

### **American Electric Power**

**Meeting with** 

### **Nuclear Regulatory Commission**

Discussion of MOV Operability with Degraded Voltage

Restarting D. C. Cook March 24, 2000





Agenda/Opening Remarks

Mike Rencheck

**■ MOV Requirements** 

Mike Finissi

Degraded Voltage Protection Licensing Basis **Robert Godley** 

 MOV Degraded Voltage Design Basis and Operability **Scot Greenlee** 

■ 89-10 Program MOVs

Mike Finissi

Closing Remarks

Mike Rencheck





- Ensure Operation in Accordance with Design Basis (DB)
- MOV DB Considerations Include:
  - Flow, pressure and temperature
  - Torque, thrust, and valve capabilities
  - Environmental qualification/HELB
  - Voltage
- **MOV DB Voltage:** 
  - Must be adequate to operate equipment





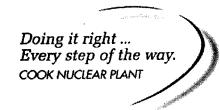
- Millstone Event, July 20, 1976
  - Degraded grid results in motor failure
- NRC Generic Letter dated August 13, 1976
  - Offsite power configuration
  - Loss of voltage design (incl. setpoints)
- AEP Response dated November 17, 1976
  - Provided analysis results
  - Proposed 2<sup>nd</sup> level UV at 94% of 34.5 kV



Doing it right ...
Every step of the way.
COOK NUCLEAR PLANT

- NRC Generic Letter (GL), June 3, 1977
  - Voltage/time setpoints analysis at all distribution levels
  - Protection to include coincident logic
  - Time delay not to exceed accident analysis
  - Include setpoints in Tech Specs





- AEP Response to GL June 3, 1977, dated July 22, 1977
  - 1st Level UV
    - » 60%
    - » 8 cycle TD
  - 2<sup>nd</sup> Level UV
    - » 94% @ 34.5 KV side of transformers
    - » 2 sec TD compatible with accident analysis
  - Tech Specs under development



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Every step of the way.
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# Degraded Voltage Protection Licensing Basis (cont.)

#### ANO Event

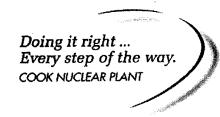
- NRC GL, dated August 8, 1979
  - Avoid spurious separation during S/U, normal ops, & when S/D
  - Provided sample Tech Specs
- NRC RAI, dated August 15, 1979
  - AEP response, dated October 5, 1979



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- AEP Response to GL August 8, 1979, dated December 17, 1979
  - Proposal
    - » 1st level UV increased to 79.9% with 2 sec TD
    - » 2<sup>nd</sup> level UV 89.9% @ 4 KV buss with 2 min TD
    - » 2<sup>nd</sup> level UV alarm only when on main generator
  - Basis
    - » Theoretical load flow study
    - » Safety busses volt range for normal ops & starting of safety loads is adequate
    - » Original proposal could cause spurious tripping
    - » Will accommodate short voltage dips
    - » Will avoid spurious separation from offsite power





- Tech Spec submitted February 22, 1980
- Unit 2 amendment 22 issued July 10, 1980 Unit 1 amendment 39 issued July 25, 1980
  - Modifications will protect class 1E equipment
  - Complies with staff positions
  - Provides for adequate testing
- Later Tech Spec Changes Made Minor Shifts in Setpoints





#### ■ Approval Based on:

- Maintaining previously analyzed time delays and minimum allowable setpoints
- Adequate margin existed between the maximum allowable setpoint and worst case anticipated degraded grid voltage
- Preclude spurious separation from grid





## Degraded Voltage Protection Licensing Basis (Summary)

#### **■** Summary

- Original proposal supported accident analysis
- TS proposal moved setpoint below analyzed degraded voltage under accident conditions
- Operability based on load flow study
- Believed setpoint voltages acceptable for continuous duty motors

#### Conclusion

Accident functions protected by depth & rigor of analysis





- Electrical Distribution System Design Basis Reconstitution Efforts
- Operability Based on Grid and Load Flow Analyses
- LER 99-022 Documents Degraded Voltage Findings
  - Load flow calculation issues
  - Grid profiles changed





- Load Flow Analysis Establishes "Analytical Limit" for 4kV Buses
  - Limiting accident conditions used in analysis
  - Modeling goes to equipment terminals
- Operation > Analytical Limit Ensures Equipment
   Can Operate
- Analytical Limit Used to Determine MOV Low Voltage and Performance



### MOV Design Input (cont.)

- Assurance of Operation > Analytical Limit Provided by Grid Study
- **■** Grid Study
  - Loss of a nearby generating unit
  - Loss of critical transmission grid element
  - CNP units down
    - » One unit in shutdown
    - » One unit in LOCA
  - Transmission system heavily loaded





### MOV Degraded Voltage Design Modifications and Enhancements

- Grid Study Results:
  - Do not expect to reach analytical value
- Restart Modifications to Ensure 4kV Bus Analytical Limit Maintained
  - New switchyard breaker
  - Transformer tap changes
- New Working Agreement Between CNP and AEP System Operations to Monitor Grid Voltages and Failure Scenarios
- **Long-term: Evaluating Additional Options**



### 89-10 Program MOVs

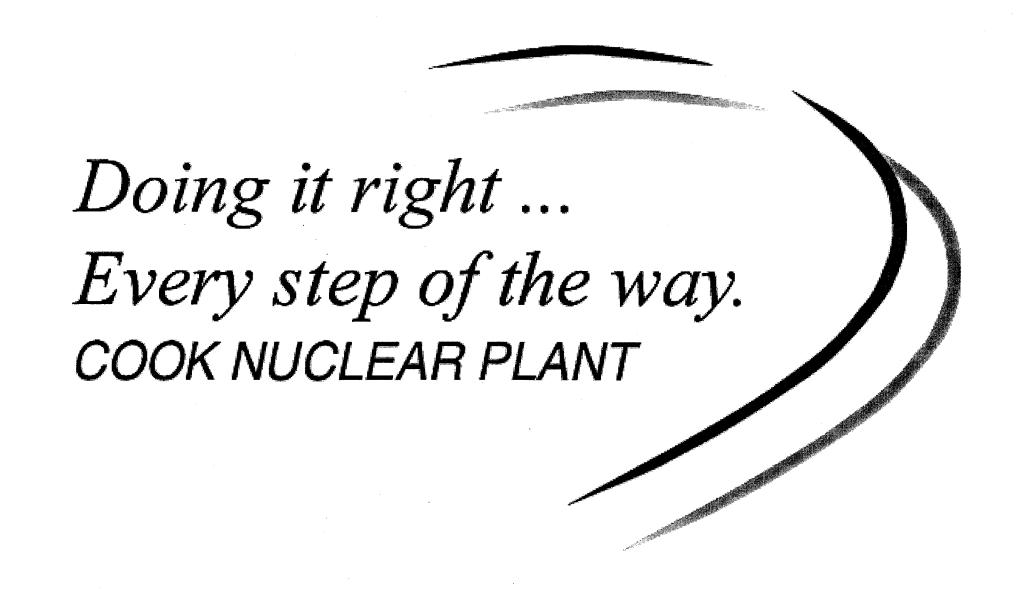
- Demonstrating that CNP MOVs will Operate as Designed
- Using Conservative Methodology in MOV Program





- Analytical Limit is Based on Load Flow Analyses
- **■** Ensures Adequate Voltage for Safety Related Loads
- **■** 89-10 MOVs Operable at Restart
- Analysis in Progress to Guide Our Future Actions





cc w/encls:

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RRB1

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Docket File

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