated? If so, why?

A3B3C06 – Individual underestimated the problem by using past events as basis

(Based on stored knowledge of past events, the individual underestimated problems with the existing event and planned for fewer contingencies than would be needed.)

Operations should have stopped when unit 4 initially tripped on low drum level and consulted the EOP. The EOP (which EOP; BFP Trip, Boiler Trip, Turbine Trip) provides steps for immediate operator response, protective relay targets, and associated alarms on the DCS alarm screen. Transformer, auxiliary transformers and relay trip schedules are also listed along with the lockout relay reset procedure. Through interviews it was noted that trips caused by the main boiler feed water pump were not uncommon and the EOP was typically not consulted for this type trip event.

Ops protocol states that we respond to unit emergencies, then refer to a procedure. "During a station transient or emergency situation (e.g. boiler leak, equipment tripping, fire, injury, etc.), Operators are expected to take prompt actions to ensure the safety of all personnel and place the station equipment in a safe and stable condition and then refer to appropriate procedures to verify correct actions have been taken."

My understanding is that a start-up procedure was pulled out to use as reference to return the unit to service. There will be an overall revision to the start-up procedure including detailed information on relay resetting including an attachment with pictures.

A6B2C01 – Practice or "hands-on" experience LTA

(The on-the-job training did not provide opportunities to learn skills necessary to perform the job. There was not enough practice, or hands-on, time allotted.)

Additional training resources were not made available to provide adequate training for the newly restructured organization as it moved through various tier levels. CRN moved from tier 3 to tier 2 status on October 7, 2020. Experience of the OTS was less than adequate, consisting of shadowing for approximately three months and becoming full time in September 2020. Not sure how tiering impacted the event, unless you are referencing that CRN reduced supervisor positions from 11 to 6 prompting many experienced OTS to leave? The remaining and new supervisors are now responsible for Plant and FGD/WWT instead of being siloed in one area.

It isn't the OTS who is tasked with knowing how to synch the unit online. It is preferable, but not a requirement to know each technical aspect of the position being supervised.

A5B1C01 – Format deficiencies

(The layout of the written communication made it difficult to follow. The steps of the procedure were not logically grouped.) The unit 4 and unit 5 steps are intertwined even though the start-up process and unit configuration are different. CRN Startup Procedure #CRNOP/00/TBD/0004 is included as Attachment 3.

A5B2C08 – Incomplete/situation not covered

(Details of the written communication were incomplete. Insufficient information was presented. The written communication did not address situations likely to occur during the completion of the procedure.)

Page 75 of the Start-up procedure notes 'two methods of generator synchronization on Unit 4: Auto sync mode and Manual mode. Automatic is the normal mode'.

Page 76, section 13.2.2 states 'If Auto synchronization is inoperable on unit 4, then use manual sync listed in Enclosure 5'. Enclosure 5 instructions are incomplete, stopping mid step.

A5B2C01 – Limit inaccuracies

(Limits were not expressed clearly and concisely.)

A generator synchronizing guide (operator aid) for unit 5 is laminated and attached to the generator synchronization panel. The guide states 'Ensure the turbine speed is at least 3600 RPM (3602 is recommended)." Quite often, turbine speed needs to be adjusted up and down for synchronization. 3602 RPM should be a target, and not a specific setpoint. Would like clarification on if the three permissive lights are illuminated, are adjustments still needed? That doesn't seem acceptable.

A4B5C09 – Change-related documents not developed or revised

(Changes to processes resulted in the need for new forms of written communication, which were not created.) Laminated generator synchronizing guidance (operator aid) did not exist for unit 4.

VII. Extent of Cause:

Cases where the plant line breakers also serve as the Generator Synchronizing Breakers should be reviewed for output contact supervision with 25A1/A2 elements. Modifying SEL-351S Breaker 3233/3234 logic to supervise output contact equation 102 with 25A1/A2 synchronizing checks will provide a fail-safe mechanism that allows performance only one way.

VIII. <u>Repeat Event Review:</u>

There have been no similar generator events at Crystal River or in the Florida fleet within the last three years.

Corrective Actions:

Immediate & Interim Corrective Actions					
A4B5C09 – Change-related documents not a	A4B5C09 – Change-related documents not developed or revised				
Corrective Action Assignee Due/Completion					
Describe specific actions taken or required. Evaluator SHALL obtain Date					
concurrence from assignee or					
supervisor					

		Duke Energy Florida, LL	_C
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Develop a generator synchronizing guide	Jamie Long	Complete	<u>ع</u> ر
(operator aid) for unit 4, laminate and attach	_		~ ·
to the generator output breaker.			

Corrective action for Extent of Condition				
Corrective Action Describe specific actions taken or required	Assignee Evaluator <u>SHALL</u> obtain concurrence from assignee or	Due/Completion Date		
Create PMs to check synchronizing relays on a six-year period based on industry standard.	Heath McDonald	Complete		
Share technical document on lessons learned with Fleet.	Joe Simpson	5/1/2021		

Action(s) to Correct the Root Cause(s)			
Root Cause(s): A2B6C01 – Damaged, D A3B2C04 – Previous suc	Root Cause(s): A2B6C01 – Damaged, Defective or failed part A3B2C04 – Previous successes in use of rule reinforced continued use of rule		
Corrective Action	Assignee	Due/Completion	
Describe specific actions taken or required	Evaluator SHALL obtain concurrence from assignee or supervisor	Date	
CAPR 1: Replace the Beckwith Manual	Heath McDonald	5/1/2021	
Sync Check Relay model M-0359 (25A1) with a new device.			
CAPR 2: Performance manage employees involved in the event as appropriate. Who was identified as requiring performance management by the team? What level?	Jamie Long	3/1/2021	
CAPR 3: Share this Root Cause Analysis with all employees at the station.	Wayne Toms	3/1/2021	

Action to Correct the C	contributing	Cause(s)	
Contributing Cause(s):	A3B3C04 – LTA review based on assumption that process will not change A4B2C04 – Resources not provided to assure adequate training was provided/ maintained A3B3C06 – Individual underestimated the problem by using past events as basis A6B2C01 – Practice or "bands-on" experience LTA		
Corrective Action Describe specific actions taken or required		Assignee Evaluator <u>SHALL</u> obtain concurrence from assignee or supervisor	Due/Completion Date
Ensure that there is a specific lesson plan around generator synchronization and implement. Include methodical problem- solving techniques with unfamiliar situations. Two separate training tasks. Divide the problem solving training into a separate task with a later due date		TJ Snodgrass	5/1/2021
Provide instructor led training for Operations and OTSs upon completion of the Start-up procedure and synchronizing quide revisions.		TJ Snodgrass	5/1/2021
Evaluate OTS training (technical, command and control) and consider increased shadowing time and rotation to improve proficiency. OTS will be provided extended pay to attend all training sessions and		Jamie Long	5/1/2021

simulator training with their crews. Extended pay to review procedures and shadow craft would be desired.

Action(s) to Correct the Contributing Cause(s) Contributing Cause (s): A5B1C01 – Format deficiencies A5B2C08 – Incomplete/situation not covered A5B2C01 – Limit inaccuracies **Corrective Action Due/Completion** Assignee Describe specific actions taken or required Evaluator SHALL obtain Date concurrence from assignee or supervisor Revise Crystal River Start-Up Procedure to TJ Snodgrass 4/1/2021 add enclosures for unit specific activities. Revise Crystal River Start-Up Procedure to TJ Snodgrass 4/1/2021 reference the EOP ensuring EOP steps have been satisfied. Update generator synchronizing guides TJ Snodgrass 4/1/2021 (operator aids) on both units to reference 3602 RPM should be a target, and not a specific setpoint.

Corrective action for Extent of Cause			
Corrective Action Describe specific actions taken or required	Assignee Evaluator <u>SHALL</u> obtain concurrence from assignee or supervisor	Due/Completion Date	
Modify SEL-351S Breaker 3233/3234 logic to supervise output contact equation 102 with 25A1/A2 synchronizing checks.	Jezzel Martinez (Transmission)	3/1/2021	
Review existing facilities in Florida for extent of cause.	Joe Simpson	4/1/2021	

Effectiveness Review Action			
		Due Dete	
Corrective Action	Assignee	Due Date	
Describe specific actions required	Evaluator SHALL obtain	6 months or earlier after	
	concurrence from assignee or	all actions have been	
	supervisor	completed	
EREV: Perform effectiveness review on	Barbara Martinuzzi	10/18/2021	
event #1100300. Document no repeat			
events, procedures revised as described in			
the corrective actions, training completed.			
and Transmission corrective actions			
complete			
complete.			

Attachments

Attachment 1: Five (5) Why Staircase

Problem Statement: Crystal River Unit 4 generator failed to synchronize (sync) with the system when breaker closed, resulting in an out of phase event.

- 1. Why did Crystal River Unit 4 generator have an out of phase synchronization to the grid?
- 1a. The operator red flagged the breaker at the wrong point in the synchronization process.
- 2. Why did the operator red flag the breaker at the wrong point in the synchronization process?
- 2a. The operator thought that it didn't matter when you red flagged the breaker.

Why did the operator think that it didn't matter when you red flagged the breaker?
 The operator understood that the synchronizing relay would not allow an out of phase synchronization.

4. Why did the operator understand that the synchronizing relay would not allow an out of phase synchronization?

4a. The operators training and experience supported this position.

4b. The operator expected the synchronization check relay to perform as designed.

5. Why did the synchronization check relay not support the operators training and experience, and not perform as designed?

5a. The synchronization check relay had failed allowing an out of phase event.

Attachment 2: Beckwith Electric Company Repair Evaluation Report



Attachment 3: CRN Startup Procedure #CRNOP/00/TBD/0004



Attachment 4: Barrier(s) that should have precluded or reduced the likelihood or significance of the incident

BARRIER(s) THAT SHOULD HAVE PRECLUDED, OR REDUCED THE LIKELIHOOD OR SIGNIFICANCE	BARRIER ASSESSMENT (HOW THE BARRIER FAILED)	CONSEQUENCES OF BARRIER FAILURE	REASON(s) for BARRIER FAILURE
OF, THE INCIDENT (Barriers that should have precluded the incident may be part of the Root Causal Train. Barriers that should have reduced the incident may be part of a Contributing Causal Train.)	(Identify whether, and in what specific manner, the barrier was missing, weak, or ineffective. Note that a barrier may fail in several different ways in the same incident. Each failure of the barrier should be considered separately.)	(Careful consideration of actual consequences of specific barrier failure is needed to help determine whether a specific failure is part of the Root Causal Train or a Contributing Causal Train.) Indicate if Barrier Failure <u>directly led to</u> or <u>contributed to</u> the Event.	(Identify immediate cause(s) of Barrier failure.) As appropriate, identify additional barrier(s) that should have prevented <u>this</u> <u>Barrier failure</u> . Apply "WHY STAIRCASE" as appropriate.
The Beckwith Manual sync check relay model M-0359 (25A1)	Relay failed in the closed position.	The relay failure armed the circuit on manual operation (directly led).	Damaged, defective or failed part
Operator red flagged the breaker at the 9 o'clock position on the synchroscope	Synchronization to the grid should occur as close to 12 o'clock as possible, but within the zone of 11 to 1 on the synchronization scope.	The operator expected a failed synchronization allowing reposition of the sync switch handle back to auto. Operator was unaware that the sync check relay failed (directly led).	Previous successes in use of rule reinforced continued use of the rule
Time pressure	Priorities changed multiple times in a short period as the station was attempting to respond to meet system requirements.	Operations should have stopped and evaluated the situation prior to continuing to attempt synchronization (contributed to).	Signs to stop were not recognized and step performed incorrectly

BARRIER(s) THAT SHOULD HAVE PRECLUDED, OR REDUCED THE LIKELIHOOD OR SIGNIFICANCE OF, THE INCIDENT (Barriers that should have precluded the incident may be part of the Root Causal Train. Barriers that should have reduced the incident may be part of a Contributing Causal Train.)	BARRIER ASSESSMENT (HOW THE BARRIER FAILED) (Identify whether, and in what specific manner, the barrier was missing, weak, or ineffective. Note that a barrier may fail in several different ways in the same incident. Each failure of the barrier should be considered separately.)	CONSEQUENCES OF BARRIER FAILURE (Careful consideration of actual consequences of specific barrier failure is needed to help determine whether a specific failure is part of the Root Causal Train or a Contributing Causal Train.) Indicate if Barrier Failure <u>directly led to</u> or <u>contributed to</u> the Event.	REASON(s) for BARRIER FAILURE (Identify immediate cause(s) of Barrier failure.) As appropriate, identify additional barrier(s) that should have prevented <u>this</u> <u>Barrier failure</u> . Apply "WHY STAIRCASE" as appropriate.
Turbine speed of 3602 RPM was considered a setpoint and not a target.	After initial voltage adjustment and verifying generator speed of 3602 RPM, no other adjustments were made to the turbine speed.	Adjusting the turbine speed greater than 3602 RPM may have allowed the generator voltage and system voltage to align and the unit to sync in auto (contributed to).	Less than adequate review based on assumption that process will not change
Operations should have stopped when unit 4 initially tripped on low drum level and consulted the Emergency Operating Procedure (EOP).	Using the startup procedure does not direct the operator to consult the EOP which provides steps for immediate operator response, protective relay targets and associated alarms on the DCS alarm screen.	Not being directed to utilize the EOP placed the operator in a skill-based scenario, outside the scope of the startup procedure, and with only knowledge to rely on. (contributed to).	Individual underestimated the problem by using past events as basis
On the job training	The amount of training did not adequately address normal, abnormal, and emergency working conditions.	Operations team supervisor experience consisted of shadowing for approximately three months. Shadowing only provides training on conditions that exist during the shadowing. (contributed to).	Practice or "hands-on" experience less than adequate

BARRIER(s) THAT SHOULD HAVE PRECLUDED, OR REDUCED THE LIKELIHOOD OR SIGNIFICANCE OF, THE INCIDENT (Barriers that should have precluded the incident may be part of the Root Causal Train. Barriers that should have reduced the incident may be part of a Contributing Causal Train.)	BARRIER ASSESSMENT (HOW THE BARRIER FAILED) (Identify whether, and in what specific manner, the barrier was missing, weak, or ineffective. Note that a barrier may fail in several different ways in the same incident. Each failure of the barrier should be considered separately.)	CONSEQUENCES OF BARRIER FAILURE (Careful consideration of actual consequences of specific barrier failure is needed to help determine whether a specific failure is part of the Root Causal Train or a Contributing Causal Train.) Indicate if Barrier Failure <u>directly led to</u> or <u>contributed to</u> the Event.	REASON(s) for BARRIER FAILURE (Identify immediate cause(s) of Barrier failure.) As appropriate, identify additional barrier(s) that should have prevented <u>this</u> <u>Barrier failure</u> . Apply "WHY STAIRCASE" as appropriate.
Procedure was not of adequate quality and did not provide clear instructions.	The unit steps are intertwined even though the start-up process and unit configuration are different. Enclosure instructions are incomplete, and limits should be a target and not setpoints.	Operator and Operations team supervisor could not rely on the procedure for guidance during the event (contributed to).	Format deficiencies Incomplete/situation not covered Limit inaccuracies Change related documents not developed or revised

Duke Energy Florida, LLC Docket No. 20210001 DEF's Suppl Response to OPC POD 1 (1-4) Q4



Root Cause Analysis Report

CRN U4 Generator Out of Phase Synchronization 12/18/2020

Revision # 0.0

PlantView Event Number: 1100300

Prepared By:	Barbara Martinuzzi	Date:	2/2/2021
Sponsor Approval:	Wayne Toms	Date:	
Regional Review	Committee date:		
This cause analysis evaluates i The information identified in t the time of writing using the b established as a responsive me corrected and, as required, to adverse to quality.	mportant conditions adverse to quality throu his report was discovered using all the data a enefit of hindsight. Cause analyses performed ans to document and assure that conditions a assure that actions are taken to reduce the ri	igh the use of a struct available to the root of d after the fact for D dverse to quality are sk of repetition of the	tured evaluation process. cause evaluation team at uke Energy have been promptly identified and e event or condition

As such, this cause analysis is not intended to make a determination as to whether any of the actions taken or the decisions made by management, vendors, internal organizations, or individual personnel prior to or at the time of the event were reasonable or prudent based on the information that was known or available at the time they took such actions or made such decisions. Any individual statement or conclusion included in the evaluation as to whether errors may have been made or improvements are warranted is based solely upon information the root cause team considered, including information and results learned after-the-fact. Nothing in this evaluation should be construed as an admission of negligence, liability, or imprudence.

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I. <u>Problem Statement:</u>

Crystal River Unit 4 generator failed to synchronize (sync) with the system when breaker closed, resulting in an out of phase event.

II. <u>Description of Incident/Issue</u>:

Crystal River Unit 4 had been in an extended outage returning to service on December 16, 2020. Unit 4 had been operating at near minimum load, having just completed the swapping from the standby boiler feed pump to the main boiler feed pump, when the turbine/generator tripped due to a boiler feed water pump control issue. Prior to returning to service on December 16, the unit 4 main boiler feed pump tripped due to low drum level. The MBFP doesn't trip due to low drum level. Also, the MBFP wouldn't be in service prior to the unit returning to service. The MBFP is put in service after the unit reaches about 250 MW.

Unit 5 was in startup operations at the time of the unit 4 turbine/generator trip. The station only has one standby boiler feed pump that is shared by both units. Since unit 5 was still one day away from being online, the decision was made to put unit 5 on hold in a safe condition and recover unit 4.

The required NERC VAR-002 AVR Alarm Status PM had been completed on unit 4. Why is this relevant?

Operations closed the exciter field breaker, turbine auto sync was selected, set breaker 3233 to close, turbine speed was set at 3602 RPM, and generator voltage verified to be within 2KV of system voltage. When the synchroscope rolled to the twelve o'clock position, all conditions were met (sync slip frequency OK, sync volts OK, sync phase angle OK), amber lights were lit, but breaker 3233 did not close and unit 4 failed to sync to the grid. A walkdown was performed and Operations found permissive 86A&B lockout relays tripped. The permissive lockout relays were reset, and a second attempt to synchronize in auto was initiated.

On the second auto attempt, when the synchroscope rolled to the twelve o'clock position, all conditions were met (sync slip frequency OK, sync volts OK, sync phase angle OK), amber lights were lit, but breaker 3233 did not close and unit 4 failed to sync to the grid a second time. Another walkdown was performed and Operations found plant lines lockout relays 3AG & AB tripped. The plant line lockout relays were reset, and a third attempt to synchronize in auto was initiated.

On the third auto attempt, when the synchroscope rolled to the twelve o'clock position, all conditions were met (sync slip frequency OK, sync volts OK, sync phase angle OK), amber lights were lit, but breaker 3233 did not close and unit 4 failed to sync to the grid for the third time in auto.

The operator green flagged the breaker and placed the sync switch in manual. The operator red flagged breaker 3233 expecting a failed synchronization allowing reposition of the sync switch handle back to auto. The operator expected nothing to happen until the auto option was selected and the synchroscope rolled to the twelve o'clock position. The operator stated that they were not attempting to synchronize in manual rather attempting to reset the synchronization circuit to permit auto synchronization. Through interviews it was noted that the auto sync option has been Page #2

Commented [WJJC1]: None of this information is relevant to our problem statement or the event under review for the RCA.

Commented [WJJC2]: Reword. Some such as Unit 5 was in startup operations at the time of the Unit 4 turbine/generator trip. The station only hs one standby boiler feed pump; shared by both units thus only one unit can be in startup at a time. Since unit 5 was still one day away from being online, the decision was made to put unit 5 on hold in a safe condition and recover uit 4.

Commented [WJJC3]: Remove. This is not relavant.

used since 2017 and use of the manual option would be rare. Unknown to Operations was that the manual sync check relay 25A1 had failed. The circuit was completed when breaker 3233 was red flagged causing the turbine/generator to attempt to sync to the grid out of phase at a 160-degree angle. This resulted in significant damage to the generator rotor. The event also caused enough grid instability on the 230KV to trip Citrus Combined Cycle PB1 station offline (reference Plantview event #1100460).

The Beckwith Manual sync check relay model M-0359 (25A1) failed to pass bench testing. The failure mode allowed the closing contact to latch closed as far out as fifty degrees from zero. The setpoint is fifteen degrees. This relay monitors the slip frequency, voltage, and phase angle. When all three conditions are satisfied, the relay closes permitting synchronization to the grid. The relay was sent for failure analysis and a spare relay was removed from Crystal River Unit 2, bench tested and installed.

No damage was initially found to the machine during inspection, all electrical tests were satisfied, and the station went into a forced outage. During attempted start-up on January 7, a low speed centrifugal ground was found on the main generator field and the unit was placed in forced outage.

Timeline

December 16, 2020	22:53	Unit 4 returned to service
December 17, 2020	19:10	Turbine/generator tripped (boiler feed water pump control issue)
December 17, 2020	22:00:12.608	First attempt to auto sync (permissive 86A&B lockouts tripped)
December 17, 2020	22:00:16.924	Second attempt to auto sync (plant line 3AG & 3BG lockout relays tripped)
December 17, 2020	22:00:20.132	Third attempt to auto sync (cause for failed auto sync unknown)
December 17, 2020	22:11:47.708	Fourth attempt (red flagged the breaker)
December 17, 2020	22:11:44.7340	Citrus Combined Cycle PB1 tripped
December 17, 2020	22:11:47.7106	Unit 4 breaker 3233 tripped open (U4 placed in forced outage)
December 18, 2020		Meeting with Turbine Generator Services
December 21, 2020		Review of substation drawings, relay operational data
December 23, 2020		Beckwith manual sync check relay replaced
January 7, 2021		Unit 4 start attempt (ground on the main field)
January 20, 2021		Beckwith manual sync check relay model M-0359 (25A1) sent for failure analysis
February 8, 2021		Beckwith completed repair evaluation report (confirmed onsite findings)

III. Extent of Condition:

The Beckwith Manual Sync Check Relay model M-0359 (25A1) is typically a very solid device with little to no history of failure in decades of operation. Relay 25A1, serial #1711 was originally procured on February 28, 2002, and then relocated from the retired 230KV Crystal River substation and reinstalled in the new 230KV substation terminal house as part of the 2017-2019 fiber optic communication upgrades. The relay was last functionally tested in April 2020. The relay was sent for failure analysis following the event. The sync check relay was verified with component failure that led to mis-operation of the device. The report is included as Attachment 2.

The Beckwith model M-0193 and M-0189 auto sync check relays were tested and passed.

The plant line lockout (3AG & AB) relay panels were modified during 2017 and completed in 2019 as part of Transmission substation upgrade project, making units 4 and 5 panel light sequence and visual cues identical. Before this project, the plant line relay panel light sequence, which indicates a unit trip, was different for both units. The Operations Team Supervisor (OTS) was aware of this modification, but several operators on shift were not and did not check the plant line relay panels on initial walkdown.

Prior to the 2017-2019 fiber optic outage, the preferred method to sync unit 4 was in manual when syncing to the grid. Following the outage, the preferred method was modified to auto. It has been verified that no changes to the wiring or sync selector switch occurred during this outage. There have been no changes to the synchronization hard panel since original panel construction in 2002.

IV. Analysis:

The team utilized interviews, shift logs, shift turnover documents and the pre-job brief. Status updates and correspondence from Transmission and TGS, developed immediately after the event were examined as part of the analysis. Station electrical drawings, digital fault recorder, relay

event files and substation relay schemes were reviewed along with projects and configuration changes occurring between 2017 and 2020. The Start-up procedure and Emergency Operating Procedure (EOP) were reviewed along with the generator synchronizing guide instructions and the General Electric (GE) contact table for breaker 3233/3234 control switch. Unit 5 breaker control switches were also evaluated. The Beckwith Electric Company repair evaluation report was reviewed.

V. Summary of Root Cause(s):

Note: Not necessarily listed in order of significance.

A2B6C01 - Damaged, Defective or failed part

The Beckwith Manual sync check relay model M-0359 (25A1) failed in the closed position which left the circuit armed on manual operation.

A3B2C04 – Previous successes in use of rule reinforced continued use of rule

(Successful use of a rule in the past led to the wrong use of the rule or the rule being incorrectly applied.) The operator red flagged breaker 3233 expecting a failed synchronization allowing reposition of the sync switch handle back to auto. Did the operator say why they didn't reposition the synch handle one more twist to OFF? i don't like the way this is worded. i think i know what you want to say but it isn't saying that.

VI. <u>Summary of Contributing Cause(s):</u>

Note: Not necessarily listed in order of significance.

A3B2C02 - Signs to stop were ignored and step performed incorrectly

Most activities generate indication of status (both positive and negative). The human tendency is to focus on the indicators of success rather than all the indicators. The negative indicators are the "signs to stop.") Changing priorities regarding unit operation changed multiple times in less than two hours, adding time pressure to complete the tasks and move on to additional tasks. Station was attempting to respond to meet system requirements. (unit 4 running, start-up on unit 5, unit 4 tripped, put unit 5 on hold, start-up unit 4, out of phase sync event happened, start-up unit 5). Once U4 tripped it required immediate response. No choice but to change priority from U5 start-up to U4 recovery. Agreed that there were immediate changing priorities, but was there really time pressure during the synchronizing process?

A3B3C04 - LTA review based on assumption that process will not change

(Individual believed that no variability existed in the process and thus overlooked the fact that a change had occurred, leading to different results than normally realized).

After initial voltage adjustment and verifying generator speed of 3602 RPM, no other adjustments were made to the frequency or voltage angle. Adjusting the turbine speed may have allowed the generator voltage and system voltage to align and the unit to sync to the grid in auto. Were all three permissive lights illuminated? Is more adjustment needed once the light is illuminated? If so, why?

A3B3C06 – Individual underestimated the problem by using past events as basis

(Based on stored knowledge of past events, the individual underestimated problems with the existing event and planned for fewer contingencies than would be needed.)

Operations should have stopped when unit 4 initially tripped on low drum level and consulted the EOP. The EOP (which EOP; BFP Trip, Boiler Trip, Turbine Trip) provides steps for immediate operator response, protective relay targets, and associated alarms on the DCS alarm screen. Transformer, auxiliary transformers and relay trip schedules are also listed along with the lockout relay reset procedure. Through interviews it was noted that trips caused by the main boiler feed water pump were not uncommon and the EOP was typically not consulted for this type trip event.

Ops protocol states that we respond to unit emergencies, then refer to a procedure. "During a station transient or emergency situation (e.g. boiler leak, equipment tripping, fire, injury, etc.), Operators are expected to take prompt actions to ensure the safety of all personnel and place the station equipment in a safe and stable condition and then refer to appropriate procedures to verify correct actions have been taken."

My understanding is that a start-up procedure was pulled out to use as reference to return the unit to service. There will be an overall revision to the start-up procedure including detailed information on relay resetting including an attachment with pictures.

Page #4

Commented [WJJC4]: The operator red flagged breaker 3233 expecting a failed synchronization per normal (past) function of the synchronizer relay. Operator stated it did not matter because if permissives are not met the synchronizing relay would block breaker closure.

Commented [WJJC5]: I understand what Plant Manager is saying. Priority change concern was resolved well ahead of the actions that caused the event. Is this truly time pressure??? Also I am a little unsure if what we wrote herein conincides with the cause code. Our wording should have included information about the 4 futile attempts and the signal a halt to this effort until a gameplan was developed based on results.

Commented [WJJC6]: All three permissive lights were only illuminated when Sync Scope reached 12:00. That is a function of the synch circuitry. No more adjusts are needed once all 3 lights light between 11 and 1.

A6B2C01 – Practice or "hands-on" experience LTA

(The on-the-job training did not provide opportunities to learn skills necessary to perform the job. There was not enough practice, or hands-on, time allotted.)

Additional training resources were not made available to provide adequate training for the newly restructured organization as it moved through various tier levels. CRN moved from tier 3 to tier 2 status on October 7, 2020. Experience of the OTS was less than adequate, consisting of shadowing for approximately three months and becoming full time in September 2020. Not sure how tiering impacted the event, unless you are referencing that CRN reduced supervisor positions from 11 to 6 prompting many experienced OTS to leave? The remaining and new supervisors are now responsible for Plant and FGD/WWT instead of being siloed in one area.

It isn't the OTS who is tasked with knowing how to synch the unit online. It is preferable, but not a requirement to know each technical aspect of the position being supervised.

A5B1C01 – Format deficiencies (The layout of the written communication made it difficult to follow. The steps of the procedure were not logically grouped.) The unit 4 and unit 5 steps are intertwined even though the start-up process and unit configuration are different. CRN Startup Procedure #CRNOP/00/TBD/0004 is included as Attachment 3.

A5B2C08 – Incomplete/situation not covered

(Details of the written communication were incomplete. Insufficient information was presented. The written communication did not address situations likely to occur during the completion of the procedure.) Page 75 of the Start-up procedure notes 'two methods of generator synchronization on Unit 4: Auto sync mode and Manual mode. Automatic is the normal mode'. Page 76, section 13.2.2 states 'If Auto synchronization is inoperable on unit 4, then use manual

sync listed in Enclosure 5'. Enclosure 5 instructions are incomplete, stopping mid step.

A5B2C01 – Limit inaccuracies

(Limits were not expressed clearly and concisely.) A generator synchronizing guide (operator aid) for unit 5 is laminated and attached to the generator synchronization panel. The guide states 'Ensure the turbine speed is at least 3600 RPM (3602 is recommended)." Quite often, turbine speed needs to be adjusted up and down for synchronization. 3602 RPM should be a target, and not a specific setpoint. Would like clarification on if the three permissive lights are illuminated, are adjustments still needed? That doesn't seem acceptable.

A4B5C09 - Change-related documents not developed or revised

(Changes to processes resulted in the need for new forms of written communication, which were not created.) Laminated generator synchronizing guidance (operator aid) did not exist for unit 4.

VII. Extent of Cause:

Cases where the plant line breakers also serve as the Generator Synchronizing Breakers should be reviewed for output contact supervision with 25A1/A2 elements. Modifying SEL-351S Breaker 3233/3234 logic to supervise output contact equation 102 with 25A1/A2 synchronizing checks will provide a fail-safe mechanism that allows performance only one way.

VIII. **Repeat Event Review:**

There have been no similar generator events at Crystal River or in the Florida fleet within the last three years.

Corrective Actions:

Immediate & Interim Corrective Actions A4B5C09 – Change-related documents not developed or revised			
Corrective Action Describe specific actions taken or required.	Assignee Evaluator <u>SHALL</u> obtain concurrence from assignee or supervisor	Due/Completion Date	

Page #5

Commented [WJJC7]: The information after referencing is true. The last sentence is how plants/industry Management thinks TODAY.

Develop a generator synchronizing guide	Jamie Long	Complete
(operator aid) for unit 4, laminate and attach		
to the generator output breaker.		

Corrective action for Extent of Condition			
Corrective Action	Assignee	Due/Completion	
Describe specific actions taken of required	concurrence from assignee or supervisor	Date	
Create PMs to check synchronizing relays on a six-year period based on industry standard.	Heath McDonald	Complete	
Share technical document on lessons	Joe Simpson	5/1/2021	

Action(s) to Correct the Root Cause(s)			
Root Cause(s): A2B6C01 – Damaged, A3B2C04 – Previous s	ause(s): A2B6C01 – Damaged, Defective or failed part A3B2C04 – Previous successes in use of rule reinforced continued use of rule		
Corrective Action	Assignee	Due/Completion	
Describe specific actions taken or required	Evaluator <u>SHALL</u> obtain concurrence from assignee or supervisor	Date	
CAPR 1: Replace the Beckwith Manual Sync Check Relay model M-0359 (25A1) with a new device.	Heath McDonald	5/1/2021	
CAPR 2: Performance manage employees involved in the event as appropriate. Who was identified as requiring performance management by the team? What level?	Jamie Long	3/1/2021	
CAPR 3: Share this Root Cause Analysis with all employees at the station.	Wayne Toms	3/1/2021	

Action to Correct the C	contributing	Cause(s)	
Contributing Cause(s):	A3B3C04 – LTA review based on assumption that process will not change A4B2C04 – Resources not provided to assure adequate training was provided/ maintained A3B3C06 – Individual underestimated the problem by using past events as basis A6B2C01 – Practice or "hands-on" experience LTA		
Corrective Action		Assignee	Due/Completion
Describe specific actions taken or required		Evaluator SHALL obtain concurrence from assignee or supervisor	Date
Ensure that there is a specific lesson plan around generator synchronization and implement. Include methodical problem- solving techniques with unfamiliar situations. Two separate training tasks. Divide the problem solving training into a separate task with a later due date		TJ Snodgrass	5/1/2021
Provide instructor led training for Operations and OTSs upon completion of the Start-up procedure and synchronizing guide revisions.		TJ Snodgrass	5/1/2021
Evaluate OTS training (technical, command and control) and consider increased shadowing time and rotation to improve proficiency. OTS will be provided extended pay to attend all training sessions and		Jamie Long	5/1/2021

simulator training with their crews.	
Extended pay to review procedures and	
shadow craft would be desired.	

Action(s) to Correct the Contributing Cause(s)					
Contributing Cause (s): A5B1C01 – Fo		ormat deficiencies			
	A5B2C08 – Inc	complete/situation not covered			
	A5B2C01 – Lir	mit inaccuracies			
Corrective Action		Assignee	Due/Completion		
Describe specific actions taken or required		Evaluator SHALL obtain concurrence from assignee or supervisor	Date		
Revise Crystal River Start-Up Procedure to add enclosures for unit specific activities.		TJ Snodgrass	4/1/2021		
Revise Crystal River Start-Up Procedure to reference the EOP ensuring EOP steps have been satisfied.		TJ Snodgrass	4/1/2021		
Update generator synchronizing guides (operator aids) on both units to reference 3602 RPM should be a target, and not a specific setpoint.		TJ Snodgrass	4/1/2021		

Corrective action for Extent of Cause				
Corrective Action	Assignee Evaluator SHALL obtain	Due/Completion		
	concurrence from assignee or supervisor	Dute		
Modify SEL-351S Breaker 3233/3234 logic to supervise output contact equation 102 with 25A1/A2 synchronizing checks.	Jezzel Martinez (Transmission)	3/1/2021		
Review existing facilities in Florida for extent of cause.	Joe Simpson	4/1/2021		

Effectiveness Review Action						
Insert rows for additional EREV such	Insert rows for additional EREV such as interim effectiveness review					
Corrective Action Describe specific actions required	Assignee Evaluator <u>SHALL</u> obtain concurrence from assignee or supervisor	Due Date 6 months or earlier after all actions have been completed				
EREV: Perform effectiveness review on event #1100300. Document no repeat events, procedures revised as described in the corrective actions, training completed, and Transmission corrective actions complete.	Barbara Martinuzzi	10/18/2021				

Attachments

Attachment 1: Five (5) Why Staircase

Problem Statement: Crystal River Unit 4 generator failed to synchronize (sync) with the system when breaker closed, resulting in an out of phase event.

- Why did Crystal River Unit 4 generator have an out of phase synchronization to the grid?
 The operator red flagged the breaker at the wrong point in the synchronization process.
- Why did the operator red flag the breaker at the wrong point in the synchronization process?
 The operator thought that it didn't matter when you red flagged the breaker.

Why did the operator think that it didn't matter when you red flagged the breaker?
 The operator understood that the synchronizing relay would not allow an out of phase synchronization.

4. Why did the operator understand that the synchronizing relay would not allow an out of phase synchronization?

4a. The operators training and experience supported this position.

4b. The operator expected the synchronization check relay to perform as designed.

5. Why did the synchronization check relay not support the operators training and experience, and not perform as designed?

5a. The synchronization check relay had failed allowing an out of phase event.

Attachment 2: Beckwith Electric Company Repair Evaluation Report



Attachment 3: CRN Startup Procedure #CRNOP/00/TBD/0004



Attachment 4: Barrier(s) that should have precluded or reduced the likelihood or significance of the incident

	BARRIER(s) THAT SHOULD HAVE PRECLUDED, OR REDUCED THE LIKELIHOOD OR SIGNIFICANCE OF, THE INCIDENT (Barriers that should have precluded the incident may be part of the Root Causal Train. Barriers that should have reduced the incident may be part of a Contributing Causal Train.)	BARRIER ASSESSMENT (HOW THE BARRIER FAILED) (Identify whether, and in what specific manner, the barrier was missing, weak, or ineffective. Note that a barrier may fail in several different ways in the same incident. Each failure of the barrier should be considered separately.)	CONSEQUENCES OF BARRIER FAILURE (Careful consideration of actual consequences of specific barrier failure is needed to help determine whether a specific failure is part of the Root Causal Train or a Contributing Causal Train.) Indicate if Barrier Failure directly led to or	REASON(s) for BARRIER FAILURE (Identify immediate cause(s) of Barrier failure.) As appropriate, identify additional barrier(s) that should have prevented <u>this</u> <u>Barrier failure</u> . Apply "WHY STAIRCASE" as appropriate.
	The Beckwith Manual sync check relay model M-0359 (25A1)	Relay failed in the closed position.	<u>contributed to</u> the Event. The relay failure armed the circuit on manual operation (directly led).	Damaged, defective or failed part
	Operator red flagged the breaker at the 9 o'clock position on the synchroscope	Synchronization to the grid should occur as close to 12 o'clock as possible, but within the zone of 11 to 1 on the	The operator expected a failed synchronization allowing reposition of the sync switch handle back to auto.	Previous successes in use of rule reinforced continued use of the rule
	Time pressure	synchronization scope.	Operator was unaware that the sync check relay failed (directly led).	Signs to stop were not recognized and
		short period as the station was attempting to respond to meet system requirements.	evaluated the situation prior to continuing to attempt synchronization (contributed to).	step performed incorrectly
l				

BARRIER(s) THAT SHOULD HAVE PRECLUDED, OR REDUCED THE LIKELIHOOD OR SIGNIFICANCE OF, THE INCIDENT (Barriers that should have precluded the incident may be part of the Root Causal Train. Barriers that should have reduced the incident may be part of a Contributing Causal Train.)	BARRIER ASSESSMENT (HOW THE BARRIER FAILED) (Identify whether, and in what specific manner, the barrier was missing, weak, or ineffective. Note that a barrier may fail in several different ways in the same incident. Each failure of the barrier should be considered separately.)	CONSEQUENCES OF BARRIER FAILURE (Careful consideration of actual consequences of specific barrier failure is needed to help determine whether a specific failure is part of the Root Causal Train or a Contributing Causal Train.) Indicate if Barrier Failure <u>directly led to</u> or <u>contributed to</u> the Event.	REASON(s) for BARRIER FAILURE (Identify immediate cause(s) of Barrier failure.) As appropriate, identify additional barrier(s) that should have prevented <u>this</u> <u>Barrier failure</u> . Apply "WHY STAIRCASE" as appropriate.
Turbine speed of 3602 RPM was considered a setpoint and not a target.	After initial voltage adjustment and verifying generator speed of 3602 RPM, no other adjustments were made to the turbine speed.	Adjusting the turbine speed greater than 3602 RPM may have allowed the generator voltage and system voltage to align and the unit to sync in auto (contributed to).	Less than adequate review based on assumption that process will not change
Operations should have stopped when unit 4 initially tripped on low drum level and consulted the Emergency Operating Procedure (EOP).	Using the startup procedure does not direct the operator to consult the EOP which provides steps for immediate operator response, protective relay targets and associated alarms on the DCS alarm screen.	Not being directed to utilize the EOP placed the operator in a skill-based scenario, outside the scope of the startup procedure, and with only knowledge to rely on. (contributed to).	Individual underestimated the problem by using past events as basis
On the job training	The amount of training did not adequately address normal, abnormal, and emergency working conditions.	Operations team supervisor experience consisted of shadowing for approximately three months. Shadowing only provides training on conditions that exist during the shadowing. (contributed to).	Practice or "hands-on" experience less than adequate

BARRIER(s) THAT SHOULD HAVE PRECLUDED, OR REDUCED THE LIKELIHOOD OR SIGNIFICANCE OF, THE INCIDENT (Barriers that should have precluded the incident may be part of the Root Causal Train. Barriers that should have reduced the incident may be part of a Contributing Causal Train.)	BARRIER ASSESSMENT (HOW THE BARRIER FAILED) (Identify whether, and in what specific manner, the barrier was missing, weak, or ineffective. Note that a barrier may fail in several different ways in the same incident. Each failure of the barrier should be considered separately.)	CONSEQUENCES OF BARRIER FAILURE (Careful consideration of actual consequences of specific barrier failure is needed to help determine whether a specific failure is part of the Root Causal Train or a Contributing Causal Train.) Indicate if Barrier Failure <u>directly led to</u> or <u>contributed to</u> the Event.	REASON(s) for BARRIER FAILURE (Identify immediate cause(s) of Barrier failure.) As appropriate, identify additional barrier(s) that should have prevented <u>this</u> <u>Barrier failure</u> . Apply "WHY STAIRCASE" as appropriate.
Procedure was not of adequate quality and did not provide clear instructions.	The unit steps are intertwined even though the start-up process and unit configuration are different. Enclosure instructions are incomplete, and limits should be a target and not setpoints.	Operator and Operations team supervisor could not rely on the procedure for guidance during the event (contributed to).	Format deficiencies Incomplete/situation not covered Limit inaccuracies Change related documents not developed or revised

Duke Energy Florida, LLC Docket No. 20210001 DEF's Suppl Response to OPC POD 1 (1-4) Q4



Root Cause Analysis Report

CRN U4 Generator Out of Phase Synchronization 12/18/2020

Revision # 1.0

PlantView Event Number: 1100300

Prepared By:	Barbara Martinuzzi	Date:	2/2/2021	
Sponsor Approval:	Wayne Toms	Date:	2/24/2021	

Regional Review Committee date:

This cause analysis evaluates important conditions adverse to quality through the use of a structured evaluation process. The information identified in this report was discovered using all the data available to the root cause evaluation team at the time of writing using the benefit of hindsight. Cause analyses performed after the fact for Duke Energy have been established as a responsive means to document and assure that conditions adverse to quality are promptly identified and corrected and, as required, to assure that actions are taken to reduce the risk of repetition of the event or condition adverse to quality.

As such, this cause analysis is not intended to make a determination as to whether any of the actions taken or the decisions made by management, vendors, internal organizations, or individual personnel prior to or at the time of the event were reasonable or prudent based on the information that was known or available at the time they took such actions or made such decisions. Any individual statement or conclusion included in the evaluation as to whether errors may have been made or improvements are warranted is based solely upon information the root cause team considered, including information and results learned after-the-fact. Nothing in this evaluation should be construed as an admission of negligence, liability, or imprudence.
Team Kick-Off Meeting Date:	1/21/2021
Date Report Completed:	2/16/2021
Root Cause Investigator(s):	Barbara Martinuzzi, Sr OE Specialist
	James C Winborne, Lead Engineer
	Joe Simpson, Manager Generation Engineering
	Doug Wood, Senior Engineer
	Gene Mullins, Interim Assignment - Leader
	Dana Christensen, Supervisor Operations

I. <u>Problem Statement:</u>

Crystal River Unit 4 generator failed to synchronize (sync) with the system when breaker closed, resulting in an out of phase event.

II. Description of Incident/Issue:

Crystal River Unit 4 had been in an extended outage returning to service on December 16, 2020. Unit 4 had been operating at near minimum load, having just completed the swapping from the standby boiler feed pump to the main boiler feed pump, when the turbine/generator tripped due to a boiler feed water pump control issue.

Unit 5 was in startup operations at the time of the unit 4 turbine/generator trip. The station only has one standby boiler feed pump that is shared by both units. Since unit 5 was still one day away from being online, the decision was made to put unit 5 on hold in a safe condition and recover unit 4.

Operations closed the exciter field breaker, turbine auto sync was selected, set breaker 3233 to close, turbine speed was set at 3602 RPM, and generator voltage verified to be within 2KV of system voltage. When the synchroscope rolled to the twelve o'clock position, all conditions were met (sync slip frequency OK, sync volts OK, sync phase angle OK), amber lights were lit, but breaker 3233 did not close and unit 4 failed to sync to the grid. A walkdown was performed and Operations found permissive 86A&B lockout relays tripped. The permissive lockout relays were reset, and a second attempt to synchronize in auto was initiated.

On the second auto attempt, when the synchroscope rolled to the twelve o'clock position, all conditions were met (sync slip frequency OK, sync volts OK, sync phase angle OK), amber lights were lit, but breaker 3233 did not close and unit 4 failed to sync to the grid a second time. Another walkdown was performed and Operations found plant lines lockout relays 3AG & AB tripped. The plant line lockout relays were reset, and a third attempt to synchronize in auto was initiated.

On the third auto attempt, when the synchroscope rolled to the twelve o'clock position, all conditions were met (sync slip frequency OK, sync volts OK, sync phase angle OK), amber lights were lit, but breaker 3233 did not close and unit 4 failed to sync to the grid for the third time in auto.

The operator green flagged the breaker and placed the sync switch in manual. The operator red flagged breaker 3233 expecting a failed synchronization allowing reposition of the sync switch handle back to auto. The operator expected nothing to happen until the auto option was selected and the synchroscope rolled to the twelve o'clock position. The operator stated that they were not attempting to synchronize in manual rather attempting to reset the synchronization circuit to permit auto synchronization. Through interviews it was noted that the auto sync option has been used since 2017 and use of the manual option would be rare. Unknown to Operations was that the manual sync check relay 25A1 had failed. The circuit was completed when breaker 3233 was red flagged causing the turbine/generator to attempt to sync to the grid out of phase at a 160-degree angle. This resulted in significant damage to the generator rotor. The event also caused enough grid instability on the 230KV to trip Citrus Combined Cycle PB1 station offline (reference Plantview event #1100460).

The Beckwith Manual sync check relay model M-0359 (25A1) failed to pass bench testing. The failure mode allowed the closing contact to latch closed as far out as fifty degrees from zero. The setpoint is fifteen degrees. This relay monitors the slip frequency, voltage, and phase angle. When all three conditions are satisfied, the relay closes permitting synchronization to the grid. The relay was sent for failure analysis and a spare relay was removed from Crystal River Unit 2, bench tested and installed.

No damage was initially found to the machine during inspection, all electrical tests were satisfied, and the station went into a forced outage. During attempted start-up on January 7, a low speed centrifugal ground was found on the main generator field and the unit was placed in forced outage.

Timeline

December 16, 2020	22:53	Unit 4 returned to service
December 17, 2020	19:10	Turbine/generator tripped (boiler feed water pump control issue)
December 17, 2020	22:00:12.608	First attempt to auto sync (permissive 86A&B lockouts tripped)
December 17, 2020	22:00:16.924	Second attempt to auto sync (plant line 3AG & 3BG lockout relays tripped)
December 17, 2020	22:00:20.132	Third attempt to auto sync (cause for failed auto sync unknown)
December 17, 2020	22:11:44.7340	Citrus Combined Cycle PB1 tripped (breaker open)
December 17, 2020	22:11:47.7080	Fourth attempt (red flagged the breaker - breaker closed)
December 17, 2020	22:11:47.7106	Unit 4 breaker 3233 tripped open (U4 placed in forced outage)
December 18, 2020		Meeting with Turbine Generator Services
December 21, 2020		Review of substation drawings, relay operational data
December 23, 2020		Beckwith manual sync check relay replaced
January 7, 2021		Unit 4 start attempt (ground on the main field)
January 20, 2021		Beckwith manual sync check relay model M-0359 (25A1) sent for failure analysis
February 8, 2021		Beckwith completed repair evaluation report (confirmed onsite findings)

III. Extent of Condition:

The Beckwith Manual Sync Check Relay model M-0359 (25A1) is typically a very solid device with little to no history of failure in decades of operation. Relay 25A1, serial #1711 was originally procured on February 28, 2002, and then relocated from the retired 230KV Crystal River substation and reinstalled in the new 230KV substation terminal house as part of the 2017-2019 fiber optic communication upgrades. The relay was last functionally tested in April 2020. The relay was sent for failure analysis following the event. The sync check relay was verified with component failure that led to mis-operation of the device. The report is included as Attachment 2.

The Beckwith model M-0193 and M-0189 auto sync check relays were tested and passed.

The plant line lockout (3AG & AB) relay panels were modified during 2017 and completed in 2019 as part of Transmission substation upgrade project, making units 4 and 5 panel light sequence and visual cues identical. Before this project, the plant line relay panel light sequence, which indicates a unit trip, was different for both units. The Operations Team Supervisor (OTS) was aware of this modification, but several operators on shift were not and did not check the plant line relay panels on initial walkdown.

Prior to the 2017-2019 fiber optic outage, the preferred method to sync unit 4 was in manual when syncing to the grid. Following the outage, the preferred method was modified to auto. It has been verified that no changes to the wiring or sync selector switch occurred during this outage. There have been no changes to the synchronization hard panel since original panel construction in 2002.

IV. Analysis:

The team utilized interviews, shift logs, shift turnover documents and the pre-job brief. Status updates and correspondence from Transmission and TGS, developed immediately after the event were examined as part of the analysis. Station electrical drawings, digital fault recorder, relay event files and substation relay schemes were reviewed along with projects and configuration changes occurring between 2017 and 2020. The Start-up procedure and Emergency Operating Procedure (EOP) were reviewed along with the generator synchronizing guide instructions and the General Electric (GE) contact table for breaker 3233/3234 control switch. Unit 5 breaker control switches were also evaluated. The Beckwith Electric Company repair evaluation report was reviewed.

V. <u>Summary of Root Cause(s)</u>:

Note: Not necessarily listed in order of significance.

A2B6C01 – Damaged, Defective or failed part

The Beckwith Manual sync check relay model M-0359 (25A1) failed in the closed position which left the circuit armed on manual operation.

A3B2C04 - Previous successes in use of rule reinforced continued use of rule

(Successful use of a rule in the past led to the wrong use of the rule or the rule being incorrectly applied.) The operator red flagged breaker 3233 expecting a failed synchronization allowing reposition of the sync switch handle back to auto. Proper operational procedure would be to remove the red flag from the breaker prior to repositioning the synchronization switch handle.

VI. <u>Summary of Contributing Cause(s):</u>

Note: Not necessarily listed in order of significance.

A3B3C04 - LTA review based on assumption that process will not change

(Individual believed that no variability existed in the process and thus overlooked the fact that a change had occurred, leading to different results than normally realized).

After initial voltage adjustment and verifying generator speed of 3602 RPM, no other adjustments were made to the frequency or voltage angle. Adjusting the turbine speed may have allowed the generator voltage and system voltage to align and the unit to sync to the grid in auto.

A3B3C06 - Individual underestimated the problem by using past events as basis

(Based on stored knowledge of past events, the individual underestimated problems with the existing event and planned for fewer contingencies than would be needed.)

During the 17-minute time frame of the event, the operations crew attempted unsuccessfully to synchronize to the grid four times without a questioning attitude and without consulting the Operations Superintendent and/or Station Manager.

A6B2C01 – Practice or "hands-on" experience LTA

(The on-the-job training did not provide opportunities to learn skills necessary to perform the job. There was not enough practice, or hands-on, time allotted.)

Additional training resources are needed to fully train the shifts for the newly restructured organization.

A5B1C01 – Format deficiencies

(The layout of the written communication made it difficult to follow. The steps of the procedure were not logically grouped.) The unit 4 and unit 5 steps are intertwined even though the start-up process and unit configuration are different. CRN Startup Procedure #CRNOP/00/TBD/0004 is included as Attachment 3.

A5B2C08 – Incomplete/situation not covered

(Details of the written communication were incomplete. Insufficient information was presented. The written communication did not address situations likely to occur during the completion of the procedure.)

Page 75 of the Start-up procedure notes 'two methods of generator synchronization on Unit 4: Auto sync mode and Manual mode. Automatic is the normal mode'.

Page 76, section 13.2.2 states 'If Auto synchronization is inoperable on unit 4, then use manual sync listed in Enclosure 5'. Enclosure 5 instructions are incomplete, stopping mid step.

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(Limits were not expressed clearly and concisely.)

A generator synchronizing guide (operator aid) for unit 5 is laminated and attached to the generator synchronization panel. The guide states 'Ensure the turbine speed is at least 3600 RPM (3602 is recommended)." Quite often, turbine speed needs to be adjusted up and down for synchronization. 3602 RPM should be a target, and not a specific setpoint.

A4B5C09 – Change-related documents not developed or revised

(Changes to processes resulted in the need for new forms of written communication, which were not created.) Laminated generator synchronizing guidance (operator aid) did not exist for unit 4.

VII. Extent of Cause:

Cases where the plant line breakers also serve as the Generator Synchronizing Breakers should be reviewed for output contact supervision with 25A1/A2 elements. Modifying SEL-351S Breaker 3233/3234 logic to supervise output contact equation 102 with 25A1/A2 synchronizing checks will provide a fail-safe mechanism that allows performance only one way.

VIII. <u>Repeat Event Review:</u>

There have been no similar generator events at Crystal River or in the Florida fleet within the last three years.

Corrective Actions:

Immediate & Interim Corrective Actions A4B5C09 – Change-related documents not developed or revised			
Corrective Action Assignee Due/Completion Describe specific actions taken or required. Evaluator SHALL obtain concurrence from assignee or supervisor Date			
Develop a generator synchronizing guide (operator aid) for unit 4, laminate and attach to the generator output breaker.	Jamie Long	Complete	

Corrective action for Extent of Condition			
Corrective Action Describe specific actions taken or required	Assignee Evaluator <u>SHALL</u> obtain concurrence from assignee or supervisor	Due/Completion Date	
Create PMs to check synchronizing relays on a six-year period based on industry standard.	Heath McDonald	Complete	
Share technical document on lessons learned with Fleet.	Joe Simpson	5/1/2021	

Action(s) to Correct the Root Cause(s)			
Root Cause(s): A2B6C01 – Damaged, D	Root Cause(s): A2B6C01 – Damaged, Defective or failed part		
A3B2C04 – Previous suc	ccesses in use of rule reinforced cont	inued use of rule	
Corrective Action	Assignee	Due/Completion	
Describe specific actions taken or required	Evaluator SHALL obtain	Date	
	concurrence from assignee or		
	supervisor		
CAPR 1: Replace the Beckwith Manual	CAPR 1: Replace the Beckwith Manual Heath McDonald 5/1/2021		
Sync Check Relay model M-0359 (25A1)			
with a new device.			
CAPR 2: Performance manage employees Jamie Long		3/15/2021	
involved in the event as appropriate.			
CAPR 3: Share this Root Cause Analysis Wayne Toms 3/31/2021			
with all employees at the station.			

Action to Correct the Contributing Cause(s)				
Contributing Cause(s):	A3B3C04 – LT	A3B3C04 – LTA review based on assumption that process will not change		
	A4B2C04 – Resources not provided to assure adequate training was			
	provided/ maintained			
	A3B3C06 – Individual underestimated the problem by using past events as			
	basis			
	A6B2C01 – Practice or "hands-on" experience LTA			
Corrective Action	Assignee Due/Completion			
Describe specific actions take	actions taken or required Date		Date	

Q4

	DEF's Supp	<u>Response to OPC POD</u>
	Evaluator <u>SHALL</u> obtain	
	concurrence from assignee or	
	supervisor	
Ensure that there is a specific lesson plan around generator synchronization and implement.	TJ Snodgrass	5/1/2021
Ensure that the lesson plan includes methodical problem-solving techniques with unfamiliar situations.	TJ Snodgrass	6/1/2021
Provide instructor led training for Operations and OTSs upon completion of the Start-up procedure and synchronizing guide revisions.	TJ Snodgrass	5/1/2021
Issue Standing Order "maximum of two attempts at synchronization in start-up procedure" until identified procedural changes are complete.	Jamie Long	3/15/2021
Evaluate OTS training (technical, command and control) and consider increased shadowing time and rotation to improve proficiency. OTS will be provided extended pay to attend all training sessions and simulator training with their crews. Extended pay to review procedures and shadow craft would be desired. (Discuss with Tara - added per Wayne)	Jamie Long	5/1/2021

Action(s) to Correct the Contributing Cause(s)			
Contributing Cause (s):	A5B1C01 – Format deficiencies		
	A5B2C08 – Inc	complete/situation not covered	
	A5B2C01 – Lir	mit inaccuracies	
Corrective Action		Assignee	Due/Completion
Describe specific actions take	en or required	Evaluator SHALL obtain	Date
	-	concurrence from assignee or	
		supervisor	
Revise Crystal River Start-Up	Procedure to	TJ Snodgrass	4/1/2021
add enclosures for unit specific activities.			
Revise Crystal River Start-Up Procedure to		TJ Snodgrass	4/1/2021
reference the EOP ensuring EOP steps			
have been satisfied.			
Update generator synchronizing guides		TJ Snodgrass	4/1/2021
(operator aids) on both units to reference			
3602 RPM should be a target, and not a			
specific setpoint.			

Corrective action for Extent of Cause			
Corrective Action Describe specific actions taken or required	Assignee Evaluator <u>SHALL</u> obtain concurrence from assignee or supervisor	Due/Completion Date	
Modify SEL-351S Breaker 3233/3234 logic to supervise output contact equation 102 with 25A1/A2 synchronizing checks.	Jezzel Martinez (Transmission)	3/1/2021	
Review existing facilities in Florida for extent of cause.	Joe Simpson	4/1/2021	

Effectiveness Review Action

Insert rows for additional EREV such as interim effectiveness review

Corrective Action	Assignee	Due Date

Q4

	DEF's Supp	Response to OPC POD 1
Describe specific actions required	Evaluator <u>SHALL</u> obtain concurrence from assignee or supervisor	6 months or earlier after all actions have been completed
EREV: Perform effectiveness review on event #1100300. Document no repeat events, procedures revised as described in the corrective actions, training completed, and Transmission corrective actions complete.	Barbara Martinuzzi	10/18/2021

Attachments

Attachment 1: Five (5) Why Staircase

Problem Statement: Crystal River Unit 4 generator failed to synchronize (sync) with the system when breaker closed, resulting in an out of phase event.

1. Why did Crystal River Unit 4 generator have an out of phase synchronization to the grid? 1a. The operator red flagged the breaker at the wrong point in the synchronization process.

2. Why did the operator red flag the breaker at the wrong point in the synchronization process?2a. The operator thought that it didn't matter when you red flagged the breaker.

3. Why did the operator think that it didn't matter when you red flagged the breaker?3a. The operator understood that the synchronizing relay would not allow an out of phase synchronization.

4. Why did the operator understand that the synchronizing relay would not allow an out of phase synchronization?

4a. The operators training and experience supported this position.

4b. The operator expected the synchronization check relay to perform as designed.

5. Why did the synchronization check relay not support the operators training and experience, and not perform as designed?

5a. The synchronization check relay had failed allowing an out of phase event.

Attachment 2: Beckwith Electric Company Repair Evaluation Report



Attachment 3: CRN Startup Procedure #CRNOP/00/TBD/0004



Attachment 4: Barrier(s) that should have precluded or reduced the likelihood or significance of the incident

BARRIER(s) THAT SHOULD HAVE PRECLUDED, OR REDUCED THE LIKELIHOOD OR SIGNIFICANCE OF, THE INCIDENT (Barriers that should have precluded the incident may be part of the Root Causal Train. Barriers that should have reduced the incident may be part of a Contributing Causal Train.)	BARRIER ASSESSMENT (HOW THE BARRIER FAILED) (Identify whether, and in what specific manner, the barrier was missing, weak, or ineffective. Note that a barrier may fail in several different ways in the same incident. Each failure of the barrier should be considered separately.)	CONSEQUENCES OF BARRIER FAILURE (Careful consideration of actual consequences of specific barrier failure is needed to help determine whether a specific failure is part of the Root Causal Train or a Contributing Causal Train.) Indicate if Barrier Failure <u>directly led to</u> or <u>contributed to</u> the Event.	REASON(s) for BARRIER FAILURE (Identify immediate cause(s) of Barrier failure.) As appropriate, identify additional barrier(s) that should have prevented <u>this</u> <u>Barrier failure</u> . Apply "WHY STAIRCASE" as appropriate.
The Beckwith Manual sync check relay model M-0359 (25A1)	Relay failed in the closed position.	The relay failure armed the circuit on manual operation (directly led).	Damaged, defective or failed part
Operator red flagged the breaker at the 9 o'clock position on the synchroscope	Synchronization to the grid should occur as close to 12 o'clock as possible, but within the zone of 11 to 1 on the synchronization scope.	The operator expected a failed synchronization allowing reposition of the sync switch handle back to auto. Operator was unaware that the sync check relay failed (directly led).	Previous successes in use of rule reinforced continued use of the rule
Turbine speed of 3602 RPM was considered a setpoint and not a target.	After initial voltage adjustment and verifying generator speed of 3602 RPM, no other adjustments were made to the turbine speed.	Adjusting the turbine speed greater than 3602 RPM may have allowed the generator voltage and system voltage to align and the unit to sync in auto (contributed to).	Less than adequate review based on assumption that process will not change

BARRIER(s) THAT SHOULD HAVE PRECLUDED, OR REDUCED THE LIKELIHOOD OR SIGNIFICANCE OF, THE INCIDENT (Barriers that should have precluded the incident may be part of the Root Causal Train. Barriers that should have reduced the incident may be part of a Contributing Causal Train.)	BARRIER ASSESSMENT (HOW THE BARRIER FAILED) (Identify whether, and in what specific manner, the barrier was missing, weak, or ineffective. Note that a barrier may fail in several different ways in the same incident. Each failure of the barrier should be considered separately.)	CONSEQUENCES OF BARRIER FAILURE (Careful consideration of actual consequences of specific barrier failure is needed to help determine whether a specific failure is part of the Root Causal Train or a Contributing Causal Train.) Indicate if Barrier Failure <u>directly led to</u> or <u>contributed to</u> the Event.	REASON(s) for BARRIER FAILURE (Identify immediate cause(s) of Barrier failure.) As appropriate, identify additional barrier(s) that should have prevented <u>this</u> <u>Barrier failure</u> . Apply "WHY STAIRCASE" as appropriate.
On the job training	The amount of training did not adequately address normal, abnormal, and emergency working conditions.	Operations team supervisor experience consisted of shadowing for approximately three months. Shadowing only provides training on conditions that exist during the shadowing. (contributed to).	Practice or "hands-on" experience less than adequate
Procedure was not of adequate quality and did not provide clear instructions.	The unit steps are intertwined even though the start-up process and unit configuration are different. Enclosure instructions are incomplete, and limits should be a target and not setpoints.	Operator and Operations team supervisor could not rely on the procedure for guidance during the event (contributed to).	Format deficiencies Incomplete/situation not covered Limit inaccuracies Change related documents not developed or revised

Duke Energy Florida, LLC Docket No. 20210001 DEF's Suppl Response to OPC POD 1 (1-4) Q4



Root Cause Analysis Report

CRN U4 Generator Out of Phase Synchronization 12/18/2020

Revision # 1.0

PlantView Event Number: 1100300

Barbara Martinuzzi	Date:	2/2/2021
Wayne Toms	Date:	2/24/2021
	Barbara Martinuzzi Wayne Toms	Barbara Martinuzzi Date: Wayne Toms Date:

Regional Review Committee date:

This cause analysis evaluates important conditions adverse to quality through the use of a structured evaluation process. The information identified in this report was discovered using all the data available to the root cause evaluation team at the time of writing using the benefit of hindsight. Cause analyses performed after the fact for Duke Energy have been established as a responsive means to document and assure that conditions adverse to quality are promptly identified and corrected and, as required, to assure that actions are taken to reduce the risk of repetition of the event or condition adverse to quality.

As such, this cause analysis is not intended to make a determination as to whether any of the actions taken or the decisions made by management, vendors, internal organizations, or individual personnel prior to or at the time of the event were reasonable or prudent based on the information that was known or available at the time they took such actions or made such decisions. Any individual statement or conclusion included in the evaluation as to whether errors may have been made or improvements are warranted is based solely upon information the root cause team considered, including information and results learned after-the-fact. Nothing in this evaluation should be construed as an admission of negligence, liability, or imprudence.

Page #1

Team Kick-Off Meeting Date:	1/21/2021
Date Report Completed:	2/16/2021
Root Cause Investigator(s):	Barbara Martinuzzi, Sr OE Specialist
	James C Winborne, Lead Engineer
	Joe Simpson, Manager Generation Engineering
	Doug Wood, Senior Engineer
	Gene Mullins, Interim Assignment - Leader
	Dana Christensen, Supervisor Operations

I. <u>Problem Statement:</u>

Crystal River Unit 4 generator failed to synchronize (sync) with the system when breaker closed, resulting in an out of phase event.

II. <u>Description of Incident/Issue</u>:

Crystal River Unit 4 had been in an extended outage returning to service on December 16, 2020. Unit 4 had been operating at near minimum load, having just completed the swapping from the standby boiler feed pump to the main boiler feed pump, when the turbine/generator tripped due to a boiler feed water pump control issue.

Unit 5 was in startup operations at the time of the unit 4 turbine/generator trip. The station only has one standby boiler feed pump that is shared by both units. Since unit 5 was still one day away from being online, the decision was made to put unit 5 on hold in a safe condition and recover unit 4.

Operations closed the exciter field breaker, turbine auto sync was selected, set<u>generator output</u> breaker 3233 to close, turbine speed was set at 3602 RPM, and generator voltage verified to be within 2KV of system voltage. When the synchroscope rolled to the twelve o'clock position, all conditions were met (sync slip frequency OK, sync volts OK, sync phase angle OK), amber lights were lit, but breaker 3233 did not close and unit 4 failed to sync to the grid. A walkdown was performed and Operations found permissive 86A&B lockout relays kere lights.

On the second auto attempt, when the synchroscope rolled to the twelve o'clock position, all conditions were met (sync slip frequency OK, sync volts OK, sync phase angle OK), amber lights were lit, but breaker 3233 did not close and unit 4 failed to sync to the grid a second time. Another walkdown was performed and Operations found plant lines lockout relays 3AG & AB tripped. The plant line lockout relays were reset, and a third attempt to synchronize in auto was initiated.

On the third auto attempt, when the synchroscope rolled to the twelve o'clock position, all conditions were met (sync slip frequency OK, sync volts OK, sync phase angle OK), amber lights were lit, but breaker 3233 did not close and unit 4 failed to sync to the grid for the third time in auto.

The operator green flagged the breaker and placed the sync switch in manual. The operator red flagged breaker 3233 expecting a failed synchronization allowing reposition of the sync switch handle back to auto. The operator expected nothing to happen until the auto option was selected and the synchroscope rolled to the twelve o'clock position. The operator stated that they were not attempting to synchronization. Through interviews it was noted that the auto sync option has been used since 2017 and use of the manual option would be rare. Unknown to Operations was that the manual sync check relay 25A1 had failed. The circuit was completed when breaker 3233 was red flagged causing the turbine/generator to attempt to sync to the grid out of phase at a 160-degree angle. This resulted in significant damage to the generator rotor. The event also caused enough grid instability on the 230KV to trip Citrus Combined Cycle PB1 station offline (reference Plantview event #1100460).

Page #2

Commented [SJ1]: Were these relays verified to not be tripped prior to the sync attempt? If so, I think we should add that.

Commented [MBJ2R1]: No. The operators did not reference any of the Emergency Operating Procedures (which list all of the relays) and the startup procedure does not address the permissives, so after each attempt, they thought that particular relay was the problem and stopped looking.

Commented [MBJ3R1]:

Commented [SJ4]: Were these relays verified to not be tripped prior to the second sync attempt? If so, I think we should add that.

Commented [MBJ5R4]: Same comment as above.

The Beckwith Manual sync check relay model M-0359 (25A1) failed to pass bench testing. The failure mode allowed the closing contact to latch closed as far out as fifty degrees from zero. The setpoint is fifteen degrees. This relay monitors the slip frequency, voltage, and phase angle. When all three conditions are satisfied, the relay closes permitting synchronization to the grid. The relay was sent for failure analysis and a spare relay was removed from Crystal River Unit 2, bench tested and installed.

No damage was initially found to the machine during inspection, all electrical tests were satisfied, and the station went into a forced outage. During attempted start-up on January 7, a low speed centrifugal ground was found on the main generator field and the unit was placed in forced outage.

Timeline

rimeime		
December 16, 2020	22:53	Unit 4 returned to service
December 17, 2020	19:10	Turbine/generator tripped (boiler feed water pump control issue)
December 17, 2020	22:00:12.608	First attempt to auto sync (permissive 86A&B lockouts tripped)
December 17, 2020	22:00:16.924	Second attempt to auto sync (plant line 3AG & 3BG lockout relays tripped)
December 17, 2020	22:00:20.132	Third attempt to auto sync (cause for failed auto sync unknown)
December 17, 2020	22:11:44.7340	Citrus Combined Cycle PB1 tripped (breaker open)
December 17, 2020	22:11:47.7080	Fourth attempt (red flagged the breaker - breaker closed)
December 17, 2020	22:11:47.7106	Unit 4 breaker 3233 tripped open (U4 placed in forced outage)
December 18, 2020		Meeting with Turbine Generator Services
December 21, 2020		Review of substation drawings, relay operational data
December 23, 2020		Beckwith manual sync check relay replaced
January 7, 2021		Unit 4 start attempt (ground on the main field)
January 20, 2021		Beckwith manual sync check relay model M-0359 (25A1) sent for failure analysis
February 8, 2021		Beckwith completed repair evaluation report (confirmed onsite findings)

III. Extent of Condition:

The Beckwith Manual Sync Check Relay model M-0359 (25A1) is typically a very solid device with little to no history of failure in decades of operation. Relay 25A1, serial #1711 was originally procured on February 28, 2002, and then relocated from the retired 230KV Crystal River substation and reinstalled in the new 230KV substation terminal house as part of the 2017-2019 fiber optic communication upgrades. The relay was last functionally tested in April 2020. The relay was sent for failure analysis following the event. The sync check relay was verified with component failure that led to mis-operation of the device. The report is included as Attachment 2.

The Beckwith model M-0193 and M-0189 auto sync check relays were tested and passed.

The plant line lockout (3AG & AB) relay panels were modified during 2017 and completed in 2019 as part of Transmission substation upgrade project, making units 4 and 5 panel light sequence and visual cues identical. Before this project, the plant line relay panel light sequence, which indicates a unit trip, was different for both units. The Operations Team Supervisor (OTS) was aware of this modification, but several operators on shift were not and did not check the plant line relay panels on initial walkdown.

Prior to the 2017-2019 fiber optic outage, the preferred method to sync unit 4 was in manual when syncing to the grid. Following the outage, the preferred method was modified to auto. It has been verified that no changes to the wiring or sync selector switch occurred during this outage. There have been no changes to the synchronization hard panel since original panel construction in 2002.

IV. Analysis:

The team utilized interviews, shift logs, shift turnover documents and the pre-job brief. Status updates and correspondence from Transmission and TGS, developed immediately after the event were examined as part of the analysis. Station electrical drawings, digital fault recorder, relay event files and substation relay schemes were reviewed along with projects and configuration changes occurring between 2017 and 2020. The Start-up procedure and Emergency Operating Procedure (EOP) were reviewed along with the generator synchronizing guide instructions and the General Electric (GE) contact table for breaker 323/3234 control switch. Unit 5 breaker control switches were also evaluated. The Beckwith Electric Company repair evaluation report was reviewed.

Page #3

Commented [SJ6]: I'm not clear on what the purpose of this paragraph is...were the 3AG&AB relays tripped for both the first and second sync attempts? Above we have that these were found tripped after the second sync attempt. Still not sure what we're trying to do with this paragraph though...

Commented [MBJ7R6]: Yes. The operators did not complete a thorough walkdown after each trip, therefore each time they attempted to sync there was another item holding them out. This particular item was missed on the first attempt by the operators due to the change in the light sequence and the operators not aware of the modification. The OTS discovered.

v Summary of Root Cause(s):

Note: Not necessarily listed in order of significance.

A2B6C01 – Damaged, Defective or failed part

The Beckwith Manual sync check relay model M-0359 (25A1) failed in the closed position which left the circuit armed on manual operation.

A3B2C04 – Previous successes in use of rule reinforced continued use of rule

(Successful use of a rule in the past led to the wrong use of the rule or the rule being incorrectly applied.) The operator red flagged breaker 3233 expecting a failed synchronization allowing reposition of the sync switch handle back to auto. Proper operational procedure would be to remove the red flag from the breaker prior to repositioning the synchronization switch handle

VI. Summary of Contributing Cause(s):

Note: Not necessarily listed in order of significance.

A3B3C04 – LTA review based on assumption that process will not change

(Individual believed that no variability existed in the process and thus overlooked the fact that a change had occurred, leading to different results than normally realized).

After initial voltage adjustment and verifying generator speed of 3602 RPM, no other adjustments were made to the frequency or voltage angle. Adjusting the turbine speed may have allowed the generator voltage and system voltage to align and the unit to sync to the grid in auto

A3B3C06 – Individual underestimated the problem by using past events as basis

(Based on stored knowledge of past events, the individual underestimated problems with the existing event and planned for fewer contingencies than would be needed.)

During the 17-minute time frame of the event, the operations crew attempted unsuccessfully to synchronize to the grid four times without a questioning attitude and without consulting the Operations Superintendent and/or Station Manager.

A6B2C01 – Practice or "hands-on" experience LTA

(The on-the-job training did not provide opportunities to learn skills necessary to perform the job. There was not enough practice, or hands-on, time allotted.)

Additional training resources are needed to fully train the shifts for the newly restructured organization.

A5B1C01 – Format deficiencies

(The layout of the written communication made it difficult to follow. The steps of the procedure were not logically grouped.) The unit 4 and unit 5 steps are intertwined even though the start-up process and unit configuration are different. CRN Startup Procedure #CRNOP/00/TBD/0004 is included as Attachment 3.

A5B2C08 - Incomplete/situation not covered

(Details of the written communication were incomplete. Insufficient information was presented. The written communication did not address situations likely to occur during the completion of the procedure.)

Page 75 of the Start-up procedure notes 'two methods of generator synchronization on Unit 4: Auto sync mode and Manual mode. Automatic is the normal mode'.

Page 76, section 13.2.2 states 'If Auto synchronization is inoperable on unit 4, then use manual sync listed in Enclosure 5'. Enclosure 5 instructions are incomplete, stopping mid step.

A5B2C01 – Limit inaccuracies (Limits were not expressed clearly and concisely.)

A generator synchronizing guide (operator aid) for unit 5 is laminated and attached to the generator synchronization panel. The guide states 'Ensure the turbine speed is at least 3600 RPM (3602 is recommended)." Quite often, turbine speed needs to be adjusted up and down for synchronization. 3602 RPM should be a target, and not a specific setpoint

A4B5C09 – Change-related documents not developed or revised

(Changes to processes resulted in the need for new forms of written communication, which were not created.) Laminated generator synchronizing guidance (operator aid) did not exist for unit 4.

Page #4

Commented [SJ8]: Does the procedure specify to do this?

Commented [MBJ9R8]: There is no guidance in the procedure for unit 4, but for unit 5 it states " IF closing the generator breaker on unit 5 THEN RED FLAG SET (CLOSE) generator output breaker 1660.

Commented [SJ10]: Why would the amber permissive lights show unit was ready to sync if more adjustments were needed to allow it to sync in auto? What would trigger operator to make adjustments if all the lights indicated he was good to sync? This contributing cause doesn't make sense to me

Commented [MBJ11R10]: When you exceed 3600 RPM all three lights will flicker and illuminate every time when the synchroscope reaches 12 o'clock, however it will not sync if the frequency and voltage angle are not aligned. The only way to do this is to increase speed.

Commented [SJ12]: It's not clear why this contributing cause is listed - are we saying we need the same operator aid for unit 4? What would have triggered operator to know an adjustment was needed if all the lights indicated ready to sync?

Commented [MBJ13R12]: Please see the information above regarding the 'ready to sync'. The operator aid is inaccurate regarding the RPM.

VII. Extent of Cause:

Cases where the plant line breakers also serve as the Generator Synchronizing Breakers should be reviewed for output contact supervision with 25A1/A2 elements. Modifying SEL-351S Breaker 3233/3234 logic to supervise output contact equation 102 with 25A1/A2 synchronizing checks will provide a fail-safe mechanism that allows performance only one way.

VIII. Repeat Event Review:

There have been no similar generator events at Crystal River or in the Florida fleet within the last three years.

Corrective Actions:

Immediate & Interim Corrective Actions			
A4B5C09 – Change-related documents not developed or revised			
Corrective Action Assignee Due/Completion			
Describe specific actions taken or required.	Evaluator <u>SHALL</u> obtain concurrence from assignee or supervisor	Date	
Develop a generator synchronizing guide (operator aid) for unit 4, laminate and attach to the generator output breaker.	Jamie Long	Complete	

Corrective action for Extent of Condition			
Corrective Action Describe specific actions taken or required	Assignee Evaluator <u>SHALL</u> obtain concurrence from assignee or	Due/Completion Date	
Create PMs to check synchronizing relays on a six-year period based on industry standard.	Heath McDonald	Complete	
Share technical document on lessons learned with Fleet.	Joe Simpson	5/1/2021	

Action(s) to Correct the Root Cause(s)			
Root Cause(s): A2B6C01 – Damaged, L	Defective or failed part		
A3B2C04 – Previous su	ccesses in use of rule reinforced cont	inued use of rule	
Corrective Action	Assignee	Due/Completion	
Describe specific actions taken or required	Evaluator SHALL obtain	Date	
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	supervisor		
CAPR 1: Replace the Beckwith Manual	Heath McDonald	5/1/2021	
Sync Check Relay model M-0359 (25A1)			
with a new device.			
CAPR 2: Performance manage employees	Jamie Long	3/15/2021	
involved in the event as appropriate.	-		
CAPR 3: Share this Root Cause Analysis with all employees at the station	Wayne Toms	3/31/2021	

Action to Correct the Contributing Cause(s)			
Contributing Cause(s):	A3B3C04 – LTA review based on assumption that process will not change A4B2C04 – Resources not provided to assure adequate training was provided/ maintained A3B3C06 – Individual underestimated the problem by using past events as basis		
	A6B2C01 – Pr	actice or "hands-on" experience LTA	
Corrective Action		Assignee	Due/Completion
Describe specific actions taken or required			Date

Page #5

Commented [SJ14]: I suspect only Joe and relay experts understand this paragraph - is there a way to write this so the audience of this RCA will understand this paragraph?

Commented [MBJ15R14]: I will work with Joe on the language. We have since found that both Anclote units and CRN Unit 5 already have this fail safe mechanism so only applies to CRN unit 4. Transmission is already moving forward with the corrective action.

	Evaluator SHALL obtain	
	concurrence from assignee or	
	supervisor	
Ensure that there is a specific lesson plan	TJ Snodgrass	5/1/2021
around generator synchronization and		
implement.		
Ensure that the lesson plan includes	TJ Snodgrass	6/1/2021
methodical problem-solving techniques with		
unfamiliar situations.		
Provide instructor led training for	TJ Snodgrass	5/1/2021
Operations and OTSs upon completion of		
the Start-up procedure and synchronizing		
guide revisions.		
Issue Standing Order "maximum of two	Jamie Long	3/15/2021
attempts at synchronization in start-up	_	
procedure" until identified procedural		
changes are complete.		
Evaluate OTS training (technical, command	Jamie Long	5/1/2021
and control) and consider increased		
shadowing time and rotation to improve		
proficiency.		

I

Action(s) to Correct the Contributing Cause(s)				
Contributing Cause (s):	A5B1C01 – Fo	rmat deficiencies		
2 ()	A5B2C08 – Inc	complete/situation not covered		
	A5B2C01 – Lir	mit inaccuracies		
Corrective Action		Assignee	Due/Completion	
Describe specific actions take	en or required	Evaluator SHALL obtain	Date	
		concurrence from assignee or		
		supervisor		
Revise Crystal River Start-Up Procedure to		TJ Snodgrass	4/1/2021	
add enclosures for unit specific activities.		-		
Revise Crystal River Start-Up Procedure to		TJ Snodgrass	4/1/2021	
reference the EOP ensuring EOP steps		-		
have been satisfied.				
Update generator synchroniz	ing guides	TJ Snodgrass	4/1/2021	
(operator aids) on both units to reference				
3602 RPM should be a target, and not a				
specific setpoint.				

Deleted: OTS will be provided extended pay to attend		
all training sessions and simulator training with their		
crews. Extended pay to review procedures and shadow		
craft would be desired. (Discuss with Tara - added per		
Wayne		

Corrective action for Extent of Cause		
Corrective Action Describe specific actions taken or required	Assignee Evaluator <u>SHALL</u> obtain concurrence from assignee or supervisor	Due/Completion Date
Modify SEL-351S Breaker 3233/3234 logic to supervise output contact equation 102 with 25A1/A2 synchronizing checks.	Jezzel Martinez (Transmission)	3/1/2021
Review existing facilities in Florida for extent of cause.	Joe Simpson	4/1/2021

Effectiveness Review Action	as interim effectiveness review	
Corrective Action Describe specific actions required	Assignee Evaluator <u>SHALL</u> obtain concurrence from assignee or supervisor	Due Date 6 months or earlier after all actions have been completed
EREV: Perform effectiveness review on event #1100300. Document no repeat	Barbara Martinuzzi	10/18/2021

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events, procedures revised as described in	
the corrective actions, training completed,	
and Transmission corrective actions	
complete.	

Attachments

Attachment 1: Five (5) Why Staircase

Problem Statement: Crystal River Unit 4 generator failed to synchronize (sync) with the system when breaker closed, resulting in an out of phase event.

1. Why did Crystal River Unit 4 generator have an out of phase synchronization to the grid?

1a. The operator red flagged the breaker at the wrong point in the synchronization process.

2. Why did the operator red flag the breaker at the wrong point in the synchronization process? 2a. The operator thought that it didn't matter when you red flagged the breaker.

3. Why did the operator think that it didn't matter when you red flagged the breaker?

3a. The operator understood that the synchronizing relay would not allow an out of phase synchronization.

4. Why did the operator understand that the synchronizing relay would not allow an out of phase synchronization?

4a. The operators training and experience supported this position.

4b. The operator expected the synchronization check relay to perform as designed.

5. Why did the synchronization check relay not support the operators training and experience, and not perform as designed?

5a. The synchronization check relay had failed allowing an out of phase event.

Attachment 2: Beckwith Electric Company Repair Evaluation Report

PDF
RMA 21184 DUKE
ENERGY EVALUATION

Attachment 3: CRN Startup Procedure #CRNOP/00/TBD/0004



Attachment 4: Barrier(s) that should have precluded or reduced the likelihood or significance of the incident

BARRIER(s) THAT SHOULD HAVE PRECLUDED, OR REDUCED THE	BARRIER ASSESSMENT (HOW THE BARRIER FAILED)	CONSEQUENCES OF BARRIER FAILURE	REASON(s) for BARRIER FAILURE
LIKELIHOOD OR SIGNIFICANCE OF, THE INCIDENT (Barriers that should have precluded the incident may be part of the Root Causal Train. Barriers that should have reduced the incident may be part of a Contributing Causal Train.)	(Identify whether, and in what specific manner, the barrier was missing, weak, or ineffective. Note that a barrier may fail in several different ways in the same incident. Each failure of the barrier should be considered separately.)	(Careful consideration of actual consequences of specific barrier failure is needed to help determine whether a specific failure is part of the Root Causal Train or a Contributing Causal Train.) Indicate if Barrier Failure <u>directly led to</u> or <u>contributed to</u> the Event.	(Identify immediate cause(s) of Barrier failure.) As appropriate, identify additional barrier(s) that should have prevented <u>this</u> <u>Barrier failure</u> . Apply "WHY STAIRCASE" as appropriate.
The Beckwith Manual sync check relay model M-0359 (25A1)	Relay failed in the closed position.	The relay failure armed the circuit on manual operation (directly led).	Damaged, defective or failed part
Operator red flagged the breaker at the 9 o'clock position on the synchroscope	Synchronization to the grid should occur as close to 12 o'clock as possible, but within the zone of 11 to 1 on the synchronization scope.	The operator expected a failed synchronization allowing reposition of the sync switch handle back to auto. Operator was unaware that the sync check relay failed (directly led).	Previous successes in use of rule reinforced continued use of the rule
Turbine speed of 3602 RPM was considered a setpoint and not a target.	After initial voltage adjustment and verifying generator speed of 3602 RPM, no other adjustments were made to the turbine speed.	Adjusting the turbine speed greater than 3602 RPM may have allowed the generator voltage and system voltage to align and the unit to sync in auto (contributed to).	Less than adequate review based on assumption that process will not change

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BARRIER(s) THAT SHOULD HAVE PRECLUDED, OR REDUCED THE LIKELIHOOD OR SIGNIFICANCE OF, THE INCIDENT (Barriers that should have precluded the incident may be part of the Root Causal Train. Barriers that should have reduced the incident may be part of a Contributing Causal Train.)	BARRIER ASSESSMENT (HOW THE BARRIER FAILED) (Identify whether, and in what specific manner, the barrier was missing, weak, or ineffective. Note that a barrier may fail in several different ways in the same incident. Each failure of the barrier should be considered separately.)	CONSEQUENCES OF BARRIER FAILURE (Careful consideration of actual consequences of specific barrier failure is needed to help determine whether a specific failure is part of the Root Causal Train or a Contributing Causal Train.) Indicate if Barrier Failure <u>directly led to</u> or <u>contributed to</u> the Event.	REASON(s) for BARRIER FAILURE (Identify immediate cause(s) of Barrier failure.) As appropriate, identify additional barrier(s) that should have prevented <u>this</u> <u>Barrier failure</u> . Apply "WHY STAIRCASE" as appropriate.
On the job training	The amount of training did not adequately address normal, abnormal, and emergency working conditions.	Operations team supervisor experience consisted of shadowing for approximately three months. Shadowing only provides training on conditions that exist during the shadowing. (contributed to).	Practice or "hands-on" experience less than adequate
Procedure was not of adequate quality and did not provide clear instructions.	The unit steps are intertwined even though the start-up process and unit configuration are different. Enclosure instructions are incomplete, and limits should be a target and not setpoints.	Operator and Operations team supervisor could not rely on the procedure for guidance during the event (contributed to).	Format deficiencies Incomplete/situation not covered Limit inaccuracies Change related documents not developed or revised

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Duke Energy Florida, LLC Docket No. 20210001 DEF's Suppl Response to OPC POD 1 (1-4) Q4



Root Cause Analysis Report

CRN U4 Generator Out of Phase Synchronization 12/18/2020

Revision # 2.0

PlantView Event Number: 1100300

Prepared By:	Barbara Martinuzzi	Date:	2/2/2021	
Sponsor Approval:	Wayne Toms	Date:	2/24/2021	

Regional Review Committee date:

This cause analysis evaluates important conditions adverse to quality through the use of a structured evaluation process. The information identified in this report was discovered using all the data available to the root cause evaluation team at the time of writing using the benefit of hindsight. Cause analyses performed after the fact for Duke Energy have been established as a responsive means to document and assure that conditions adverse to quality are promptly identified and corrected and, as required, to assure that actions are taken to reduce the risk of repetition of the event or condition adverse to quality.

As such, this cause analysis is not intended to make a determination as to whether any of the actions taken or the decisions made by management, vendors, internal organizations, or individual personnel prior to or at the time of the event were reasonable or prudent based on the information that was known or available at the time they took such actions or made such decisions. Any individual statement or conclusion included in the evaluation as to whether errors may have been made or improvements are warranted is based solely upon information the root cause team considered, including information and results learned after-the-fact. Nothing in this evaluation should be construed as an admission of negligence, liability, or imprudence.

Team Kick-Off Meeting Date:	1/21/2021
Date Report Completed:	2/16/2021
Root Cause Investigator(s):	Barbara Martinuzzi, Sr OE Specialist
	James C Winborne, Lead Engineer
	Joe Simpson, Manager Generation Engineering
	Doug Wood, Senior Engineer
	Gene Mullins, Interim Assignment - Leader
	Dana Christensen, Supervisor Operations

I. <u>Problem Statement:</u>

Crystal River Unit 4 generator failed to synchronize (sync) with the system when breaker closed, resulting in an out of phase event.

II. Description of Incident/Issue:

Crystal River Unit 4 had been in an extended outage returning to service on December 16, 2020. Unit 4 had been operating at near minimum load, having just completed the swapping from the standby boiler feed pump to the main boiler feed pump, when the turbine/generator tripped due to a boiler feed water pump control issue.

Unit 5 was in startup operations at the time of the unit 4 turbine/generator trip. The station only has one standby boiler feed pump that is shared by both units. Since unit 5 was still one day away from being online, the decision was made to put unit 5 on hold in a safe condition and recover unit 4.

Operations closed the exciter field breaker, turbine auto sync was selected, set generator output breaker 3233 to close, turbine speed was set at 3602 RPM, and generator voltage verified to be within 2KV of system voltage. When the synchroscope rolled to the twelve o'clock position, all conditions were met (sync slip frequency OK, sync volts OK, sync phase angle OK), amber lights were lit, but breaker 3233 did not close and unit 4 failed to sync to the grid. A walkdown was performed and Operations found permissive 86A&B lockout relays tripped. The permissive lockout relays were reset, and a second attempt to synchronize in auto was initiated.

On the second auto attempt, when the synchroscope rolled to the twelve o'clock position, all conditions were met (sync slip frequency OK, sync volts OK, sync phase angle OK), amber lights were lit, but breaker 3233 did not close and unit 4 failed to sync to the grid a second time. Another walkdown was performed and Operations found plant lines lockout relays 3AG & AB tripped. The plant line lockout relays were reset, and a third attempt to synchronize in auto was initiated.

On the third auto attempt, when the synchroscope rolled to the twelve o'clock position, all conditions were met (sync slip frequency OK, sync volts OK, sync phase angle OK), amber lights were lit, but breaker 3233 did not close and unit 4 failed to sync to the grid for the third time in auto.

The operator green flagged the breaker in auto and placed the sync switch in manual. The operator then red flagged breaker 3233 expecting a failed synchronization allowing reposition of the sync switch handle back to auto. The operator expected nothing to happen until the auto option was selected and the synchroscope rolled to the twelve o'clock position. The operator stated that they were not attempting to synchronize in manual rather attempting to reset the synchronization circuit to permit auto synchronization. Through interviews it was noted that the auto sync option has been used since 2017 and use of the manual option would be rare. Unknown to Operations was that the manual sync check relay 25A1 had failed. The circuit was completed when breaker 3233 was red flagged causing the turbine/generator to attempt to sync to the grid out of phase at a 160-degree angle. This resulted in significant damage to the generator rotor. The event also caused enough grid instability on the 230KV to trip Citrus Combined Cycle PB1 station offline (reference Plantview event #1100460).

The Beckwith Manual sync check relay model M-0359 (25A1) failed to pass bench testing. The failure mode allowed the closing contact to latch closed as far out as fifty degrees from zero. The setpoint is fifteen degrees. This relay monitors the slip frequency, voltage, and phase angle. When all three conditions are satisfied, the relay closes permitting synchronization to the grid. The relay was sent for failure analysis and a spare relay was removed from Crystal River Unit 2, bench tested and installed.

No damage was initially found to the machine during inspection, all electrical tests were satisfied, and the station went into a forced outage. During attempted start-up on January 7, a low speed centrifugal ground was found on the main generator field and the unit was placed in forced outage.

Timeline

December 16, 2020	22:53	Unit 4 returned to service
December 17, 2020	19:10	Turbine/generator tripped (boiler feed water pump control issue)
December 17, 2020	22:00:12.608	First attempt to auto sync (permissive 86A&B lockouts tripped)
December 17, 2020	22:00:16.924	Second attempt to auto sync (plant line 3AG & 3BG lockout relays tripped)
December 17, 2020	22:00:20.132	Third attempt to auto sync (cause for failed auto sync unknown)
December 17, 2020	22:11:44.7340	Citrus Combined Cycle PB1 tripped (breaker open)
December 17, 2020	22:11:47.7080	Fourth attempt (red flagged the breaker - breaker closed)
December 17, 2020	22:11:47.7106	Unit 4 breaker 3233 tripped open (U4 placed in forced outage)
December 18, 2020		Meeting with Turbine Generator Services
December 21, 2020		Review of substation drawings, relay operational data
December 23, 2020		Beckwith manual sync check relay replaced
January 7, 2021		Unit 4 start attempt (ground on the main field)
January 20, 2021		Beckwith manual sync check relay model M-0359 (25A1) sent for failure analysis
February 8, 2021		Beckwith completed repair evaluation report (confirmed onsite findings)

III. Extent of Condition:

The Beckwith Manual Sync Check Relay model M-0359 (25A1) is typically a very solid device with little to no history of failure in decades of operation. Relay 25A1, serial #1711 was originally procured on February 28, 2002, and then relocated from the retired 230KV Crystal River substation and reinstalled in the new 230KV substation terminal house as part of the 2017-2019 fiber optic communication upgrades. The relay was last functionally tested in April 2020. The relay was sent for failure analysis following the event. The sync check relay was verified with component failure that led to mis-operation of the device. The report is included as Attachment 2.

The Beckwith model M-0193 and M-0189 auto sync check relays were tested and passed.

The plant line lockout (3AG & AB) relay panels were modified during 2017 and completed in 2019 as part of Transmission substation upgrade project, making units 4 and 5 panel light sequence and visual cues identical. Before this project, the plant line relay panel light sequence, which indicates a unit trip, was different for both units. The Operations Team Supervisor (OTS) was aware of this modification, but several operators on shift were not and did not check the plant line relay panels on initial walkdown. Detailed information on relay trip schedules along with the lockout relay reset procedure would have assisted Operations during the multiple attempts to synchronize.

Prior to the 2017-2019 fiber optic outage, the preferred method to sync unit 4 was in manual when syncing to the grid. Following the outage, the preferred method was modified to auto. It has been verified that no changes to the wiring or sync selector switch occurred during this outage. There have been no changes to the synchronization hard panel since original panel construction in 2002.

IV. Analysis:

The team utilized interviews, shift logs, shift turnover documents and the pre-job brief. Status updates and correspondence from Transmission and TGS, developed immediately after the event were examined as part of the analysis. Station electrical drawings, digital fault recorder, relay event files and substation relay schemes were reviewed along with projects and configuration changes occurring between 2017 and 2020. The Start-up procedure and Emergency Operating Procedure (EOP) were reviewed along with the generator synchronizing guide instructions and the General Electric (GE) contact table for breaker 3233/3234 control switch. Unit 5 breaker

control switches were also evaluated. The Beckwith Electric Company repair evaluation report Q4 was reviewed.

V. <u>Summary of Root Cause(s)</u>:

Note: Not necessarily listed in order of significance.

A2B6C01 – Damaged, Defective or failed part

The Beckwith Manual sync check relay model M-0359 (25A1) failed in the closed position which left the circuit armed on manual operation.

A3B2C04 – Previous successes in use of rule reinforced continued use of rule

(Successful use of a rule in the past led to the wrong use of the rule or the rule being incorrectly applied.) The operator red flagged breaker 3233 expecting a failed synchronization allowing reposition of the sync switch handle back to auto. Proper operational procedure would be to green flag the breaker placing the unit in a safe condition prior to repositioning the synchronization switch handle.

VI. <u>Summary of Contributing Cause(s):</u>

Note: Not necessarily listed in order of significance.

A3B3C04 – LTA review based on assumption that process will not change

(Individual believed that no variability existed in the process and thus overlooked the fact that a change had occurred, leading to different results than normally realized).

After initial voltage adjustment and verifying generator speed of 3602 RPM, no other adjustments were made to the frequency or voltage angle. Adjusting the turbine speed may have allowed the generator voltage and system voltage to align and the unit to sync to the grid in auto.

A3B3C06 - Individual underestimated the problem by using past events as basis

(Based on stored knowledge of past events, the individual underestimated problems with the existing event and planned for fewer contingencies than would be needed.)

During the 17-minute time frame of the event, the operations crew attempted unsuccessfully to synchronize to the grid four times without a questioning attitude and without consulting the Operations Superintendent and/or Station Manager.

A6B2C01 – Practice or "hands-on" experience LTA

(The on-the-job training did not provide opportunities to learn skills necessary to perform the job. There was not enough practice, or hands-on, time allotted.)

Additional training resources are needed to fully train the shifts for the newly restructured organization.

A5B1C01 – Format deficiencies

(*The layout of the written communication made it difficult to follow. The steps of the procedure were not logically grouped.*) The unit 4 and unit 5 steps are intertwined even though the start-up process and unit configuration are different. CRN Startup Procedure #CRNOP/00/TBD/0004 is included as Attachment 3.

A5B2C08 – Incomplete/situation not covered

(Details of the written communication were incomplete. Insufficient information was presented. The written communication did not address situations likely to occur during the completion of the procedure.)

Page 75 of the Start-up procedure notes 'two methods of generator synchronization on Unit 4: Auto sync mode and Manual mode. Automatic is the normal mode'.

Page 76, section 13.2.2 states 'If Auto synchronization is inoperable on unit 4, then use manual sync listed in Enclosure 5'. Enclosure 5 instructions are incomplete, stopping mid step.

A5B2C01 – Limit inaccuracies

(Limits were not expressed clearly and concisely.)

A generator synchronizing guide (operator aid) for unit 5 is laminated and attached to the generator synchronization panel. The guide states 'Ensure the turbine speed is at least 3600 RPM (3602 is recommended)." Quite often, turbine speed needs to be adjusted up and down for synchronization. 3602 RPM should be a target, and not a specific setpoint.

A4B5C09 – Change-related documents not developed or revised (Changes to processes resulted in the need for new forms of written communication, which were not created.) Laminated generator synchronizing guidance (operator aid) did not exist for unit 4.

VII. Extent of Cause:

Cases where the plant line breakers also serve as the Generator Synchronizing Breakers should be reviewed for output contact supervision with 25A1/A2 elements. Modifying SEL-351S Breaker 3233/3234 logic to supervise output contact equation 102 with 25A1/A2 synchronizing checks will provide a fail-safe mechanism that allows performance only one way.

VIII. <u>Repeat Event Review:</u>

There have been no similar generator events at Crystal River or in the Florida fleet within the last three years.

Corrective Actions:

Immediate & Interim Corrective Act A4B5C09 – Change-related documents not c	t ions leveloped or revised	
Corrective Action	Assignee	Due/Completion
Describe specific actions taken or required.	Evaluator SHALL obtain	Date
	concurrence from assignee or	
	supervisor	
Develop a generator synchronizing guide	Jamie Long	Complete
(operator aid) for unit 4, laminate and attach		
to the generator output breaker.		

Corrective action for Extent of Condition			
Corrective Action	Assignee	Due/Completion	
Describe specific actions taken or required	Evaluator <u>SHALL</u> obtain	Date	
	concurrence from assignee or		
	supervisor		
Create PMs to check synchronizing relays	Heath McDonald	Complete	
on a six-year period based on industry			
standard.			
Share technical document on lessons	Joe Simpson	5/1/2021	
learned with <mark>peers.</mark>			

Action(s) to Correct the Root Cause(s)			
Root Cause(s): A2B	A2B6C01 – Damaged, Defective or failed part		
A3B	2C04 – Previous su	ccesses in use of rule reinforced con	tinued use of rule
Corrective Action		Assignee	Due/Completion
Describe specific actions	taken or required	Evaluator SHALL obtain	Date
		concurrence from assignee or	
		supervisor	
CAPR 1: Replace the B	eckwith Manual	Heath McDonald	5/1/2021
Sync Check Relay model	M-0359 (25A1)		
with a new device.			
CAPR 2: Revise Crystal	River Start-Up	TJ Snodgrass	4/1/2021
Procedure to include deta	ailed information		
on resetting relays.			
CAPR 3: Performance r	nanage employees	Jamie Long	3/15/2021
involved in the event as a	ppropriate.	_	
CAPR 4: Share this Roo	ot Cause Analysis	Wayne Toms	3/31/2021
with all employees at the	station.	-	

			Duke Energy Florida, Docket No. 2021
Action to Correct the (Contributing	Cause(s)	ppi Response to OPC POD 1
Contributing Cause(s):	A3B3C04 – LTA review based on assumption that process will not change A4B2C04 – Resources not provided to assure adequate training was provided/ maintained A3B3C06 – Individual underestimated the problem by using past events as basis A6B2C01 – Practice or "hands-on" experience LTA		
Corrective Action		Assignee	Due/Completion
Describe specific actions tak	en or required	Evaluator <u>SHALL</u> obtain concurrence from assignee or supervisor	Date
Ensure that there is a specific lesson plan around generator synchronization and implement.		TJ Snodgrass	5/1/2021
Ensure that the lesson plan i methodical problem-solving t unfamiliar situations.	ncludes echniques with	TJ Snodgrass	6/1/2021
Provide instructor led training Operations and OTSs upon of the Start-up procedure and s guide revisions.	g for completion of synchronizing	TJ Snodgrass	5/1/2021
Issue Standing Order "maxin attempts at synchronization i procedure" until identified pro changes are complete.	num of two n start-up ocedural	Jamie Long	3/15/2021
Evaluate OTS training (techr and control) and consider inc shadowing time and rotation proficiency.	nical, command creased to improve	Jamie Long	5/1/2021

Action(s) to Correct the Contributing Cause(s)				
Contributing Cause (s):	A5B1C01 – Format deficiencies			
	A5B2C08 – Inc	complete/situation not covered		
	A5B2C01 – Lir	mit inaccuracies		
Corrective Action		Assignee	Due/Completion	
Describe specific actions take	en or required	Evaluator SHALL obtain	Date	
	-	concurrence from assignee or		
		supervisor		
Revise Crystal River Start-Up Procedure to		TJ Snodgrass	4/1/2021	
add enclosures for unit specific activities.		_		
Revise Crystal River Start-Up Procedure to		TJ Snodgrass	4/1/2021	
reference the EOP ensuring EOP steps				
have been satisfied.				
Update generator synchronizing guides		TJ Snodgrass	4/1/2021	
(operator aids) on both units to reference				
3602 RPM should be a target, and not a				
specific setpoint.				

Corrective action for Extent of Cause			
Corrective Action Describe specific actions taken or required	Assignee Evaluator <u>SHALL</u> obtain concurrence from assignee or supervisor	Due/Completion Date	
Modify SEL-351S Breaker 3233/3234 logic to supervise output contact equation 102 with 25A1/A2 synchronizing checks.	Jezzel Martinez (Transmission)	3/15/2021	
Review existing facilities in Florida for extent of cause.	Joe Simpson	4/1/2021	

Q4

Effectiveness Review Action				
Insert rows for additional EREV such	as interim effectiveness review			
Corrective Action Describe specific actions required	Assignee Evaluator <u>SHALL</u> obtain concurrence from assignee or supervisor	Due Date 6 months or earlier after all actions have been completed		
EREV: Perform effectiveness review on event #1100300. Document no repeat events, procedures revised as described in the corrective actions, training completed, and Transmission corrective actions complete.	Barbara Martinuzzi	10/18/2021		

Attachments

Attachment 1: Five (5) Why Staircase

Problem Statement: Crystal River Unit 4 generator failed to synchronize (sync) with the system when breaker closed, resulting in an out of phase event.

1. Why did Crystal River Unit 4 generator have an out of phase synchronization to the grid?

1a. The operator red flagged the breaker at the wrong point in the synchronization process.

2. Why did the operator red flag the breaker at the wrong point in the synchronization process? 2a. The operator thought that it didn't matter when you red flagged the breaker.

Why did the operator think that it didn't matter when you red flagged the breaker?
 The operator understood that the synchronizing relay would not allow an out of phase synchronization.

4. Why did the operator understand that the synchronizing relay would not allow an out of phase synchronization?

4a. The operators training and experience supported this position.

4b. The operator expected the synchronization check relay to perform as designed.

5. Why did the synchronization check relay not support the operators training and experience, and not perform as designed?

5a. The synchronization check relay had failed allowing an out of phase event.

Attachment 2: Beckwith Electric Company Repair Evaluation Report



Attachment 3: CRN Startup Procedure #CRNOP/00/TBD/0004



Attachment 4: Barrier(s) that should have precluded or reduced the likelihood or significance of the incident

BARRIER(s) THAT SHOULD HAVE PRECLUDED, OR REDUCED THE LIKELIHOOD OR SIGNIFICANCE OF, THE INCIDENT (Barriers that should have precluded the incident may be part of the Root Causal Train. Barriers that should have reduced the incident may be part of a Contributing Causal Train.)	BARRIER ASSESSMENT (HOW THE BARRIER FAILED) (Identify whether, and in what specific manner, the barrier was missing, weak, or ineffective. Note that a barrier may fail in several different ways in the same incident. Each failure of the barrier should be considered separately.)	CONSEQUENCES OF BARRIER FAILURE (Careful consideration of actual consequences of specific barrier failure is needed to help determine whether a specific failure is part of the Root Causal Train or a Contributing Causal Train.) Indicate if Barrier Failure <u>directly led to</u> or <u>contributed to</u> the Event.	REASON(s) for BARRIER FAILURE (Identify immediate cause(s) of Barrier failure.) As appropriate, identify additional barrier(s) that should have prevented <u>this</u> <u>Barrier failure</u> . Apply "WHY STAIRCASE" as appropriate.
The Beckwith Manual sync check relay model M-0359 (25A1)	Relay failed in the closed position.	The relay failure armed the circuit on manual operation (directly led).	Damaged, defective or failed part
Operator red flagged the breaker at the 9 o'clock position on the synchroscope	Synchronization to the grid should occur as close to 12 o'clock as possible, but within the zone of 11 to 1 on the synchronization scope.	The operator expected a failed synchronization allowing reposition of the sync switch handle back to auto. Operator was unaware that the sync check relay failed (directly led).	Previous successes in use of rule reinforced continued use of the rule
Turbine speed of 3602 RPM was considered a setpoint and not a target.	After initial voltage adjustment and verifying generator speed of 3602 RPM, no other adjustments were made to the turbine speed.	Adjusting the turbine speed greater than 3602 RPM may have allowed the generator voltage and system voltage to align and the unit to sync in auto (contributed to).	Less than adequate review based on assumption that process will not change

BARRIER(s) THAT SHOULD HAVE PRECLUDED, OR REDUCED THE LIKELIHOOD OR SIGNIFICANCE OF, THE INCIDENT (Barriers that should have precluded the incident may be part of the Root Causal Train. Barriers that should have reduced the incident may be part of a Contributing Causal Train.)	BARRIER ASSESSMENT (HOW THE BARRIER FAILED) (Identify whether, and in what specific manner, the barrier was missing, weak, or ineffective. Note that a barrier may fail in several different ways in the same incident. Each failure of the barrier should be considered separately.)	CONSEQUENCES OF BARRIER FAILURE (Careful consideration of actual consequences of specific barrier failure is needed to help determine whether a specific failure is part of the Root Causal Train or a Contributing Causal Train.) Indicate if Barrier Failure <u>directly led to</u> or <u>contributed to</u> the Event.	REASON(s) for BARRIER FAILURE (Identify immediate cause(s) of Barrier failure.) As appropriate, identify additional barrier(s) that should have prevented <u>this</u> <u>Barrier failure</u> . Apply "WHY STAIRCASE" as appropriate.
On the job training	The amount of training did not adequately address normal, abnormal, and emergency working conditions.	Operations team supervisor experience consisted of shadowing for approximately three months. Shadowing only provides training on conditions that exist during the shadowing. (contributed to).	Practice or "hands-on" experience less than adequate
Procedure was not of adequate quality and did not provide clear instructions.	The unit steps are intertwined even though the start-up process and unit configuration are different. Enclosure instructions are incomplete, and limits should be a target and not setpoints.	Operator and Operations team supervisor could not rely on the procedure for guidance during the event (contributed to).	Format deficiencies Incomplete/situation not covered Limit inaccuracies Change related documents not developed or revised

Duke Energy Florida, LLC Docket No. 20210001 DEF's Suppl Response to OPC POD 1 (1-4) Q4



Root Cause Analysis Report

CRN U4 Generator Out of Phase Synchronization 12/18/2020

Revision # 0.0

PlantView Event Number: 1100300

Prepared By:	Barbara Martinuzzi	Date:	2/2/2021
Sponsor Approval:	Wayne Toms	Date:	

Regional Review Committee date:

This cause analysis evaluates important conditions adverse to quality through the use of a structured evaluation process. The information identified in this report was discovered using all the data available to the root cause evaluation team at the time of writing using the benefit of hindsight. Cause analyses performed after the fact for Duke Energy have been established as a responsive means to document and assure that conditions adverse to quality are promptly identified and corrected and, as required, to assure that actions are taken to reduce the risk of repetition of the event or condition adverse to quality.

As such, this cause analysis is not intended to make a determination as to whether any of the actions taken or the decisions made by management, vendors, internal organizations, or individual personnel prior to or at the time of the event were reasonable or prudent based on the information that was known or available at the time they took such actions or made such decisions. Any individual statement or conclusion included in the evaluation as to whether errors may have been made or improvements are warranted is based solely upon information the root cause team considered, including information and results learned after-the-fact. Nothing in this evaluation should be construed as an admission of negligence, liability, or imprudence.

Team Kick-Off Meeting Date:	1/21/2021
Date Report Completed:	2/16/2021
Root Cause Investigator(s):	Barbara Martinuzzi, Sr OE Specialist
	James C Winborne, Lead Engineer
	Joe Simpson, Manager Generation Engineering
	Doug Wood, Senior Engineer
	Gene Mullins, Interim Assignment - Leader
	Dana Christensen, Supervisor Operations

I. <u>Problem Statement:</u>

Crystal River Unit 4 generator failed to synchronize (sync) with the system when breaker closed, resulting in an out of phase event.

II. Description of Incident/Issue:

Crystal River Unit 4 had been in an extended outage returning to service on December 16, 2020. Unit 4 had been operating at near minimum load, having just completed the swapping from the standby boiler feed pump to the main boiler feed pump, when the turbine/generator tripped due to a boiler feed water pump control issue. Prior to returning to service on December 16, the unit 4 main boiler feed pump tripped due to low drum level.

Unit 5 was in startup operations at the time of the unit 4 turbine/generator trip. The station only has one standby boiler feed pump that is shared by both units. Since unit 5 was still one day away from being online, the decision was made to put unit 5 on hold in a safe condition and recover unit 4.

The required NERC VAR-002 AVR Alarm Status PM had been completed on unit 4.

Operations closed the exciter field breaker, turbine auto sync was selected, set breaker 3233 to close, turbine speed was set at 3602 RPM, and generator voltage verified to be within 2KV of system voltage. When the synchroscope rolled to the twelve o'clock position, all conditions were met (sync slip frequency OK, sync volts OK, sync phase angle OK), amber lights were lit, but breaker 3233 did not close and unit 4 failed to sync to the grid. A walkdown was performed and Operations found permissive 86A&B lockout relays tripped. The permissive lockout relays were reset, and a second attempt to synchronize in auto was initiated.

On the second auto attempt, when the synchroscope rolled to the twelve o'clock position, all conditions were met (sync slip frequency OK, sync volts OK, sync phase angle OK), amber lights were lit, but breaker 3233 did not close and unit 4 failed to sync to the grid a second time. Another walkdown was performed and Operations found plant lines lockout relays 3AG & AB tripped. The plant line lockout relays were reset, and a third attempt to synchronize in auto was initiated.

On the third auto attempt, when the synchroscope rolled to the twelve o'clock position, all conditions were met (sync slip frequency OK, sync volts OK, sync phase angle OK), amber lights were lit, but breaker 3233 did not close and unit 4 failed to sync to the grid for the third time in auto.

The operator green flagged the breaker and placed the sync switch in manual. The operator red flagged breaker 3233 expecting a failed synchronization allowing reposition of the sync switch handle back to auto. The operator expected nothing to happen until the auto option was selected and the synchroscope rolled to the twelve o'clock position. The operator stated that they were not attempting to synchronize in manual rather attempting to reset the synchronization circuit to permit auto synchronization. Through interviews it was noted that the auto sync option has been used since 2017 and use of the manual option would be rare. Unknown to Operations was that the manual sync check relay 25A1 had failed. The circuit was completed when breaker 3233 was red flagged causing the turbine/generator to attempt to sync to the grid out of phase at a 160-

DEF's Suppl Response to OPC POD 1 (1-4) degree angle. This resulted in significant damage to the generator rotor. The event also caused Q4 enough grid instability on the 230KV to trip Citrus Combined Cycle PB1 station offline (reference Plantview event #1100460).

The Beckwith Manual sync check relay model M-0359 (25A1) failed to pass bench testing. The failure mode allowed the closing contact to latch closed as far out as fifty degrees from zero. The setpoint is fifteen degrees. This relay monitors the slip frequency, voltage, and phase angle. When all three conditions are satisfied, the relay closes permitting synchronization to the grid. The relay was sent for failure analysis and a spare relay was removed from Crystal River Unit 2, bench tested and installed.

No damage was initially found to the machine during inspection, all electrical tests were satisfied, and the station went into a forced outage. During attempted start-up on January 7, a low speed centrifugal ground was found on the main generator field and the unit was placed in forced outage.

<u>Timeline</u>

December 16, 2020	22:53	Unit 4 returned to service
December 17, 2020	19:10	Turbine/generator tripped (boiler feed water pump control issue)
December 17, 2020	22:00:12.608	First attempt to auto sync (permissive 86A&B lockouts tripped)
December 17, 2020	22:00:16.924	Second attempt to auto sync (plant line 3AG & 3BG lockout relays tripped)
December 17, 2020	22:00:20.132	Third attempt to auto sync (cause for failed auto sync unknown)
December 17, 2020	22:11:47.708	Fourth attempt (red flagged the breaker)
December 17, 2020	22:11:44.7340	Citrus Combined Cycle PB1 tripped
December 17, 2020	22:11:47.7106	Unit 4 breaker 3233 tripped open (U4 placed in forced outage)
December 18, 2020		Meeting with Turbine Generator Services
December 21, 2020		Review of substation drawings, relay operational data
December 23, 2020		Beckwith manual sync check relay replaced
January 7, 2021		Unit 4 start attempt (ground on the main field)
January 20, 2021		Beckwith manual sync check relay model M-0359 (25A1) sent for failure analysis
February 8, 2021		Beckwith completed repair evaluation report (confirmed onsite findings)

III. Extent of Condition:

The Beckwith Manual Sync Check Relay model M-0359 (25A1) is typically a very solid device with little to no history of failure in decades of operation. Relay 25A1, serial #1711 was originally procured on February 28, 2002, and then relocated from the retired 230KV Crystal River substation and reinstalled in the new 230KV substation terminal house as part of the 2017-2019 fiber optic communication upgrades. The relay was last functionally tested in April 2020. The relay was sent for failure analysis following the event. The sync check relay was verified with component failure that led to mis-operation of the device. The report is included as Attachment 2.

The Beckwith model M-0193 and M-0189 auto sync check relays were tested and passed.

The plant line relay panels were modified during 2017 and completed in 2019 as part of Transmission substation upgrade project, making units 4 and 5 panel light sequence and visual cues identical. Before this project, the plant line relay panel light sequence, which indicates a unit trip, was different for both units. The Operations Team Supervisor (OTS) was aware of this modification, but several operators on shift were not and did not check the plant line relay panels on initial walkdown.

Prior to the 2017-2019 fiber optic outage, the preferred method to sync unit 4 was in manual when syncing to the grid. Following the outage, the preferred method was modified to auto. It has been verified that no changes to the wiring or sync selector switch occurred during this outage. There have been no changes to the synchronization hard panel since original panel construction in 2002.

IV. Analysis:

The team utilized interviews, shift logs, shift turnover documents and the pre-job brief. Status updates and correspondence from Transmission and TGS, developed immediately after the event were examined as part of the analysis. Station electrical drawings, digital fault recorder, relay event files and substation relay schemes were reviewed along with projects and configuration changes occurring between 2017 and 2020. The Start-up procedure and Emergency Operating Procedure (EOP) were reviewed along with the generator synchronizing guide instructions and

V. <u>Summary of Root Cause(s)</u>:

Note: Not necessarily listed in order of significance.

A2B6C01 – Damaged, Defective or failed part

The Beckwith Manual sync check relay model M-0359 (25A1) failed in the closed position which left the circuit armed on manual operation.

A3B2C04 – Previous successes in use of rule reinforced continued use of rule

(Successful use of a rule in the past led to the wrong use of the rule or the rule being incorrectly applied.) The operator red flagged breaker 3233 expecting a failed synchronization allowing reposition of the sync switch handle back to auto.

VI. <u>Summary of Contributing Cause(s):</u>

Note: Not necessarily listed in order of significance.

A3B2C02 - Signs to stop were ignored and step performed incorrectly

(Most activities generate indication of status (both positive and negative). The human tendency is to focus on the indications of success rather than all the indicators. The negative indicators are the "signs to stop.") Changing priorities regarding unit operation changed multiple times in less than two hours, adding time pressure to complete the tasks and move on to additional tasks. Station was attempting to respond to meet system requirements. (unit 4 running, start-up on unit 5, unit 4 tripped, put unit 5 on hold, start-up unit 4, out of phase sync event happened, start-up unit 5).

A3B3C04 – LTA review based on assumption that process will not change

(Individual believed that no variability existed in the process and thus overlooked the fact that a change had occurred, leading to different results than normally realized).

After initial voltage adjustment and verifying generator speed of 3602 RPM, no other adjustments were made to the frequency or voltage angle. Adjusting the turbine speed may have allowed the generator voltage and system voltage to align and the unit to sync to the grid in auto.

A3B3C06 – Individual underestimated the problem by using past events as basis

(Based on stored knowledge of past events, the individual underestimated problems with the existing event and planned for fewer contingencies than would be needed.)

Operations should have stopped when unit 4 initially tripped on low drum level and consulted the EOP. The EOP provides steps for immediate operator response, protective relay targets, and associated alarms on the DCS alarm screen. Transformer, auxiliary transformers and relay trip schedules are also listed along with the lockout relay reset procedure. Through interviews it was noted that trips caused by the main boiler feed water pump were not uncommon and the EOP was typically not consulted for this type trip event.

A6B2C01 - Practice or "hands-on" experience LTA

(The on-the-job training did not provide opportunities to learn skills necessary to perform the job. There was not enough practice, or hands-on, time allotted.)

Additional training resources were not made available to provide adequate training for the newly restructured organization as it moved through various tier levels. CRN moved from tier 3 to tier 2 status on October 7, 2020. Experience of the OTS was less than adequate, consisting of shadowing for approximately three months and becoming full time in September 2020.

A5B1C01 – Format deficiencies

(*The layout of the written communication made it difficult to follow. The steps of the procedure were not logically grouped.*) The unit 4 and unit 5 steps are intertwined even though the start-up process and unit configuration are different. CRN Startup Procedure #CRNOP/00/TBD/0004 is included as Attachment 3.

A5B2C08 – Incomplete/situation not covered

(Details of the written communication were incomplete. Insufficient information was presented. The written communication did not address situations likely to occur during the completion of the procedure.)

Duke Energy Florida, LLC Docket No. 20210001 DEF's Suppl Response to OPC POD 1 (1-4) Page 75 of the Start-up procedure notes 'two methods of generator synchronization on Unit 4: Auto sync mode and Manual mode. Automatic is the normal mode'. Page 76 section 13.2.2 states 'If Auto synchronization is inoperable on unit 4, then use manual

Page 76, section 13.2.2 states 'If Auto synchronization is inoperable on unit 4, then use manual sync listed in Enclosure 5'. Enclosure 5 instructions are incomplete, stopping mid step.

A5B2C01 – Limit inaccuracies

(Limits were not expressed clearly and concisely.)

A generator synchronizing guide (operator aid) for unit 5 is laminated and attached to the generator synchronization panel. The guide states 'Ensure the turbine speed is at least 3600 RPM (3602 is recommended)." Quite often, turbine speed needs to be adjusted up and down for synchronization. 3602 RPM should be a target, and not a specific setpoint.

A4B5C09 - Change-related documents not developed or revised

(Changes to processes resulted in the need for new forms of written communication, which were not created.) Laminated generator synchronizing guidance (operator aid) did not exist for unit 4.

VII. Extent of Cause:

Cases where the plant line breakers also serve as the Generator Synchronizing Breakers should be reviewed for output contact supervision with 25A1/A2 elements. Modifying SEL-351S Breaker 3233/3234 logic to supervise output contact equation 102 with 25A1/A2 synchronizing checks will provide a fail-safe mechanism that allows performance only one way.

VIII. <u>Repeat Event Review:</u>

There have been no similar generator events at Crystal River or in the Florida fleet within the last three years.

Corrective Actions:

Immediate & Interim Corrective Actions A4B5C09 – Change-related documents not developed or revised			
Corrective Action Describe specific actions taken or required.	Assignee Evaluator <u>SHALL</u> obtain concurrence from assignee or supervisor	Due/Completion Date	
Develop a generator synchronizing guide (operator aid) for unit 4, laminate and attach to the generator output breaker.	Jamie Long	Complete	

Corrective action for Extent of Condition			
Corrective Action Describe specific actions taken or required	Assignee Evaluator <u>SHALL</u> obtain concurrence from assignee or	Due/Completion Date	
	supervisor		
Create PMs to check synchronizing relays on a six-year period based on industry standard.	Heath McDonald	Complete	
Share technical document on lessons learned with Fleet.	Joe Simpson	5/1/2021	

Action(s) to Correct the Root Cause(s)				
Root Cause(s):	A2B6C01 – Damaged, L	A2B6C01 – Damaged, Defective or failed part		
	A3B2C04 – Previous su	ccesses in use of rule reinforced cont	inued use of rule	
Corrective Actio	Corrective Action Assignee Due/Completion			
Describe specific actions taken or required		Evaluator <u>SHALL</u> obtain concurrence from assignee or supervisor	Date	
CAPR 1: Replace Sync Check Relay with a new device.	the Beckwith Manual model M-0359 (25A1)	Heath McDonald	5/1/2021	

			Duke Energy Florid Docket No. 202	la, LLC 210001
		DEF's Supp	Response to OPC POD	1 (1-4)
CAPR 2: Performance manage employees	Jamie Long		3/1/2021	`Q4́
involved in the event as appropriate.				
CAPR 3: Share this Root Cause Analysis	Wayne Toms		3/1/2021	
with all employees at the station.				

Action to Correct the Contributing Cause(s)			
Contributing Cause(s):	A3B3C04 – LTA review based on assumption that process will not change A4B2C04 – Resources not provided to assure adequate training was provided/ maintained A3B3C06 – Individual underestimated the problem by using past events as basis A6B2C01 – Practice or "hands-on" experience LTA		
Corrective Action	Corrective Action Assignee Due/Completion		
Describe specific actions taken or required		Evaluator <u>SHALL</u> obtain concurrence from assignee or supervisor	Date
Ensure that there is a specific lesson plan around generator synchronization and implement. Include methodical problem- solving techniques with unfamiliar situations		TJ Snodgrass	5/1/2021
Provide instructor led training for Operations and OTSs upon completion of the Start-up procedure and synchronizing guide revisions.		TJ Snodgrass	5/1/2021
Evaluate OTS training (technical, command and control) and consider increased shadowing time and rotation to improve proficiency.		Jamie Long	5/1/2021

Action(s) to Correct the Contributing Cause(s)			
Contributing Cause (s):	A5B1C01 – Format deficiencies		
	A5B2C08 – Incomplete/situation not covered		
	A5B2C01 – Limit inaccuracies		
Corrective Action Assignee D			Due/Completion
Describe specific actions take	en or required	Evaluator SHALL obtain	Date
		concurrence from assignee or	
		supervisor	
Revise Crystal River Start-Up Procedure to		TJ Snodgrass	4/1/2021
add enclosures for unit specific activities.			
Revise Crystal River Start-Up Procedure to		TJ Snodgrass	4/1/2021
reference the EOP ensuring EOP steps			
have been satisfied.			
Update generator synchronizing guides		TJ Snodgrass	4/1/2021
(operator aids) on both units to reference			
3602 RPM should be a target, and not a			
specific setpoint.			

Corrective action for Extent of Cause			
Corrective Action Describe specific actions taken or required	Assignee Evaluator <u>SHALL</u> obtain concurrence from assignee or	Due/Completion Date	
Modify SEL-351S Breaker 3233/3234 logic to supervise output contact equation 102 with 25A1/A2 synchronizing checks.	Jezzel Martinez (Transmission)	3/1/2021	
Review existing facilities in Florida for extent of cause.	Joe Simpson	4/1/2021	

Q4

Effectiveness Review Action			
Insert rows for additional EREV such as interim effectiveness review			
Corrective Action Describe specific actions required	Assignee Evaluator <u>SHALL</u> obtain concurrence from assignee or supervisor	Due Date 6 months or earlier after all actions have been completed	
EREV: Perform effectiveness review on event #1100300. Document no repeat events, procedures revised as described in the corrective actions, training completed, and Transmission corrective actions complete.	Barbara Martinuzzi	10/18/2021	

Attachments

Attachment 1: Five (5) Why Staircase

Problem Statement: Crystal River Unit 4 generator failed to synchronize (sync) with the system when breaker closed, resulting in an out of phase event.

1. Why did Crystal River Unit 4 generator have an out of phase synchronization to the grid?

1a. The operator red flagged the breaker at the wrong point in the synchronization process.

2. Why did the operator red flag the breaker at the wrong point in the synchronization process? 2a. The operator thought that it didn't matter when you red flagged the breaker.

Why did the operator think that it didn't matter when you red flagged the breaker?
 The operator understood that the synchronizing relay would not allow an out of phase synchronization.

4. Why did the operator understand that the synchronizing relay would not allow an out of phase synchronization?

4a. The operators training and experience supported this position.

4b. The operator expected the synchronization check relay to perform as designed.

5. Why did the synchronization check relay not support the operators training and experience, and not perform as designed?

5a. The synchronization check relay had failed allowing an out of phase event.

Attachment 2: Beckwith Electric Company Repair Evaluation Report



Attachment 3: CRN Startup Procedure #CRNOP/00/TBD/0004



Attachment 4: Barrier(s) that should have precluded or reduced the likelihood or significance of the incident

BARRIER(s) THAT SHOULD HAVE PRECLUDED, OR REDUCED THE LIKELIHOOD OR SIGNIFICANCE	BARRIER ASSESSMENT (HOW THE BARRIER FAILED)	CONSEQUENCES OF BARRIER FAILURE	REASON(s) for BARRIER FAILURE
OF, THE INCIDENT (Barriers that should have precluded the incident may be part of the Root Causal Train. Barriers that should have reduced the incident may be part of a Contributing Causal Train.)	(Identify whether, and in what specific manner, the barrier was missing, weak, or ineffective. Note that a barrier may fail in several different ways in the same incident. Each failure of the barrier should be considered separately.)	(Careful consideration of actual consequences of specific barrier failure is needed to help determine whether a specific failure is part of the Root Causal Train or a Contributing Causal Train.) Indicate if Barrier Failure <u>directly led to</u> or <u>contributed to</u> the Event.	(Identify immediate cause(s) of Barrier failure.) As appropriate, identify additional barrier(s) that should have prevented <u>this</u> <u>Barrier failure</u> . Apply "WHY STAIRCASE" as appropriate.
The Beckwith Manual sync check relay model M-0359 (25A1)	Relay failed in the closed position.	The relay failure armed the circuit on manual operation (directly led).	Damaged, defective or failed part
Operator red flagged the breaker at the 9 o'clock position on the synchroscope	Synchronization to the grid should occur as close to 12 o'clock as possible, but within the zone of 11 to 1 on the synchronization scope.	The operator expected a failed synchronization allowing reposition of the sync switch handle back to auto. Operator was unaware that the sync check relay failed (directly led).	Previous successes in use of rule reinforced continued use of the rule
Time pressure	Priorities changed multiple times in a short period as the station was attempting to respond to meet system requirements.	Operations should have stopped and evaluated the situation prior to continuing to attempt synchronization (contributed to).	Signs to stop were not recognized and step performed incorrectly

BARRIER(s) THAT SHOULD HAVE PRECLUDED, OR REDUCED THE LIKELIHOOD OR SIGNIFICANCE OF, THE INCIDENT (Barriers that should have precluded the incident may be part of the Root Causal Train. Barriers that should have reduced the incident may be part of a Contributing Causal Train.)	BARRIER ASSESSMENT (HOW THE BARRIER FAILED) (Identify whether, and in what specific manner, the barrier was missing, weak, or ineffective. Note that a barrier may fail in several different ways in the same incident. Each failure of the barrier should be considered separately.)	CONSEQUENCES OF BARRIER FAILURE (Careful consideration of actual consequences of specific barrier failure is needed to help determine whether a specific failure is part of the Root Causal Train or a Contributing Causal Train.) Indicate if Barrier Failure <u>directly led to</u> or <u>contributed to</u> the Event.	REASON(s) for BARRIER FAILURE (Identify immediate cause(s) of Barrier failure.) As appropriate, identify additional barrier(s) that should have prevented <u>this</u> <u>Barrier failure</u> . Apply "WHY STAIRCASE" as appropriate.
Turbine speed of 3602 RPM was considered a setpoint and not a target.	After initial voltage adjustment and verifying generator speed of 3602 RPM, no other adjustments were made to the turbine speed.	Adjusting the turbine speed greater than 3602 RPM may have allowed the generator voltage and system voltage to align and the unit to sync in auto (contributed to).	Less than adequate review based on assumption that process will not change
Operations should have stopped when unit 4 initially tripped on low drum level and consulted the Emergency Operating Procedure (EOP).	Using the startup procedure does not direct the operator to consult the EOP which provides steps for immediate operator response, protective relay targets and associated alarms on the DCS alarm screen.	Not being directed to utilize the EOP placed the operator in a skill-based scenario, outside the scope of the startup procedure, and with only knowledge to rely on. (contributed to).	Individual underestimated the problem by using past events as basis
On the job training	The amount of training did not adequately address normal, abnormal, and emergency working conditions.	Operations team supervisor experience consisted of shadowing for approximately three months. Shadowing only provides training on conditions that exist during the shadowing. (contributed to).	Practice or "hands-on" experience less than adequate

BARRIER(s) THAT SHOULD HAVE PRECLUDED, OR REDUCED THE LIKELIHOOD OR SIGNIFICANCE OF, THE INCIDENT (Barriers that should have precluded the incident may be part of the Root Causal Train. Barriers that should have reduced the incident may be part of a Contributing Causal Train.)	BARRIER ASSESSMENT (HOW THE BARRIER FAILED) (Identify whether, and in what specific manner, the barrier was missing, weak, or ineffective. Note that a barrier may fail in several different ways in the same incident. Each failure of the barrier should be considered separately.)	CONSEQUENCES OF BARRIER FAILURE (Careful consideration of actual consequences of specific barrier failure is needed to help determine whether a specific failure is part of the Root Causal Train or a Contributing Causal Train.) Indicate if Barrier Failure <u>directly led to</u> or <u>contributed to</u> the Event.	REASON(s) for BARRIER FAILURE (Identify immediate cause(s) of Barrier failure.) As appropriate, identify additional barrier(s) that should have prevented <u>this</u> <u>Barrier failure</u> . Apply "WHY STAIRCASE" as appropriate.
Procedure was not of adequate quality and did not provide clear instructions.	The unit steps are intertwined even though the start-up process and unit configuration are different. Enclosure instructions are incomplete, and limits should be a target and not setpoints.	Operator and Operations team supervisor could not rely on the procedure for guidance during the event (contributed to).	Format deficiencies Incomplete/situation not covered Limit inaccuracies Change related documents not developed or revised


Duke Energy Florida, LLC Docket No. 20210001 Should Should Storm Sync VS Synchronize throughout

Root Cause Analysis Report

CRN U4 Generator Sync Out of Phase 12/18/2020

Revision # 0.0

PlantView Event Number: 1100300

Prepared By:	Barbara Martinuzzi	Date:	2/2/2021
Sponsor Approval:	Wayne Toms	Date:	
Regional Review C	ommittee date:		
negional neview C			

This cause analysis evaluates important conditions adverse to quality through the use of a structured evaluation process. The information identified in this report was discovered using all the data available to the root cause evaluation team at the time of writing using the benefit of hindsight. Cause analyses performed after the fact for Duke Energy have been established as a responsive means to document and assure that conditions adverse to quality are promptly identified and corrected and, as required, to assure that actions are taken to reduce the risk of repetition of the event or condition adverse to quality.

As such, this cause analysis is not intended to make a determination as to whether any of the actions taken or the decisions made by management, vendors, internal organizations, or individual personnel prior to or at the time of the event were reasonable or prudent based on the information that was known or available at the time they took such actions or made such decisions. Any individual statement or conclusion included in the evaluation as to whether errors may have been made or improvements are warranted is based solely upon information the root cause team considered, including information and results learned after-the-fact. Nothing in this evaluation should be construed as an admission of negligence, liability, or imprudence.

Team Kick-Off Meeting Date:	1/21/2021
Date Report Completed:	2/16/2021
Root Cause Investigator(s):	Barbara Martinuzzi, Sr OE Specialist
	James C Winborne, Lead Engineer
	Joe Simpson, Manager Generation Engineering
	Doug Wood, Senior Engineer
	Gene Mullins, Interim Assignment - Leader
	Dana Christensen, Supervisor Operations

synchronize

I. <u>Problem Statement:</u>

Crystal River Unit 4 generator failed to align with the system when breaker closed, resulting in an out of phase event.

II. <u>Description of Incident/Issue</u>:

Crystal River Unit 4 had been in an extended outage returning to service on December 16 Unit 4 had been operating at near minimum load, having just completed the swapping from the standby boiler feed pump to the main boiler feed pump, when the turbine/generator tripped due to a boiler feed water pump control issue. Prior to returning to service on December 16, the governor on unit 4 main boiler feed pump was replaced and set at 60 percent capacity rather than 100 percent, restricting water flow and causing the unit trip due to low drum level.

Unit 5 was in startup operations at the time of the unit 4 turbine/generator trip. The station only has one standby boiler feed pump that is shared by both units. Since unit 5 was still one day away from being online, the decision was made to take the ignitors out and put unit 5 on hold and recover unit 4.

The required NERC VAR-002 AVR Alarm Status PM had been completed on unit 4.

Operations closed the exciter field breaker, turbine auto sync was selected, set breaker 3233 to close, turbine speed was set at 3602 RPM, and generator voltage verified to be within 2KV of system voltage. When the synchro scope rolled to the twelve o'clock position, all conditions were met (sync slip frequency OK, sync volts OK, sync phase angle OK), amber lights were lit, but breaker 3233 did not close and unit 4 failed to sync to the grid. A walkdown was performed and Operations found permissive 86A&B lockout relays tripped. The permissive lockout relays were reset, and a second attempt to synchronize in auto was initiated.

On the second auto attempt, when the synchro scope rolled to the twelve o'clock position, all conditions were met (sync slip frequency OK, sync volts OK, sync phase angle OK), amber lights were lit, but breaker 3233 did not close and unit 4 failed to sync to the grid a second time. Another walkdown was performed and Operations found plant lines lockout relays 3AG & AB tripped. The plant line lockout relays were reset, and a third attempt to synchronize in auto was initiated.

On the third auto attempt, when the synchro scope rolled to the twelve o'clock position, all conditions were met (sync slip frequency OK, sync volts OK, sync phase angle OK), amber lights were lit, but breaker 3233 did not close and unit 4 failed to sync to the grid for the third time in auto.

The operator green flagged the breaker and placed the sync switch in manual. The operator red flagged breaker 3233 expecting a failed synchronization allowing reposition of the sync switch handle back to auto. The operator expected nothing to happen until the auto option was selected and the synchro scope rolled to the twelve o'clock position. The operator stated that they were not attempting to sync in manual rather attempting to reset the sync circuit to **auto** permit aver synchronization. Through interviews it was noted that the auto sync option has been used since 2017 and use of the manual option would be rare. Unknown to Operations was that the manual sync check relay 25A1 had failed. The circuit was completed when breaker 3233 was red flagged

Page #2 OPCEXH1 000073

CAP?

72020

Docket No. 20210001 synchronize DEF's Suppl Response to OPC POD 1 (1-4) causing the turbine/generator to attempt to sync to the grid out of phase at a 160-degree angle. Q4 This resulted in significant damage to the generator rotor. The event also caused enough grid instability on the 230KV to trip Citrus Combined Cycle PB1 station offline. (Ref PV 110 0440)

The Beckwith Manual sync check relay model M-0359 (25A1) failed to pass bench testing. The failure mode allowed the closing contact to close as far out as fifty degrees from zero. The set point is fifteen degrees. This relay monitors the slip frequency, voltage, and phase angle. When all three conditions are satisfied, the relay closes permitting synchronization to the grid. The relay was sent for failure analysis and a spare relay was removed from Crystal River Unit 2, bench tested and installed.

No damage was initially found to the machine during inspection, all electrical tests were satisfied. and the station went into a forced outage. During attempted start-up on January 7, a low speed centrifugal ground was found on the main electrical field and the unit was placed in forced outage. generator

Timeline

22:53	Unit 4 returned to service
19:10	Turbine/generator tripped (boiler feed water pump control issue)
22:00:12.608	First attempt to auto sync (permissive 86A&B lockouts tripped)
22:00:16.924	Second attempt to auto sync (plant line 3AG & 3BG lockout
	relays tripped)
22:00:20.132	Third attempt to auto sync (cause for failed auto sync unknown)
22:11:47.708	Fourth attempt (red flagged the breaker)
22:11:44.7340	Citrus Combined Cycle PB1 tripped
22:11:47.7106	Unit 4 breaker 3233 tripped open (U4 placed in forced outage)
	Meeting with Turbine Generator Services
	Review of substation drawings, relay operational data
	Beckwith manual sync check relay replaced
	Unit 4 start attempt (ground on the main field)
	Beckwith manual sync check relay model M-0359 (25A1) sent for
	failure analysis
	22:53 19:10 22:00:12.608 22:00:16.924 22:00:20.132 22:11:47.708 22:11:47.7106

111. Extent of Condition:

The Beckwith Manual Sync Check Relay model M-0359 (25A1) is typically a very solid device with little to no history of failure in decades of operation. Relay 25A1, serial #1711 was acquired-purcha we on February 28, 2002 from the retired 230KV Crystal River substation and reinstalled in the new 230KV substation terminal house as part of the 2017-2019 fiber optic communication upgrades. Itwas The relay was last functionally tested in April 2020 and has been sent for failure analysis. As of ins writing, two bad boards and manual contacts failed closed have been discovered. Made in Lupdak

The Beckwith model M-0193 and M-0189 auto sync check relays were tested and passed.

2002 but reloca ted in way

Duke Energy Florida, LLC

The plant line relay panels were modified during 2017 and completed in 2019 as part of Transmission substation upgrade project, making units 4 and 5 panel light sequence and visual cues identical. Before this project, the plant line relay panel light sequence, which indicates a unit line /brow trip, was different for both units. The Operations Team Supervisor (OTS) was aware of this modification, but several operators on shift were not and did not check the plant line relay panels on initial walkdown.

Prior to the 2019 Spring outage (upgrading fiber optics), the preferred method to sync unit 4 was in manual when syncing to the grid. Following the outage, the preferred method was modified to auto. It has been verified that no changes to the wiring or switch selector occurred during this outage. There have been no changes to the synchronization hard panel since original plant construction.

Analysis:

The team utilized interviews, shift logs, shift turnover documents and the pre-job brief. Status updates and correspondence from Transmission and TGS, developed immediately after the event were examined as part of the analysis. Station electrical drawings, digital fault recorder, relay event files and substation relay schemes were reviewed along with projects and configuration

The drift is an issue but lauger issue is the Alb contact latching.

Do we want to mention the report the fear t from Beckwith from Beckwith that they have that they have very low return yery 9 rate?

Is this different thanp 2

IV.

Duke Energy Florida, LLC Docket No. 20210001 DEF's Suppl Response to OPC POD 1 (1-4) changes occurring between 2017 and 2020. The Start-up procedure and Emergency Operating Procedure (EOP) were reviewed along with the generator synchronizing guide instructions and the General Electric (GE) contact table for breaker 3233/3234 control switch. Unit 5 breaker control switches were also evaluated.

V. <u>Summary of Root Cause(s)</u>:

Note: Not necessarily listed in order of significance.

A2B6C01 - Damaged, Defective or failed part

The Beckwith Manual sync check relay model M-0359 (25A1) failed in the closed position which left the circuit armed on manual operation.

A3B2C04 - Previous successes in use of rule reinforced continued use of rule

(Successful use of a rule in the past led to the wrong use of the rule or the rule being incorrectly applied.) The operator red flagged breaker 3233 expecting a failed synchronization allowing reposition of the sync switch handle back to auto.

VI. <u>Summary of Contributing Cause(s):</u>

Note: Not necessarily listed in order of significance.

A3B2C02 – Signs to stop were ignored and step performed incorrectly

(Most activities generate indication of status (both positive and negative). The human tendency is to focus on the indications of success rather than all the indicators. The negative indicators are the "signs to stop.") Changing priorities regarding unit operation changed multiple times in less than two hours, adding time pressure to complete the tasks and move on to additional tasks. Station was attempting to respond to meet system requirements. (unit 4 running, start-up on unit 5, unit 4 tripped, put unit 5 on hold, start-up unit 4, event happened, start-up unit 5).

A3B3C04 - LTA review based on assumption that process will not change

(Individual believed that no variability existed in the process and thus overlooked the fact that a change had occurred, leading to different results than normally realized).

After initial voltage adjustment and verifying generator speed of 3602 RPM, no other adjustments were made to the frequency or voltage angle. Adjusting the turbine speed may have allowed the generator voltage and system voltage to align and the unit to sync to the grid in auto.

A3B3C06 - Individual underestimated the problem by using past events as basis

(Based on stored knowledge of past events, the individual underestimated problems with the existing event and planned for fewer contingencies than would be needed.)

Operations should have stopped when unit 4 initially tripped on low drum level and consulted the EOP. The EOP provides steps for immediate operator response, protective relay targets, and associated alarms on the DCS alarm screen. Transformer, auxiliary transformers and relay trip schedules are also listed along with the lockout relay reset procedure. Through interviews it was noted that trips caused by the main boiler feed water pump were not uncommon and the EOP was typically not consulted for this type trip event.

A6B2C01 - Practice or "hands-on" experience LTA

(The on-the-job training did not provide opportunities to learn skills necessary to perform the job. There was not enough practice, or hands-on, time allotted.)

Additional training resources were not made available to provide adequate training for the newly restructured organization as it moved through various tier levels. CRN moved from tier 3 to tier 2 status on October 7, 2020. Experience of the OTS was less than adequate, consisting of shadowing for approximately three months and becoming full time in September 2020. This amount of training did not adequately address normal, abnormal, and emergency working conditions.

A5B1C01 – Format deficiencies

(The layout of the written communication made it difficult to follow. The steps of the procedure were not logically grouped.) The unit 4 and unit 5 steps are intertwined even though the start-up process and unit configuration are different. CRN Startup Procedure #CRNOP/00/TBD/0004 is included as Attachment 2.

A5B2C08 – Incomplete/situation not covered

(Details of the written communication were incomplete. Insufficient information was presented. The written communication did not address situations likely to occur during the completion of the procedure.)

Page 75 of the Start-up procedure notes 'two methods of generator synchronization on Unit 4: Auto synch mode and Manual mode. Automatic is the normal mode'.

Page 76, section 13.2.2 states 'If Auto synchronization is inoperable on unit 4, then use manual sync listed in Enclosure 5'. Enclosure 5 instructions are incomplete, stopping mid step.

A5B2C01 – Limit inaccuracies

(Limits were not expressed clearly and concisely.)

A generator synchronizing guide (operator aid) for unit 5 is laminated and attached to the generator output breaker. The guide states 'Ensure the turbine speed is at least 3600 RPM (3602 is recommended)." Quite often, turbine speed needs to be adjusted up and down for synchronization. 3602 RPM should be a target, and not a specific setpoint.

Conhols reside.

Q4

A4B5C09 - Change-related documents not developed or revised

(Changes to processes resulted in the need for new forms of written communication, which were not created.) Laminated generator synchronizing guidance (operator aid) did not exist for unit 4.

VII. Extent of Cause:

Cases where the plant line breakers also serve as the Generator Synchronizing Breakers should be reviewed for output contact supervision with 25A1/A2 elements. Modifying SEL-351S Breaker 3233/3234 logic to supervise output contact equation 102 with 25A1/A2 synchronizing checks will provide a fail-safe mechanism that allows performance only one way.

VIII. **Repeat Event Review:**

There have been no similar events at Crystal River or in the Florida fleet within the last three years.

- Should we mention the pulseriles good with

Corrective Actions:

Immediate & Interim Corrective Actions A4B5C09 – Change-related documents not developed or revised			
Corrective Action Assignee Due/Completion Describe specific actions taken or required. Evaluator SHALL obtain Date concurrence from assignee or supervisor Supervisor Date			
Develop a generator synchronizing guide (operator aid) for unit 4, laminate and attach to the generator output breaker.	Jamie Long	Complete	

Corrective action for Extent of Condition			
Corrective Action Describe specific actions taken or required	Assignee Evaluator <u>SHALL</u> obtain concurrence from assignee or supervisor	Due/Completion Date	
Create PMs to check synchronizing relays on a six-year period based on industry standard.	Heath McDonald	Complete	
Share technical document on lessons learned with Fleet.	Joe Simpson	5/1/2021	

Action(s) to Correct the Root Cause(s)				
Root Cause(s):	A2B6C01 – Damaged, Defective or failed part			
	A3B2C04 – Previous successes in use of rule reinforced continued use of rule			
Corrective Action Assignee Due/Completion				
Describe specific actions taken or required		Evaluator SHALL obtain	Date	
		concurrence from assignee or		
		supervisor]	

		DEE's Suppl Re	Duke Energy Florid Docket No. 202 Desponse to OPC POD	la, LLC 210001 1 (1-4)
CAPR 1: Replace the Beckwith Manual Sync Check Relay model M-0359 (25A1) with a new device (Work Order #).	Heath McDonald		5/1/2021	Q4
CAPR 2: Performance manage employees involved in the event as appropriate.	Jamie Long		3/1/2021	
CAPR 3: Share this Root Cause Analysis with all employees at the station.	Wayne Toms		3/1/2021	

Action to Correct the Contributing Cause(s)			
Contributing Cause(s):	A3B3C04 – LTA review based on assumption that process will not change A4B2C04 – Resources not provided to assure adequate training was provided/ maintained A3B3C06 – Individual underestimated the problem by using past events as basis A6B2C01 – Practice or "hands-on" experience LTA		
Corrective Action	•	Assignee	Due/Completion
Describe specific actions taken or required		Evaluator <u>SHALL</u> obtain concurrence from assignee or supervisor	Date
Ensure that there is a specific lesson plan around generator synchronization and implement. Include methodical problem- solving techniques with unfamiliar situations.		TJ Snodgrass	5/1/2021
Provide instructor led training for Operations and OTSs upon completion of the Start-up procedure and synchronizing guide revisions.		TJ Snodgrass	5/1/2021
Evaluate OTS training (techn and control) and consider inc shadowing time and rotation proficiency.	ical, command reased to improve	Jamie Long	5/1/2021

Action(s) to Correct the Contributing Cause(s)				
Contributing Cause (s):	A5B1C01 – Fo	A5B1C01 – Format deficiencies		
	A5B2C08 – Inc	complete/situation not covered		
) A5B2C01 – Lir	mit inaccuracies		
Corrective Action		Assignee	Due/Completion	
Describe specific actions take	en or required	Evaluator SHALL obtain	Date	
		concurrence from assignee or		
	supervisor			
Revise Crystal River Start-Up Procedure to		TJ Snodgrass	4/1/2021	
add enclosures for unit specific activities.				
Revise Crystal River Start-Up Procedure to		TJ Snodgrass	4/1/2021	
reference the EOP ensuring EOP steps				
have been satisfied.				
Update generator synchronizing guides		TJ Snodgrass	4/1/2021	
(operator aids) on both units to reference				
3602 RPM should be a targe	t, and not a			
specific setpoint.				

Corrective action for Extent of Cause			
Corrective Action	Assignee	Due/Completion	
Describe specific actions taken or required	Evaluator <u>SHALL</u> obtain concurrence from assignee or supervisor	Date	
Modify SEL-351S Breaker 3233/3234 logic to supervise output contact equation 102 with 25A1/A2 synchronizing checks.	Jezzel Martinez (Transmission)	3/1/2021	

		DEE's Suppl Response to OPC POD 1	(1-4)
Review existing facilities in Florida for	Joe Simpson	4/1/2021	04
extent of cause.			<u> </u>

Effectiveness Review Action Insert rows for additional EREV such as interim effectiveness review			
Corrective Action Describe specific actions required	Assignee Evaluator <u>SHALL</u> obtain concurrence from assignee or supervisor	Due Date 6 months or earlier after all actions have been completed	
EREV: Perform effectiveness review on event #1100300. Document no repeat events, procedures revised as described in the corrective actions, training completed, and Transmission corrective actions complete.	Barbara Martinuzzi	6/18/2021	

Attachments

Attachment 1: Five (5) Why Staircase

Problem Statement: Crystal River Unit 4 generator failed to align with the system when breaker closed, resulting in an out of phase event.

1. Why did Crystal River Unit 4 generator have an out of phase synchronization to the grid?

1a. The operator red flagged the breaker at the wrong point in the synchronization process.

2. Why did the operator red flag the breaker at the wrong point in the synchronization process?

2a. The operator thought that it didn't matter when you red flagged the breaker.
3. Why did the operator think that it didn't matter when you red flagged the breaker?

3a. The operator understood that the synchronizing relay would not allow an out of phase synchronization.

Why did the operator understand that the synchronizing relay would not allow an out of phase synchronization?

4a. The operators training and experience supported this position.

4b. The operator expected the synchronization relay to perform as designed.

Lohere 5. Why did the synchronization relay not support the operators training and experience, and not perform

as designed? 5a. The synchronization relay had failed allowing an out of phase event.

Schech

Attachment 2: CRN Startup Procedure #CRNOP/00/TBD/0004

CR Unit Start-Up Procedure OI-1 CRNC

	Duke Energy Florida, LLC Docket No. 20210001			
REASON(s) for BARRIER FAILURE (Identify immediate cause(s) of Barrier failure.) As appropriate, identify additional barrier(s) that should have prevented <u>this</u> <u>Barrier failure</u> . Apply "WHY STAIRCASE" as appropriate.	Damaged, defective or failed part	Previous successes in use of rule reinforced continued use of the rule DEL 8 20	Signs to stop were ignored and step performed incorrectly performed incorrectly	Q4# Q4# B B C
CONSEQUENCES OF BARRIER FAILURE (Careful consideration of actual consequences of specific barrier failure is needed to help determine whether a specific failure is part of the Root Causal Train or a Contributing Causal Train.) Indicate if Barrier Failure <u>directly led to</u> or contributed to the Event.	The relay failure armed the circuit on manual operation (directly led).	The operator expected a failed synchronization allowing reposition of the sync switch handle back to auto. Operator was unaware that the sync check relay failed (directly led).	Operations should have stopped and evaluated the situation prior to continuing to attempt synchronization (contributed to).	
BARRIER ASSESSMENT (HOW THE BARRIER FAILED) (Identify whether, and in what specific manner, the barrier was missing, weak, or ineffective. Note that a barrier may fail in several different ways in the same incident. Each failure of the barrier should be considered separately.)	Relay failed in the closed position.	Synchronization to the grid should occur as close to 12 as possible, but within the zone of 11 to 1 on the synchronization scope. $(\pm 5^{\circ})$	Priorities changed multiple times in a short period as the station was attempting to respond to meet system requirements.	
BARRIER(s) THAT SHOULD HAVE PRECLUDED, OR REDUCED THE LIKELIHOOD OR SIGNIFICANCE OF, THE INCIDENT (Barriers that should have precluded the incident may be part of the Root Causal Train.) Barriers that should have reduced the incident may be part of a Contributing Causal Train.)	The Beckwith Manual sync check relay model M-0359 (25A1)	Operator red flagged the breaker at the 9 position	Time pressure	

Attachment 3: Barrier(s) that should have precluded or reduced the likelihood or significance of the incident

				Duke E Do	Energy Florida, LLC ocket No. 20210001
REASON(s) for BARRIER FAILURE	(Identify immediate cause(s) of Barrier failure.) As appropriate, identify additional barrier(s) that should have prevented <u>this</u> <u>Barrier failure</u> . Apply "WHY STAIRCASE" as appropriate.	LTA review based on assumption that process will not change	Individual underestimated the problem by using past events as basis	Practice or "hands-on" experience less than adequate	o OPC POD 1 (1-4) (34 2 2 2 2
CONSEQUENCES OF BARRIER FAILURE	(Careful consideration of actual consequences of specific barrier failure is needed to help determine whether a specific failure is part of the Root Causal Train or a Contributing Causal Train.) Indicate if Barrier Failure <u>directly led to</u> or <u>contributed to</u> the Event.	Adjusting the turbine speed greater than 3602 RPM may have allowed the generator voltage and system voltage to align and the unit to sync in auto (contributed to).	The EOP was typically not consulted for main boiler feed water pump trips as they were not uncommon (contributed to).	OTS experience consisted of shadowing for approximately three months (contributed to).	
BARRIER ASSESSMENT (HOW THE BARRIER FAILED)	(Identify whether, and in what specific manner, the barrier was missing, weak, or ineffective. Note that a barrier may fail in several different ways in the same incident. Each failure of the barrier should be considered separately.)	After initial voltage adjustment and verifying generator speed of 3602 RPM, no other adjustments were made to the frequency or voltage angle.	The EOP provides steps for immediate operator response, protective relay targets and associated alarms on the DCS alarm screen.	The amount of training did not adequately address normal, abnormal, and emergency working conditions.	
BARRIER(s) THAT SHOULD HAVE PRECLUDED, OR REDUCED THE	LIKELIHOOD OR SIGNIFICANCE OF, THE INCIDENT (Barriers that should have precluded the incident may be part of the Root Causal Train. Barriers that should have reduced the incident may be part of a Contributing Causal Train.)	Turbine speed of 3602 RPM was considered a set point and not a target.	Operations should have stopped when unit 4 initially tripped on low drum level and consulted the EOP.	On the job training	

REASON(s) for BARRIER FAILURE (Identify immediate cause(s) of Barrier failure.) As appropriate, identify additional barrier(s) that should have prevented <u>this</u> <u>Barrier failure</u> . Apply "WHY STAIRCASE" as appropriate.	Format deficiencies Incomplete/situation not covered Limit inaccuracies Change related documents not developed or revised
CONSEQUENCES OF BARRIER FAILURE (Careful consideration of actual consequences of specific barrier failure is needed to help determine whether a specific failure is part of the Root Causal Train or a Contributing Causal Train.) Indicate if Barrier Failure <u>directly led to</u> or contributed to the Event.	Operator and OTS could not rely on the procedure for guidance during the event (contributed to).
BARRIER ASSESSMENT (HOW THE BARRIER FAILED) (Identify whether, and in what specific manner, the barrier was missing, weak, or ineffective. Note that a barrier may fail in several different ways in the same incident. Each failure of the barrier should be considered separately.)	The unit steps are intertwined even though the start-up process and unit configuration are different. Enclosure instructions are incomplete, and limits should be a target and not set points.
BARRIER(s) THAT SHOULD HAVE PRECLUDED, OR REDUCED THE LIKELIHOOD OR SIGNIFICANCE OF, THE INCIDENT (Barriers that should have precluded the incident may be part of the Root Causal Train. Barriers that should have reduced the incident may be part of a Contributing Causal Train.)	Procedure was not of adequate quality and did not provide clear instructions.

Duke Energy Florida, LLC Docket No. 20210001 DEF's Suppl Response to OPC POD 1 (1-4)