B 3.7 PLANT SYSTEMS

B 3.7.5 Auxiliary Feedwater (AFW) System

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BACKGROUND

The AFW System automatically supplies feedwater to the steam generators to remove decay heat from the Reactor Coolant System upon the loss of normal feedwater supply. The AFW pumps provide cooling water to the steam generator secondary side via connections to the main feedwater (MFW) piping inside containment. The steam generators function as a heat sink for core decay heat. The heat load is dissipated by releasing steam to the atmosphere from the steam generators via the main steam safety valves (MSSVs) (LCO 3.7.1) or atmospheric dump valves (LCO 3.7.4). If the main condenser is available, steam may be released via the steam bypass valves and recirculated to the CST.

The AFW System consists of three independent pump systems; two motor driven AFW pumps which are shared between the two units, and one dedicated steam turbine driven pump per unit. Each motor driven pump is capable of providing 100% of the design AFW flow rate, while the turbine driven pump is capable of providing 200% of the design flowrate. Each pump is provided with a recirculation line to maintain pump discharge flow above the minimum required flow rate for pump cooling. Each AFW pump system can be manually aligned to take suction from the service water system. The normal source of water for the AFW pumps is the Condensate Storage Tank (CST) and the safety related supply is the Service Water (SW) System. Motor operated valves are provided to allow the suction supply for the AFW pumps to be manually transferred to the SW system. For an AFW pump system to be considered OPERABLE, its associated service water suction supply valve must be operable. CST low level alarms and AFW pump low suction pressure alarms and trips are provided to alert personnel that the AFW pump suction supply must be manually swapped.

Each motor driven AFW pump is powered from an independent safeguards power supply and feeds one steam generator in each unit. AFW pump P-38A supplies AFW flow to the Unit 1 and Unit 2 A steam generators, while AFW pump P-38B supplies the Unit 1 and Unit 2 B steam generators. Each motor driven AFW pump's discharge header contains two normally closed automatic motor operated valves. Upon receipt of an AFW actuation signal, the discharge valve associated with the affected unit receives an automatic open signal and the discharge valve associated with the unaffected unit receives an automatic close signal. This feature will ensure that 100% of the motor driven AFW pump flow will be delivered to the affected unit, thereby, assuring that

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the accident analysis flowrates are met. Each motor driven AFW pump BACKGROUND is also equipped with a backpressure control valve, which is designed (continued) to preclude the motor driven AFW pump from tripping on an overcurrent condition at low steam generator pressures. The motor driven AFW pump systems actuate automatically on steam generator water level (low-low) and upon receipt of an safety injection (SI) signal. If offsite power is available, the motor driven AFW pump systems actuate immediately. If offsite power is not available, the safeguards buses shed their normal operating loads and are connected to the emergency diesel generators (EDGs). The motor driven AFW pump systems are then actuated per their programmed time sequence. While not credited in any DBA analysis, the motor driven AFW pump systems also actuate on; a trip of all MFW pumps, and by the Anticipated Transient Without Scram Mitigating System Actuation Circuit. Each unit's turbine driven AFW pump receives steam from both steam generator main steam lines upstream of the main steam isolation valves. Each of the two steam feed lines can supply 100% of the required steam flow to the turbine driven AFW pump. Both steam supply lines must be OPERABLE to consider the turbine driven AFW pump OPERABLE. All power-operated valves associated with the turbine driven AFW pump system are DC-powered, with the exception of the service water suction supply valve (Unit 1 and Unit 2 AF-4006) which is powered from a 480 Volt AC safeguards bus. The turbine driven AFW pump system actuates automatically on a steam generator water level - low-low in both steam generators. While not credited in any DBA analysis, the turbine driven AFW pump system also actuates on; a trip of all MFW pumps, undervoltage on both main feedwater pump buses, and by the Anticipated Transient Without Scram Mitigating System Actuation Circuit. The AFW System is capable of supplying feedwater to the steam generators during normal unit startup, shutdown, and hot standby conditions. One pump at full flow is sufficient to remove decay heat and cool the unit to residual heat removal (RHR) entry conditions. Thus, the requirement for diversity in motive power sources for the AFW System is met. The AFW System is designed to supply sufficient water to the steam generator(s) to remove decay heat with steam generator pressure at the setpoint of the MSSVs. Subsequently, the AFW System supplies

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BACKGROUND (continued)	sufficient water to cool the unit to RHR entry conditions, with steam released through the ADVs.
	The AFW System is discussed in the FSAR, Section 10.2 (Ref. 1).
APPLICABLE SAFETY ANALYSES	The AFW System mitigates the consequences of any event with loss of normal feedwater.
	The design basis of the AFW System is to supply water to the steam generator to remove decay heat and other residual heat by delivering at least the minimum required flow rate to the steam generators at pressures in excess of the steam generator safety valve set pressure.
	In addition, the AFW System must supply enough makeup water to replace steam generator secondary inventory lost as the unit cools to MODE 4 conditions.
	The AFW system is assumed to function in the mitigation of Design Basis Accidents (DBAs) and transients to include; Steam Generator Tube Rupture (SGTR), main steam line break, loss of normal feedwater, and loss of all AC power to the station auxiliaries. The AFW system must be capable of isolating AFW to the ruptured steam generator following a SGTR in addition to isolating the steam supply to turbine driven AFW pump associated with the ruptured steam generator. Although the AFW System will be initiated during the Small Break LOCA, the event has been analyzed with no credit for AFW. The Small Break LOCA was analyzed without AFW to be conservative and to limit the modeling required to address all possible combinations and time delays for various AFW system configurations.
	The limiting Design Basis Accident (DBA) for the AFW System is the loss of normal feedwater event (Ref. 2).
	The ESFAS automatically actuates the AFW turbine driven pump and associated power operated valves and controls when required to ensure an adequate feedwater supply to the steam generators during loss of power. DC power operated valves are provided for each AFW line to control the AFW flow to each steam generator.
	The AFW System satisfies the requirements of Criterion 3 of the NRC Policy Statement.

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LCO	This LCO provides assurance that the AFW System will perform its design safety function to mitigate the consequences of Design Basis Accidents and transients. Three AFW pump systems, consisting of two shared motor driven pump systems and one dedicated turbine driven pump system are required to be OPERABLE to ensure the availability of RHR capability for all events accompanied by a loss of offsite power and a single failure. This is accomplished by powering two of the pumps from independent emergency buses. The third AFW pump is powered by a different means, a steam driven turbine supplied with steam from a source that is not isolated by closure of the MSIVs.
	The AFW System is configured into three pump systems. The AFW System is considered OPERABLE when the components and flow paths required to provide redundant AFW flow to the steam generators are OPERABLE, and the components required to manually transfer AFW pump suction supply to the service water system are OPERABLE. This requires that the two motor driven AFW pumps be OPERABLE, each capable of supplying AFW to a separate steam generator. The turbine driven AFW pump is required to be OPERABLE with redundant steam supplies from each main steam line upstream of the MSIVs, and shall be capable of supplying AFW to both of the steam generators. The piping, valves, instrumentation, and controls in the required flow paths also are required to be OPERABLE.
	The LCO is modified by a Note indicating that only the motor driven AFW pumps which are associated with steam generators required to be operable for heat removal (per LCO 3.4.6) are required to be OPERABLE in MODE 4. This is because of the reduced heat removal requirements and short period of time in MODE 4 during which the AFW is required and the insufficient steam available in MODE 4 to power the turbine driven AFW pump.
APPLICABILITY	In MODES 1, 2, and 3, the AFW System is required to be OPERABLE in the event that it is called upon to function when the MFW is lost. In addition, the AFW System is required to supply enough makeup water to replace the steam generator secondary inventory, lost as the unit cools to MODE 4 conditions.
	In MODE 4 the AFW System may be used for heat removal via the steam generators.
	In MODE 5 or 6, the steam generators are not normally used for heat removal, and the AFW System is not required.

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ACTIONS

<u>A.1</u>

If one of the two steam supplies to the turbine driven AFW pump system is inoperable, action must be taken to restore the inoperable steam supply to OPERABLE status within 7 days. The 7 day Completion Time is reasonable, based on the following reasons:

- a. The redundant OPERABLE steam supply to the turbine driven AFW pump;
- b. The availability of redundant OPERABLE motor driven AFW pumps; and
- c. The low probability of an event occurring that requires the inoperable steam supply to the turbine driven AFW pump.

The second Completion Time for Required Action A.1 establishes a limit on the maximum time allowed for any combination of Conditions to be inoperable during any continuous failure to meet this LCO.

The 10 day Completion Time provides a limitation time allowed in this specified Condition after discovery of failure to meet the LCO. This limit is considered reasonable for situations in which multiple Conditions are entered concurrently. The <u>AND</u> connector between 7 days and 10 days dictates that both Completion Times apply simultaneously, and the more restrictive must be met.

<u>B.1</u>

With the turbine driven AFW pump system (e.g., pump, flow path, or turbine) inoperable in MODE 1, 2, or 3, action must be taken to restore the pump system to OPERABLE status within 72 hours. The 72 hour Completion Time is reasonable, based on redundant capabilities afforded by the remaining OPERABLE motor driven AFW pump systems, time needed for repairs, and the low probability of a DBA occurring during this time period.

The second Completion Time for Required Action B.1 establishes a limit on the maximum time allowed for any combination of Conditions to be inoperable during any continuous failure to meet this LCO.

The 10 day Completion Time provides a limitation on the time allowed in this specified Condition after discovery of failure to meet the LCO. This limit is considered reasonable for situations in which multiple Conditions are entered simultaneously. The <u>AND</u> connector between the 72 hour and 10 day Completion Times dictates that both

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ACTIONS (continued)	Completion Times apply simultaneously, and the more restrictive must
	be met.

<u>C.1</u>

With one of the motor driven AFW pump systems (e.g., pump or flow path) inoperable in MODE 1, 2, or 3, action must be taken to restore the pump system to OPERABLE status within 7 day. The 7 day Completion Time is reasonable, based on redundant capabilities afforded by the remaining OPERABLE motor driven and turbine driven AFW pump systems, time needed for repairs, and the low probability of a DBA occurring during this time period.

The second Completion Time for Required Action C.1 establishes a limit on the maximum time allowed for any combination of Conditions to be inoperable during any continuous failure to meet this LCO.

The 10 day Completion Time provides a limitation on the time allowed in this specified Condition after discovery of failure to meet the LCO. This limit is considered reasonable for situations in which multiple Conditions are entered simultaneously. The <u>AND</u> connector between the 7 day and 10 day Completion Times dictates that both Completion Times apply simultaneously, and the more restrictive must be met.

D.1 and D.2

When Required Action A.1, B.1, or C.1 cannot be completed within the required Completion Time, or if two AFW pump systems are inoperable in MODE 1, 2, or 3, the unit must be placed in a MODE in which the LCO does not apply. To achieve this status, the unit must be placed in at least MODE 3 within 6 hours, and in MODE 4 within 18 hours.

Required Action D.1 is modified by a Note indicating that each unit may be sequentially placed in MODE 3 within 12 hours when both units are in Condition D concurrently. Proper application of this Note requires that no more than 12 hours elapse between the time Condition D.1 is entered for the first unit and entry into MODE 3 for both units. This Completion Time extension is reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems.

Required Action D.2 is modified by a Note indicating that entry into MODE 4 is not required unless one motor driven AFW pump system is OPERABLE. This Completion Time extension precludes entry into an operational condition where a motor driven AFW pump system may be needed when no motor driven AFW pump systems are available. ,F J

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ACTIONS (continued)	The allowed Completion Times, as modified by the Notes, are reasonable based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems.
	<u>E.1</u>
	If all three AFW pump systems are inoperable in MODE 1, 2, or 3, the unit is in a seriously degraded condition with no safety related means for conducting a cooldown, and only limited means for conducting a cooldown with non-safety related equipment. In such a condition, the unit should not be perturbed by any action, including a power change, that might result in a trip. The seriousness of this condition requires that action be started immediately to restore one AFW train to OPERABLE status.
	Required Action E.1 is modified by a Note indicating that all required MODE changes or power reductions are suspended until one AFW pump system is restored to OPERABLE status. In this case, LCO 3.0.3 is not applicable because it could force the unit into a less safe condition.
	<u>F.1</u>
<u>.</u>	In MODE 4, either the reactor coolant pumps or the RHR loops can be used to provide forced circulation. This is addressed in LCO 3.4.6, "RCS Loops-MODE 4." With one or more required motor driven pump systems inoperable, action must be taken to immediately restore the inoperable pump system(s) to OPERABLE status. The immediate Completion Time is consistent with LCO 3.4.6.
SURVEILLANCE REQUIREMENTS	<u>SR 3.7.5.1</u>
	Verifying the correct alignment for manual, power operated, and automatic valves in the AFW System water and steam supply flow paths provides assurance that the proper flow paths will exist for AFW operation. This SR therefore also applies to Main Steam and Service Water valves located in these flowpaths. This SR does not apply to valves that are locked, sealed, or otherwise secured in position, since they are verified to be in the correct position prior to locking, sealing, or securing. This SR also does not apply to valves that cannot be inadvertently misaligned, such as check valves. This Surveillance does not require any testing or valve manipulation; rather, it involves verification that those valves capable of being mispositioned are in the correct position.

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