Final Precursor Analysis

Accident Sequence Precursor Program – Office of Nuclear Regulatory Research

| Monticello | Partial Loss Of Offsite Power Event W Instrument Trip Failures | Partial Loss Of Offsite Power Event With HPCI High Level Instrument Trip Failures | | | | |
|------------------------|---|--|--|--|--|--|
| Event Date: 09/11/2008 | LER: 263/2008-005 | CCDP = 1×10^{-5} | | | | |

EVENT SUMMARY

Event Description. On September 11, 2008, Monticello Nuclear Generating Plant experienced a line fault on the supply line to the 2R Transformer. The 1R Transformer was out-of-service for planned maintenance when the event started. With both the 1R and 2R Transformers unavailable, the offsite electrical power supply to the non-safety buses was lost, resulting in a reactor scram with loss of the normal heat sink. The unit also experienced Group 1, 2 and 3 isolations of containment and the reactor pressure vessel. The 1AR Transformer remained available and the safety buses automatically transferred to that source as designed. Both emergency diesel generators (EDGs) started and were running, but did not load as offsite power was available to the safety buses.

Since the normal heat sink was lost as a result of main steam isolation valve (MSIV) closure and loss of electrical power to support equipment, operators used the reactor core isolation cooling system (RCIC), the high pressure coolant injection (HPCI), the safety relief valves (SRVs) and the torus cooling system for pressure and level control. The licensee decided to place the plant in Mode 4 (Cold Shutdown) pending assessment of the transient. Subsequently, the licensee restored the 1R Transformer and returned power to the non-safety buses.

The licensee documented their event details in Reference 1. NRC conducted a special inspection of the event; inspection findings are documented in Reference 2.

Cause. The root cause of the event was the A and B phase conductors supplying power to the 2R Transformer faulted to ground, resulting in the 34.5 kV breaker opening as designed to protect equipment from fault current damage. The opening of the 34.5 kV Breaker with the 1R Transformer out of service resulted in a loss of normal offsite power and a reactor scram. Due to the destruction of the failed insulation (splice and cable), the exact failure mechanism was not determined.

Additional Event Details. The HPCI turbine failed to trip at the +48 inch reactor vessel level signal. Operators manually isolated the steam line for the turbine. HPCI was declared inoperable. An investigation determined the failure of the HPCI to trip was due to three effects: (1) the trip solenoid valve had been misassembled, (2) no periodic maintenance on the valve, and a battery voltage well above the minimum required, but slightly below the normally observed voltage.

In addition, Division I of Residual Heat Removal Service Water (RHRSW) was out of service for maintenance at the onset of the reactor trip and during event recovery.

Recovery Opportunities. The licensee determined that recovery of the 1R Transformer was possible within 6 hours (Reference 1).

Analysis Rules. The ASP program uses Significance Determination Process (SDP) results for degraded conditions when available. However, the ASP program performs independent initiating event analysis when an initiator occurs and a condition analysis when there are no performance deficiencies identified for a particular event. In addition, the ASP program analyzes separate degraded conditions that were present during the same period and similar degraded conditions on an individual system or component that had different performance deficiencies.

Five GREEN findings have been identified for this event and are described in Reference 2. Therefore, this analysis focuses solely on the risk of the reactor trip and loss of offsite power to the non-safety buses that occurred.

ANALYSIS RESULTS

Conditional Core Damage Probability. The point estimate conditional core damage probability (CCDP) value for this event is 1.4×10^{-6} . The results of an uncertainty assessment on the event CCDP are summarized below.

| _ | 5% | Mean | 95% |
|------|----------------------|----------------------|----------|
| CCDP | 1.9×10 ⁻⁶ | 1.4×10 ⁻⁵ | 4.5×10⁻⁵ |

The Accident Sequence Precursor Program acceptance threshold is a CCDP of 1×10^{-6} or the CCDP equivalent of an uncomplicated reactor trip with a non-recoverable loss of secondary plant systems (e.g., feed water and condensate), whichever is greater. This CCDP equivalent for Monticello is 2×10^{-6} .

Dominant Sequence. The dominant accident sequence, Loss of Condenser Heat Sink (LOCHS) Sequence 62 (CCDP = 1.1×10^{-5}) contributes 78.6% of the total internal events CCDP. Additional sequences that contribute at least 1% of the total internal events CCDP are provided in Appendix A (GEM Worksheet).

The dominant sequence is shown graphically in Figure B-1 (Appendix B). The events and important component failures in LOCHS Sequence 62 are:

- LOCHS occurs due to loss of offsite power to the non-safety buses,
- reactor scram succeeds,
- SRVs successfully close (if opened),
- main feedwater fails,
- high-pressure injection (HPCI/RCIC) fails,
- manual reactor depressurization succeeds,
- condensate injection fails,
- low-pressure injection (LPCI/CS) fails, and
- alternate low-pressure injection fails.

GEM Worksheet. The GEM analysis worksheet contained in Appendix A provides the following:

- Modified basic events and initiating event frequencies, including base and change case probabilities/frequencies.
- Dominant sequences (including CCDPs).
- Sequence logic for all dominant sequences.
- Fault tree definitions.
- Sequence cutsets.
- Definitions and probabilities for key basic events.

MODELING ASSUMPTIONS

Analysis Type. The Revision 3-Plus (Change 3.45) of the Monticello Standardized Plant Analysis Risk (SPAR) model (Reference 3) created in June 2008 was used for this event analysis. This event was modeled as a loss of condenser heat sink initiating event with the unavailability of offsite power to the non-safety buses.

Unique Design Features. Monticello has the following unique design features that are pertinent to this event assessment:

- **Reserve Auxiliary Transformer 1AR.** Auxiliary power is supplied by the Station Auxiliary Transformer 2R during normal power operation. However, provisions are made for an automatic, fast transfer of the auxiliary load to the Reserve Transformer 1R. In the event Reserve Transformer 1R is unable to accept load, the essential buses are automatically transferred to the Reserve Auxiliary Transformer 1AR. Reserve Auxiliary Transformer 1AR is sized to provide only the plant's essential 4160 V buses and connected loads.
- **Control Rod Drive System.** Modifications made to the control rod drive (CRD) return flow required analysis and testing to ensure this source of high-pressure water flow was not reduced below a water boil-off rate due to decay heat generation 40 minutes following shutdown from rated power and the maximum leakage rate from the primary system. The analysis was redone using up-to-date thermal power and decay heat curve. This analysis indicates that a flow rate of 100.9 gpm is required to maintain the water level above the top of the active fuel. Additional flow to the vessel can be obtained by opening the two outboard isolation valves to the reactor water cleanup return line. In this mode of operation, one CRD pump can be used to add as much as 150 gpm to reactor vessel.

Modeling Assumptions. The following modeling assumptions were determined to be vital to this event analysis:

• Loss of Condenser Heat Sink Initiating Event. This analysis models the September 11, 2008 reactor scram at Monticello as a loss of condenser heat sink initiating event. A loss of offsite power to the non-safety buses resulted in the unavailability of the feedwater, condensate, recirculation, and circulating water systems. In addition, the unavailability of both the 1R and 2R Transformers caused a Group 1 isolation (i.e., the MSIVs automatically closed).

- Power Recovery to Non-Safety Bus. Offsite power recovery to a non-safety bus was possible six hours after the initiating event occurred. To reenergize a non-safety bus, Reserve Transformer 1R would need to be placed back into service from the ongoing maintenance activity. In this analysis, time for recovery is assumed to be available if high-pressure injection (HPCI/RCIC) is successful.
- Failure of HPCI/RCIC High Reactor Vessel Level Trip. The high reactor vessel level automatic trip for HPCI/RCIC failed during event recovery. Operator action was required to prevent over-filling the reactor vessel and prevent the unavailability and potential damage to RCIC and HPCI turbine-driven pumps.
- **Division I RHRSW Unavailable.** Division I of RHRSW was unavailable due to maintenance and was assumed to be non-recoverable during the event.

Fault Tree Modifications. The following fault tree modifications were necessary to perform this event analysis:

- Condensate. The condensate pumps fault tree (CDS-PMPS) was modified to account for initial
 loss of the condensate system (i.e., it balance-of-plant function) due to the loss of power to the
 non-safety buses. However, if HPCI and/or RCIC were initially available, condensate could be
 available later. The 'AND' Gate CDS-LOOP1 and the subsequent logic (including basic event
 (OPR-XHE-XL-NONVITAL) were added to model the initial loss of condensate and the potential
 recovery of the low-pressure injection function of the condensate system. See Figure C-1
 (Appendix C) for modified CDS-PMPS fault tree.
- **HPCI and RCIC.** The basic event TDP-XHE-XL-LEVEL was added to the HPCI and RCIC turbine-driven pump faults trees to account for the required operator action to secure the pumps due to the failure of the automatic high reactor vessel level trip. See Figure C-2 (HCI-TDP) and Figure C-3 (RCI-TDP) in Appendix C for the modified HPCI and RCIC fault trees.

Basic Event Probability Changes. The following initiating event frequencies and basic event probabilities were modified for this event analysis:

- *IE-LOCHS set to 1.0.* The loss of condenser heat sink (LOCHS) initiating event frequency was set 1.0 to represent the operational event that occurred at Monticello on September 11, 2008. All other initiating events frequencies were set to zero.
- **LOOP-NONVITAL was set to TRUE.** This event was set to TRUE because Monticello experienced a loss of offsite power to the non-safety buses during the event.
- **OPR-XHE-XL-NONVITAL.** This event represents the probability of operators failing to restore power to a non-safety bus given successful high-pressure injection (HPCI/RCIC). This event was evaluated using the SPAR-H Method (Reference 4). It was determined that this human failure event required diagnostic activity. All diagnostic performance shaping factors were determined to be nominal; therefore, the failure probability was calculated as 1.0×10⁻².
- **RSW-MDP-TM-TRNA and RSW-MDP-TM-TRNC were set to TRUE.** These basic events were set to TRUE because Division I RHRSW was unavailable due to maintenance

TDP-XHE-XL-LEVEL was set to 1.0×10². This event represents the probability of operators failing to terminate HPCI/RCIC flow prior to overfilling the reactor vessel into the steam piping and potentially damaging the pumps. This event was evaluated using the SPAR-H Method (Reference 4). It was determined that this human failure event required diagnostic activity. All diagnostic performance shaping factors were determined to be nominal; therefore, the failure probability was calculated as 1.0×10⁻².

REFERENCES

- 1. Xcel Energy, "LER 263-2008-005, Rev. 0, Reactor Scram due to Loss of Normal Offsite Power, Event Date of September 11, 2008," dated November 07, 2008.
- 2. U.S. Nuclear Regulatory Commission, "Monticello Nuclear Generating Plant Special Inspection Report 05000263/2008009," dated December 16, 2008.
- 3. Idaho National Laboratory, "Standardized Plant Analysis Risk Model for Monticello," Revision 3.45, dated June 2008.
- 4. Idaho National Laboratory, "NUREG/CR-6883: The SPAR-H Human Reliability Analysis Method," dated August 2005.
- 5. U.S. Nuclear Regulatory Commission, "RASP Handbook: Internal Events," Revision 1.01, dated January 2008.

APPENDIX A GEM WORKSHEET

| <u>SAPHIRE Code Version</u> : | 7.27.0.41 |
|--------------------------------------|--|
| <u>SPAR Model Version</u> : | Monticello 3.45 (June 2008) |
| Analysis Type: Event Description: | Initiating Event Assessment Loss of Condenser Heat Sink (LOCHS) With Loss of Offsite Power to the Non- Safety Buses. |

Total CCDP:

1.4E-5 (Point Estimate & Mean)

Basic Event Changes

| | | Base | Current |
|---------------------|--|--------------------|--------------------|
| Event Name | Description | Probability | Probability |
| IE-IORV | Inadvertent Open Relief Valve | 2.0E-002 | 0.0E+000 |
| IE-ISL-RHR | ISLOCA (2-MOV RHR Interface) | 4.0E-006 | 0.0E+000 |
| IE-LLOCA | Large LOCA | 1.0E-005 | 0.0E+000 |
| IE-LOACB-A | Loss of Vital Bus A | 4.5E-003 | 0.0E+000 |
| IE-LOACB-B | Loss of Vital Bus B | 4.5E-003 | 0.0E+000 |
| IE-LOCHS | Loss of Condenser Heat Sink | 2.0E-001 | 1.0E+000 |
| IE-LODCB-A | Loss of Vital DC Bus A | 6.0E-004 | 0.0E+000 |
| IE-LODCB-B | Loss of Vital DC Bus B | 6.0E-004 | 0.0E+000 |
| IE-LOIAS | Loss of Instrument Air | 1.0E-002 | 0.0E+000 |
| IE-LOMFW | Loss of Feedwater | 1.0E-001 | 0.0E+000 |
| IE-LOOP | Loss of Service Water | 4.0E-004 | 0.0E+000 |
| IE-MANSD | Manual Shutdown | 1.7E+000 | 0.0E+000 |
| IE-MLOCA | Medium LOCA | 1.0E-004 | 0.0E+000 |
| IE-SLOCA | Small LOCA | 6.0E-004 | 0.0E+000 |
| IE-TRANS | General Plant Transient | 8.0E-001 | 0.0E+000 |
| IE-XLOCA | Excessive LOCA (Vessel Rupture) | 1.0E-007 | 0.0E+000 |
| LOOP-NONVITAL | Loss of Offsite Power to Non-Safety Buses | 0.0E+000 | TRUE |
| OPR-XHE-XL-NONVITAL | Operator Fails to Restore Power to a Non-Safety Bus | IGNORE | 1.0E-002 |
| RSW-MDP-TM-TRNA | RHRSW Train A Is Unavailable Due to Maintenance | 0.0E+000 | TRUE |
| RSW-MDP-TM-TRNC | RHRSW Train C Is Unavailable Due to Maintenance | 0.0E+000 | TRUE |
| TDP-XHE-XL-LEVEL | Operator Fails To Secure TDPs Prior to Water Induction | 0.0E+000 | 1.0E-002 |

Dominant Sequences

| Event Tree | Sequence | CCDP | % Contribution |
|------------|-----------------|----------|----------------|
| LOCHS | 62 | 1.1E-005 | 78.6 |
| LOCHS | 19 | 1.8E-006 | 12.9 |
| LOCHS | 39 | 3.9E-007 | 2.8 |
| LOCHS | 69 | 3.1E-007 | 2.2 |

Sequence Logic

| Event Tree | <u>Sequence</u> | Logic | | | | | | | | | |
|------------|-----------------|-------|------|-----|------|------|------|------|-----|-----|------|
| LOCHS | 62 | /RPS | /SRV | MFW | HPI | /DEP | CDS | LPI | VA | | |
| LOCHS | 19 | /RPS | /SRV | MFW | /HPI | SPC | /DEP | /CDS | SDC | CSS | PCSR |
| | | CVS | LI01 | | | | | | | | |
| LOCHS | 39 | /RPS | /SRV | MFW | /HPI | SPC | DEP | CRD | | | |
| LOCHS | 69 | /RPS | /SRV | MFW | HPI | DEP | CRD | | | | |

Fault Tree Descriptions

| Fault Tree | Description |
|------------|--|
| CDS | Condensate |
| CRD | CRD Injection (2 Pumps) |
| CSS | Containment Spray |
| CVS | Containment Venting |
| DEP | Manual Reactor Depress |
| HPI | High Pressure Injection (RCIC or HPCI) |
| LI01 | Monticello Late Injection Fails |
| LPI | Low Pressure Injection (CS or LPCI) |
| MFW | Main Feedwater |
| PCSR | Power Conversion System Recovery |
| RPS | Reactor Shutdown |
| SDC | Shutdown Cooling |
| SPC | Suppression Pool Cooling |
| SRV | SRVs Close |
| VA | Alternate Low Press Injection |

Sequence Cutsets

Sequence: LOCHS 62

<u>CCDP</u>: 1.1E-005

| CCDP | <u>% Cutset</u> | Cutset Events | | |
|----------|-----------------|-------------------|---------------------|-------------------|
| 1.0E-005 | 88.45 | LPI-XHE-XO-LVLCTL | TDP-XHE-XL-LEVEL | |
| 1.8E-007 | 1.59 | HCI-MOV-CC-IVFRO | HCI-MULTIPLE-INJECT | HCI-XHE-XL-INJECT |
| | | LPI-XHE-XO-LVLCTL | RCI-TDP-TM-TRAIN | |
| 1.3E-007 | 1.11 | HCI-MOV-CC-IVFRO | HCI-MULTIPLE-INJECT | HCI-XHE-XL-INJECT |
| | | LPI-XHE-XO-LVLCTL | RCI-TDP-FS-TRAIN | |
| 8.4E-008 | 0.74 | LPI-XHE-XO-LVLCTL | HCI-TDP-TM-TRAIN | RCI-TDP-FS-TRAIN |
| 7.4E-008 | 0.65 | HCI-MOV-CC-IVFRO | HCI-MULTIPLE-INJECT | HCI-XHE-XL-INJECT |
| | | LPI-XHE-XO-LVLCTL | RCI-TDP-FR-TRAIN | |
| 7.0E-008 | 0.62 | LPI-XHE-XO-LVLCTL | RCI-TDP-TM-TRAIN | HCI-TDP-FS-TRAIN |

Sequence: LOCHS 19

<u>CCDP</u>: 1.8E-006

| CCDP | <u>% Cutset</u> | Cutset Events | | |
|----------|-----------------|---------------------------------------|---------------------------------------|-------------------------------|
| 1.0E-006 | 55.96 | RHR-XHE-XO-CHR | | |
| 5.5E-007 | 30.78 | CVS-XHE-XM-RVENT OPR-XHE-XE-IDSHED | PCS-XHE-XL-LTLCHS CFAILED1 | CFAILED |
| 1.3E-007 | 7.39 | HCI-MOV-CC-IVFRO PCS-XHE-XL-LTLCHS | CVS-XHE-XM-RVENT OPR-XHE-XE-IDSHED | HCI-XHE-XL-INJECT CFAILED1 |

Sequence: LOCHS 39

<u>CCDP</u>: 3.9E-007

| CCDP | <u>% Cutset</u> | Cutset Events | | |
|----------|-----------------|------------------|-------------------|-------------------|
| 1.1E-007 | 28.41 | OPR-XHE-XM-INJEC | OPR-XHE-XE-IDSHED | |
| 6.1E-008 | 15.63 | ADS-XHE-XM-MDEPR | OPR-XHE-XE-IDSHED | CRD-XHE-XM-BRKRS |
| 4.4E-008 | 11.36 | ADS-XHE-XM-MDEPR | CRD-MDP-TM-TRNA | OPR-XHE-XE-IDSHED |
| 4.4E-008 | 11.36 | ADS-XHE-XM-MDEPR | CRD-MDP-TM-TRNB | OPR-XHE-XE-IDSHED |
| 2.0E-008 | 5.16 | SPC-MOV-CC-LOOPB | OPR-XHE-XM-INJEC | |
| 1.1E-008 | 2.84 | ADS-XHE-XM-MDEPR | CRD-MDP-FS-TRNB | OPR-XHE-XE-IDSHED |

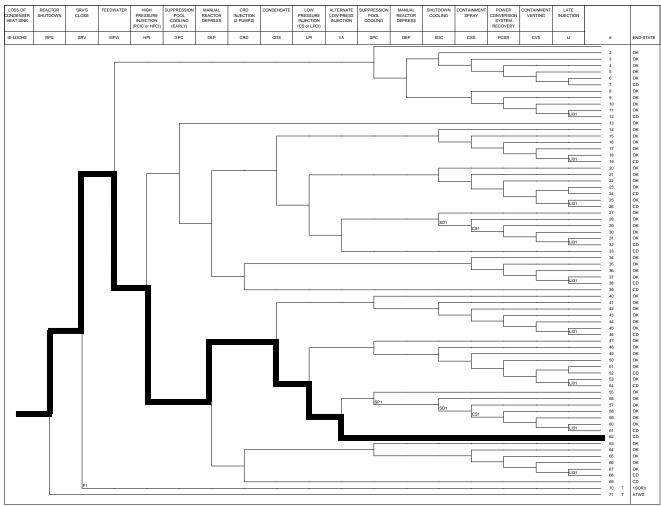
Sequence: LOCHS 69

<u>CCDP</u>: 3.1E-007

| CCDP | % Cutset | Cutset Events | | |
|----------|----------|------------------|------------------|------------------|
| 1.0E-007 | 31.97 | OPR-XHE-XM-INJEC | TDP-XHE-XL-LEVEL | |
| 5.5E-008 | 17.58 | ADS-XHE-XM-MDEPR | TDP-XHE-XL-LEVEL | CRD-XHE-XM-BRKRS |
| 4.0E-008 | 12.79 | ADS-XHE-XM-MDEPR | CRD-MDP-TM-TRNB | TDP-XHE-XL-LEVEL |
| 4.0E-008 | 12.79 | ADS-XHE-XM-MDEPR | CRD-MDP-TM-TRNA | TDP-XHE-XL-LEVEL |
| 1.0E-008 | 3.20 | ADS-XHE-XM-MDEPR | CRD-MDP-FS-TRNA | TDP-XHE-XL-LEVEL |
| 1.0E-008 | 3.20 | ADS-XHE-XM-MDEPR | CRD-MDP-FS-TRNB | TDP-XHE-XL-LEVEL |
| 1.0E-008 | 3.20 | ESF-ACT-FC-LEVEL | OPR-XHE-XM-INJEC | |
| 5.0E-009 | 1.60 | ADS-XHE-XM-MDEPR | RBC-MOV-OO-ISOL | TDP-XHE-XL-LEVEL |
| 5.0E-009 | 1.60 | ADS-XHE-XM-MDEPR | TDP-XHE-XL-LEVEL | CRD-XHE-XM-PUMP |

Basic Events (Cutsets Only)

| | | Current |
|---------------------|---|--------------------|
| Event Name | <u>Description</u> | Probability |
| ACP-BAC-LP-DII | Division II AC Power Buses Fail | 9.6E-006 |
| ADS-XHE-XM-MDEPR | Operator Fails To Depressurize the Reactor | 5.0E-004 |
| CFAILED | Containment Failure Causes Loss of All Low-Pressure Injection | 5.0E-001 |
| CFAILED1 | Containment Failure Causes Loss of CRD/FW Injection | 1.0E-001 |
| CRD-MDP-FS-TRNA | CRD Pump P-201A Fails To Start | 2.0E-003 |
| CRD-MDP-FS-TRNB | CRD Pump P-201B Fails To Start | 2.0E-003 |
| CRD-MDP-TM-TRNA | CRD Train A Is Unavailable Because Of Maintenance | 8.0E-003 |
| CRD-MDP-TM-TRNB | CRD Train B Is Unavailable Because Of Maintenance | 8.0E-003 |
| CRD-XHE-XM-BRKRS | Operator Fails To Close CRD-RBCW Breakers | 1.1E-002 |
| CRD-XHE-XM-PUMP | Operator Fails To Start the Standby CRD Pump | 1.0E-003 |
| CVS-XHE-XM-RVENT | Operator Fails To Vent Containment (Remote Operation) | 1.0E-003 |
| DCP-BAT-LP-BATTB | Division II Battery Fails | 4.8E-005 |
| DCP-XHE-XL-BRKRS | Operator Fails To Close DC Powered Breakers Locally | 3.4E-001 |
| ESF-ACT-FC-LEVEL | ESF Actuation Fails | 1.0E-003 |
| HCI-MOV-CC-IVFRO | HPCI Injection Valve (MOV HPCI-2061) Fails To Reopen | 1.5E-001 |
| HCI-MULTIPLE-INJECT | Probability of Multiple HPCI Injections | 1.5E-001 |
| HCI-TDP-FS-TRAIN | HPCI Pump P-209 Fails To Start | 7.0E-003 |
| HCI-TDP-TM-TRAIN | HPCI Train Is Unavailable Because Of Maintenance | 1.2E-002 |
| HCI-XHE-XL-INJECT | Operator Fails To Recover HPCI Injection Valve Reopening | 8.0E-001 |
| LPI-XHE-XO-LVLCTL | Operator Fails to Control Level Using Low-Pressure Injection | 1.0E-003 |
| OPR-XHE-XE-IDSHED | Operator Fails To Identify Load Shedding As Cause of Failure | 1.1E-002 |
| OPR-XHE-XM-INJEC | Operator Fails To Detect Need for Injection within 45 Minutes | 1.0E-005 |
| PCS-XHE-XL-LTLCHS | Operator Fails To Recover the PCS in the Long Term | 1.0E+000 |
| RBC-MOV-OO-ISOI | RBCCW Isolation Valve Fails To Close | 1.0E-003 |
| RCI-TDP-FR-TRAIN | RCIC Pump P-207 Fails To Run Given That It Started | 4.1E-003 |
| RCI-TDP-FS-TRAIN | RCIC Pump P-207 Fails To Start | 7.0E-003 |
| RCI-TDP-TM-TRAIN | RCIC Pump Train Is Unavailable Because Of Maintenance | 1.0E-002 |
| RHR-XHE-XO-CHR | Operator Fails To Start/Control RHR (Dependent Event) | 1.0E-006 |
| RHR-XHE-XO-ERROR | Operator Fails To Start/Control RHR | 5.0E-004 |
| SPC-MOV-CC-LOOPB | SPC Injection Valves LPCI-2007 and LPCI-2009 Fail To Open | 2.0E-003 |
| TDP-XHE-XL-LEVEL | Operator Fails To Secure Pumps Prior To Water | 1.0E-002 |



APPENDIX B EVENT TREE WITH DOMINANT SEQUENCE HIGHLIGHTED

Figure B-1: Loss of Condenser Heat Sink Event Tree (w/ Dominant Sequence Highlighted).

APPENDIX C MODIFIED FAULT TREES

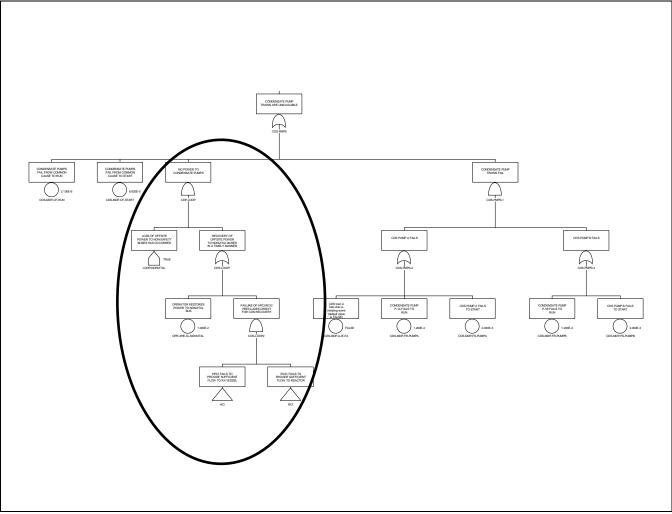


Figure C-1: Modified CDS-PMPS Fault Tree.

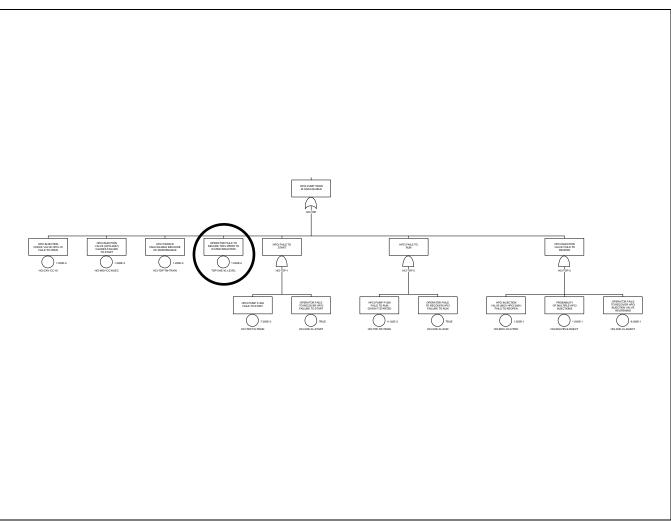


Figure C-2: Modified HCI-TDP Fault Tree.

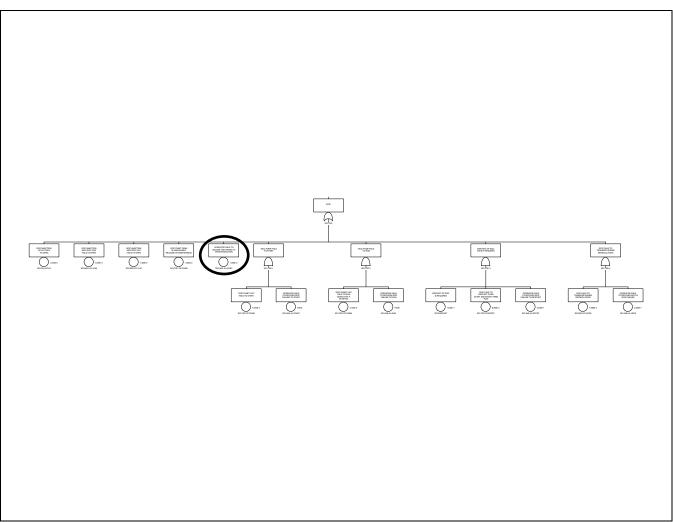


Figure C-3: Modified RCI-TDP Fault Tree.