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April 25, 1983
IPN-83-28

Director of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Mr. Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation

Subject: Indian Point 3 Nuclear Power Plant
Docket No. 50-286
Response to Generic Letter No. 83-10d
Automatic Trip of Reactor Coolant Pumps

Dear Sir:

This letter and its Attachment serve to provide the Authority's response to Generic Letter No. 83-10d regarding automatic trip of the reactor coolant pumps under postulated accident conditions. Please note that the schedules discussed herein are contingent on the timely receipt of information from the Westinghouse Electric Corporation and the Westinghouse Owner's Group and may be revised at a later date should unforeseen circumstances arise which adversely affect them.

Should you or your staff have any questions regarding this matter, please contact Mr. P. Kokolakis of my staff.

Very truly yours,

J. P. Bayne
Executive Vice President
Nuclear Generation

cc: attached

A001

State of New York
County of ~~New York~~ WESTCHESTER

Subscribed and sworn to before
me this 25th day of April 1983

Doreen Pisco

Notary Public

DOREEN PISCO
Notary Public, State of New York
No. 4737373
Qualified in Westchester County
Term Expires March 30, 1985

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PDR

cc: Resident Inspector's Office
Indian Point Unit 3
U. S. Nuclear Regulatory Commission
P. O. Box 66
Buchanan, New York 10511

Attachment to IPN-83-28
Response to Generic Letter No. 81-10d
Automatic Trip of Reactor Coolant Pumps

POWER AUTHORITY OF THE STATE OF NEW YORK
INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286

The information contained herein is provided in response to Generic letter No. 83-10d concerning NUREG-0737, Item II.K.3.5, "Automatic Trip of Reactor Coolant Pumps". The Response refers to ongoing and planned analytical and procedural tasks involving both the Westinghouse Electric Corporation and the Westinghouse Owner's Group and is integrated with the emergency operating procedure upgrade program being performed as part of the Authority's efforts related to Supplement 1 to NUREG-0737.

INTRODUCTION

The criteria for resolution of TMI Action Plan Item II.K.3.5, "Automatic Trip of Reactor Coolant Pumps" were stated in letters from Mr. Darrel G. Eisenhut of the Nuclear Regulatory Commission to all Applicants and licensees with Westinghouse designed Nuclear Steam Supply Systems (Generic Letter Nos. 83-10 c and d) dated February 8, 1983. The following represents the plan for demonstrating compliance with those criteria. In order to avoid confusion, the overall philosophy and plan will first be stated. Then, each section of the attachment to NRC Generic Letters Nos. 83-10 c and d will be addressed as to how the overall plan responds to each NRC criteria.

OVERALL PLAN

In the four years that have passed since the event at Three Mile Island, Westinghouse and the Westinghouse Owners Group have held steadfastly to several positions relative to post-accident reactor coolant pump (RCP) operation. First, there are small-break LOCAs for which delayed RCP trip can result in higher fuel cladding temperatures and a greater extent of zircalloy-water reaction. Using the conservative evaluation model, analyses for these LOCAs result in a violation of the Emergency Core Cooling System (ECCS) Acceptance Criteria as stated in 10CFR50.46. The currently approved Westinghouse Evaluation Model for small break LOCAs was used to perform these analyses and found acceptable for use by the NRC in Generic Letter Nos. 83-10c and d. Therefore, to be consistent with the conservative analyses performed, the RCPs should be tripped if indications of a small break LOCA exist.

Secondly, Westinghouse and the Westinghouse Owners Group have always felt that the RCPs should remain operational for non-LOCA transients and accidents where their operation is beneficial to accident mitigation and recovery. This position was taken even though a design basis for the plant is a loss of off-site power. Plant safety is demonstrated in the Final Safety Analysis Reports.

In keeping with these two positions, a low RCS pressure (symptom based) RCP trip criterion was developed that provided an indication to the operator to trip the RCPs for small break LOCA but would not indicate a need to trip the RCP for the more likely non-LOCA transients and accidents where continued RCP operation is desirable. The basis for this criterion is included in the generic Emergency Response Guideline

(ERG) Background document: (E-O Basic Revision, Appendix A). Relevant information regarding the expected results of using the RCP trip criterion can be derived from the transients which resulted from the stuck open steam dump valve at North Anna in 1979, the steam generator tube rupture at Prairie Island in 1980 and the steam generator tube rupture at Ginna in 1982. The RCPs were tripped in all three cases. However, a study of the North Anna and Prairie Island transients indicated the RCP trip would not have been needed based on the application of the ER trip criterion. The Ginna event, however, indicated a need to review the basis for the RCP trip criterion to allow continued RCP operation for a steam generator tube rupture for low head SI plants.

Thirdly, it has always been the position of Westinghouse and the Westinghouse Owners Group that if there is doubt as to what type of transient or accident is in progress, the RCPs should be tripped. Again, the plants are designed to mitigate the effects of all transients and accidents even without RCP operation while maintaining a large margin of safety to the public. The existing emergency operating procedures reflect this design approach.

Lastly, it remains the position of Westinghouse and the Westinghouse Owners Group that RCP trip can be achieved safely and reliably by the operator when required. An adequate amount of time exists for operator action for the small break LOCAs of interest. The operators have been trained on the need for RCP trip and the emergency operating procedures give clear instructions on this matter. In fact, one of the initial operator activities is to check if indications exist that warrant RCP trip.

Westinghouse and the Westinghouse Owners Group will undertake a two part program to address the requirements of NRC letters 83-10 c and d based on the aforementioned positions for the purpose of providing more uniform RCP trip criteria and methods of determining those criteria. In the first part of the program, revised RCP trip criteria will be developed which provide an indication to the operator to trip the RCPs for small break LOCAs requiring such action but will allow continued RCP operation for steam generator tube ruptures, less than or equal to a double-ended tube rupture. The revised RCP trip criteria will also be evaluated against other non-LOCA transients and accidents where continued RCP operation is desirable in order to demonstrate that a need to trip the RCPs will not be indicated to the operator for the more likely cases. Since this study is to be utilized for emergency response guideline development, better estimate assumptions will be applied in the consideration of the more likely scenarios. The first part of the program will be completed and incorporated into Revision 1 of the Emergency Response Guidelines developed by Westinghouse for the Westinghouse Owners Group. The Scheduled date for completion of Revision 1 is July 31, 1983.

The second part of the program is intended to provide the required justification for manual RCP trip. This part of the program must necessarily be done after the completion of the first part of the program. The schedule for completion of the second part of the program is the end of 1983.

The preferred and safest method of pump operation following a small break LOCA is to manually trip the RCPs before significant system voiding occurs. No attempt will be made in this program to demonstrate the acceptability of continued RCP operation during a small break LOCA. Further, no request for an exemption to 10 CFR 50.46 will be made to allow continued RCP operation during a small break LOCA.

DETAILED RESPONSE TO NRC LETTERS 83-10 C AND D

Each of the requirements stated in the attachment to NRC letters 83-10 c and d will now be discussed indicating clearly how they will be addressed. The organization of this section of the report parallels the attachment to NRC letters 83-10 c and d.

I. Pump Operation Criteria Which Can Result in RCP Trip During Transients and Accidents.

1. Setpoints for RCP Trip

The Westinghouse Owners Group response to this section of requirements will be contained in Revision 1 to the Emergency Response Guidelines scheduled for July 31, 1983. As stated in the Authority's response to Generic Letter No. 82-33 (IPN-83-26), the emergency operating procedure (EOP) upgrade program for Indian Point 3 will utilize the technical guidelines provided with Revision 1 to the Westinghouse Owner's Group Emergency Response Guidelines (ERGs).

a) As stated above, Westinghouse and the Westinghouse Owners Group are developing revised RCP trip criteria which will assure that the need to trip the RCPs will be indicated to the operator for LOCAs where RCP trip is considered necessary. The criteria will also ensure continued forced RCS flow for:

- 1) steam generator tube rupture (up to the design bases, double-ended tube rupture)
- 2) the other more likely non-LOCA transients where forced circulation is desirable (e.g., steam line breaks equal to or smaller than 1 stuck open PORV)

NOTE: Event diagnosis will not be used. The criteria developed will be symptom based.

The criteria being considered for RCP trip are:

- 1) RCS wide range pressure < constant
- 2) RCS subcooling < constant
- 3) Wide range RCS pressure < function of secondary pressure

Instrument uncertainties will be accounted for. Environmental uncertainty will be included if appropriate.

No partial or staggered RCP trip schemes will be considered. Such schemes are unnecessary and increase the requirements for training, procedures and decision making by the operator during transients and accidents.

- b) The RCP trip criteria selected will be such that the operator will be instructed to trip the RCPs before voiding occurs at the RCP.
- c) The criteria developed in Item 1a above is not expected to lead to RCP trip for the more likely non-LOCA and SGTR transients. However, since continued RCP operation cannot be guaranteed, the emergency response guidelines provide guidance for the use of alternate methods for depressurization.
- d) The Emergency Response Guidelines contain specific guidance for detecting, managing and removing coolant voids that result from flashing. The symptoms of such a situation are described in these guidelines and in detail in the background document for the guidelines. Additionally, explicit guidance for operating the plant with a vaporous void in the reactor vessel head is provided in certain cases where such operation is needed. The existing Indian Point 3 procedures provide guidance for operator action in the unlikely event of void formation in the reactor coolant system. These procedures will be reviewed as part of the EOP upgrade program and the technical guidelines of the Revision 1 ERG set incorporated, as required.
- e) The existing Indian Point 3 procedures provide guidance for operator action regarding restoration of auxiliary water services (component cooling water and seal water injection) to the reactor coolant pumps. These procedures will be reviewed as part of the EOP upgrade program and the technical guidelines of the Revision 1 ERG set incorporated, as required.
- f) This topic is discussed in sections 1a and 1c above.

2. Guidance for Justification of Manual RCP Trip

The Westinghouse Owners Group response to this section of requirements will be reported separately at the end of 1983. The Authority intends to review the Owners Group report for applicability to Indian Point 3 as well as for technical content and to incorporate the technical guidance provided in that report into the upgraded EOPs and the associated training programs, as appropriate. The schedule for the EOP upgrade program is contained in the Authority's response to Generic Letter No. 82-33.

- a) A significant number of analyses have been performed by Westinghouse for the Westinghouse Owners Group using the currently approved Westinghouse Appendix K Evaluation Model for small break LOCA. This Evaluation Model uses the WFLASH Code. These analyses demonstrate for small break LOCAs of concern, if the RCPs are tripped 2 minutes following the onset of reactor conditions corresponding to the RCP trip setpoint, the predicted transient is nearly identical to those presented in the Safety Analysis Reports for all Westinghouse plants. Thus, the Safety Analysis Reports for all plants demonstrate compliance with requirement 2a. The analyses performed for the Westinghouse Owners Group will be used to demonstrate the validity of this approach.
- b) Better estimate analyses will be performed for a limiting Westinghouse designed plant using the WFLASH computer code with better estimate assumptions. These analyses will be used to determine the minimum time available for operator action for a range of break sizes such that the ECCS acceptance criteria of 10CFR50.46 are not exceeded. It is expected that the minimum time available for manual RCP trip will exceed the guidance contained in N660. This will justify manual RCP trip for all plants.

3. Other Considerations

- a) The design features of the instrumentation that will be used to signal the need for RCP trip will be addressed when the trip criteria are finalized and the upgraded EOPs implemented. The design features to be considered will include seismic and environmental qualification, reliability, and redundancy.
- b) The Emergency Response Guidelines contain guidance for the timely restart of the reactor coolant pumps when conditions which will support safe pump start-up and operation are established. The Authority intends to incorporate the ERG guidance into the Indian Point 3 procedures as part of the EOP upgrade program.
- c) The operator training programs will be modified to reflect the results of the Westinghouse analyses and the Revision 1 ERGs. The schedule for completion of the EOP upgrade program is contained in the Authority's response to Generic Letter No. 82-33.

II. Pump Operation Criteria Which Will Not Result in RCP Trip During Transient and Accidents.

The preferred and safest method of operation following a small break LOCA is to manually trip the RCPs. Therefore, there is no need to address the criteria contained in this section.