

UNITED STATES
 NUCLEAR REGULATORY COMMISSION
 REGION III
 789 ROOSEVELT ROAD
 GLEN ELLYN, ILLINOIS 60137

NPC-29448

March 10, 1983

*Copy supplied
 by S.P. to RSL
 3/11/83 C.0830/lu.
 REL*

*JFJ
 SJ
 JF
 RAF
 send to
 copy to
 C.083*

MEMORANDUM FOR: J.F. Streeter, Chief, Reactor Projects Branch #2
 THROUGH: I.N. Jackiw, Chief, Reactor Projects Section 2C
 FROM: R.L. Hague, Senior Resident Inspector, Pt. Beach
 SUBJECT: POINT REACH AUXILIARY FEED SYSTEM AUTOMATIC INITIATION/
 OPERABILITY

*Plant 12.3.3 #76
 (cl. 5.5.1)*

On February 20, 1983, the licensee was experiencing water hammer in the recirc line of the Unit 1 steam driven auxiliary feedwater pump, due to excessive backleakage through three check valves in the discharge line. To alleviate the problem the licensee shut MOVs 4000 and 4001, the steamer discharge valves to the Unit 1 A and B steam generators. I contended, at that time, that they had placed themselves in the 72 hour LCO for the steam driven pump because the FFSAR calls for those two valves to be open. Their normal position is throttled approximately 20% open which provides 200 GPM per steam generator. I verified my position through phone calls to both you and the LPM, Tim Colburn. Colburn also asserted that having those valves shut would defeat the automatic initiation feature prescribed by 0737.

I presented my case to the licensee at an exit meeting along with some quotes from their Safety Analysis Report which, in the case of two accidents, auxiliary feedwater was supplied to the steam generators within one minute and a third accident which merely called for automatic initiation of auxiliary feedwater. I was told that the matter would be discussed at the next staff meeting and that I would be informed of their findings. After their meeting I was told that they could not resolve the issue without a further search of the correspondence between the licensee and NRR on Item II. E.1.2, of NUREG 0737. I did my own search of that correspondence and found the words "automatic initiation of auxiliary feedwater" used numerous times by both the licensee and NRR. I again called Colburn and asked for NRR's definition of those words and was told that they meant "capable of providing auxiliary feedwater without operator action".

At this point I realized the licensee's dilemma. The problem with accepting my contentions on operability was not with the steamer but with the motor driven pumps which are shared by both Units. The motor driven auxiliary feedwater pumps are routinely used to feed steam generators following plant trips and during startups and shutdowns. In order to feed a shutdown Unit with it's steam generator pressure higher than that of the operating Unit, they must isolate the motor driven pumps from the operating Unit. Their

*Copy to
 RSL*

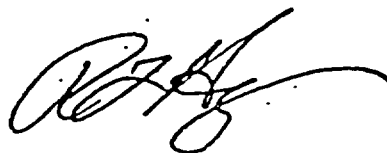
A/41

present Technical Specification allows for one motor driven pump to be out-of-service for 7 days. However, there is no allowance for having both motor operated pumps out-of-service at the same time. Therefore, if the licensee were to accept my contentions on operability and comply with Tech Specs, whenever they wanted to feed a shutdown Unit using the motor driven pumps they would have 3 hours to place the operating Unit in Hot Shutdown.

There appears to be no simple solution to this problem. Routine use of the steam driven pumps is avoided because their operation provides an unmonitored release path to atmosphere. And finally, probably the biggest problem with the design of their motor operated auxiliary feed system is that it is incapable of automatic initiation as defined by NRR. The only way to feed an affected Unit is to manually isolate the unaffected Unit.

I am enclosing simplified drawings of the auxiliary feedwater system for clarification as well as the applicable sections of their Tech Specs. I am suggesting that this issue be referred to NRR for resolution

Enclosure not sent to file
with this letter



R.L. Hague