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VIRGINIA ELECTRIC AND POWER COMPANY REGION II
ATLANTA, GEORGIA
RICHMOND, VIRGINIA 23261

June 16, 1980 80 JUN 20 A 9:52

Mr. James P. O'Reilly, Director
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Serial No. 432A
NO/RMT:ms
Docket Nos. 50-280
50-281
50-338
50-339
License Nos. DPR-32
DPR-27
NPF-4
NPF-7

SUBJECT: I. E. BULLETIN 80-12

Dear Mr. O'Reilly:

In our letter of June 11, 1980, serial no. 432/050980, we forwarded responses to I. E. Bulletin 80-12 "Decay Heat Removal System Operability". This letter is to forward a revision to page 2 of the attachment to that letter.

Very truly yours,

BR Sylvia
B. R. Sylvia
Manager-Nuclear Operations
and Maintenance

Attachment

cc: Director, Division of Reactor Operations Inspection
NRC Office of Inspection and Enforcement
Washington, D. C. 20555

4. Current operating procedures provide adequate safeguards for redundancy while operating or in a hot, shutdown condition by requiring two RHR Subsystems to be operable. In an intermediate or cold shutdown condition, Technical Specifications and operating procedures require only one RHR subsystem to be operable and therefore are inadequate for safeguarding against loss of redundancy required by the Bulletin. During a refueling, Technical Specifications and operating procedures require one RHR Subsystem in operation with permission to remove it from service for up to one hour per eight hours during the performance of core alterations. Consequently, during refueling, procedures and Technical Specifications are inadequate to safeguard against loss of redundancy required by the Bulletin. Technical Specifications do, however, require a boron injection flow path to be operable. The additional source of borated water meets diversity requirements of the Bulletin in lieu of maintaining two operable RHR Subsystems during refueling. Normally, it is during refueling that the Reactor Coolant System is opened; however, maintenance may be performed other than removing the head in cold shutdown, which requires draining reactor coolant to the centerline of the vessel nozzles. This makes the steam generators unavailable to remove heat as a diverse source. For this condition, diversity requirements are met by the operability of the boron injection flow path. Other means of backup are also available during cold shutdown by RWST recirculation utilizing the low head safety injection pumps and during refueling by use of the refueling purification system and the spent fuel pit cooling system.

In summary, operating procedures and Technical Specifications for all modes are adequate for redundancy or diversity requirements of the Bulletin except for RHR operation in an intermediate or cold shutdown condition. In these conditions, meeting redundancy requirements is impractical if RHR maintenance activities are to be performed. Therefore, procedures require revision to ensure a diverse method of residual heat removal if one RHR Subsystem is inoperable. Operating procedures will be changed to require at least one operable steam generator capable of removing heat or at least one operable SI pump (and the RWST) while operating in an intermediate or cold shutdown condition with one RHR subsystem inoperable. Current Technical Specifications require an operable boron injection flow path in an intermediate or cold shutdown condition.

5. The abnormal operating procedures are adequate for responding to loss of the RHR System. There is, however, a need for an additional improvement to the procedures which will emphasize operator response to loss of the RHR inlet valves. Since spurious actuation of the valve pressure interlock has occurred in the past, identification of specific actions required in response to this event will aid the operator in recovering the system as rapidly as possible.
- 6a. As a temporary measure, a Standing Order will be issued to implement the second paragraph of Item 4.