

Jaegers, Cathy

To: Leeds, NRR
Ref. G20110002

From: Dave Lochbaum [DLochbaum@ucsusa.org]
Sent: Thursday, January 06, 2011 9:17 AM
To: qpif@aol.com; Borchardt, Bill
Subject: RE: 2.206 Petition for Byron Unit 2 (Docket 50-455)
Attachments: Att. 1 - 20080500-reg-guide-1-45-rcs-leak-detection.pdf

cys: EDO
DEDMRT
DEDR
DEDCM
AO
R111
OGC
Mensah, NRR
Scott, OGC
Kotzalas, OEDO

Hello Barry:

Thanks for including me on the distribution of this petition.

After reading the petition, I had these observations/comments:

- 1) Several BWRs had safety relief valve problems in the early 1980s. Pilgrim, FitzPatrick, and to a lesser extent Browns Ferry experienced problems with safety relief valves opening before their setpoints. At Pilgrim, some safety relief valves stuck open. There was no single cause for all these problems, but a cause for some of the problems was steam jetting/eroding of the valve internals. That cause sounds familiar to the situation occurring at Byron today.
- 2) As indicated by the highlighted text within attached Reg Guide 1.45 (May 2008 version), the NRC considers leakage through safety valves to be identified RCS leakage. If Byron is not tracking this leakage as RCS leakage, there's a problem. If the leakage is greater than the limits in admin procedures and/or tech specs on RCS leakage, the significance of the problem increases dramatically.
- 3) The petition states that the tailpiece temperature alarm for 2RY8010A have been in solid since late October. The condition of abnormal becoming normal poses several problems. First, the alarm constantly being tripped could mask degradation. The alarm is there to inform the operators that the safety valve has opened. Also, that condition could delude the operators into thinking an open safety valve is closed. If this safety valve opened and then failed to fully re-close, the tailpiece alarm is one data point for the operators to recognize this condition. By always being in, the operators could easily assume the safety valve reclosed the the alarm merely sustained its annoying presence. It happened at TMI -- the operators noticed high temperature downstream of the stuck open PORV but falsely attributed it to the temperature rise following the initial opening of the PORV.
- 4) Following the Davis-Besse debacle, NRC revised its procedures to require resident inspectors to review each and every corrective action report initiated at sites. In this case, multiple corrective action reports were written. To your knowledge, are the NRC resident inspectors aware of the safety valve issue and have they asked any questions of Byron management as to the reasons for the deferred repairs?

Thanks,
Dave Lochbaum
UCS

From: qpif@aol.com [qpif@aol.com]
Sent: Sunday, January 02, 2011 7:13 PM
To: bill.borchardt@nrc.gov
Cc: Dave Lochbaum
Subject: 2.206 Petition for Byron Unit 2 (Docket 50-455)

Please see the attached petition.

My contact information is:

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Received: from mail2.nrc.gov (148.184.176.43) by TWMS01.nrc.gov
(148.184.200.145) with Microsoft SMTP Server id 8.2.247.2; Thu, 6 Jan 2011
09:18:01 -0500

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<dlochbaum@ucsusa.org>); Thu, 06 Jan 2011 07:17:58 -0700 (MST)

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UCXSREX054147.ucs.usa ([fe80::65c5:9f09:2487:d403%11]) with mapi; Thu, 6 Jan
2011 09:17:06 -0500

From: Dave Lochbaum <DLochbaum@ucsusa.org>

To: "qpif@aol.com" <qpif@aol.com>, "bill.borchardt@nrc.gov"
<bill.borchardt@nrc.gov>

Subject: RE: 2.206 Petition for Byron Unit 2 (Docket 50-455)

Thread-Topic: 2.206 Petition for Byron Unit 2 (Docket 50-455)

Thread-Index: AQHLqtsKWTPWToks0EmNy/NMVwwFS5PD/poB

Date: Thu, 6 Jan 2011 14:17:06 +0000

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