CONFIDENTIAL THE -BABCOCK & WILCOX COMPANY 7/10 COUNSEL ONLY POWER GENERATION GROUP TERRY Ta W. H. Spangler, Nuclear Service From 805 653.5 E. W. Swanson, Plant Integration Cust. File No. or Ref. Toledo-MSS-14 Subi. Date November 15, 1978 Auxiliary Feedwater Setpoints

This letter to caver one customer and one subject only

Our recent discussions with Toledo personnel regarding their need to reduce the steam generator level setpoint for natural circulation, and B&W's need to maintain a high level because of ECCS small break have led to an impasse.

Both B&W and Toledo are in a "risk" position because the Toledo small break topical was based on a 32' level position; any change to that position may require re-analysis and re-licensing. Nevertheless, a steam generator level value has not been reported to NRC, and the ECCS Unit believes that a 10' level setpoint will be adequate.

Toledo's needs to lower the setpoint are genuine and I offer the following suggestion which you should pursue with Toledo:

- 1. Alter the control logic of the SFRCS so that it will provide two sctpoints. Since a control function cannot be readily placed in an ESFAS system, the SFRCS must be medified. In the presence of an ESFAS signal, the ESFAS sets a priority for operation over any SFRCS signal and directs the SFRCS to provide a high setpoint level control. In the absence of an ESFAS signal, but with an SFRCS generated signal, the SFRCS control setpoint is directed to a low level. A general schematic is attached; other methods of implementing are possible, but this purveys the concept.
- 2. ESFAS could also initiate auxiliary feedwater and isolate main feedwater. Further investigation needs to be made as to the actual sequence of events. I believe it is now possible for two conditions to exist because the TECo systems do not initiate AFW by ESFAS. These are:

## Current Design

Site Condition			vstems Sequence	Control Setpoint		
1.	Offsite Power Available	E	SFAS ICS	2*	(Main	Feedwater)
2.	Offsite Power Unavailable	Ε:	SFAS - A SFRCS	10'	(Aux.	Feedwater)
	my reasoning is correct, the strol (of main feedwater); no	SFRC	S signal will occur			

ontrol (of main feedwater); no SFRCS signal will only provide a 2' control. The other condition will cause the SFRCS to respond to a loss of level (most likely) or to a loss of pump power. At any rational initiate AFW and control to the high setpoint.

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The first condition may or may not be acceptable to ECCS Analysis; they have not investigated small breaks with RC pumps running. If such an analysis were to be made, the results would probably be unfavorable.

I suggest that TECo confirm that the above sequences are correct before a decision is made to initiate AFN with ESFAS.

- 3. I believe that further analytical effort will probably be needed by ECCS to confirm that the 10' setpoint is acceptable even though their judgement says it is. I think that some documentation on file will be required to substantiate their claim, but I do not recommend analyses at this time.
- 4. An additional thought might be considered for limiting the pressurizer draining. Recent investigations for the 205 plants have shown us that the rate of addition of feedwater has a substantial effect on RC temperature drop. The Toledo plant power level only requires about 500 gpm (at about 30-40 seconds after trip) to remove decay heat. Yet the pumps are capable (at design) of about 800 gpm each; with reduced steam generator pressure the addition rate increases by about 25% to 30%. The total flow rate possible tends to introduce subcooled water into the generator, fill to a preset level (possibly as a subcooled inventory-- I don't know the effect of heat pickup as the water falls through the tube nest), and then heat up to boiling. A more preferable mode would be to introduce flow at a rate more equal to the decay heat load. An investigation into rate limiting (valve opening restrictions, cavitating venturis) may be worthwhile. Rate limiting may be a full or partial tradeoff for level limiting.
- 5. Further discussions with TECo about these suggestions are desirable; we will support efforts in this area.

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EWS:db Attach

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ESFAS/SFRAB MOD. IS PROBABLY The Best Fix IN That Field Changes Would Be hess Expensive \$ IMPACT ON ECCS Would Be OF LESS RISE. That is, one would AT LEAST GET A 10-HT Level Dueing Contesc POST LOCA CONDITIONS. - Is A Level Coutea Following ESFAS ACTUATION MANDATORY? LEC.

ESFAS AFW ACT No Level OPERTOR MEST INTERME TO TORMINATE AFW FLOW.

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