Florida Power
CORPORATION

50-302

March 10, 1980

File: 3-0-3-a-3

Mr. Robert W. Reid
Chief
Operating Reactors Branch #4
Division of Operating Reactors
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Request for Information on the Effects of Certain Valve Lineup Procedural Changes (Letter dated 1/22/80 to J. A. Hancock from R. W. Reid)

Dear Mr. Reid:

In response to the subject letter, the following information is being provided:

1. What is the adverse safety impact of starting up the plant with the MOV in the open position?

   With this MOV in the open position, isolation of the Reactor Coolant System (high pressure) from the Decay Heat System (low pressure) is maintained by two (2) check valves. If leakage past both check valves occurs, one train of the Decay Heat System will begin to increase in pressure. Pressure would increase until the relief valve (DHV-17 or DHV-28) setting in that train is exceeded. At that time, reactor coolant would be relieved into the decay heat pit sump. This event would be considered an unplanned release of airborne contaminates which would create a hazard to personnel in the area.

   If the leakage rate past both check valves approaches or exceeds the relief capacity (31.5 GPM) of the relief valve in that train, the potential exists to over-pressurize that decay heat train and a possible pipe rupture. During startup, this condition may be controlled in time to prevent equipment damage.

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With the MOV in the closed position during startup, pressures can procedurally be monitored upstream of this valve by use of a pressure gage between the Reactor Building penetration and the MOV. Increasing gage pressures while increasing Reactor Coolant System would indicate both check valves are leaking and appropriate action would be initiated.

2. What is the adverse safety impact of operating the plant with the MOV in the open position?

   The hazards involved with operating the plant with the MOV open are identical to those stated in Question 1. Probability of Decay Heat System over-pressurization is increased due to the time required to lower the Reactor Coolant System pressure to reduce check valve leakage. Reactor Coolant System pressure could not be controlled quick enough to prevent a Decay Heat System over-pressurization.

   Operating the plant with the MOV in the closed position would prevent these hazards. Leakage past both check valves can be detected by monitoring a pressure gage which indicates the pressure between the last check valve and the MOV. Procedurally, this gage would be monitored on a regular basis and before the quarterly ISI stroke testing of the MOV.

Answers to these two questions have indicated there are adverse safety impacts related to plant operation or startup with the MOV open. With the MOV closed, check valve leakage can be monitored by procedurally requiring pressures behind the MOV to be monitored before operation of the MOV.

If you have any questions concerning the subject of this letter, please contact this office.

Very truly yours,

FLORIDA POWER CORPORATION

Ronald M Bright

Ronald M. Bright
Acting Manager
Nuclear Support Services

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STATE OF FLORIDA

COUNTY OF PINELLAS

R. M. Bright states that he is the Acting Manager, Nuclear Support Services, of Florida Power Corporation; that he is authorized on the part of said company to sign and file with the Nuclear Regulatory Commission the information attached hereto; and that all such statements made and matters set forth therein are true and correct to the best of his knowledge, information and belief.

Ronald M. Bright
R. M. Bright

Subscribed and sworn to before me, a Notary Public in and for the State and County above named, this 10th day of March, 1980.

Catherine T. Cameron
Notary Public

Notary Public, State of Florida at Large,
My Commission Expires: August 8, 1983

Cameron(Notary)