# **REQUEST FOR ADDITIONAL INFORMATION**

# ECCS REPORTS (F-47) TMI ACTION PLAN REQUIREMENTS

DAIRYLAND POWER COOPERATIVE LACROSSE BOILING WATER REACTOR

NRC DOCKET NO 50-409

NRC CONTRACT NO. NRC-03-81-130

FRC PROJECT C5506 FRC ASSIGNMENT 7 FRC TASK 196

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#### INTRODUCTION

This Request for Additional Information (RAI) is the result of an evaluation of the information contained in the Dairyland Power Cooperative (DPC) letter dated January 16, 1981 [1] to the Nuclear Regulatory Commission (NRC) in response to NUREG-0737 [2], Item II.K.3.17, "Report on Outages of Emergency Core-Cooling Systems Licensee Report and Proposed Technical Specification Changes." The evaluation revealed an item of concern. Additional information relating to this concern is needed before a final evaluation can be made.

# Item II.K.3.17

Report on Outages of Emergency Core Cooling Systems Licensee Report and Proposed Technical Specification Changes

## BACKGROUND

In NUREG-0737, Item II.K.3.17, the NRC requested that a licensee submit a report detailing dates, lengths, and causes of outages for all emergency core cooling (ECC) systems for the last five years of operation. The purpose of the request was to obtain a quantitative history of the unavailability of the ECC systems to help the NRC determine if cumulative outage limitations are required in technical specifications.

To clarify the issue, the report was to contain the following details on outages that occurred during a continuous 5-year period of recent operation: (1) dates and durations; (2) causes, including test and maintenance; (3) ECC systems or commonents involved; and (4) corrective actions taken. In addition, a licensee was to propose changes to improve the availability of ECC system equipment, if necessary.

### CONCERN

Evaluation of calculated small-break transients, with the assumptions of proper operator actions and the worst single failure in the ECC systems, has shown that some small breaks will result in partial uncovering of the core. However, technical specifications permit several components of the ECC systems to have substantial outage times. In addition, there are no cumulative outage limitations for ECC systems. Thus, the unavailability of an FCC system train for extended periods is not precluded.

For an evaluation of the responses to NUREG-0737, Item II.K.3.17, to be meaningful and to produce significant conclusions, the responses must be complete and accurate. They must include, for a continuous 5-year period of recent operation, not only the outage dates, durations, causes, ECC system equipment involved, and corrective actions taken, but also identification of the ECC system trains affected by the outages. Outages for surveillance

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testing and for planned, unplanned, and preventive maintenance should also be reported. This information will be used to determine the cumulative outage time of each ECC system train per reactor year and the need for cumulative outage limitations in the technical specifications.

The list of systems and components provided by DPC in their response [1] did not include outages of the manual depressurization system, which DPC had indicated in previous documentation [3] was a subsystem of the ECC system.

#### REQUEST

In order for the staff to continue its review of DPC's response to NUREG-0737, Item II.K.3.17, the following additional information is required:

A complete summary of outages for manual depressurization system for the period coinciding with the initial response [1]. Wherever outage durations are not available for an outage event, an estimate of the outage duration should be supplied.

#### REFERENCES

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F. Linder (DPC)

 Letter to D. G. Eisenhut (NRR)
 Subject: Post TMI Requirements
 January 16, 1981

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- "Clarification of TMI Action Plan Requirements" NRC, November 1980 NUREG-0737
- 3. J. P. Modget (DPC) Letter to V. Stello, Jr. (NRC) Subject: Systematic Evaluation Program (SEP) - Environmental Qualification of Safety-Related Equipment February 22, 1978

