

GARY R. PETERSON Vice President McGuire Nuclear Station

Duke Power MG01VP / 12700 Hagers Ferry Road Huntersville, NC 28078-9340

704 875 5333

704 875 4809 fax grpeters@duke-energy.com

May 2, 2005

U.S. Nuclear Regulatory Commission Document Control Desk Washington, D.C. 20555

Subject: McGuire Nuclear Station, Unit 2 Docket No. 50-370 Licensee Event Report 370/2005-02, Revision 0 Problem Investigation Process (PIP) M-05-00882

Pursuant to 10 CFR 50.73, Sections (a)(1) and (d), attached is Licensee Event Report (LER) 370/2005-02, Revision 0.

This report is being submitted in accordance with 10 CFR 50.73 (a)(2)(i)(B) due to the McGuire Unit 2 failed surveillance test for Ice Condenser Lower Inlet Doors. Probabilistic risk assessment has determined this event to be of no significance to the health and safety of the public. There are no regulatory commitments contained in the LER.

Sincerely, Peterson

Attachment

IE22

U. S. Nuclear Regulatory Commission May 2, 2005 Page 2 of 2

¢

cc: W. D. Travers U. S. Nuclear Regulatory Commission Regional Administrator, Region II Atlanta Federal Center 61 Forsyth St., SW, Suite 23T85 Atlanta, GA 30303

> J. J. Shea (Addressee Only) NRC Project Manager (McGuire) U. S. Nuclear Regulatory Commission Mail Stop O-7 D11 Washington, DC 20555-0001

> J. B. Brady Senior Resident Inspector U. S. Nuclear Regulatory Commission McGuire Nuclear Site

Beverly O. Hall, Section Chief Radiation Protection Section 1645 Mail Service Center Raleigh, NC 27699-1645

							2220152			NO. 0450.0	104	· · ·		EVDIDE	C 0C 00 0007
NRC FORM (6-2004)	1 366		U.S. NUC	LEAR REGU	MISSIC					NO. 3150-0		ie mandatony i	nlorma		S 06-30-2007
(0 2004)						h	urs. Repor	ted less	sons	s learned are	incorpora	ted into the lic	ensing	process a	and fed back to
1 110	FNSF	F FVF	NT REPO	ORT (LEF	3)	Br	anch (T-5 F	52), U	S. I	s regarding bu Nuclear Regu	latory Co	nate to the He	coras hingto	n, DC 205	555-0001, or by
			or required num	•	•/	Re	Estimated burden per response to comply with this mandatory information collection request: 50 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the Records and FOIA/Privacy Service Branch (T-5 F52), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to Infocollects@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202 (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB.								
	()((	ligits/charac	ters for each bio	ock)				IUIIIDEL		e NRC may r	an informa lot conduc	tion collection	does r and a	person is	a currently valid not required to
1. FACILITY	NAME					_	DOCKET N			n.collection		3. PAGE			
		rlear	Statio	n, Unit	2					370				1 OF	6
4. TITLE		JICUL	0000101						<u> </u>					- 01	
4. 111 66															
Ice Co	ndens	ser Lo	wer In	let Doo	r Fa	ile	d Sur	vei]	11	ance T	estii	ng			
5. E	VENT DAT	E		6. LER NUMBE	R		7. REPORT DATE						ACILITIES INVOLVED		
				SEQUENTIAL		EV					FACILI	TY NAME	DOC	CKET NUN	IBER
MONTH	DAY	YEAR	YEAR	NUMBER	I	10	MONTH	DAY	Y	YEAR	EAC!! I	Y NAME			
3	3	2005	2005 -	- 002	0	0	05	2		2005	T AOILI			CKET NUM	IBER
		2005	11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check all that apply)						h.A.						
9. OPER. MOD		5	20.220						_	50.73(a)(2)(i				an (nat app (a)(2)(ix)	
10 00	10. POWER LEVEL 000		20.220		20.2203(2				50.73(a)(2)(iii			11	50.73(a)(2)(x)		(,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
				D3(a)(1)	1-1-		(1)(i)(A)			50.73(a)(2)(iv)(A)		1 1		(a)(4)	
			20.220	03(a)(2)(i)	50	.36(c)	(1)(ii)(A)			50.73(a)(2)(	/)(A)		73.71(a)(5)		
				03(a)(2)(ii)	50	.36(c)	(2)			50.73(a)(2)(	v)(B)		OTHE Speci		tract below or
			20.220	03(a)(2)(iii)	50	.46(a)	(3)(ii)		_	50.73(a)(2)(	v)(C)			C Form 3	
				03(a)(2)(iv)			(2)(i)(A)		_	50.73(a)(2)(					
				03(a)(2)(v)			(2)(i)(B)			50.73(a)(2)(					
				03(a)(2)(vi)			(2)(i)(C)			50.73(a)(2)(				14. 14.	
<u>1963) - X</u>			20.220	03(a)(3)(i)			(2)(ii)(A) CONTACT	FORT		50.73(a)(2)(	VIII)(B)		· · · · · ·	1 ( e ¥1, •	
NAME											ABER (Inc	lude Area Code	-)		
	. T. C	Simme	Recula	atory C	ന്നി	ian	Ce				•	4-875-	•	5	
						-		T FAIL	.UR	E DESCRIB					
							5						T		
CAUSE	SYSTEM	co	MPONENT	MANU- FACTURER	REPORT TO EF	IX	CAUS	E	s	SYSTEM	сом	PONENT	FA	MANU- CTURER	REPORTABLE TO EPIX
							ŝ								
		14. SUPP	LEMENTAL F	REPORT EXP	ECTED					15. EXPEC		MONTH	1	DAY	YEAR
YES (	(If yes, co	omplete 15	EXPECTED	SUBMISSIO		). 🛛 🗵				SUBMISS DATE	ION				
				pproximately		_		tten lin	ies)						
	•					•			-						
				time of		ev	ent,	Unit	t	2 was	in Mo	ode 5 (	Co]	ld	
				nt powe						- 1 1.	•		£		<b>1</b>
				n 3/3/0											
				Inlet D ion (TS											
				ight LI											
				en LIDs											đ
				of the											
acce	ptano	ce cri	teria.	Subse	quer	tly	, McG	uire	е	determ	ined	that c	ne	or m	ore
				ould ha				ious	sl	y inop	erab	le in M	Iode	es 1-	4 for
-		-		allowe	_										
				e doors			-							/3/05	and
				LID spr	-				-			-			
				he five											
				reteste											
				ntative											or
	sidie	ennar	cement	s. TSS	кз.	0.1	<b>5.</b> 0 a	na e	aS	sociat	ea Ba	ases wi	. エ エ	be	

.

reviewed for possible enhancements.

#### U.S. NUCLEAR REGULATORY COMMISSION

LICENSEE EVENT REPORT (LER)

1. FACILITY NAME	2. DOCKET	6	. LER NUMBER			3. PAGE	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
McGuire Nuclear Station, Unit 2	05000370	2005	- 002 -	00	2	OF	6

17. NARRATIVE (If more space is required, use additional copies of NRC Form 366A)

## BACKGROUND

The Ice Condenser [COND] is an Engineered Safety Feature System containing borated ice that acts to absorb energy in the event of a Loss Of Coolant Accident (LOCA) or a Main Steam Line Break. Steam is condensed and post accident pressure is reduced to ensure containment integrity.

The Ice Condenser is divided into 24 bays. Each bay has a pair of inlet doors [DR]. The doors are in the lower compartment and are designed to quickly open due to differential pressure during a large break LOCA or during a high energy line break such that energy is evenly absorbed by the Ice Bed. For the small break LOCA scenario, the doors are also designed to open uniformly to prevent an uneven distribution of steam into the Ice Bed. All 48 Lower Inlet Doors (LIDs) are required to be operable while the Unit is in Modes 1-4.

During a small break LOCA event, the doors will begin to open with a 1 pound per square foot (PSF) differential pressure between lower containment and the ice bed. Sustained lower containment pressure at this magnitude (or higher) will move the doors to their full open position (i.e., 40 degrees from closed) against the shock absorbers.

Technical Specification (TS) Surveillance Requirement (SR) 3.6.13.6 assesses the LIDs' ability to modulate after opening in the event of a small break LOCA event, by quantifying resistance in the door hinges and springs through a series of opening/closing force tests. Associated test acceptance criteria (TAC) include:

- Verify that the torque, T (Open), required to cause opening motion at the 40 degree open position is </= 195 in-lb (approx. 7-1/8 lb at door test position).
- 2. Verify that the torque, T (Close), required to hold the door stationary at the 40 degree open position is >/= 78 in-lb (approx. 3 lb at door test position).
- 3. Calculate the frictional torque of each door using the results obtained from the above steps, and verify that the calculated frictional torque, T (Friction) is </= 40 in-lb.

These torque values are tested every 18 months per procedure PT/0/A/4200/32, "Periodic Inspection of Ice Condenser Lower Inlet Doors." Historically, these surveillance tests were performed in the as-left (i.e., just prior to Unit start-up) condition. However, the procedure was recently revised to require performance in both the asfound (i.e., prior to maintenance of the LID hinges or springs) and asleft conditions. NRC FORM 366A

U.S. NUCLEAR REGULATORY COMMISSION

# LICENSEE EVENT REPORT (LER)

1. FACILITY NAME	2. DOCKET	6	. LER NUMBER			3. PAGI	E
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
McGuire Nuclear Station, Unit 2	05000370	2005	- 002 -	00	3	OF	6

17. NARRATIVE (If more space is required, use additional copies of NRC Form 366A)

If any LID cannot satisfy TSSR 3.6.13.6 during Modes 1-4, then the LID shall be declared inoperable and Required Actions B.1 (verify maximum ice bed temperature is less than or equal to 27 degrees Fahrenheit once per 4 hours) and B.2 (restore ice condenser door to operable status and closed positions within 14 days) shall be met.

#### EVENT\_DESCRIPTION

At the time of the event, Unit 2 was in Mode 5 at 0 percent power. No additional structures, systems, or components were out of service at the time of the event which contributed to either the event's occurrence or its significance.

McGuire completed the As-Found surveillance tests on the LIDs on 3/3/05 per procedure PT/0/A/4200/032. Out of a total of forty-eight LIDs, seven LIDs exceeded one of the SR 3.6.13.6 TAC. Six doors failed to meet TAC No. 1, and the remaining door failed to meet TAC No. 2 as explained on page No. 2.

Subsequently, an evaluation was initiated to determine why the seven LIDs failed their test acceptance criteria. Also, PT/0/A/4200/032 was revised to incorporate industry operating experience and to improve repeatability of the LID test results.

On 3/25/05, while Unit 2 was in Mode 6, the seven LIDs were retested (in the as-found condition) using the revised surveillance procedure. Of the seven LIDs re-tested, five LIDs (i.e., 2L, 2R, 3R, 14R, 23R) still failed to meet their test acceptance criteria. The remaining two doors (22R, 23L) did meet their acceptance criteria.

Spring adjustments were made on all five doors that failed the 3/25/05 LID Torque Tests. Post-maintenance re-tests on all 48 LIDs (all required surveillances) were performed in Mode 6 on 3/30/05 with all 48 doors successfully meeting their test acceptance criteria.

Since the tests on 3/3/05 and 3/25/05 were conducted as-found and five doors required repair before they could satisfy TS SR 3.6.13.6, it is reasonable to conclude that one or more the five LIDs that failed their test acceptance criteria on 3/3/05 and 3/25/05 could have been previously inoperable in Modes 1-4 and that Required Actions B.1 and B.2 would not have been satisfied within the completion times specified by TS. Therefore, this event is considered reportable pursuant to 10CFR50.73 as a condition prohibited by TS.

#### U.S. NUCLEAR REGULATORY COMMISSION

LICENSEE EVENT REPORT (LER)

1. FACILITY NAME	2. DOCKET	· 6	. LER NUMBER			3. PAG	E
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
McGuire Nuclear Station, Unit 2	05000370	2005	- 002 -	00	4	OF	6

17. NARRATIVE (If more space is required, use additional copies of NRC Form 366A)

#### CAUSAL FACTORS

A review of the Unit 1 and Unit 2 LID torque test results from the previous four refueling outages, including a review of industry operating experience shows that no anomalous condition would have been expected in the EOC16 refueling outage, as no problems requiring corrective maintenance had been reported previously. No problems were noted in the performance of any of the other LID surveillances.

Therefore, the Apparent Cause of the five doors that failed the verification tests on 3/3/05 and 3/25/05 is LID spring tension being out of adjustment. The springs on all five LIDs required adjustment before they could satisfy TSSR 3.6.16.3 acceptance criteria.

#### CORRECTIVE ACTIONS

#### Immediate Corrective Actions:

- 1. Adjusted springs on five of the failed LIDs.
- 2. Revised Procedure PT/0/A/4200/0032, Rev.11 so that the 40 degree test results are an average from three tests to ensure that the test methodology has a higher degree of repeatability and consistency.

# Planned Corrective Actions:

- 1. Enhance the LID Inspection and Corrective Maintenance procedure (MP/0/A/7150/141) to include inspection and preventive maintenance of the LID spring clevis brackets/rod ends, and inspection and cleaning of the hinge bearing housings including swing arms. Also, the procedure will be revised to ensure a more comprehensive inspection to the LID's cover skins, frame shims and hinge boot covers to help in identifying potential problems.
- 2. Evaluate and revise as appropriate TSSR 3.6.13.6 and associated Bases to revise the LID Torque Test series requirement, and provide greater assurance that LID quality and operability are satisfactorily maintained.
- 3. Further evaluation will be performed on the LIDs to identify whether an anomalous degradation mechanism exists. If further evaluation determines new significant information with regard to a potential degradation mechanism of the springs, then this LER will be supplemented with the new information.

U.S. NUCLEAR REGULATORY COMMISSION

LICENSEE EVENT REPORT (LER)

	· · · · · ·				(		
1. FACILITY NAME	2. DOCKET	6	LER NUMBER			3. PAC	ЗЕ.
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
McGuire Nuclear Station, Unit 2	05000370	2005	- 002 -	00	5	OF	6

17. NARRATIVE (If more space is required, use additional copies of NRC Form 366A)

## SAFETY\_ANALYSIS

Based on the following, this event is not considered to be significant. At no time was the safety or health of the public or plant personnel affected as a result of the event.

The Ice Condenser design basis requires it to function properly to maintain peak containment pressure below the containment design pressure. To ensure the ice bed is available to absorb energy from a Main Steam Line Break or LOCA, the Ice Condenser Lower Inlet Doors must be capable of opening at a relatively low pressure to prevent steam from bypassing the Ice Condenser to upper Containment during a small break LOCA.

Large Break LOCA and Main Steam Line Break are the design basis limiting transients for the Ice Condenser. The blow-down load from a large break LOCA bounds small break LOCAs as well as steam line and feedwater line breaks. The pressure differential across the LIDs following a large break LOCA will be substantially greater than that applied to the doors in the TSSR 3.6.13.6 torque test procedure. The doors which failed the TSSR 3.6.13.6 torque test procedure requirements would have opened as designed following the potential bounding LOCA.

Analyses have been performed using the GOTHIC computer code to determine what fraction, if any, of the LIDs can be completely blocked closed with containment pressure remaining below the calculated peak containment internal pressure (Pa=14.8 psig) during the blow-down period of the limiting size Large Break LOCA. These analyses demonstrated approximately 1/3 of the doors can be completely blocked shut (i.e., will not open at all) during the design basis events and containment pressure will remain below 14.8 psig.

The LIDs at McGuire were not blocked shut. The doors would have opened as designed during a limiting Large Break LOCA. For the small break LOCA event, the doors also would have opened as designed, but some of the doors might not have exhibited the expected flow proportioning capabilities as described in UFSAR 6.2.2.8.1.

In conclusion, the GOTHIC results demonstrate that for a large break LOCA, all of the Ice Condenser Lower Inlet Doors would have performed their design basis function. Adequate operating doors would mitigate the small break LOCA. The slight increase in the required opening/closing torque would not be expected to have a measured effect on the containment response following any design basis accident.

## U.S. NUCLEAR REGULATORY COMMISSION

# LICENSEE EVENT REPORT (LER)

\_\_\_\_

1. FACILITY NAME	2. DOCKET	6. LER NUMBER 3. PAGE
		YEAR NUMBER NUMBER
CGuire Nuclear Station, Unit 2	05000370	2005 - 002 - 00 6 of 6
7. NARRATIVE (If more space is required, use additional copies	s of NRC Form 3	66A)
A review of the McGuire correct previous reportable occurrence Test. This was reported in Li	e of LIDs ER 369/99	s failing to meet the Torque 9-01.
Applicable Energy Industry Ide codes are enclosed within brac		

•