

Public Service Electric and Gas Company 80 Park Place Newark, N.J. 07101 Phone 201/430-7000

March 3, 1980

Mr. Denwood F. Ross, Jr., Acting Director Division of Project Management Office of Nuclear Reactor Regulation U.S. Nuclear Regulatory Commission Washington, D. C. 20555

Dear Mr. Ross:

MODIFICATION OF SMALL-BREAK LOSS-OF-COOLANT ACCIDENT OPERATOR GUIDELINES SALEM GENERATING STATION UNIT NO. 1 DOCKET NO. 50-272

In compliance with your letter of December 27, 1979 to Cordell Reed, our response is attached.

If you have any questions, please do not hesitate to contact us.

Very truly yours,

Frank P. Librizzi General Manager -Electric Production

Attachment



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ATTACHMENT

- 1. A copy of the detailed error analysis and its effects on the calculation of subcooling temperature margin is attached.
- 2. The application of the subcooling criterion for HPI termination for non-LOCA events to existing operating procedures has been discussed in the Westinghouse Owner's Group Letter OG-29, dated January 23, 1980 from Cordell Reed to Mr. Denwood F. Ross, Jr.
- 3. Our calculations show that we have provided a minimum actual margin of 20 F in subcooling temperature indication after discounting the effect of possible maximum instrumentation error. Therefore, we presently do not plan to add any additional instrumentation.
- 4. Sufficient instrumentation is available on redundant emergency power supplies to permit the operator to perform the actions defined in the procedure for the subcooling criterion for HPI termination.

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ERROR ANALYSIS OF THE SUBCOOLING MARGIN READING:

SALEM NUCLEAR GENERATING STATION PUBLIC SERVICE ELECTRIC & GAS CO.

CONTENT:

Principle of Analysis 2
 Error Calculations in the Pressure Channels ... 4
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NOTE: THE ERRORS IN THE SUBCOOLING MARGIN

READINGS	FOUND IN T	HIS ANA	LYSIS
HAVE TO BE	APPLIED TO	THE MI	NIMUM
INDICATED	SUBCOOLING	MARGIN	SET-
POINT OF 5	0 ⁰ F.		

Prepared by :

(Sanjit K. Bardhan)

Date : Feb.22.1980

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ANALYSIS OF ERROR IN SIGNAL CHANNELS:

- Assumptions: (1) All the sources of error in any instrument (or measurement subsystem) are assumed to be random variables in the statistical sense. $E_{i,i}$ represents the random variable due to the jth source of error in the ith instrument in a particular signal channel.
 - (2) Each E is statistically characterized by a Normal (Gaussian) distribution with zero mean (i.e. systematic or bias error is zero) and standard deviation d_{ij}.
 - (3) Some of the E_{ij}'s may be statistically dependent. The statistical correlation is assumed to be 100% for the sake of conservativeness.
 - (4) Individual instrument (or measurement subsystem) errors are assumed to be statistically independent (E_i) . As $E_i = E_{i1} + E_{i2} + \dots$, it will be normally distributed with zero mean and standard deviation d;.
 - (5) Any E_{ij} 's contributing less than 1% accuracy to E_{ij} may be neglected.

Derivation:

For zero bias or systematic error in any E_{ij}'s, the accuracy is equal to the precision.

e = accuracy (precision) for E i; Let,

 $e_i = accuracy (precision) for E_i$

The random variable E with standard deviation d represents the overall signal channel error and is given by,

... ... (1) $E = E_1 + E_2 + \cdots$ The given accuracy figures e 's have confidence levels of better than

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95% i.e. the probability is greater than 95% that the true value will be within a range of $\pm e_{ij}$ with respect to the instrument reading due to E_{ij} alone.

 $e_{ij} = 2d_{ij}$... (2) When E_{ik}, E_{il}, \ldots are statistically dependent, the random variable defined by,

 $E_{ik,l,...} = E_{ik} + E_{il} + \dots \dots \dots \dots (3)$ and is also normally distributed with standard deviation $d_{ik,l,..}$ which is given by,

$$d_{ik,l}, \dots = d_{ik} + d_{il} + \dots + (4)$$

$$d_{i}^{2} = d_{il}^{2} + d_{i2}^{2} + \dots + (d_{ik} + d_{il} + \dots)^{2}$$

$$= (1/2)^{2} e_{il}^{2} + (1/2)^{2} e_{i2}^{2} + \dots + (1/2)^{2} (e_{ik} + e_{il} + \dots)^{2}$$

$$\dots \dots \dots (5)$$

For a confidence level of at least 95% in E_i , $e_i^2 = (2d_i)^2 = e_{i1}^2 + e_{i2}^2 + \dots + (e_{ik} + e_{i1} + \dots)^2 \dots$ (6) For a confidence level of 95% in the signal channel,

$$e^{2} = (2d)^{2} = (2d_{1})^{2} + (2d_{2})^{2} + \dots$$

 $e^{2} = \sqrt{e_{1}^{2} + e_{2}^{2} + \dots}$ (7)

i.e. the overall signal channel accuracy is equal to the square root of the sum of the squares of the individual instrument/or measurement subsystem accuracies and is also defined as the root mean square (rms) error. It may be expressed either in units of a physical variable or in percentage of a reference span.

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A. Errors in the Reactor Temperature Measurement Channel as used in the Subcooling Margin Calculations: Reference Span = 700 °F Regular Channel: Incore Thermocouple ---> Computer Signal Conditioner ------> Computer Normal Operating Condition: Thermocouple: Combined accuracy (e_1) ...= + 5 $^{\circ}F$ (Mr. Wassel, W, Tel. Con. 2.7.80)= + 0.7143 % Computer Signal Conditioner: Dependent accuracies: $\frac{\text{Dependent accuracies:}}{\text{Reference accuracy } (e_{21}) \dots = + 0.05 \%}$ $\frac{\text{Drift } (e_{22}) \dots \cdots = + 0.05 \%}{\text{Independent accuracies:}}$ $\frac{\text{Repeatability } (e_{23}) \dots \cdots = + 0.05 \%}{\text{Resolution } (e_{24}) \dots \cdots = + 0.05 \%}$ $\frac{e_2 = + \sqrt{(e_{21} + e_{22})^2 + e_{23}^2 + e_{24}^2}}$ $= + \sqrt{(0.05 + 0.05)^2 + 0.05^2 + 0.025^2} = + 0.115 \%$ The channel accuracy is given by, $e(nl) = +\sqrt{e_1^2 + e_2^2} = \pm\sqrt{0.7143^2 + 0.115^2} = \pm 0.7235 \ \%$

Small Break LOCA Condition:

The effects of a small break LOCA are assumed to result in a containment temperature of 165 $^{\rm OF}$ and a corresponding pressure of 8 psig.

The channel accuracy is not affected by the changes in the environment as the components in this channel are unaffected by it. Hence, the channel accuracy $e(al) = e(nl) = + 5 \cdot 1 \circ F$

Back-up Channel #1:

Incore Thermocouple ->>> Precision Chart Recorder

Normal Operating Condition:

<u>Thermocouple:</u> Combined accuracy (e₁) (From Reg. Ch.) = + 0.7143 %

= + 5.1^oF

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Test Instruments:		
Combined accuracy (e ₈)	• • •	= <u>+</u> 0.1 %
Precision Chart Recorder:		
Independent accuracies:		
Accuracy (e ₃₁)	•••	= + 0.2 %
Resolution (e ₃₂)	• • •	= + 0.07 %
Reading error (e ₃₃)	• • •	= +(1/4)(1/2 ^O F)
(Mr. Andy Smith, Honeywell,		= + 0.125 °F
Tel. Con. 2.13.80)		= <u>+</u> 0.018 %
. $e_3 = \pm \sqrt{e_{31}^2 + e_{32}^2 + e_{33}^2}$		_
$= \pm \sqrt{0.2^2 + 0.07^2 + 0.018^2}$	-	= <u>+</u> 0.213 %

The channel accuracy is given by,

$$e(n2) = \pm \sqrt{e_1^2 + e_8^2 + e_3^2} = \pm \sqrt{0.7143^2 + 0.1^2 + 0.213^2} = \pm 0.752 \ \text{\%}$$
$$= \pm 5.26 \ \text{or}$$

Small Break LOCA Condition:

The channel accuracy $e(a2) = e(n2) = \pm 0.75 \% = \pm 5.25 °F$ Back-up Channel #2:

Hot Leg RTD -> Amplifier -> Isolater -> Chart Recorder Normal Operating Condition:

RTD:Independent accuracies:Accuracy (e_1)...(includes process measurementerror, reference error perMr. Dick Miller, W, Tel. Con. 2.7.80)Calibration Curve accuracy (e_{42})Test Inst. accuracy (e_{43})...= + 0.1 %

 $\frac{\text{Amplifier:}}{\text{Combined accuracy } (e_5) \qquad \dots \qquad = \pm 0.1 \%$ Isolater:

Combined accuracy (e_6) ... $= \pm 0.1 \%$

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Chart Recorder:	
Independent Accuracies:	
Accuracy (e ₇₁)	= + 0.5 %
Repeatability (e72)	= + 0.2 %
Deadband (e_{73})	$\dots = \overline{+} \text{ O.l } \%$
Reading error (e ₇₁)	$\dots = \overline{+}(1/4)(10^{\circ}F)$
	= + 0.36 %
. $e_7 = \pm \sqrt{e_{71}^2 + e_{72}^2 + e_{73}^2 + e_{73}^2}$	2 e ₇₄
$= \pm \sqrt{0.5^2 + 0.2^2 + 0.1^2}$	$2^{2} + 0.36^{2} = + 0.656 \%$

The channel accuracy is given by,

$$e(n3) = \pm \sqrt{e_4^2 + e_5^2 + e_6^2 + e_7^2}$$

= $\pm \sqrt{3.002^2 + 0.1^2 + 0.1^2 + 0.656^2} = \pm 3.08 \%$
= $\pm 21.56^{\circ}F$

Small Break LOCA Condition:

The channel accuracy $e(a3) = e(n3) = \pm 3.08 \ \% = \pm \frac{21.56}{F}$

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B. Errors in the Reacter Pressure Measurement Channel as used in the Subcooling Margin Calculations:

Reference Span = 3000 psig

.Regular Channel:

Transmitter ---> Isolator --> Computer Signal Conditioner ---> Computer. Normal Operating Condition:

nsmitter:		
Dependent Accuracies:		
Reference accuracy (e ₁₁)		= + 0.5 %
Drift (e ₁₂)		= + 0.5 %
Temperatūře effects (e ₁₃)	• • •	= <u>+</u> 0.5 %
Independent Accuracies:		
Deadband (e ₁₄)	•••	= <u>+</u> 0.01 %
	<u>Dependent Accuracies:</u> <u>Reference accuracy (e₁₁)</u> Drift (e ₁₂) <u>Temperature effects (e₁₃)</u> <u>Independent Accuracies:</u> <u>Deadband (e₁₄)</u>	<u>Dependent Accuracies:</u> <u>Reference accuracy (e₁₁)</u> Drift (e ₁₂) <u>Temperature effects (e₁₃)</u> <u>Independent Accuracies:</u> <u>Deadband (e₁₄)</u>

$$\cdot \cdot e_1 = \pm \sqrt{(e_{11} + e_{12} + e_{13})^2 + e_{14}^2}$$

$$= \pm \sqrt{(0.5 + 0.5 + 0.5)^2 + 0.01^2} = \pm 1.5 \%$$

$\frac{\text{Isolator:}}{\text{Combined accuracy (e}_6)} \quad \dots \quad = \pm \text{ 0.1 } \%$

$$\frac{\text{Computer Signal Conditioner:}}{\text{Combined accuracy (e}_2)} \qquad \cdots \qquad = \pm 0.115 \ \%$$
(From Temp. Ch.)

$$\frac{\text{Test Instruments:}}{\text{Combined accuracy (e}_8)} \dots = \pm 0.1 \%$$

The channel accuracy is given by,

$$e(nl) = \pm \sqrt{e_1^2 + e_6^2 + e_2^2 + e_8^2}$$

= $\pm \sqrt{1.5^2 + 0.1^2 + 0.115^2 + 0.1^2}$ = $\pm 1.51 \%$
= $\pm 45.35 \text{ psig}$

Small Break LOCA Condition:

...

Transmitter:		
Dependent Accuracies:		
Reference accuracy (e ₁₁)		= + 0.5 %
Drift (e,)		= + 0.5 %
*Temperature effects (e ₁₃)	• • •	= + 3.47 %
Independent Accuracies:		_
Deadband (e_1)	• • •	= + 0.01 %
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$$e_{1} = \pm \sqrt{(e_{11} + e_{12} + e_{13})^{2} + e_{14}^{2}}$$

$$= \pm \sqrt{(0.5 + 0.5 + 3.47)^{2} + 0.01^{2}} = \pm 4.47 \%$$
*Temperature effects at 165 oF are being cal-
culated as the square of the ratio of (165/280)
multiplied by the accuracy at 280 °F because
the accuracy is affected by the additional heat
energy absorbed by the transmitter at an
accident condition.
Isolator:
Combined accuracy (e_{6}) ... = \pm 0.1 \%
Computer Signal Conditioner:
Combined accuracy (e_{2}) ... = \pm 0.115 \%
(From Temp. Ch.)
Test Instruments:
Combined accuracy (e_{6}) ... = \pm 0.1 \%
Bias Error (e_{1}):
Due to rise in the containment pressure from 0 psig
(approx) to 8 psig during accident condition, the
gage pressure instruments will have bias errors of
(-)8 psig. This type of bias error can be factored
out with the help of the containment pressure instru-
mentation. Otherwise it will tend to indicate a
lower value for the Subcooling Margin than the act-
ual. For the sake of conservativeness the bias error
will not be factored out.

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$$e(al) = \pm \sqrt{e_1^2 + e_6^2 + e_2^2 + e_8^2}$$

= $\pm \sqrt{4.47^2 + 0.1^2 + 0.115^2 + 0.1^2} = \pm 4.474 \%$
= $\pm 134.2 \text{ psig}$

Back-up Channel #1:

Transmitter \longrightarrow Isolator \longrightarrow Chart Recorder

Normal Operating Condition:

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Isolator:
Combined accuracy (
$$e_6$$
)...= \pm 0.1 %Chart Recorder:
Combined accuracy (e_7)...= \pm 0.656 %(From Temp. Ch.)...= \pm 0.656 %Test Instruments:
Combined accuracy (e_8)...= \pm 0.1 %

The channel accuracy is given by,

$$e(n2) = \pm \sqrt{e_1^2 + e_6^2 + e_7^2 + e_8^2}$$

= $\pm \sqrt{1.5^2 + 0.1^2 + 0.656^2 + 0.1^2}$ = $\pm 1.643 \%$
= $\pm 49.3 \text{ psig}$

Small Break LOCA Condition:

 $\frac{\text{Transmitter:}}{\text{Combined accuracy (e}_{1})} \cdots = \pm 4.47 \%$ $\frac{\text{Isolator:}}{\text{Combined accuracy (e}_{6})} \cdots = \pm 0.1 \%$ $\frac{\text{Chart Recorder:}}{\text{Combined accuracy (e}_{7})} \cdots = \pm 0.656 \%$ $\frac{\text{Test Instruments:}}{\text{Combined accuracy (e}_{8})} \cdots = \pm 0.1 \%$

The channel accuracy is given by,

$$e(a2) = \pm \sqrt{e_1^2 + e_6^2 + e_7^2 + e_8^2}$$

= $\pm \sqrt{4.47^2 + 0.1^2 + 0.656^2 + 0.1^2} = \pm 4.52 \%$
= $\pm \frac{135.6 \text{ psig}}{4.47^2}$

Back-up Channel #2:

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:

Transmitter
$$\longrightarrow$$
 Isolator \longrightarrow Indicator
Normal Operating Condition:
Transmitter:
Combined accuracy (e_1) ... = + 1.5 %
(From Reg. Ch.)

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Combined accuracy (e₉) (From Norm. Cond.) ··· = <u>+</u> 1.64 % • • • Test Instruments: Combined accuracy (e₈) = <u>+</u> 0.1 % • • • . . .

The channel accuracy is given by,

$$e(a3) = \pm \sqrt{e_1^2 + e_6^2 + e_9^2 + e_8^2}$$

= $\pm \sqrt{4.47^2 + 0.1^2 + 1.64^2 + 0.1^2}$ = $\pm 4.77 \%$
= ± 142.9 psi

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C. Errors in the Reactor Subcooling Margin Calculations:

The Subcooling Margin is given by,

 $\Delta T = T_{sat} - T_{act}$ 1 $= T(P) - T_{act}$ (C-1)where, T(P) = A non-linear function of the coolant pressure in ^OF. It is found from the Steam Table (ASME) for a given pressure level. . . Total Error in ΔT = + Error in T(P) + Error in T_{act} Or, $e_{\Lambda T} = (+ e_P + e_T)^{\circ} F \cdots \cdots \cdots$ (C-2)The worst case results from the maximum positive value of ($\Delta T_{\rm reading}$ - $\Delta T_{\rm act})$. This corresponds to the situation when $e_{\rm P}$ is positive and $e_{\rm T}$ negative. ···· (<u>C-3</u>) $\cdot \cdot e_{\Delta T} = |e_P| + |e_T|$ • • • The same e_p in psig will result in different e_p 's in ^OF corresponding to the different coolant pressure levels. Let, $e_p(jk) = The coolant pressure error (psig) in kth pressure$ instrument channel (k=1,2,3) under jth operating $e_{\text{Pi}}(jk) = T_{\text{sat}} \text{ error } ({}^{\text{OF}}) \text{ due to } e_{p}(jk) \text{ corresponding to the coolant pressure level reading of } P_{i} (i=1,2,3).$ $e_{\text{T}}(jk) = T_{\text{act}} \text{ error } ({}^{\text{OF}}) \text{ in } k^{\text{th}} \text{ temperature instrument channel } (k=1,2,3) \text{ under } j^{\text{th}} \text{ operating condition.}$... (C-4) . . $e_{P_{i}}(jk) = T(P_{i}) - T(P = P_{i} - e_{P}(jk))$ The different values for $e_{Pi}(jk)$, $e_P(jk)$ & $e_T(jk)$ are being shown in Table-I. The different values for e_{AT} are being shown in Table-II. Sample Calculations: Assumed Pressure Reading $P_1 = 1765$ psig = 1780 psia Operating Condition: Small Break LOCA Accident (a) Pressure Instrument Channel: #2 (BU#1) Temperature Instrument Channel: #1 (Reg.) From the Steam Table & equn(C-4), $e_{P1}(a2) = T(1780) - T(1780-135.6) = 619.47 - 608.88 = 10.89$ °F (shown in Table-1) The total error in Subcooling Margin is given by, $e_{\Lambda\pi}(a21)_{Pl} = e_{Pl}(a2) + e_{\pi}(a1) = 10.89 + 5.1 = 15.99 \text{ or}$ (shown in Table-II)

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TABLE-I: TEMPERATURE & PRESSURE CHANNEL ERROR MATRIX AT DIFFERENT OPERATING

	TEMP CH. ERRORS			PRESS CH. ERRORS							
Operating	Indicated	Reg.	BU#T	BU#2	Reg	•	BU#1		BU#2		NOTE
000410100	(psia)	°F	°F	°F	°F	psi	°F	psi	°F	psi	
	P ₁ = 1780	- (n1)	o (n2)	(77)	$e_{pl}(nl)$ 3.57	35	e _{p1} (n2) 3.88	ю	e _{P1} (n3) 5.28	8	
Normal	P ₂ = 1880	e _T ("-) = 5.10	$= \frac{5}{2}$	= $=$ 21.56	3.42	nl) 45	e _{p2} (n2) 3.72	n2) 49.	e _{p2} (n3) 5.05	n3) 66.	
Normar	P ₃ = 2000	0.10	0.20		2.73 • _{P3} (n1)	ep(=	3.73 e _{P3} (n2)	e _P	4.27 e _{P3} (n3)	e	
Small	P ₁ = 1780				e _{p1} (al) 10.77	5	e _{p1} (a2) 10.89	6.6	e _{Pl} (*3) 11.49	6.0	
Break LOCA Accident	P ₂ = 1880	e _T (al) =	e _T (a2) =	e _T (a3) = p] 56	e _{P2} (al) 10.29	аl) 134	e _{p2} (a2) 10.41	a2) : 135	e _{p2} (a3) 10.98	в3) : 142	
Accident	P ₃ = 2000	5.10	5.20	21.30	'e _{p3} (al)' '9,98	ep(e _{P3} (a2) 10.09	ер($e_{P3}(a3)$ 10.64	е _Р	

CONDITIONS & COOLANT PRESSURES.

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TABLE-II: TOTAL SUBCOOLING MARGIN ERROR MATRIX AT DIFFERENT OPERATING

CONDITIONS & COOLANT PRESSURES.

: ".	MAXIMUM H	ERRORS I	N PRESS	URE & TE	MPERATURE	CHANNEL	COMBINA	ATIONS
Assumed	Normal Op	Small Break LOCA Condition						
Indicated Pressure (psia)	ep's (OF)er's (OF)	Reg: (5.1) e _m (n1)	BU#1: (5.26) e _T (n2)	BU#2 (21.56) e _m (n3)	e F ser s	Reg: (5.1) e _m (al)	BU#⊥ (5.26) e _m (a2)	BU#2 (21.56) e _m (a3)
	Reg(3.57) e _{Pl} (nl)	8.67	8.83	25.13	Reg(10.77) e(al)	15.87	16.03	32.33
P ₁ =1780	e _{Pl} (n2)	8.98	9.14	25.44	e _{Pl} (a2)) 15.99	16.15	32.45
	BU#2(5.28)	10.38	10.54	26.84	BU#2(11.49 epj(a3))16.59	16.75	32.45
P_==1880 2: -	Reg(3.42) e _{P2} (nl)	8.52	· 8.68	24.98	Reg(10.29) e _{P2} (al)	15.39	15.55	31.85
	BU#1(3.72) e(n2)	8.82	8.98	25.28	BU#1(10.41 e _{P2} (a2)) _15.51	15.47	31.97
	BU#2(5.05) e _{P2} (n3)	10.15	10.31	26.61	e _{P2} (a3)) 16.08	16.24	32.54
P ₃ =2000	Reg(2.73) e _{P2} (n1)	7.83	-7.99	24.29	Reg(9.98) e _{P2} (al)	15.08	15.24	31.54
	$BU#1(3.73) e_{P2}(n2)$	8.83	8.99	25.29	BU#1(10.09 e _{p2} (a2)) 15 .1 9	15.35	31.65
	BU#2(4~27) e _{P3} (9.37	9.53	25.83	e _{P3} (a3)) 15.74	15.90	32.20

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