CONDITION REPORT CR 97-0930 PAGE: 1 of 2 DATE: 07/01/97

ISSUE MANAGER: EDWARD HUDSON TOTAL NUMBER OF ACTIONS : 1

MSS #:

STATUS: CLOSEDUNIT: 0SYSTEM: AFINITIATED: 03/20/97CLOSED: 07/01/97INITIATOR: JOHN SCHROEDERADMINISTRATOR: EDWARD HUDSONNUMBER OF OPEN ACTIONS : 0NUMBER OF CLOSED ACTIONS : 1

Questions and concerns about the use of operator action to control AFW flow

DESCRIPTION:

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A dedicated operator is currently being used to adjust the P-38A+B discharge pressure control valves AF-4012 and AF-4019 via the controllers on CO1 for the motor driven AFW pump's to prevent pump motor trip on overcurrent when powered by a diesel generator at high frequency. The following questions and concerns are being raised with respect to the use of operatoraction to control AFW flow:

During the accident when AFW flow is most needed (i.e., complete loss of offsite power accident), P-38A+B would be powered by the EDGs and the instrument air (IA) compressors (and SA compressors) would be stripped on loss of voltage. If instrument air is lost, PCVs AF-4012 and AF-4019 wouldfail open and the dedicated operator would not able to adjust flow via the PCV controller on CO1. Additional operator action would then be needed tocontrol flow by manually starting an IA compressor to regain control of the PCV or to manually gag the PCV or throttle thedischarge MOV in the AFWpump room.

In a seismic event, the loss of all offsite AC Accident Analysis Basis Document (AABD Module 11) and FSAR 14.1.10 list the only required operator action for AFW flow as the switchover of the AFW suction supply from the CSTs to the Service Water system. Since AF-4012 and 4019 are fail open AOVs, and the IA system is non-seismic, a seismic event could result in loss of air to these valves requiring additional operator action to gag the pump discharge AOV or to throttle on the discharge MOV to control flow and prevent possible motor trip on overcurrent.

It can be noted that Calculation P-87-001 shows that when the PCV fails open, flow from P-38A or P-38B would be above the 240 gpm limit establishedon the dedicated operator instructions even with SG pressure above 1000 psig and assuming normal power supply frequency. AOP-5B, Loss Of Instrument Air, lists that AF-4012 and AF-4109 fail open and that the mini-recirc valves fail shut, however the AOP only addresses the need to maintain a minimum flow by gagging open the mini-recirc valves. The only specified direction with respect to maximum flow is to utilize the turbine driven AFW pump to prevent excessive cooldown due to loss of flow control on the motordriven pump. The AOP does not address gagging AF-4012 and AF-4019 to limit flow to a maximum value.

Significance:

The additional operator actions described above may also need to be addressed in the dedicated operator issue of controlling flow from the motor driven AFW pumps to prevent motor trip on overcurrent due to high flow rates.

In a seismic event, the accident analysis basis document (AABD Module 11) and FSAR 14.1.10 list the only necessary operator action for AFW as the suction supply switchover from the CSTs to the SW system. The analysis does not describe the possible need to manually throttle flow in the AFW pump room if Instrument Air is lost during a seismic event. This may require a licensing basis change via 50.59.

AP-5B, Loss Of Instrument Air, does not provide specific instructions to limit flow from P-38A/B if AF-4012/4019 fails open.

STATUS UPDATE:

(07/01/97 EH) Condition report closed to action taken.

SCREENED BY : EDWARD HUDSON	DATE: 03/26/97	COMMITMENT(Y/N): N
REGULATORY REPORTABLE(Y/N): Y	TS VIOLATION(Y/N): N	10 CFR 21
TS LCO	OPERABILITY IMPACT PER TS.(Y/N): Y	JCO REQUIRED(Y/N): N
MSS REVIEW(Y/N): N	SCAQ(Y/N): Y	OPERABILITY DETERMINATION.(Y/N): N

SUPPORTING DETERMINATIONS:

Four hour report made to the NRC and the electric motor driven AFW pumps were declared inoperable. Unit 1 is in cold shutdown and Unit 2 is defueled, so AFW not required to be operational.

 TRENDING INFORMATION:
 NON-OUTAGE

 WHEN_:
 FIRST GUARTER OF 1997
 NON-OUTAGE

 WHO_::
 WHY__:
 PROBLEM WAS NOT ANTICIPATED WHEN DESIGNED

 WHAT_:
 PROBLEM WAS NOT ANTICIPATED WHEN DESIGNED
 RESTART ISSUE

 ELECTRICAL MOTOR RELATED
 RESTART ISSUE

 SYSTEM:
 AUXILIARY FEEDWATER

REFERENCES: AABD MODULE 11 FSAR 14.1.11 RTS_S8 AFW DBD-01 CALCULATION P87-001 MR 97-038 FSAR 14.1.10 AOP-58

CONDITION REPORT CR 97-0930 PAGE: _____ of Z DATE: ______ 07/01/97

CR 97-0930 ACTION NUMBER 1

DONE	DUE DATE: 06/13/97	PRIORITY: 62	EXTENSIONS MADE: 1
CREATED : 03/26/97 0	DER EDWARD HUDSON	RECEIVED: 03/31/97 NI	IS PAUL HUFFMAN
WORK DONE: 06/29/97	JACK HAMMERS	APPROVED: 06/30/97	PAUL HUFFMAN
VERIFIED : 07/01/97	EDWARD HUDSON	CLOSED : 07/01/97	EDWARD HUDSON

Evaluate the concerns about AFW system operation as identified in this conditon report and develop/initiate any corrective actions (as required) to resolve these concerns.

NOTE: Refer to the following recommendations of the condition report initiator for use in formulating corrective actions:

* Evaluate the use of dedictate operators with respect to the loss of control air to the discharge pressure control valves wherever the AFW dedicated operator issue is addressed.

* Consider revising the AABD and FSAR to descrbe all operator actions necessary to maintain AFW flow.

* Revise AOP-58 to specify a maximum flow from P-38A/B.

(03/31/97 PWH) Received Action into Group: NMS Responsible Person: JSH:JACK HAMMERS Due Date: 05/01/97

(03/31/97 PWH) Set Work Priority to 62.

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(04/23/97 JSH) Evaluations performed indicate that a modification to the AOV's is necessary. A design change is currently being implemented to add a backup source of air to the AOV's.

(04/25/97 JSH) Evaluation of this CR has resulted in the initiation of MR 97-038, this CR will remain open until completion of MR 97-038.

(04/25/97 JSH) Requested Due Date: 06/13/97

(04/26/97 PWH) Changed the Due Date from: 05/01/97 to 06/13/97 Requested change in due date is to allow MR 97-038 to be installed, tested and evaluated before closure of CR. Current scheduled completion date for modification is 6/6/97. Other actions suggested by the CR are inappropriate because they do not address the root problem which is need to ensure operability of AFP's after a SG failure with loss of the associated P29.

(06/29/97 JSH) Passed to PAUL HUFFMAN for acceptance of work.

(06/30/97 PWH) Passed to EDWARD HUDSON for Verification.

Modification MR 97-038 added a nitrogen back system to the motor-driven AFW pump discharge valves. This modification provides pneumatic control capability for the valves during design basis accidents when the instrument air system is lost. With this control the availability of the motor-driven pumps and the control of the discharge valves is ensured. This modification resolves the issues raised by this condition report. The modification installation is complete with the exception of post-mod acceptance testing. A de dicated operator will not be used because the G-01 control system has been replaced with an electronic (zero speed drop) system. With addition of the nitrogen backup, the potential casualty workaround of operator action to gag the discharge control valves will be addressed. As a result of the change to G01 and the discharge AOV's, no revision is needed to the FSAR, the AABD or to AOP5B. Based on the above design changes, this action can be closed.

(07/01/97 EH) PLA Closure of Item. Action accepted as complete.

REFERENCES: AABD MODULE 11 FSAR 14.1.11 RTS_S8 AFW DBD-01 CALCULATION P87-001 MR 97-038 FSAR 14.1.10 AOP-5B

SIGNATURES	DATES .
Issue Manager:	Date:
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