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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

	DOCKET NUMBER (2)	<u> </u>	LER NUMBER (6)	PAGE (3)	
FACILITY NAME (1)	05000266	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	3 OF 6
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EXT (If more space is required use additional copies of NRC Form 366A) (17)

discharge flow. The significance of the timing of these actions was realized by the NMC in its self-initiated, voluntary review and update of the PRA. This condition had not been identified in the baseline PRA.

Operator training included lesson plans which identified the need and basis for maintaining minimum flows through the AFWS pumps and discussed the opening and closing logic for the recirculation valves. Operating crew simulator training included loss of instrument air scenarios. However, the specifics of the simulator program are such that failing closed the recirculation valves and shutting the AFWS discharge valves does not automatically fail the AFW pump. Therefore, the crew simulator training may not have sensitized the operators to this vulnerability.

The PRA's capacity to integrate system performance with potential human actions to obtain a spectrum of plant responses allowed for identification of this vulnerability. The NMC has concluded that this vulnerability would not likely have been identified through normal surveillance or quality assurance activities. The root cause investigation of this condition identified that previous reviews in this area were generally focused on the necessity of providing adequate flow to the steam generators to remove decay heat. Because of the small margin in the capacity of the motor driven AFWS pumps in particular, it is essential in many scenarios that the recirculation valves are shut in order to assure adequate flow to the steam generators.

Corrective Actions:

- A Root Cause Evaluation (RCE 01-069) Team was chartered to evaluate the vulnerability and why the risk significance of this condition was not recognized previously. The report of this team is scheduled to be provided for senior management review in late January 2002. The preliminary findings of this team with regard to root cause and contributing factors are included in the "Cause" section of this report.
- Beginning at 1520 on November 30, 2001, the operating crews were briefed on the concerns identified with a loss of IA and AFWS pump requirements to maintain adequate minimum pump flow. Temporary information tags were placed adjacent to the Control Room controls for all four AFW pumps to provide a reminder of the minimum flow requirements for each AFW pump.
- Temporary procedure changes were completed on November 30 to EOP-0, "Reactor Trip or Safety Injection" and EOP 0.1 "Reactor Trip Response,' to reflect the guidance provided earlier to operators via the temporary information tags. On December 14, 2001, these changes were made permanent. The step was added as a foldout page item so that operators would stop the pumps any time the minimum flow requirements were not met.
- Each operating crew received just in time training, briefings and simulator training concerning this event scenario to reinforce proper AFWS flow control.
- On December 20, 2001, EOP 0 and EOP 0.1 were further revised to link problems with IA as indicated by the IA header pressure low alarm with the continuing need to closely monitor and maintain adequate AFWS pump flows. This revision was also included in ECA 0.0, "Loss of All AC Power".
- Plant modifications to enhance system reliability, including providing a backup air or nitrogen supply to the minimum recirculation valves, are being evaluated.
- Simulator modifications to enhance modeling the potential failure of the AFWS pumps following loss of instrument air scenarios are being pursued

Why pracedure change not as glabell as present change? (consequences are the same) AC FORM 366A (T-2

To: Duane Schoon

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Procedure that are being changed via Temp Change Process to address the AFW recircorifice issue. Procedure # Applicable unit EOP 0 1 &2 EOP 0 1 &2

	Procedure #	Applicable unit
	EOP 0	1 &2
	EOP 0.0	1 &2
	EOP 0.1	1 &2
	EOP 0.2	1 &2
	EOP 0.3	1 &2
	EOP 0.4	1 &2
	EOP 1.0	1 &2
	EOP 1.1	1 &2
	EOP 1.2	1 &2
	EOP 1.3	1 &2
- 1	EOP 1.4	1 &2
	EOP 2	1 & 2
(5TE) 4	EOP 3	1 & 2 -
	EOP 3.1	1 & 2
T	EOP 3.2	1 & 2
	EOP 3.3	1 & 2
	FCA 0.0	1 & 2
	ECA 0.1	1 & 2
	ECA 0.2	1 & 2
	ECA 1.1	1 & 2
$\mathbf{Y}_{\mathbf{r}}$	ECA 1.2	1 & 2
/ R.	ECA 2.1	1 & 2 / 2
مر	· ECA 3.1	1 &2 Ĵ
	ECA 3.2	1 &2
	ECA 3.3	1 &2
	CSP S.1	1 &2
	CSP S.2	1 &2
	CSP C.1	1 &2
	CSP C.2	1 &2
	CSP C.3	1 &2
	CSP H.1	1 &2
	CSP H.2	1 &2
	CSP H.3	1 &2
	CSP H.3	1 & 2
	CSP H.4	1 &2
	CSP H.5	1 &2
•	CSP P.1	1 &2

WHY NOT OPIA STEP 3-22 5.6



Total procedures being changed = 102 procedures

Ken Sokol 10/30/2002

ee/18/91 1/14 201-11 801-11 401-11 (HP-T (A8-11 801-90A Sterine 183me MAR LISIT DEN DEM 2 ME MODED 11989 Surregues

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NUCLEAR POWER BUSINESS UNIT CRITICAL SAFETY PROCEDURES

CSP INDEX Revision 58 November 20, 2001

I	NDE:	X
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	PROCEDURE	REVISI PROCEDURE TITLE NUMB	ON <u>ER</u>	EFFECTIVE	PERIODIC REVIEW/ CANCELED DATE
	CSP-ST.0	Critical Safety Function Status Trees1	С	10/30/00	10/30/00
	CSP-S.1	Response to Nuclear Power Generation/ATWS	C	04/30/01	04/30/01
	CSP-S.2	Response to Loss of Core Shutdown	C	00/09/99	0//25/01
	CSP-C.1	Response to Inadequate Core Cooling	C	04/26/01	04/26/01
	CSP-C.2 CSP-C.3	Response to Degraded Core Cooling	C	04/28/01 06/09/99	07/23/01
	CSP-H.1	Response to Loss of Secondary Heat Sink	C	04/26/01	04/26/01
	CSP-H.2 CSP-H.3	Response to Steam Generator Overpressure	C	11/20/01	11/20/01
	CSP-H.4	Response to Loss of Normal Steam Release Capabilities	C	06/09/99	07/23/01
	CSP-H.5	Response to Steam Generator Low Level	С	06/09/99	07/23/01
	CSP-P.1	Response to Imminent Pressurized Thermal Shock Condition		11/20/01	11/20/01
	CSP-P.2	Response to Anticipated Pressurized Thermal Shock Condition		11/20/01	11/20/01
	CSP-Z.1	Response to High Containment Pressure	С	• 04/26/01	04/26/01
	CSP-Z.2	Response to Containment Flooding5	C	06/09/99	07/23/01
	CSP-Z.3	Response to High Containment Radiation Level 11	С	04/26/01	04/26/01
	CSP-I.1	Response to High Pressurizer Level8	C	04/26/01	04/26/01
	CSP-L2	Response to Low Pressurizer Level	C	10/30/00	11/20/01
	CSP-L3	Response to Voids in Reactor Vessel		11/20/01	11/20/01

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