

GPU 2438

FORM 100

TO : J.H. TAYLOR
J.D. PHINNEY

MEMORANDUM

BABCOCK & WILCOX

May 16, 1978

FROM: D. H. ROY
LYNCHBURG, VA.
J. H. Taylor

MAY 16 1978

In the attached memo from Bob Vosburgh, he points out the necessity for Safety Analysis' participation in the resolution of site operational problems such as those we have recently had at Florida, SMUD and TMI-2. I think Bob makes a good point and would appreciate your alerting Safety Analysis to such problems at the earliest possible time. In this way, they can make an evaluation of any possible safety implications and help resolve them at the least possible cost and licensing risk.

Thanks,



DHR/dww

cc: D. W. LaBelle
R. O. Vosburgh

Attachment

325 0543

F15 9299

THE BABCOCK & WILCOX COMPANY
POWER GENERATION GROUP

To

D. H. Roy, Manager, Plant Design

From

D. W. LaBelle, Safety Analysis (2117) *DW*

Cust.

Subj.

Action

D. H. ROY

APR 14 REC'D

SDS 683.5

File No.
or Ref.

Date

April 13, 1978

This letter is cover and customer and not subject only.

Don,

I concur with Bob's findings (attached). It would certainly be a benefit to our interface management program to have front-loading participation on problems affecting our area. Yet, I know that you are leaving much of this front-loading to Plant Integration and also that much of the initial personnel involvement is being dictated from department level.

Please advise as to what action you feel is appropriate.

cc: w/o Attachment
R. O. Vosburgh

325 0544

F15 9300

THE BABCOCK & WILCOX COMPANY
POWER GENERATION GROUP

To D.W. LABELLE, MANAGER, SAFETY ANALYSIS

From R.O. VOSEBURGH^{no}, SAFETY ANALYSIS (2176)

SDS 663.3

Cust. ALL OPERATING PLANTS

File No.
or Ref.

Subj. SITE PROBLEMS REVIEW

Date

APRIL 11, 1978

This letter is cover and customer and not subject only.

A situation has been developing that I believe needs escalation by you to Department Manager level for a policy decision. Several recent site operational problems have occurred, e.g., FPC - LBP Rod Problem, SMUD - Loss of Site Power to the NMI, TMI-2, Failure of Anti-Rotational Device on Idle Pump and EMOV Opening on Loss of X-Cabinet Power. The approach, as I perceive it, has been to evaluate what went wrong, fix it and return to operation. There has been no formal Safety Analysis involvement in any of these evaluations. The lack of our involvement can have at least three detrimental consequences best illustrated by the following examples:

1. Impact on Contracts Presently Under NRC Review

By the time SA was asked to be involved in the TMI-2 pump incident, the NRC had done its homework. Without adequate time to prepare a position on three-pump Safety Analysis evaluation, the indications are that the NRC will require much more partial pump analysis on CFCO - Midland Docket. This may be cost-recoverable for us on Midland, but what about TVA?

2. Impact on Other Operational Plants

The NRC also intimated, in the example given above, that no B&W plant would be allowed 3-pump operation without extensive analysis. Further it appears that at least two Tech Spec Sections (3.2.2 and 3.2.3 in Std. Format) will need revisions for all B&W plants.

Items 1 and 2 may not have been averted by early SA involvement, but some mitigation of consequences could have been accomplished if prior knowledge and planning had been done.

3. Impact on Plant Safety and Current SA-NRC Licensing Philosophy

At the risk of sounding egotistic, no other Unit has the knowledge to assess whether or not a site problem constitutes a safety issue and/or violation of the Safety Analysis assumptions under which the plant is licensed. Examples of this are:

- a) Opening of EMOV on loss of X-cabinet power at TMI-2. If all operating plants' ICS are wired with this logic as was TMI-2, then any transient done with loss of offsite power is invalid.

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D.W. LaBelle
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- b) Loss of MNI Power at SMUD - Has a transient scenario been uncovered that creates a worse overcooling transient of moderate frequency than is currently evaluated? Can the results be correlated with our transient codes? There are many questions that need SA attention.
- c) Failure of Anti-Rotational Device on TMI-2 - In addition to items 1 and 2, what were or could be the consequences of this on fuel integrity if it was not corrected prior to power escalation? Can this mode of operation be used for thermal mix code verification?

The purpose of the examples given in Item 3 are to indicate that neither Licensing, Nuclear Services, Fuels, Control Analysis, etc. are qualified to make safety evaluation judgements. Therefore, there must be an automatic mechanism in-place where Safety Analysis, through its Contracts Group, is brought on board at the initial stages of any site problem. Also, its (SA) involvement in the Task Force should be an automatic function.

I would appreciate your and D.H. Roy's comments on the above.

ROV:lw

cc: D.H. Roy

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