



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

Enclosure 2

JUN 3 1982

MEMORANDUM FOR: Harold R. Denton, Director, NRR
Robert B. Minogue, Director, RES
Richard C. DeYoung, Director, IE
Guy H. Cunningham, Director, ELD
Joseph J. Fouchard, Director, PA
James P. O'Reilly, Regional Administrator, Region II

FROM: Carlyle Michelson, Director
Office for Analysis and Evaluation
of Operational Data

SUBJECT: PROPOSED ABNORMAL OCCURRENCE - PRESSURE TRANSIENTS DURING
SHUTDOWN AT A NUCLEAR POWER PLANT

Enclosed is a draft Commission Paper (Enclosure 1) with a proposed Federal Register Notice in regard to a potential abnormal occurrence at Turkey Point Unit 4 involving pressure transients while the unit was shutdown in a water solid condition at low temperature (110°F). The pressure transients exceeded by a factor of two the temperature-pressure limits in the license technical specifications which are based on Appendix G, 10 CFR Part 50 (which relates to Section III of the ASME Boiler & Pressure Vessel Code). The pressure transients exceeded the license limits because the overpressure mitigating system did not function properly. The events were terminated by prompt operator actions. However, if significant flaws were present and prompt operator actions were not taken, the potential existed for brittle fracture of the reactor vessel.

These events were previously included as an Enclosure 3 item to SECY-82-142 which forwarded the final draft "Report to Congress on Abnormal Occurrences for October-December, 1981" for approval by the Commission. The Chilk to Dircks memorandum (Enclosure 2) dated May 14, 1982, contains the Commission response to SECY-82-142. The response requested staff to reevaluate the Turkey Point Unit 4 overpressure transient incidents for reporting as an abnormal occurrence.

On May 19, Commissioner Roberts, his Technical Assistant and the Technical Assistants from the Chairman's Office and Commissioner Ahearne's Office were briefed on the events, staff evaluations and related material.

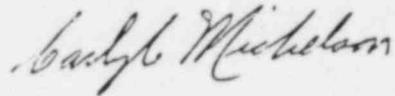
The enclosed writeup was prepared by AEOD based on information provided by the licensee, Region II and NRR. The event is proposed for reporting because it appears to satisfy Example I.D.4 (For All Licensees) of Appendix A of the Abnormal Occurrence Reports Policy Statement, i.e., recurring events which create a major safety concern.

Your comments are requested by c.o.b. June 9, 1982. It is important to meet this date so that the PAO can be processed in a timely manner. The Commission has requested a response by June 11, 1982.

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If you have any questions or wish to discuss details, please contact P. Bobe or J. Crooks of my office at 492-4426 and 492-4425, respectively.



Carlyle Michelson, Director
Office for Analysis and Evaluation
of Operational Data

Enclosures:

1. Draft Commission Paper
2. Chilk Memorandum

cc w/enclosure:

W. Dircks, EDO	F. Ingram, PA
T. A. Rehm, AO/EDO	G. Holahan, NRR (3)
T. Murley, CRGR	S. D. Ebnetter, Region I
D. G. Eisenhut, NRR	D. Price, Region II
E. Brach, IE (6)	T. N. Tambling, Region III
R. L. Fonner, ELD	K. V. Seyfrit, Region IV
J. Murphy, RES	J. L. Crews, Region V
R. L. O'Connell, NMSS	M. Grotenhuis, NRR
T. Marsh, NRR	
P. N. Randall, NRR	

For: The Commissioners

From: William J. Dircks
Executive Director for Operations

Subject: ABNORMAL OCCURRENCE RECOMMENDATION - PRESSURE TRANSIENTS
DURING SHUTDOWN AT A NUCLEAR POWER PLANT

Purpose: Approval of an abnormal occurrence determination.

Discussion: Enclosed is a draft Federal Register notice in regard to two events at Turkey Point Unit 4 involving pressure transients while the unit was shutdown in preparation for startup. The pressure transients exceeded by a factor of two the temperature-pressure limits stated in the licensee's technical specifications which are based on Appendix G of 10 CFR Part 50 (which relates to Section III of the ASME Boiler and Pressure Vessel Code). Subsequently, a fracture mechanics analysis indicated that these transients did not significantly impair the vessel integrity. Concerns existed, however, because (1) Turkey Point Unit 4 has a reactor vessel with sufficient radiation exposure to raise the reference temperature for nil-ductility transition and (2) the pressure transients had the potential for brittle fracture of the reactor vessel if significant flaws were present and the transients had not been promptly terminated by operator action.

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CONTACT:
J. Crooks/P. Bobe
492-4425/492-4426

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This item is proposed for reporting based on Example I.D.4 ("For All Licensees") of the Abnormal Occurrence Reports Policy Statement, as published in the Federal Register (42 FR 10950) on February 24, 1977; i.e., recurring incidents which create a major safety concern can be considered an abnormal occurrence.

These pressure transients were the subject of an informal briefing given to Commissioner Roberts on May 19, 1982 by staff members from the offices of Region II, NRR, IE, and AEOD.

The occurrence of these pressure transients was originally submitted to the Commission on April 2, 1982 as an "Enclosure 3" item to SECY-82-142 which forwarded for approval the Section 208 Report to Congress on Abnormal Occurrences for October-December 1981. On May 14, 1982, the Commission approved the report with comments, one of which was that the staff should reevaluate the Turkey Point Unit 4 events as an abnormal occurrence for the succeeding quarterly report; a staff reply was requested within four weeks. Based on further staff review which concluded that the recurrence of these events creates a major safety concern, the staff recommends the events as an abnormal occurrence. It is planned to include the item in the First Quarter CY 1982 Abnormal Occurrence Report to Congress.

Recommendation: That the Commission:

1. Approve the subject proposed abnormal occurrence recommendation together with its associated Federal Register Notice and,

2. Note that following approval, the Office of Congressional Affairs will notify the appropriate Congressional Committees of the intent to publish the Federal Register Notice.

Scheduling:

While no specific circumstances require Commission Action by a particular date, it is desirable to disseminate abnormal occurrence information to the public as soon as possible. It is expected that Commission action within two weeks of receipt of this draft proposal would permit publication in the Federal Register about ten days later.

William J. Dircks
Executive Director for Operations

Enclosure:
Draft Federal Register
Notice

NUCLEAR REGULATORY COMMISSION
 ABNORMAL OCCURRENCE
 PRESSURE TRANSIENTS DURING SHUTDOWN
 AT A NUCLEAR POWER PLANT

Section 208 of the Energy Reorganization Act of 1974, as amended, requires the NRC to disseminate information on abnormal occurrences (i.e., unscheduled incidents or events which the Commission determines are significant from the standpoint of public health and safety). The following incidents were determined to be an abnormal occurrence using the criteria published in the Federal Register on February 24, 1977 (42 FR 10950). Example I.D.4 ("For All Licensees") in Appendix A notes that recurring incidents which create a major safety concern can be considered an abnormal occurrence. The following description of the incidents also contains the remedial actions taken.

Date and Place - The licensee, Florida Power and Light Company, reported that on November 28 and 29, 1981, two reactor coolant system pressure transients occurred while the Turkey Point Unit 4 was shutdown. Unit 4 is a Westinghouse designed pressurized water reactor facility located in Dade County, Florida.

Nature and Probable Consequences - In 1976, the NRC noted an increasing number of incidents called "pressure transients" that were occurring in pressurized water reactors.^{1/} The term "pressure transients," as used here, refers to incidents where the temperature-pressure limits of the reactor vessel, (included in the facilities' Technical Specifications) were exceeded. The majority of the incidents occurred during startup or shutdown operation when the reactor coolant system was at low temperature. About 30 incidents had occurred; eight occurred in 1976. Concern existed for the possibility of a

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 NUREG-0138. Staff discussion of Fifteen Technical Issues Listed in Attachment to November 3, 1976 Memorandum from Director, NRR to NRR Staff. Office of Nuclear Reactor Regulation (Program Support). Dec. 1976.

reactor vessel failing by the brittle fracture mechanism as a consequence of a pressure transient at near ambient temperature (near 100°F), once the reactor vessel material has experienced a reduction in fracture toughness (an upward shift in the nil-ductility transition temperature) due to irradiation effects which gradually accumulate over an extended period of time. In order for a reactor vessel to fail, in addition to the low temperature, high pressure and loss of fracture toughness conditions, it must also have a critical-sized flaw at a high stress location in the embrittled area, i.e., that part of the cylindrical shell of the reactor vessel directly opposite the core (the belt line area). In 1976 many reactor vessels had not yet experienced a significant reduction in fracture toughness and conservatism existed in reactor vessel design and fabrication control to preclude sizable flaws. However, because of the potential safety significance of such incidents occurring when the reactor vessels became more embrittled, the NRC requested the licensees to upgrade administrative controls in the near term to reduce the likelihood of future pressure transients and to install design modifications by the end of 1977^{2/} to further reduce their likelihood of occurrence and mitigate their consequences.

The pressure transients, described below, that occurred at Turkey Point Unit 4 exceeded by a factor of two the temperature-pressure limits stated in the Technical Specifications which are based on Appendix G 10 CFR Part 50 (which relates to Section III of the ASME Boiler and Pressure Vessel Code). Fracture mechanics analysis indicated, however, that there was no significant impairment of the vessel integrity. Concerns existed because Turkey Point

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NUREG-0090-5, "Report to Congress on Abnormal Occurrences: July-September, 1976" published March 1977.

Unit 4 has a reactor vessel with sufficient radiation exposure to reduce the fracture toughness of the reactor vessel at low temperatures, and the pressure transients had the potential for brittle fracture of the reactor vessel if significant flaws were present and the transients had not been promptly terminated by operator action. These transients highlight the importance of properly operating overpressure mitigation systems to reduce the potential for brittle fracture of the reactor vessel. Though the frequency of pressure transients has decreased, the possibility of affecting a reactor vessel's integrity remains as a safety concern. Any event which impacts on the integrity of the reactor vessel is a significant safety matter and would require significant actions such as an in-service-inspection, repair and annealing of the vessel.

Conditions Prior to the Pressure Transients

The reactor was shutdown and preparations were underway to restart from a refueling outage. The plant operators were performing OP 0202.1 - Reactor Startup - Cold Condition to Hot Shutdown Conditions. The Reactor Coolant System (RCS) had been filled solid with water. The letdown path was via the Residual Heat Removal (RHR) system suction valves MOV-4-750 and 751, which close at 465 psig to protect the RHR pump suction lines from being overpressurized. The RHR system was cross-connected to the letdown portion of the Chemical and Volume Control System (CVCS) downstream of the RHR heat exchangers at valve HCV-4-142. Letdown flow control to the Volume Control Tank and consequently, RCS pressure, was controlled by pressure control valve PCV-4-145 in the letdown portion of the CVCS. The positive displacement charging pump was in operation providing both makeup into the RCS and Reactor Coolant Pump seal injection flow. RCS temperature was about 110°F and pressure was about 340 psig.

With the plant alignment described above, any flow blockage in the letdown path would cause an immediate increase in RCS pressure because the charging pump would be charging into a solid system. Overpressure mitigating devices installed include an alarm at 400 psig warning of impending overpressure mitigating system (OMS) protective action and two independent OMS channels designed to both alarm and operate power operated relief valves (PORVs) on the pressurizer at 415 psig (at low temperature) and prevent an unacceptable pressure excursion.

At the time of the incidents, however, one OMS valve (PORV) train was known to be inoperable, with the PORV block valve shut. Maintenance was being conducted on the high pressure controls for the PORV of that train. Unknown at the time, a blown fuse in the OMS comparator output rendered inoperable the alarm that signals a need for primary OMS protective action at 415 psig. Also unknown at the time, the backup OMS train was inoperable because (1) the root isolation valve for its pressure transmitter, PT-4-405, was shut which rendered the system inoperable, (2) the root isolation valve apparently "leaked through" causing PT-4-405 to indicate about 130 psig higher than actual system pressure, once the root valve was opened, (3) the temperature summator for the train had failed high rendering the train inoperable.

Description of the Pressure Transients

On November 28, 1981, at 10:55 p.m., the 4B Reactor Coolant Pump (RCP) was started to begin RCS heatup. The Reactor Control Operator noticed that RCS pressure was approximately 500 psig and increasing. Though it is common for the RCS pressure to surge momentarily following RCP startup, the operator noted that conditions persisted and were thus abnormal. He also noticed that valve PCV-4-145 was in the fully closed position and attempted to open it

automatically by lowering the control setpoint. When this attempt failed, the valve was opened using the manual control mode, and the 4B RCP, 4A charging pump, and the pressurizer control heaters were shut off. One Power Operated Relief Valve (PORV-4-455C) was opened by the operator to reduce RCS pressure. The other PORV (PORV-4-456) was isolated and out-of-service for maintenance on the high pressure controls for the PORV. An RHR isolation valve (MOV-4-750) was found in the closed position and was immediately opened by the operator. PCV-4-145 was returned to auto control and the 4A charging pump was restarted. The RCS pressure was then maintained constant at approximately 335 psig.

The RCS peak pressure during the transient was 1100 psig. Duration of the overpressure condition was approximately two minutes.

The pressure transient was initially diagnosed as initiating from mis-operation of valve PCV-4-145. The root isolation valve for PT-4-405 was also found closed which made the backup OMS train inoperable. The valve was opened. Valve PCV-4-145 was returned to auto control and RCS pressure was maintained constant.

On November 29, 1981, at 12:55 a.m., the 4B RCP was restarted. An overpressure condition recurred with peak pressure reaching 750 psig. Again the RCP and the charging pump in operation were shut down. PORV-4-455C was manually opened to decrease RCS pressure. Duration of the overpressure condition was approximately one minute.

During both occurrences, the operators took action to stop the charging pumps which were providing the source of rapid pressurization. However, once the letdown flow was significantly reduced or terminated by closure of the RHRS isolation valves, timely operator action was precluded by the rapidity of the transient.

Cause or Causes - The primary cause of the overpressure conditions is considered to be the automatic closure of the RHR system suction isolation valves coupled with the malfunction of the OMS while operating in a water solid condition.

The automatic closures of the RHRS suction isolation valves were attributed to:

- (a) RCS pressure transmitter PV-4-403 closing MOV-4-750, due to the pressure interlock at 465 psig during the first event, thus resulting in the overpressure condition.
- (b) PT-4-405 (the backup OMS input) was reading about 130 psig higher (based on post event testing) than actual RCS pressure when unisolated after the first event. (The transmitter had been relocated and may have lost its setpoint due to hydrostatic testing of the sensing line with the root valve leaking through the seat.) This variance likely led to MOV-4-751 closing at about 375 psig actual RCS pressure, initiating the second pressure transient.

The reasons the OMS did not operate as designed are:

- (1) One train was inoperable for maintenance as permitted by license conditions.
- (2) The backup train failure was attributed to
 - (a) The root isolation valve to PT-4-405 was shut, isolating PT-4-405, during the first event. (No procedure was found that aligns RCS instrumentation root valves prior to RCS fill.)
 - (b) In addition, during both events, the backup OMS temperature summator, which generates the "pressure set point" to which loop pressure is

compared to generate the OMS actuation signal, had failed high - about 2335 psig - also rendering the backup OMS inoperable. This condition was unknown because of an inadequate surveillance procedure used to satisfy the technical specification requirement to operationally check each channel. The procedure is OP 1004.4 - Overpressure Mitigating System Functional Test of Nitrogen backup System dated - May 7, 1981. This procedure did not test the summator.

Actions Taken to Prevent Recurrence

Licensee - After the first pressure transient, the root valve to P-4-405 was reopened. In addition, attempts were made to release the redundant OMS loop from clearance and restore it to operating condition, but this was not accomplished by the time the second pressure transient occurred. The immediate corrective action during both events consisted of reducing the RCS pressure to a value within the Technical Specification limits. Subsequent to the second event, the licensee requested an evaluation of the consequences from the Nuclear Steam System Supplier (Westinghouse) and notified the NRC's Region II of the incidents. The licensee also confirmed that the Unit would not be restarted until the NRC has reviewed the results of the requested analyses.

A fracture mechanics analysis based on the methods of Appendix G to Section III of the ASME Boiler and Pressure Vessel Code was performed by Westinghouse. The analysis showed that the integrity of the reactor vessel was not impaired by these transients. It was further judged that the fatigue life of the vessel was not significantly affected. An independent licensee consultant reviewed the analysis and concurred with its conclusions. The fact that there was no thermal stress present was a beneficial factor in the analysis.

The licensee responded to the NRC's notice of violation by taking appropriate actions. Procedure changes were made to include additional equipment checks as well as to insure proper valve line up following any tests prior to releasing the systems to operations. These actions will minimize the probability of component failures similar to the ones that resulted in the OMS operational anomalies.

NRC: The NRC conducted a special safety inspection of the circumstances related to these events. The NRC's Region II reviewed the analysis of the consequences of the events prior to the unit returning to operation. The licensee was cited with a notice of violation for (1) having an inadequate functional testing procedure for the OMS in that the summator circuitry was not tested and (2) not including an alignment check of the instrumentation root valve in station procedures for reactor coolant system fill after refueling or plant startup.

An Information Notice will be issued to other licensees informing them of these events and their potential significance.

Dated at Washington, D.C. this day of 1982.

Samuel J. Chilk
Secretary of the Commission



UNITED STATES
NUCLEAR REGULATORY COMMISSION

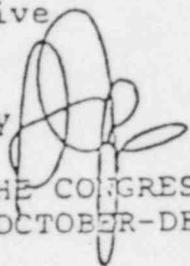
WASHINGTON, D.C. 20555

May 14, 1982

Enclosure 2

OFFICE OF THE
SECRETARY

MEMORANDUM FOR: William J. Dircks, Executive
Director for Operations

FROM: Samuel J. Chilk, Secretary 

SUBJECT: SECY 82-142 - REPORT TO THE CONGRESS ON
ABNORMAL OCCURRENCES FOR OCTOBER-DECEMBER
1981

This is to advise you that the Commission (with all Commissioners agreeing) has approved the proposed Abnormal Occurrence Report to Congress as modified in Attachment 1.

The Commission believes that the staff should reevaluate the Turkey Point Unit 4 overpressurization event (Item 3 of Enclosure 3 to the paper) for inclusion in the next quarterly report. You also should provide the Commission with the reasoning for making or not making the event an abnormal occurrence.

(EDO) (SECY Suspense: 6/11/82)

Attachment:
As stated

cc: Chairman Palladino
Commissioner Gilinsky
Commissioner Ahearne
Commissioner Roberts
Commission Staff Offices

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT
WASHINGTON, D.C. 20555

June 11, 1982

IE INFORMATION NOTICE NO. 82-17: OVERPRESSURIZATION OF REACTOR COOLANT SYSTEM

Addressees:

All nuclear power reactor facilities holding an operating license (OL) or construction permit (CP).

Purpose:

This information notice is provided as a notification of two events that may have safety significance. It is expected that recipients will review the information for applicability to their facilities. No specific action or response is required.

Description of Circumstances:

On November 30, 1981, Florida Power and Light Company reported that the Turkey Point Unit 4 reactor coolant system (RCS) was overpressurized on November 28 and 29 during startup following a refueling outage. The reactor was shut down and the RCS was in a water solid condition with a pressure and temperature of approximately 310 psig and 110°F, respectively. Two separate transients that resulted in overpressure conditions of 1100 and 750 psig at 110°F occurred for which the overpressure mitigating system (OMS) failed to operate. These events exceeded the pressure limit of 480 psig at 110°F specified in Technical Specifications which prescribe the allowable pressure and temperature limits to prevent reactor vessel brittle fracture.

The OMS is specifically designed to prevent this type of overpressurization. The OMS did not operate as designed because:

1. After the first event a pressure transmitter isolation valve was found closed and was opened. This transmitter provides input into the OMS circuit to automatically open a power operated relief valve (PORV) if the reactor coolant system exceeds the allowable pressure for RCS temperature;
2. The summator failed in the electrical circuitry which prescribes the pressure at which the OMS is to initiate PORV actuation. The failed summator was identified and corrected after the second event. The OMS surveillance procedure in use before the event did not include testing the summator, in that the test signal bypassed the summator; and
3. The redundant OMS circuit was out of service for calibration.

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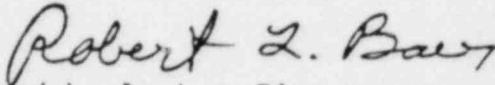
Before each event the reactor coolant system inventory was being maintained by charging from the chemical and volume control system and letdown through the residual heat removal (RHR) system. Each event was initiated with a pressure spike caused by the start of a reactor coolant pump which resulted in isolation of letdown by automatic closure of the RHR system isolation valve. During both occurrences, the operator took immediate action to stop the charging pump which was providing the source of rapid pressurization. Within two minutes the operator decreased pressure to the desired level by manually opening the PORV and securing the pressurizer heaters in addition to securing the charging flow. Timely operator action to completely prevent the overpressurization was precluded by the rapidity of the transient.

Following the events, OMS surveillance procedures were revised to include testing of the summator. Other procedural changes include additional equipment checks to ensure OMS operability. Westinghouse performed a fracture mechanics analysis based on the method of Appendix G, Section III of the ASME Boiler and Pressure Vessel Code. The analysis showed that these transients had neither impaired the integrity of the reactor vessel, nor significantly affected the fatigue life of the vessel. A Florida Power and Light Company consultant reviewed the analysis and concurred with the Westinghouse conclusion.

In a separate event, on May 23, 1982 Virginia Electric Power Company (VEPCO) reported that the overpressure protection system (OPS) at North Anna was inoperable from May 19-22. The OPS had not been called upon to operate during this time. The reactor was in cold shutdown and for two days the reactor coolant system was in the water solid condition. Initially, one OPS system was declared inoperable when the pressure in the "A" nitrogen supply reservoir dropped below the minimum pressure required to maintain the PORV operable. Two days later, a low pressure alarm occurred on the "B" nitrogen supply reservoir. An isolation valve between the reservoir and the "B" OPS system had been closed for an indeterminate period (possibly as long as eight days), isolating the nitrogen supply to the "B" PORV. Therefore both PORVs were inoperable. Initial investigation discovered that system procedure did not include OPS valve lineups, and the incorrectly positioned valve was not shown on plant drawings in use at that time. VEPCO is presently taking action to correct these problems.

Each of the above events involved failure of two redundant systems designed to provide overpressure protection. The concern is that without prompt operator action such failures increase the potential for brittle fracture of the reactor pressure vessel from overstress during pressure transients.

If you have any questions regarding this matter, please contact the Regional Administrator of the appropriate NRC Regional Office, or this office..

for 
Edward L. Jordan, Director
Division of Engineering and
Quality Assurance
Office of Inspection and Enforcement

Technical Contact: R. A. Holland
301-492-4791

W. R. Mills
301-492-4791

Attachment:
List of Recently Issued IE Information Notices

LIST OF RECENTLY ISSUED
 IE INFORMATION NOTICES

Information Notice No.	Subject	Date of Issue	Issued to
82-16	HPCI/RCIC High Steam Flow Setpoints	5/28/82	All power reactor facilities holding an OL or CP
82-15	Notification of the Nuclear Regulatory Commission (NRC)	5/28/82	All NRC licensees and all power reactor facilities holding a CP
82-14	TMI-1 Steam Generator/Reactor Coolant System Chemistry/Corrosion Problem	5/12/82	All power reactor facilities holding an OL or CP
82-13	Failures of General Electric Type HFA Relays	5/10/82	All power reactor facilities holding an OL or CP
82-12	Surveillance of Hydraulic Snubbers	4/21/82	All power reactor facilities holding an OL or CP
82-11	Potential Inaccuracies in Wide Range Pressure Instruments used in Westinghouse Designed Plants	04/09/82	All power reactor facilities holding an OL or CP
82-10	Following up Symptomatic Repairs to Assure Resolution of the Problem	04/09/82	All power reactor facilities holding an OL or CP
82-09	Cracking in Piping of Makeup Coolant Lines at B&W Plants	03/31/82	All power reactor facilities holding an OL or CP
82-08	Check Valve Failures on Diesel Generator Engine Cooling System	03/26/82	All power reactor facilities holding an OL or CP
82-07	Inadequate Security Screening Programs	03/16/82	All power reactor facilities holding an OL or CP

OL = Operating License
 CP = Construction Permit