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AUTH.NAME AUTHOR AFFILIATION
SCHUYLER,J.O. Pacific Gas & Electric Co.
RECIP.NAME RECIPIENT AFFILIATION
KNIGHTONN,G.W. Licensing Branch 3

SUBJECT: Requests approval for removal of RHR suction valve automatic closuure interlock.Upon approval,util will install alarms & restore power to RHR suction valve operators during periods of RHR sys operation while alligned to RCS.

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J. O. SCHUYLER
VICE PRESIDENT
NUCLEAR POWER GENERATION

August 15, 1984

PGandE Letter No.: DCL-84-285

Mr. George W. Knighton, Chief
Licensing Branch No. 3
Division of Licensing
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Docket No. 50-275, OL-DPR-76
Docket No. 50-323
Diablo Canyon Units 1 and 2
RHR System Suction Line Isolation Valves

Dear Mr. Knighton:

NRC letter, G. W. Knighton to J. O. Schuyler, dated May 21, 1984, and SSER 26, p. A.4-45.2, indicate that Technical Specification 3.4.9.3 and DCPP Operating Procedure B-2.11 should be changed to require that power be available to the RHR system suction line isolation valves (in modes 4, 5, and 6) within three months after the RHR low flow alarm is installed. PGandE letter DCL-84-208, dated June 6, 1984, states that the RHR low flow alarm is installed and functional.

Restoring power to the valves also restores the auto closure function of the RHR suction valves interlock. PGandE understands that the reasons for the auto closure interlock on the RHR suction valves are to prevent inadvertent RHR system overpressurization when aligned to the Reactor Coolant System (RCS) and to prevent an occurrence whereby a single failure in one RHR suction valve (with the second valve inadvertently left open) could result in an intersystem LOCA with the RCS at pressure. However, with the interlock installed and power restored to the valves, inadvertent valve closures have occurred at PWR plants which resulted in adverse situations such as (1) interruption of decay heat removal, (2) RHR letdown isolation resulting in RCS pressure spiking and/or PORV challenge, and (3) potential for RHR pump damage. In addition, both Westinghouse and EPRI (NSAC Report 52, dated January 1983) recognize the serious consequences of inadvertent valve closure when the RCS is depressurized and strongly advocate operating with power removed from the suction valves when the RCS is incapable of being pressurized. Therefore, PGandE does not feel that restoring power to the RHR suction valves with the interlock installed is in the best interest of plant safety.

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PGandE believes that the valve closure interlock can be eliminated for the following reasons: (1) there is no reason for the interlock when the vessel head is removed and the RCS is not pressurized, (2) the RHR System has sufficient relief valve capacity for overpressure protection for all anticipated transients when operating aligned with the RCS, without any automatic isolation provisions, (3) the presently installed low temperature overpressure protection system provides RHR system protection when activated, and (4) intersystem LOCA concerns can be resolved by installing alarms to warn the operators if the RHR suction valves are not closed when the RCS pressure is above 450 psig. These alarms would back up operating procedures and provide additional assurance that both valves will be closed when the RCS is at pressure.

Based on this rationale, PGandE requests NRC approval for removal of the RHR suction valve automatic closure interlock. If such approval is granted, PGandE would install the alarms described above and restore power to the RHR suction valve operators during periods of RHR system operation while aligned to the RCS.

Kindly acknowledge receipt of this material on the enclosed copy of this letter and return it in the enclosed addressed envelope.

Sincerely,

J. D. Schuyler

cc: J. B. Martin
H. E. Schierling
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