

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

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AEOD/E211

MEMORANDUM FOR:

Carlyle Michelson, Director

Office for Analysis and Evaluation

of Operational Data

FROM:

Eugene V. Imbro, Lead Reactor Systems Engineer

Reactor Operations Analysis Branch

SUBJECT:

REPETITIVE FAILURES OF EMERGENCY FEEDWATER FLOW VALVES AT ARKANSAS UNIT 2 BECAUSE OF VALVE OPERATOR HYDRAULIC PROBLEMS

When each of the referenced LERs was examined, it was apparent that the fuse failure was an isolated event, and that valve operator hydraulic problems were a repetitive mode of failure in the EFW system. (There are only two hydraulically operated valves in the EFW system, 2CV-1025 and 2CV-1075 - see attached flow diagram.) It was found that some of the referenced LERs were not for problems similar to the original LER; however, the LERs that did pertain to valve operator hydraulic problems referenced some additional LERs that were not referenced in the original LER. This sequence of acquiring LERs on Emergency Feedwater flow control valve failures due to failures of the hydraulic operator was persued until all relevant LERs were acquired. A draft table of the reported failures and the relevant LERs are attached.

In summary, in the past three years, there have been eight instances of a problem with the hydraulic valve operator system that prevented the closure of one-of-the-two Emergency Feedwater flow valves in the two loop system, In particular, valve 2CV-1025 failed to function on seven occasions as shown in the table below. In each case, the valve failed to close on demand from the control room. Failure-to-close would be the "safe" position for the valve in order to maintain auxiliary feedwater flow to the steam generators but one degree of redundancy would be lost if the valve was required to close on a main steam isolation signal (MSIS).—

In each case, the redundant valve in the same loop and the valves in the alternate flow loop were tested operable.

Footnote attached.

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## Failure of Valve 2CV-1025 to Actuate

Date	Reason for Failure
10/6/78	Hydraulic pump motor failed making the valve inoperable.
6/9/79	Valve operator required to be filled and vented with oil.
11/22/79	Valve operator hydraulic pressure was low. Hydraulic system vented and pressure returned to normal.
11/24/79	Dirt in the valve operator hydraulic system.
11/25/79	Low valve operator hydraulic fluid - no leaks could be found.
12/1/79	Low fluid level in hydraulic accumulator due to leakage - accumulator replaced.
1/20/80	Lack of hydraulic pressure caused by air in the system.

The frequency and repetitive nature of the information in this table would lead to the suspicion that either the maintenance/surveillance has not been optimized or a thorough understanding of the operation of the valve operator's hydraulic system is lacking. This thought is strengthened by the fact that valve 2CV-1025 failed to actuate four times in a 2-week period. While the failure of this valve to operate in the Emergency Feedwater system presents no apparent consequence greater than a loss of redundancy, the root cause of the repetitive failures was unknown.

On February 1, 1982, we telephoned the licensee to discuss our observations on the hydraulic operators in the Emergency Feedwater system at Arkansas-2. The licensee, too, had been familiar with the repetitive nature of the failures and had implemented a corrective program shortly after reporting LER-80-3 in January 1980 (the last reported failure of valve 2CV-1025). The licensee's modifications included replacing the manifold of the Borg-Warner operators with a manifold that had significantly less fittings to reduce total air leakage into the hydraulic system. The check valves were replaced with softer seated valves, an internal filtration system was added, and the individual hydraulic accumulators were modified to retain pressure longer. In addition, a periodic preventive maintenance program was initiated to detect potentially degraded operation appreciably before the event becomes reportable.

Apparently, the licensee has recognized the problem and has provided the proper corrective action. Since initiation of the hydraulic operator modifications and the preventive maintenance program, valve 2CV-1025 has not failed to function; valve 2CV-1075 failed once, but the problem was not directly related to the previous events.

In the last 20 months, 2CV-1075 has required two additions of hydraulic fluid and valve 2CV-1025 has had five additions. Previously, the systems were refilled at more frequent intervals, i.e., when leakage was detected. This was generally before the valve became inoperable, and hence, before reportable. The EFW control valves are safety grade valves and are readily accessible during all conditions. They can be operated manually, if desired, by pumping the handle of a hand pump located on the side of the valve operator.

Although Arkansas-2 has apparently reduced the number of problems with the hydraulic valve actuation system to a reasonable level and adopted a successful monitoring program, we recommend that hydraulic valve operators be added to the AEOD "watch list." As a "watch list" item, similar problems at other operating plants can be trended and the dissemination of possible fixes, such as those in effect at Arkansas-2, can be transmitted to the licensees.

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Eugene V. Imbro, Lead Reactor Systems Engineer Reactor Operations Analysis Branch

Attachments: As Stated

cc w/attachments:

E. Brown, AEDD

R. Martin, NRR

W. Johnson, IE

CONTROL BLOCK: 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
A R A  N 0 2   0 0   -  0  0   0  0  -  0  0   0  4  1  1  1  1  0     3
CONT   ACPORT   L   ©   0   5   0   0   0   3   6   8   7   0   8   1   5   8   1   0   9   1   5   8   1   0    SOURCE SOURCE SO SOURCE NUMBER SO EVENT DATE 14 73 HEPORT DATE SO
On 8/15/81, during unit startup, Emergency Feedwater (EFW) flow valve,
[0]3] [ 2CV-1038, failed rendering one flowpath to "A" Steam Generator inoperable,
Old On 9/1/81, during Mode 1 operation, EFW flow falve, 2CV-1075, would not
ols   operate from the Control Room, again rendering one flowpath to "A" Steam
Generator inoperable. Alternate flowpath remained operable in both cases,
The 8/15/81 occurrence is similar to LER's 50-368/78-026. 79-037. The
9/1/81 occurrence is similar to LFR's 79-043, 79-036, 79-037, 79-090, 79-092 and 80-003. Reportable per 1.5.6.9.1.9.b.
HIH TO E TO B TO LA TO PORT TO THE TOTAL TO
17) REPORT   18   1   -
NUMBER 21 27 23 24 26 27 78 79 30 31 32
B TO Z TO
CAUSE DESCRIPTION AND CORRECTIVE ACTIONS (27)  [1] Valve 2CV1038 failed due to a power supply fuse blown caused by a relay
failure. The relay was replaced and the valve was returned to operable
status. Valve 2CV1075 failed due to a lack of hydraulic pressure caused
by a low fluid level caused by a leaking mechanical seal. The seal was
replaced and the valve was returned to operable status.
TACILITY OPERATOR OF NA NA STATUS (30) METHOD OF DISCOVERY DESCRIPTION (32) NA
ACTIVITY CONTENT 12 13  AMOUNT OF ACTIVITY (35)  NA LOCATION OF RELEASE (36)  NA LOCATION OF RELEASE (36)
PERSONNEL EXPOSURES  NUMBER TYPE DESCRIPTION (39)
1 7 0 0 0 0 37 Z 38 NA .
1 A 0 0 0 0 NA NA
LOSS OF OR DAMAGE TO FACILITY (3)  TYPE DESCRIPTION  1 2 (3) NA
ISSUED CESCRIPTION (S)  NAC USE ONLY
NAME OF PREPARER _ Chris N. Shively PHONE: 501/968-2519

CONTROL BLOCK: 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
SOUNCE LE DO 15 D 10 10 13 16 18 7 0 1 112 101 8 0 10 12 11 15 18 10 10 10 10 10 10 10 10 10 10 10 10 10
[0]2   During Mode 3 operation, with the electric driven Emergency Feedwater
[0]3 Lpump, 2P7B, in service as an auxiliary feedwater pump for normal start-up.
Steam Generator feed, EFW flow control valve, 2CV-1025-1, failed to close
ols on demand from the Control Room. The valve failed in the EFW, or safe
old position. The block valve was used to control level and all redundant
[0]7 [EFW valves were proven operable. Similar to LER 50-368/79-092, 79-090,
TOTAL TOPON TOPON COME CAUSE CAUSE COMPONENT COURT C
DI MBIO ED BO INTINIO ED ED ED
TACTION SUTURE SUFFICER SMUTDOWN MOUNS (2) SUBMITTED SUFFICER WAND ACTURE TO SUFFICER WAND ACTURE SUFFICER SUFFICER WAND ACTURE SUFFICER S
[10] Unvestigation revealed that the valve failed to operate due to the lack
of hydraulic pressure caused by air in the system. The accumulator did
117 Idid not indicate low oil. The hydraulic system was vented & filled with
13 [oi]. The requirements of Action Statement T.S.3.7.1.2 were met. One
[1] [valve operator was returned to vendor for analysis.
STATUS OTHER STATUS (30) METHOD OF DISCOVERY DESCRIPTION (32)
ACTIVITY CONTENT  RELEASED OF RELEASE  NA  NA  LOCATION OF HELEASE 36
TERSONNEL EXPOSURES TOTAL TOTAL TOTAL TOTAL TOTAL TERSONNEL TYPE DESCRIPTION (39) NA TERSONNEL INJURIES TOTAL TOTAL TERSONNEL INJURIES TOTAL TOT
1 × 10 0 0 0 0 NA NA
LOSS OF OR DAWAGE TO FACILITY (3)  TYPE DESCRIPTION  1 2 NA  10 10
ISSUED DESCRIPTION (S)  NAC USE ONLY  NAC USE ONLY
NAME OF PRICABLE Chris N. Shively 501/968-2519

CONTROL BLOCK:	OR TYPE ALL REQUIRED INFURMATION
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CONT DOUBLE CODE IN THE CONTRACT OF THE POPULATION OF THE POPULATI	17 19 10 11 1 2 12 1 1 17 19 10 THEFORT DATE 10
During Mode 2 operation, with the electric d	riven Emergency Feedwater
pump, 2P7B, in service as an auxiliary feedw	ater pump for normal startup
ole   Steam Generator feed, EFW flow control valve	. 2CV-1025-1. failed to close
ols on demand from the Control Room. The valve	failed in the EFW, or safe,
ole   position. All redundant EFW valves were suc	cessfully stroked from the
[0]7 [ Control Room. This occurrence is similar to	LER 50-368/79-090, 79-089, J
	1ve 2CV-1025-1 are 50-368/ 3-009.Reportable per T.S.6.9.1.9.b.
MINIMINI E BIO L'AIVIT IATOR	513 (FIQ FIQ
SEQUENTIAL DOCCE  17 NEMORE TAKEN ACTION ON FLANT METHOD HOURS (2) SUBMITTEE	
CAUSE DESCRIPTION AND CORRECTIVE ACTIONS (27)	N (1) (N (2) (W 1 1 2 17 (1) (8)
Investigation revealed that the valve failed	to operate due to the lack of
hydraulic pressure caused by a low fluid lev	el in the hydraulic accumula-
tor because of leakage. The accumulator was	replaced and the system was
filled and vented. The valve was declared o	perable within 19 hours,
meeting the requirements of Action Statement	T.S. 3.7.1.2.
STATUS OTHER STATUS OF METHOD OF MET	NA SECTION OF SCHAPTION (12)
ACTIVITY CONTENT  ACLEASED OF ACLEASE  NA  NA  NA  NA  NA  NA	LOCATION OF MELEASE 36
THE SONNEL EXPOSURES THE CESCRIPTION 39	1
MUMBER DESCRIPTION (1)	
TYPE DESCRIPTION OF NA DAMAGE TO FACILITY (3)	
SSUEC DESCRIPTION (S)	SAC USE ONLY
NAME OF PREPAREM Chris N. Shively	501/968-2519

2012310409

CONTROL BLOCK:
AIR   A; N  0   2   0   0   0   0   0   0   0   0
ONT DESCRIPTION AND PROBABLE CONSCOURNCES (19)
During Mode 3 operation, with the electric driven Emergency Feedwater
pump, 2P7B, in service as an auxiliary feedwater pump for normal startup
Old LSteam Generator feed. FFW flow control valve, 2CV-1025-1, failed to close
old on demand from the Control Room. The valve failed in the EFW, or safe,
DIS Lossition. All redundant FFW valves were successfully stroked from the
OTO   Control Room. This occurrence is similar to LER 50-368/79-089. 79-088.
79-043. Other occurrences involving 2CV-1025-1 are 50-368/79-068, 79-054, 79-051, 79-035, 78-028 and 78-009. Reportable per T.S. 6.9.1.9.b.
LOS MENTO POR BOUND IN THE PROPERTY OF THE PRO
TAKEN ACTION AND CORRECTIVE ACTIONS (27)
[1] Linvestigation revealed that the valve operator's hydraulic system was low
ITTO Lof fluid. No leaks could be found. The system was filled and the valve
[1] Lwas declared operable within four (4) hours, meeting the requirements of
(I) LAction Statement T.S. 3.7.1.2.
[II]
STATUS COVERY CESCHIPTION (3)
ACTIVITY CONTENT  RELEASED OF RELEASE  AMOUNT OF ACTIVITY (25)  NA  NA  OCATION OF HELEASE (36)
17 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0
LOSS OF ON DAMAGE TO FACISITY (3)
Z C NA
SSUED OF SCHIPTION (S)  NAC :SE ONLY  I I I I I I I I I I I I I I I I I I I
VAME OF PREPARES Chris N. Shively 501/968-2519

CONTROL BLOCK:
O 1   A R   A   N  0   2   0   0   -   0   0   0   -   0   0   0
O 1 SOUNCE LE 0 15 0 10 10 13 6 8 0 EVENT DATE 34 7 HEPORT DATE 30
During Mode 3 operation, with the electric driven Emergency Feedwater
pump, 2P7B, in service as an auxiliary feedwater pump for normal startup
[0] Steam Generator feed, EFW flow control valve, 2CV-1025-1, failed to closel
ols on demand from the Control Room. The valve failed in the EFW, or safe.
[0]6] position. All redundant EFW valves were successfully stroked from the
[0] [ Control Room. This occurrence is similar to LER 50-368/79-088 and 79-043]
Other occurrences involving 2CV-1025-1 are 50-368/79-068, 79-054, 79-051 J 79-035, 78-028 and 78-009, Reportable per T.S. 6.9,1.9.b
WI BO E BO WIALLIVIOPO ADOS
17 NUMBER 71 0 1 22 23 26 27 78 5 30 31 32 1 1 1 22 23 24 26 27 28 27 28 27 28 28 28 28 28 28 28 28 28 28 28 28 28
ACTION SUTURE STREET SHUTDOWN MOURS (22) ATTACHMENT FORVAUL SUPPLIER SUPPLI
CAUSE DESCRIPTION AND CORRECTIVE ACTIONS (27)
Investigation revealed trash in the valve operator's hydraulic system and
the hydraulic snubber out of adjustment, restricting oil flow in one
direction. The hydraulic system was cleaned, the hydraulic snubber was
[1] Ladjusted, the valve stroked satisfactorily and declared operable within
13 hours, meeting the requirements of Action Statement T.S. 3.7.1.2.
STATUS  STATUS  STATUS  STATUS  OTHER STATUS
ACTIVITY CONTENT RELEASED OF RELEASE AMOUNT OF ACTIVITY (35) NA LOCATION OF HELEASE (36)
7 PERSONNEL EXPOSURES 17UMBER TOPE DESCRIPTION 39 17   0   0   0   0   0   0   NA
TO SEPSONNEL INJURIES 13  PERSONNEL INJURIES NUMBER DESCRIPTION (41)
LOSS OF DE DAMAGE TO FACILITY (3)
I Z @ NA
PUBLICITY SSUED DESCRIPTION (5)
7 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5
Chris N. Shively

## LICENSEE EVENT REPORT

EXHIBIT A

	CONTROL BLOCK:
01	A R   A  N 0 2   0 0   -  0  0  0  0  -  0  0   0  -  0  0   0  -  0  0  0  0  0  0  0  0  0  0  0  0  0
OIT	AEPORT L 10 15 0 10 10 13 16 18 10 11 12 2 7 1 9 10 112 12 11 17 1 9 10
0 2	During Mode 3 operation, with the electric driven Emergency Feedwater
0]3	pump, 2P7B, in service as an auxiliary feedwater pump for normal startup
0 4	Steam Generator feed, EFW flow control valve, 2CV-1025-1, failed to closes
0 5	on demand from the Control Room. The valve failed in the EFW. or safe.
06	Losition. All redundant FFW valves were successfully stroked from the
0 7	Control Room. This occurrence is similar to LER 50-368/79-043. Other
, ,	occurrences involving valve 2CV-1025-1 are 50-368/79-068, 79-054, 79-051, 79-035, 78-028 and 78-009, Reportable per T.S. 6.9-1, 9.6
0 9	WIBO LETO BO LATINO DE LATO LETO
	(17) AFFORT   7   0   1-1   10   12   10   21   11   10   1
	ACTION PUTURE 21 22 23 24 26 27 28 29 30 31 32 ATTACHMENT WARDS PRIME COMPONENT
	B TO Z TO Z TO TO TO TO THE THOSE TO THE THO
110	Investigation revealed that the valve operator's hydraulic pressure was
n	low. The hydraulic system was vented, the reservoir was returned to
1 2	normal level, and the hydraulic pressure was adjusted. The valve was
13	successfully stroke tested and declared operable within 29 hours, meeting
(III)	Lthe requirement of Action Statement T.S. 3.7.1.2.
115	B 28 10 10 10 10 NA DISCOVERY DESCRIPTION 3
	ACTIVITY CONTENT 13  PELEASED OF RELEASE AMOUNT OF ACTIVITY (25)  NA LOCATION OF RELEASE (36)
12	TYPE DESCRIPTION 39
TI.	PEMSONNEL INJURIES 12 NUMBER ESSCRIPTION (1) 10 1 0 10 1(40) I NA.
, .	LOSS OF OR DAMAGE TO FACILITY (2)
1 2	Z O NA
20	PUBLICITY ISSUED CESCAIPTION (S) NAC LISE ONLY
	NAME OF PREPARER Chris N. Shively

	CONTROL BLOCK
Į I	[A R A  N 0 2] 0 0 - 0 0 0 0 0 - 0 0 04  1  1 1 1 1 0 0
011	EVENT DESCRIPTION AND PROHABLE CONSEQUENCES (10)
0 2	[During !: de 3 operation, Emergency Feedwater flow control valves
0 2	[from the electric driven EFW pump, 2P7A, to the "A" Steam
014	[Generator, 2CV-1025-1 and 2CV-1038-1, failed to close from a
0 5	control room demand signal. The open position is required for EFAS; therefor
0 6	the EFW flowpath would be uneffected in an emergency situation. The remaind
0 7	lof the EFW valves were successfully tested from the control room. Occurrence
018	[similar to 50-368/79-035, 78-028, & 78-009. Reportable per T.S.6.1.9.1(b)]
io o	W B 10 E 17 B 17 V ALL V S IP 14 A 10 Z 16
110	TO PLANT TO THE COMPONENT METHOD HOURS (27) ATTACHMENT SUPPLIFED TO THE COMPONENT MANUFACTURES (27) SUBMITTED TO TO TO TO TO THE COMPONENT MANUFACTURES (27) SUBMITTED TO
111	a loose wire on the handswitch. Valve 2CV-1025-1 required to be
1 2	[filled and vented with oil. The valves were operable within
113	the T2 hours as required by Action Statement T.S.3.7.1.2.
ļu.	
115	STATUS OTHER STATUS OF METIOD OF DISCOVERY DESCRIPTION (32)
	CONTINUE CONTENT  CLEASED OF MELE SE  AMOUNT OF ACTIVITY (3)  NA  LOCATION OF HELEACE (36)
	2 11 45
Į.	O O O O NA
	OIOIOIONES  OIOIOINES  NA  PERSONNES  PERSONNES  PERSONNES  NA  PERSONNES  PERSONNES  NA  PERSONNES  NA  PERSONNES  NA  PERSONNES  NA  NA  PERSONNES  NA  NA  NA  NA  NA  NA  NA  NA  NA  N
	PENSONNEE EXPONENCES  O O O O O O O O O O O O O O O O O O O
10	PENSONNEL EXPONENCES  O O O O O O NA  PENSONNEL PLUMES  O SCHIPTION  O O O O O O O O O O O O O O O O O O

어느님이 내려보다 그리고 있는데 하나 하는데 하면 하는데	
CONTROL BLOCK:	YPE ALL REQUIRED INFORMATION
	4 1 1 1 1 1 0 57 CAT 54 3
SOUNCE LE GOS 10 10 13 6 8 11 10 10 10 17	1201111013171810
EVENT DESCRIPTION AND PROBABLE CONSEQUENCES (10)	
11.7	
1013 Mode 3 operation, Emergency Feelwater	
1 hydranlic pump motor failed making	
1 Operability is required for associated	flowpath per T.S.37.12.
DIE LER 50-368/78-2 also involved the Eme	ragency Feedwater
1) System, but was not similar in nature	e
08	
CODE CODE SUBCODE SUBC	SUBCODE SUBCODE
TENINO EVENT YEAR AFFORT NO. 10 13 10 10 13 10 10 10 10 10 10 10 10 10 10 10 10 10	TYPE IN INC.
ACTION FUTURE ON LANT SMUTDOWN HOURS (2) SUBMITTED ATTACHMENT AND THOURS (2) SUBMITTED ATTACHMENT AND THOURS (2) SUBMITTED ATTACHMENT AND THOURS (2) ATTACHMENT AND THOURS (2) ATTACHMENT AND THOURS (2) ATTACHMENT AND THOURS (3)	SUPPLIER COMPONENT COMPONENT MANUFACTURER  WANUFACTURER  42  43  44  45  46  47
110 The hydranlic pump motor for valve	e2CY-1025-1 Was
III replaced and successfully tested	
III feedwater flowpath was re-establis	
11) meeting requirement of Action Statement	
STATUS SPOWER OTHER STATUS 30 METHOD OF DISCOVERY	DISCOVERY DESCRIPTION (32)
III BO COOL OF HET LAW NA	J. C.
ACTIVITY CONTENT  DELEASED OF RELEASE  AMOUNT OF ACTIVITY 35	LOCATION OF RELEASE (36)
PERSONNEL EXPOSURES TYPE DESCRIPTION 39	•
PERSONNEL INJURIES 13	
NUMBER DESCRIPTION (1)	
LOSS OF OR CAMAGE TO FACILITY (1)	90
TIO ZIO HA	•0
2 0 DESCRIPTION 45	NRC USE ONLY
NAME OF PREPARER Chris N. Shively	PHONE 501/968-2519
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