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STATE OF NEW YORK
ENERGY OFFICE

AGENCY BUILDING 2
EMPIRE STATE PLAZA
ALBANY, NEW YORK 12223

JAMES L. LAROCCA
COMMISSIONER

April 25, 1979

Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

REGULATORY DOCKET FILE COPY

Dear Mr. Denton:

The New York State Energy Office has reviewed I.E. Bulletin 79-06A, dated April 14, 1979, and its recommendations for Westinghouse pressurized water reactor facilities, particularly as they would apply to Indian Point Units 2 and 3 and the R. E. Ginna plant.

Based on our review we have identified one item that may result in a reduction in the safety margin for Indian Point Units 2 and 3 and one item that has the potential for adversely affecting all three plants.

The item of greatest concern is the requirement in paragraph 3 that states if pressurizer level is used in coincidence with pressurizer pressure, the low pressurizer level setpoint bistables should be tripped such that when pressurizer pressure reaches the low setpoint, safety injection would be initiated regardless of pressurizer level.

The implementation of this bistable trip creates a condition where the safety injection actuation, with an associated unit trip, is susceptible to initiation by perturbations on a single instrument bus. A scenario can be developed for Indian Point Units 2 and 3, which share a common offsite switchyard, where an event caused by a natural phenomenon (e.g. lightning striking the grid network) could generate a bus disturbance. This in turn would be reflected on the instrument busses of each unit which supply the logic circuits for safety injection. This momentary fluctuation could cause the actuation of a bistable on each unit thus tripping the unit and initiating safety injections. Since both units would be aligned per I.E. Bulletin 79-06A, a condition exists for a dual plant trip and associated loss of electric generation. This simultaneous loss of generating capability from both units could place the system grid in a situation that would result in a partial system blackout and a total loss of off-site power. We recognize that on-site power would supply the engineered safeguards equipment; however, a stable off-site power supply may not be available for the reactor coolant pumps. If this condition were to exist, the units would be required to utilize natural circulation for removal of core heat. Our preliminary evaluation indicates that this situation may be less desirable than permitting temporary operation with the original safety injection logic scheme until a well planned solution which would meet the objective of 79-06A is developed.

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Our second concern relates to item 7b of 79-06A which requires that the high pressure injection system remain in operation for at least 20 minutes if it is actuated by a low pressure condition. The low pressure safety injection logic aligned as per 79-06A will increase the potential for inadvertent safety injection actuations and hence the increased operation of the pumps near shutoff head conditions. Since these pumps operate under different conditions than those at Three Mile Island, it appears prudent to review the operating time criteria to insure that the imposed specification is not detrimental to the operation of these high pressure injection pumps, with consequent reduction in the safety of the plant.

It is requested that careful consideration be given to these specific concerns to insure that the universal application of the directive will not, under certain conditions, have a negative impact on the safety of these plants. While expeditious changes may be necessary, they should be the result of a thorough, well evaluated decision process to insure that the desired effect is indeed obtained.

Sincerely,



T. K. DeBoer
Director of Nuclear Operations

mc/TDB

cc Boyce H. Grier
William J. Cahill, Jr.
George T. Berry