AEOD/E207



FROM:

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

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

> Eugene V. Imbro Office for Analysis and Evaluation of Operational Data

SUBJECT: LER 50-336/81-26: INVESTIGATION OF THE RELATIVE FREQUENCY OF VALVE OVERTRAVEL ANOMALIES THAT COULD RESULT IN A POTENTIAL CENTRIFUGAL PUMP RUNOUT EXCEEDING NPSH

At the Millstone Nuclear Power Station, Unit 2, LER 81-26 describes an event where seven of the eight high pressure safety injection (HPSI) motor-operated valves overtravel from ½ to one inch further than the required position. The LER states that valve overtravel results in smaller HPSI pump runout margins. The overtravel was caused by the variable coastdown of the Limitorque motor-operated valves and the small margin of acceptable valve position. It was noted in this LER that valve 2-SI-616 overtraveled on four successive test days (after being reset each time), and valves 2-SI-626 and 627 each overtraveled on two separate test days during recent adjustments in June 1981.

The HPSI safety injection valves have regularly overtraveled in the yearly surveillance test at Millstone. In 1979 (LER 79-41), valves 2-SI-616 and 626 overtraveled by 3% and in 1980 (LER 80-41), MOV 2-SI-616 overtraveled by ½ inch.<sup>1</sup> Apparently, frustrated by the repeated surveillance failures of the valve to cycle to a correct opening, the licensee manually opened the valves to the required position and set each "fully open" limit switch in the '\_imitorque motor operator to be electrically open at this point to prevent any further remote opening of valves. In this configuration, the valve can be closed remotely. If, during power operation, the valve is inadvertently in the closed position, it will open on an SIAS, but again, may overtravel.

The HPSI injection values are two-inch nominal pipe size globe values with  $3\frac{1}{2}$  turns between the full closed and full open position. There are two marks corresponding to a minimum and maximum acceptable technical specification flow rate. The two reference marks are on an approximate two-inch diameter circle so that one inch of overtravel would result in about 5% change in value stem travel.

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<sup>&</sup>lt;sup>1</sup> The technical specification requiring the valve travel test became effective in spring 1978.

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The valve operator is a Limitorque-type SMB-00 powered by an AC electric motor with both limit and torque switches to define the potential valve stem travel. On valve closure, the torque switch should provide the initial cut-off of electrical power with the thermal overload device as a backup. (After the valve has seated, stem travel has virtually ceased and closing torque is increasing rapidly.) On full opening of the valve, the limit switch should first cut-off electricity to the motor operator before the valve stem starts to reach the limit of its travel in the full open position and the torque switch is activated. A Limitorque adjustment manual implies that the "fully open" limit switch can be activated from 90 to 100% of the valve's full open position. The desired valve opening necessary to get acceptable HPSI flow for the injection valves at Millstone 2 is 212 turns or a "fully open" limit switch setting of about 71% of valve stem travel. Limit switch adjustments in this vicinity are somewhat more difficult to set than at the recommended 90-100% position. Further, all Limitorque actuators are designed to reach full motor speed before applying torque to turn the valve stem. This results in an impact to the valve stem at energization that should result in less precise initial stem movement. In addition, the motor speed during valve movement is not constant but is load dependent and may be influenced by the relative valve packing tightness on the test date. Also, there is a certain amount of play or lost motion in the worm gear linkage to the limit switch. Finally, the Limitorque operator is relatively large in comparison to the HPSI valve it is driving. Each of these conditions further exacerbate the difficulty in reaching repeatable valve positions while trying to stop valve movement in a narrow band at about 70% of stem travel. (The acceptable range of HPSI flows is on average 157 to 168.75 gpm per injection line.)

To continue the investigation of valve overtravel conditions, an LER search was performed to determine how prevalent valve overtravel conditions are within the nuclear industry. The search span was limited to calendar years 1980 and 1981 and used combinations of code and text searches sufficiently generalized to capture 188 LERs in this time frame. Each of these LERs was read and only two of these events involved valve overtravel situations; they were the two known LERs submitted by Millstone 2.

The relevant Millstone technical specifications were compared to the Combustion Engineering standard technical specifications and the technical specifications of each of the other seven Combustion Engineering designed plants to determine if there was something unique in the Millstone 2 technical specifications that caused the valve overtravel to be reported. Although the technical specifications are somewhat different, most required verification that each ECCS throttle valve would actuate to its correct position on an SIAS once per 18 months. The exceptions are Palisades and Ft. Calhoun, these require testing during each refueling outage. Apparently, overtravel of ECCS throttle valves is unique to Millstone 2.

Finally, each of the resident inspectors at the Combustion Engineering plants was contacted. The intent of the survey was to determine the correct position of the HPSI injection valves following a SIAS at other CE plants and to determine if the pump runout problem at Millstone 2 could be an unrecognized generic problem at the other CE sites. The salient points of this survey were:

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- The HPSI injection valves go full open on a SIAS.<sup>2</sup> Only at Millstone 2 are the valves required to open to a throttled position. This is probably due to unusually low HPSI system line losses. (There may have been an interface problem between CE and the A/E during plant construction.)
- 2. At all CE plants, a provision exists whereby some of the containment spray flow discharged from the containment spray HXs can be diverted into the HPSI pump suction lines. If inadequate NPSH is postulated on recirculation flow, the containment spray system could provide a source of cool water to the HPSI pump suction.
- 3. Each plant has some indicating device; e.g., a low suction pressure alarm, HPSI pump amperage, etc., together with a flowmeter on each HPSI leg to inform the operator of a pump runout condition.

We have discussed our observations and findings in a series of telephone conversations with site personnel at Millstone 2. The licensee is continuing to study the problem to determine a satisfactory method for restoring remote position operability to these valves. Neither the resident inspector nor AEOD observe a safety problem in operation of the facility with the HPSI injection valves manually open to the technical specification position. A possible corrective action could be the installation of a flow restricting device; e.g., another orifice or a more restrictive flowmeter orifice or a different plug or reduced trim on the HPSI injection valves. In any case, it is expected that the final configuration will be identical with the other CE plants, i.e., the rated HPSI flow is achieved at the full open HPSI valve position. No further AEOD action is required.

E.Y. Umbro

Eugene V. Imbro Office for Analysis and Evaluation of Operational Data

cc: EConner, NRR JShedlosky, RI EBrown, AEOD FAshe, AEOD MChiramal, AEOD

<sup>&</sup>lt;sup>2</sup> The CE design basis for the HPSI system is such that pump NPSH requirements would not be exceeded during post-LOCA recirculation flow from the containment sump with the injection valves wide open.

LER SCREENING/DISPOSITION SHEET LER NO. 81-206/032-0 DABRO Docket No. 336 129 8/25/81 FSA E/13/81 Engineer: 1. Add'l Info. No Yes (NO) No Yes Required? (circle one) IF VALVES OPEN If YES, describe FULLY WILL NPSH REQUIREMENTS BE FYCEEDED AFTER A LOCA 2. Is this event significant? No No) No (Appendix A) (Circle one) Yes Yes Yea A-5,8 If yes, why? 3: Abnormal Occurrence? No No Yes NO Yes Yes (Appendix B) (Circle one) If yes, why? 4. Reportable to NEA? (NO) No Yes Yes NO Yes (Appendix C) (Circle One) If yes, why? Follow-up possible Eng Eval. 5. Recommended Action: I II III (IV I (II) ITT IV Category(circle one) I II III (IV 5. Lead Engineer (NSSS) Disposition (Category III only): Category: I II IV Comments: Lead Engineer: one 7. Final Action/Disposition Jubry -in this martine

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P.O. BOX 270 HARTFORD, CONNECTICUT 06101 (203) 566-6911

LER

July 16, 1981 MP-2-4849

Mr. Boyce H. Grier Director, Region I Office of Inspection and Enforcement U. S. Nuclear Regulatory Commission 631 Park Avenue King of Prussia, Pennsylvania 19406



Reference: Facility Operating License No. DPR-65 Docket No. 50-336 Reportable Occurrence RO-50-336/81-26/3L-0

Dear Mr. Grier:

This letter forwards Licensee Event Report 81-26/3L-0 required to be submitted within thirty days pursuant to Millstone Unit 2 Appendix A Technical Specifications, Section 6.9.1.9.b, conditions leading to operation in a degraded mode permitted by a limiting condition for operation. An additional three copies of the report are enclosed.

Yours truly,

NORTHEAST NUCLEAR ENERGY COMPANY

E. J. Mroczka Station Superintendent Millstone Nuclear Power Station

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Attachment: LER R0-81-26/3L-0

cc: Director, Office of Inspection and Enforcement, Washington, D. C. (30) Director, Office of Management Information and Program Control, Washington, D. C. (3) U. S. Nuclear Regulatory Commission, c/o Document Management Branch, Washington, D. C. 20555

LICENSEE EVENT REPORT 771 (PLEASE PRINT OR TYPE ALL REQUIRED INFORMATION) (1)CONTROL BLOCK: 0 0 0 0 0 0 - 0 0 0 4 1 1 1 1 1 LICENSE NUMBER 25 26 LICENSE TYPE J (4) 0 0 -TIMINIS 2 2 Ci 11 LICENSE NUMBER LICENSEE CODE LE 015101010131316 010161161811 80171161811 DNT REPORT 11 SOURCE COCKET NUMBER EVENT DESCRIPTION AND PROBABLE CONSEQUENCES (10) While performing TS 4.5.2.e surveillance testing between June 16 and July 9. 12 7 of the 8 HPSI MOV's overtraveled from 1/4 to 1 inch past the required position. 13 In each case the plant was operated in accordance with the action specified in 14 TSAS 3.5.2.a. The overtravel would have resulted in higher injection flow rates ) 5 and smaller HPSI pump runout margins. Similar events were reported in LER's NOT ENUCH NIGH CONCERN - VERY CLOSE ON TRIP 5 6 79-41 and 80-41. 12 L PORT ABLE 6214-1 3 7 0 8 COMP. SUBCODE CAUSE CAUSE SYSTEM SUBCODE COMPONENT CODE SUBCODE CODE Z (16) A | (15 VALVOP (13) IZ S| F (11 X (12) 0 9 19 REVISION 12 OCCURRENCE REPORT SEQUENTIAL NO. CODE TYPE REPORT NO. 0 EV LER/RO 0 3 LI 0 2 6 18 11 (17) REPORT 32 NUMBER 27 COMPONENT 22 PRIME COMP. ATTACHMENT NPRD-MANUFACTURER METHOD EFFECT ON PLANT HOURS (22) FORMSUS SUPPLIER ACTION ACTION 2 0 0 1(2 N 25 Y (24) Y (23) 0 0 0 0 0 (21) (18) Z CAUSE DESCRIPTION AND CORRECTIVE ACTIONS (27) The overtravels were a result of the variable coastdown times of the motor and 10 the small margin of acceptable valve position. To eliminate the potential for 1 1 future overtravel events, the valves are opened to the required position and 1 2 maintained at that position. 1 3 1 4 9 METHOD OF DISCOVERY DESCRIPTION (32) OTHER STATUS 30 FACILITY S POWER Routine surveillance B (31 1 0 0 29 NA E (28) 80 1 5 13 LOCATION OF RELEASE (36) CONTENT ACTIVITY AMOUNT OF ACTIVITY 35 OF RELEASE EASED NA NA Z 33 Z 34 80 1 6 PERSONNEL EXPOSURES DESCRIPTION (39) TYPE NUMBER (37) Z (38 NA 80 1 7 10 10 0 PERSONNEL INJURIES DESCRIPTION(41) NUMBER NA 0 0 (40) 1 8 0 12 EXT 4424 LOSS OF OR DAMAGE TO FACILITY (43) DESCRIPTION. TYPE (1) NA Z .0 1 .1 NEC USE ONLY 07290056 810716 R ADOCK 05000336 10 PDR PUBLICITY US: LAIPTIC . (15 ADOCK PDR NA LN (4-) 2 0 . 10 203-447-1791 John Dacka ...........

ATTACHMENT TO LER 81-26/3L-0 NORTHEAST NUCLEAR ENERGY COMPANY MILLSTONE NUCLEAR POWER STATION - UNIT 2 PROVISIONAL LICENSE NUMBER DPR-65 DOCKET NUMBER 50-336

## EVENT DESCRIPTION AND PROBABLE CONSEQUENCES

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While performing T.S.4.5.2.e. surveillance testing between June 16 and July 9, 7 of the 8 HPSI MOV's overtraveled 1/4 to 1 inch past the required position. In each case the plant was operated in accordance with the action specified in T.S.A.S.3.5.2.a. The overtravels would have resulted in higher injection flow rates and smaller HPSI pump runout margins. The overtravels occurred as follows:

Date	Valve
6-16-81	2-51-626
6-19-81	2-SI-616) 5 SUCCESSIVE TIMES
6-21-81	2-SI-616
6-22-81	2-SI-616
6-23-81	2-SI-616
6-25-81	2-SI-646
6-28-81	2-SI-626. 2-SI-636
7-2-81	2-51-62744
7-7-81	2-SI-627 2-SI-637
7-9-81	2-SI-647

Similar events were reported in LER 79-41 and 80-41.