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Main Steam Code Safety Valve Operation

- We identified a GREEN non cited violation of 10 CFR 50 appendix B, Criteria XVI, Corrective Actions related to a failure to take actions to correct deficiencies in the Reactor Regulating System (RRS) and Atmospheric Steam Dump System (ASDS).
- on March 6, 2004 and March 15, 2004. We observed that Main Steam Code Safety Valves had lifted during uncomplicated scrams at U2. The inspectors questioned the licensee as to the adequacy of the RRS and ASDS systems
- The Final Safety Analysis Report (FSAR) states that the RRS and ASDS properly functioned to prevent the lifting of the Main Steam Code Safety Valves, following a design basis turbine trip/reactor trip from 100% power.
- You initiated an investigation and determined this to be a long standing issue and corrective actions taken to date had not been effective.
- The inspectors determined that cycling the Main Steam Code Safety Valves following a turbine trip/reactor trip from full power resulted in an increase likelihood that they may not reseal or may reseal improperly which is an FSAR initiating event.
- The finding is more than minor because if left uncorrected it could lead to a more significant event because operation of Code safeties result in a higher probability of the valves failing open during an event. This affects the Initiating Event Cornerstone because an Inadvertent Opening of a Steam Generator Safety Relief is a FSAR Chapter 14 Initiating Event. CR-04-02514

UNRESOLVED ISSUES

MAIN STEAM CODE SAFETY TEST EQUIPMENT

- We questioned the adequacy of testing and surveillance on the Millstone Unit 2 Main Steam Code Safety Valves as performed by part by SP-2730B, Main Steam Code Safety Valve Test.
- The surveillance procedure contained a conversion factor for the Main Steam Code Safety Valves that was developed by a 10 CFR Appendix B qualified vendor, but the developmental data was not available for NRC Inspection and had not been technically reviewed by Dominion. historical vendor bulletin which identified an error in its development.
- We questioned whether the conversion factor indicate tolerances such as testing assurance, variation or error related to its development and whether the surveillance adequately addresses testing assurance, variation or error related the measurement and test equipment (MT&E).

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- Does the Vendor technical materials allow for its use following full valve lifts that resulted from plant transients. Dominion documentation indicates that the M&TE was used on several Main Steam Code Safety Valves after an operation.

.A URI is being opened to evaluate the issues. CR-04-09086

### CONTAINMENT SUMP TRISODIUM PHOSPHATE

The inspectors questioned Millstone U2 implementation of the requirements of Technical Specification (TS) 5.5, Trisodium Phosphate (TSP) which requires a verification that there are 282 cubic feet of active, granulated TSP stored in Millstone Unit 2 containment.

- We questioned the effectiveness of the TSP related to it being in a "granulated" state throughout its volume as apposed to the current condition of a coagulated mass.
- We questioned if the sampling mechanism and size was adequate.
- We questioned why the engineering calculation used to determine the necessary amount of TSP did not include several volumes of borated water (ex. piping down stream of the blender, EDT, VCT, and PDT) which would contribute to the post accident, containment sump, Boric acid concentration.

The URI is being opened to address these questions and determine the significance of the issue. CR-04-09202,04-07801

### URI - EMERGENCY FILTRATION SYSTEM

- We identified that Millstone U2 Operability Determination did not ensure the Emergency Filtration System (EBFS) would function within its design in a post accident, upset environment.
- Following the rupture of several atmospheric relief housekeeping boots at Millstone Unit 2, Dominion removed the housekeeping boots, we questioned the effectiveness of the EBFS system with these holes and you issued a CR (CR-04-03329)
- An operability determination (OD) was conducted based in part on a "draw down test" which indicated that, in the absence of housekeeping boots the EBFS system was capable of drawing a vacuum of 2.5 inches of water within the required 60 seconds using a single train of EBFS and you concluded that the EBFS remained operable following the rupture and subsequent removal of the housekeeping boots.
- We questioned what would be the effect of steam, increased humidity, an altered flow path and the distribution of debris (scale, dirt, and bird feathers) in the penetration room on the post accident operation of the EBFS and in light of the fact the the technical evaluation assumed zero moisture.