

R. C. JONES, NUCLEAR SERVICE

L. R. CARTIN, PLANT INTEGRATION

Work: K 100 - 29  
L/S: 1/2/78

ADS 663.5

Subj.

File no.  
or Ref.

By  
**TECO STATUS REPORT**

Date  
DECEMBER 19, 1978

This letter is copy one customer one one subject only.

- Reference:
1. L. R. Cartin to B. A. Karrasch, "TECO - B&W Meeting Minutes", dated November 29, 1978
  2. N. H. Shah to L. R. Cartin, "Ten-Foot AFW Control", NSS-14, dated December 13, 1978
  3. R. C. Jones to L. R. Cartin, "Small Break Analysis with R.C. Pumps Powered", dated December 11, 1978

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Since issuance of Reference 1, several activities have been initiated to assist TECO in their attempts to resolve NRC concerns relative to AFW actuation and control. Attachment 1 is a TECO letter requesting B&W analysis support; our progress or position to date to supply the seven items requested is as follows:

Items 1 - 3

Control Analysis performed the requested analyses and a preliminary report was submitted to TECO on December 5, 1978. Attachment 2 is a summary of the conclusions drawn. The Control Analysis work has been subsequently Q.A.'d and the preliminary conclusions presented to TECO were found to be valid. A formal report for submittal to TECO is scheduled to be completed by December 22, 1978.

Item 4

No plant specific (Davis-Besse 1) ECCS analysis is available or planned to address steam generator water levels when the R.C. pumps are operative. The customer is to be advised at this time to automate the present site instruction which requires auxiliary feed-water control to a ten-foot steam generator level following an ECCAS actuation. Under these conditions, B&W's position is that the small break topical (S&W-10075A, Revision 1) remains valid for Davis-Besse 1. Further, discussion is presented below on this general subject.

Item 5

ECCS has completed a listing of available analyses which support the use of a ten-foot auxiliary feed-water control setpoint (see Reference 2). The customer is to be advised that a portion of

These results are available upon request to support the B&W/TECO position that the topical remains valid. No additional ECCS analysis with a ten-foot auxiliary feedwater control setpoint is planned. ECCS, if required, plans to defend the validity of topical report via arguments that emphasize that the injection of auxiliary feedwater in the upper part of steam generator tube bundle would be continuous (at least intermittent) and that the simulation of primary to secondary heat transfer process (not steam generator level) in the topical is valid. This memo is also to advise Nuclear Service that approximately 100 manhours and a span time of three weeks would be required to assimilate the analysis results with a ten-foot auxiliary feedwater control setpoint into suitable form for an NRC submittal.

Item 6

B&W position to TECO is that the status of R.C. pumps should not be included in the dual setpoint control logic at this time. If questioned by the NRC, however, B&W must be in a position to state that the small break topicals have considered the worst possible conditions (i.e., loss of offsite power). Our inability to respond conclusively to such an inquiry could result in the NRC derating or shutting down all of B&W's 177 F.A. operating plants (except SMUD) until the issue is resolved. ECCS (Reference 3) has proposed that a generic study with the R.C. pumps powered be initiated now on the 205 F.A. plant, ECCS model. I agree that this analysis work should take place and be performed at B&W's expense. This course of action will require identification of funding (E. M. Dunn to secure) to resolve this unanalyzed small break. If this work effort is completed and results are acceptable, B&W may then be in a better position to support TECO's request to include the status of the R.C. pumps into the dual setpoint logic.

Note: The customer should not be informed of the ECCS analysis efforts to examine the pumps running case. It is imperative that B&W be totally prepared to defend an FOAK analysis of this type or to have a planned course of action if results are unacceptable.

Item 7

B&W position is that no new analysis is required. Commitments to perform additional analyses either in the LOCA or long-term safety analysis area are not to be made unless specifically requested by the NRC.

In addition to the above, TECO submitted a report to the NRC justifying the in-reactor site inspection as an adequate basis to support continued operation of Davis-Besse 1. B&W had provided TECO with an alternate technical which I feel was a better defended conclusion drawn from B&W supplied analyses. TECO refused to use the

B&W write-up, but they did agree to put less emphasis on ECCS. TICO's submittal to the NRC is given in Attachment 3.

A letter to TICO will be prepared by R. C. Luken of Nuclear Service consistent with the above and/or modified position as soon as concurrence within B&W is obtained.

LRC/dww

cc: B. A. Karrassch  
E. W. Swanson  
E. A. Womack  
R. C. Jones  
N. H. Shah  
B. M. Dunn  
R. W. Winks  
R. O. Vosburgh

Attachments

*EWS  
for LRC*