JUN 9 1982

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

FROM: Edward L. Jordan, Director, Division of Engineering and Quality Assurance, IE

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

Enclosed are our comments on the subject proposed Abnormal Occurrence and Federal Register Notice.

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

Enclosure:
As stated

cc w/enclosure:
J. Taylor, IE
R. Baer, IE
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IE COMMENTS 7590-01

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"The letdown path was via the Residual Heat Removal (RHR) system suction valves MOV-4-750 and 751, which close ...."

The reason given for closure should be changed to be more specific.

One possible reading:

" ... valves MOV-4-750 and 751. These valves are designed to close automatically at RCS pressures above 465 psig. [to protect against taking the plant to operating conditions (2200 psig) with only one RHR isolation valve closed.]

The words in brackets can be included or excluded at your discretion.

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With respect to the first event, the cause should not be ascribed to the RHR suction isolation pressure interlock. This circuit as installed is designed to function as it did and it is there for a purpose. The cause of an AO cannot be that a system worked as designed unless the design is seriously flawed.

The real cause was a pressure transient when starting the RCP which exceeded the magnitude expected for a normal RCP start. That is, either the RCP was started at too high an initial pressure or the pressure increase resulting from the RCP start was greater than expected. This later circumstance could arise due to a thermal expansion of the reactor coolant if the steam generator's secondary side temperatures were hotter than the primary side. We understand that this condition was not investigated by the licensee.

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ENCLOSURE