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U.S. Nuclear Regulatory Commission  
Advisory Committee On Reactor Safeguards

Title:

Subcommittee On Thermal Hydraulic Phenomena  
NRC Program In Interfacing Systems Loca

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PUBLIC NOTICE BY THE  
UNITED STATES NUCLEAR REGULATORY COMMISSION'S  
ADVISORY COMMITTEE ON REACTOR SAFEGUARDS

DATE: Wednesday, December 12, 1990

The contents of this transcript of the proceedings of the United States Nuclear Regulatory Commission's Advisory Committee on Reactor Safeguards, (date) Wednesday, December 12, 1990, as reported herein, are a record of the discussions recorded at the meeting held on the above date.

This transcript has not been reviewed, corrected or edited, and it may contain inaccuracies.

1 UNITED STATES OF AMERICA  
2 NUCLEAR REGULATORY COMMISSION

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5 ADVISORY COMMITTEE ON REACTOR SAFEGUARDS

6 \*\*\*

7 SUBCOMMITTEE ON THERMAL HYDRAULIC PHENOMENA

8 \*\*\*

9 Meeting On

10 NRC PROGRAM IN INTERFACING SYSTEMS LOCA

11  
12  
13 Holiday Inn - Bethesda

14 The Delaware Room

15 Wisconsin Avenue

16 Bethesda, Maryland

17  
18 Wednesday, December 12, 1990

19  
20  
21 The Subcommittee met, pursuant to notice, at 8:34  
22 o'clock a.m., the Honorable Ivan Catton, Chairman of the  
23 Subcommittee, presiding.

24

25

## 1 PARTICIPANTS:

2

3 I. CATTON, ACRS Subcommittee Chairman

4 W. KERR ACRS Member

5 C. MICHELSON ACRS Member

6 E. WILKINS ACRS Member

7 C. WYLIE ACRS Member

8 H. SULLIVAN ACRS Consultant

9 P. BOEHNERT ACRS Staff Member

10 W. BECKNER NRC/NRR

11 G. BURDICK NRC/RES

12 D. HANSON INEL

13 D. WESLEY INEL

14 W. GALYEAN INEL

15 H. BLACKMAN INEL

16 D. KELLY INEL

17 D. GERTMAN INEL

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## P R O C E E D I N G S

[8:34 a.m.]

MR. CATTON: The meeting will now come to order. This is a meeting of the Advisory Committee on Reactor Safeguards, Subcommittee on Thermal Hydraulic Phenomena.

I am Ivan Catton, Subcommittee Chairman.

The ACRS members in attendance are Bill Kerr, Carl Michelson, Ernest Wilkins, Charlie Wylie, and ACRS Consultant, Harold Sullivan.

The purpose of this meeting is to discuss the status of the NRC staff's program on interfacing systems LOCA.

Paul Boehnert is the cognizant ACRS staff member for this meeting.

The rules for participation in today's meeting have been announced as part of the notice of this meeting previously published in the Federal Register on November 27, 1990.

A transcript of the meeting is being kept and will be made available as stated in the Federal Register Notice. It is requested that each speaker first identify himself, or herself, and speak with sufficient clarity and volume so that he or she can be readily heard.

We have received no written comments or requests to make oral statements from members of the public.

1 I have a couple of comments but I think I'll just  
2 wait. One in particular, I ran into a new Code while  
3 reading through the documentation.

4 RELAP5/MOD 2.5/V3d3 -- maybe at the appropriate  
5 time somebody can tell me what it is.

6 Do any of the other members have any comments?

7 [No response.]

8 MR. CATTON: Seeing none, the first speaker is  
9 Bill Beckner.

10 [Slide]

11 MR. BECKNER: Good morning. I'm Bill Beckner.  
12 I'm the Chief of the Risk and Applications branch at NRR,  
13 and I'm going to give a brief introduction before we get to  
14 the bulk of the presentation which will be presented by  
15 Research.

16 [Slide]

17 MR. BECKNER: By way of background I'd like to  
18 briefly recap of how we got from, or, got to this current  
19 point. First of all there has been a generic issue  
20 associated with interfacing system LOCA for quite some time.

21 However, several years ago, why, NRR became  
22 concerned about it -- specifically Tom Murley -- came from  
23 concerned and from absorbing a number of events that were  
24 happening out in operating the reactor. Specifically, we're  
25 seeing a lot of events that look like precursors to

1 interfacing system LOCA.

2 And we started becoming very concerned that the  
3 risk from ISLOCA might be a lot greater than a lot greater  
4 than what we had perceived at that time, and what the  
5 current PRAs were telling us. Because of that, NRR  
6 initiated an accelerated effort to take a look and try to  
7 evaluate ISLOCA risk faster than the current GI 105 program  
8 at that point in time.

9 So, we initiated a couple of things. First of  
10 all, AEOD did a review of operating experience, and NRR  
11 conducted a number of inspections at plants, and also did  
12 some limited root cause analyses to see what was the root  
13 cause of these various events we were seeing.

14 In addition, there was some engineering and PRA  
15 analyses conducted, or started, at that time by a Research.  
16 In effect, it was part of the continuing GI 105 effort, but  
17 that effort was significantly expanded at that point in  
18 time. So this is basically how we got to where we are now.

19 Let me tell you a little bit about what we plan to  
20 talk about today.

21 [Slide]

22 MR. BECKNER: I'm going to start out and try to  
23 provide a brief Regulatory perspective. Or, in other words,  
24 what NRR's current views are regarding this program. Then  
25 we'll go into a more of a status type report

1           Sammy Diab, whom I don't see yet -- I hope he gets  
2 here. We may have to postpone it -- is going to briefly  
3 talk about some of the inspection findings. Then we will  
4 get into the research results which will be really the bulk  
5 of what you're going to hear today.

6           After that, Gary Burdick is going to talk about  
7 what our schedules and future milestones are. And, of  
8 course, the bottom line -- and we'll try to provide a  
9 summary of what our initial findings are.

10           But one thing I want to point out is that we're  
11 not finished the GI 105 program at this point in time, so  
12 we're not really ready to provide an indication of specific  
13 recommendations that we might provide.

14           [Slide]

15           MR. BECKNER: We have gotten some preliminary  
16 information. We've taken a look at the work that research  
17 has done at this point in time, and we have come to some  
18 preliminary conclusions, based on the work that has been  
19 conducted to date.

20           What the initial findings seem to suggest is that,  
21 in spite of the large number of precursors that we're seeing  
22 out there, why the risk from ISLOCA might not be as great as  
23 what we perceived when we first saw these operating events.  
24 I believe the research effort will provide a lot of detail  
25 as to why that is true.



1           So basically, at this point in time, NRR does not  
2 see any basis to try to take any accelerated actions. And  
3 what our plan is right now is to continue to go ahead and  
4 monitor the GI 105 program, and not take any Regulatory  
5 actions until we get recommendations from that program.

6           However, we still are concerned, even though we  
7 think that the risk may not be quite as high as we initially  
8 perceived, we're still concerned about the large number of  
9 precursors that we're seeing out at the operating plants.

10           And we also feel that the research program and  
11 inspections that they have produce some useful information.  
12 So, we would like to go ahead and try to get that  
13 information out to the operating reactors ahead of any  
14 resolution to 105.

15           So, along that line, we have started to draft an  
16 information notice. This would not be any type of  
17 Regulatory requirement, but it would just be an information  
18 notice, to provide licensees with some of the indications  
19 of, first of all, what's happening out there as far as  
20 operating events. Also, provide an indication of some of  
21 our initial findings.

22           We probably will try to issue that information  
23 notice some time early next year, but we'd like to talk to  
24 some of the industry before that happens because we're aware  
25 that NUMARC and EPRI have also been doing some work on this.

1           So our plan is to try to initiate some discussions  
2 early next year with industry, see what they're coming up  
3 with, and then provide an information notice to just to give  
4 the licensees a heads up prior to any resolution to 105 on  
5 some of the problems that are being encountered out there,  
6 and some of the potential solutions.

7           That's really the Regulatory perspective and what  
8 NRR plans to do. As I indicated, our plan is to wait the  
9 resolution of 105 for any formal Regulatory actions, if that  
10 is recommended, but to try to get an information notice out  
11 earlier.

12           MR. KERR: May I ask a question?

13           MR. BECKNER: Yes.

14           MR. KERR: You indicated that, in spite of a  
15 generic issue resolution process, that NRR decided that this  
16 needed some special attention?

17           MR. BECKNER: That's correct.

18           MR. KERR: And so you started on this. Is that,  
19 perhaps, characteristic of any generic issues, with the  
20 resolutions proceeding more slowly than it should be? Has  
21 NRR looked at the picture generally?

22           MR. BECKNER: Okay. I'm not aware of any. There  
23 are a couple high priority things that we are looking at.

24           Shut down risk is one thing that's come up. NRR  
25 is working very heavily. We've also looked at some MOV

1 problems. But I think we are working closely with Research  
2 on all those issues.

3 This was one in which I believe, again, I'm coming  
4 into this fairly recently, but from my time back in  
5 Research, that it was going along in a relatively low  
6 effort. I think what we did is, we just simply accelerated  
7 at both NRR efforts and also the research side.

8 But to answer your question, I'm not aware of any  
9 major things right now that are hanging out.

10 MR. KERR: Well, what I really was asking was  
11 whether NRR had decided perhaps they should take a  
12 systematic look at the resolution process to see if there  
13 might be other issues that needed to be accelerated?

14 MR. BECKNER: I think the answer is no. To my  
15 knowledge, we have not.

16 MR. KERR: Second --

17 MR. MINNERS: Could I make a comment on that, Dr.  
18 Kerr? On Issue 105, although --

19 MR. BECKNER: You'll have to identify yourself.

20 MR. MINNERS: Oh, pardon me. Warren Minners,  
21 Research.

22 Issue 105 was going slowly in its resolution, but  
23 I think the thing that NRR picked up that Research didn't  
24 was they saw human factors element that we were not  
25 concentrating on. So, they saw a different problem than we

1 did. I think the direction of the issue was changed more  
2 than the schedule.

3 MR. KERR: I didn't mean to be critical about the  
4 process. It seems to me that it's not a bad idea for NRR to  
5 occasionally look and see what Research is doing, see if  
6 it's, in their view, maybe some different emphasis is  
7 needed. And I just was curious to know whether that was  
8 being done any more broadly than on this particular issue,  
9 and I guess the answer is no.

10 Second, you indicated that, although the  
11 preliminary work seems to indicate that the risk is not as  
12 great as you had expected, you're still concerned about the  
13 number of precursors.

14 Now, on what basis are you concerned if it's not -  
15 - if the risk is not very great? Is it that you're still  
16 skeptical of the numbers that you're seeing, or what?

17 MR. BECKNER: Okay.

18 As Warren Minners just indicated, we're seeing  
19 human factors playing a major role, both in the potential  
20 precursor and also in the potential recovery. While the net  
21 numbers are very low, we recognize that there's large  
22 uncertainty in the human factor element, so, yes, we  
23 recognize that PRA has its limitations.

24 As a minimum, even if the risk from these  
25 precursors is not high, it's causing operational problems

1 out at the plants. They're having shutdowns, people are  
2 being injured and potentially things like that. We are  
3 concerned, primarily because PRA is not a perfect science  
4 and, particularly, this is very heavy into one of the areas  
5 of large uncertainty, and that's human factors.

6 MR. KERR: Thank you.

7 [Slide.]

8 MR. BECKNER: The only other thing I want to do  
9 is; I was asked to comment on the ACRS letter. I believe  
10 it was in January of this year, so I have briefly tried to  
11 summarize the letter.

12 My overall comment really is that I don't think I  
13 can disagree too much with the conclusions of this letter.  
14 Yes, I think that we've done a limited number of plants  
15 under the research program and we have seen tremendous  
16 variations in those plants, so, yes, we think that the  
17 causes and the ways to mitigate ISLOCA risks are going to be  
18 highly plant-specific.

19 Like I said, human actions is a problem as far as  
20 the state of the art in PRA and obviously, this problem has  
21 not been adequately treated in the past in PRAs. It's been  
22 treated primarily as a hardware problem and not a people  
23 issue. The IPE may not give us the answer we need in this  
24 area.

25 In general, I think we agree with the ACRS

1 comments. As far as possible resolution, again, there were  
2 three possible ways to resolve this, suggested by the ACRS,  
3 with pros and cons. I think, again, with the first order  
4 comment, I don't disagree with it.

5 I don't think, if we tried to -- of course, the  
6 IPE process is already underway. Everything we load on it  
7 is going to be another excuse or another reason to delay the  
8 IPE process, so including it directly in the IPEs really  
9 isn't an optimal situation.

10 That's already underway. Some type of separate  
11 resolution may be unnecessarily burdensome; we agree with  
12 that. I think what the ACRS ultimately recommended in the  
13 letter was some type of a hybrid approach where ISLOCA is  
14 not explicitly included in the PRA, but it is dealt with as  
15 part of the IPE process.

16 I guess I can't comment on what type of resolution  
17 will ultimately be recommended. Again, Research has to  
18 complete their program and see just what type of  
19 requirement, if any, they would recommend. I think, in  
20 general, we do agree with what the ACRS comments are. I  
21 think we'll keep this under consideration when Research and  
22 NRR work together on what the ultimate resolution will be.

23 That's really all I had to say. In summary, I  
24 think we generally agree with what the ACRS letter provided.  
25 Yes?

1 MR. MICHELSON: Section 3.6 of the Standard Review  
2 Plan requires that the licensees look at certain types of  
3 pipe breaks outside of containment and doing appropriate  
4 analysis. Are all of the ISLOCAs that you've looked at also  
5 covered by the licensee analyses, perhaps inadequately, but  
6 nevertheless covered?

7 MR. BECKNER: I think that they're covered  
8 inadequately.

9 MR. MICHELSON: But they are covered? Every  
10 ISLOCA you have looked at, you could find a particular  
11 licensee's analysis of?

12 MR. BECKNER: I think the primary thing, for  
13 instance, the one plant that we've completed the analysis  
14 of, there were procedures and it had been looked at as far  
15 as a leak outside the containment, but this tended to be a  
16 small leak and not a large LOCA.

17 MR. MICHELSON: You realize that Section 3.6 calls  
18 for particular size leaks and so forth. You don't decide  
19 how big the leak is.

20 MR. BECKNER: Right.

21 MR. MICHELSON: You use the Standard Review Plan.  
22 Did they do that type of analysis?

23 MR. BECKNER: Well, again, I'm just commenting on  
24 the one plant with which I am familiar. In general, their  
25 analysis of breaks outside the containment were small leaks

1 and not larger ones.

2 MR. MICHELSON: How did they get by the Standard  
3 Review Plan requirement then?

4 MR. BECKNER: I guess I can't specifically answer  
5 that, but I think that, in general, the licensees were not  
6 and probably NRC was not really up to speed or aware of this  
7 potential problem at that point in time. We viewed it more  
8 as a hardware problem, like I said, with basically problems  
9 with check valves failing.

10 I don't think that we really looked at it from the  
11 aspect of the real problem which is basically opening and  
12 closing of pressure isolation valves in the wrong sequence,  
13 this type of thing.

14 MR. MICHELSON: Section 3.3 and 3.6 has rather  
15 explicit requirements for what you do look at and the size  
16 break you have to postulate and so forth. Was that kind of  
17 analysis, though, done? It didn't have to be called an  
18 interfacing systems LOCA; just, did they do what Section 3.6  
19 required to begin with?

20 MR. BECKNER: I think they obviously did it in an  
21 inadequate manner. I think the reason for it is that they  
22 were primarily looking simply at check valves and that type  
23 of thing.

24 MR. MICHELSON: Well, 3.6 has nothing to do,  
25 necessarily, with check valves. It has to do with



1 postulated pipe breaks.

2 MR. BECKNER: That might prevent a postulated  
3 break. In other words, you might say that that break is not  
4 credible because you've got two check valves.

5 MR. MICHELSON: No, there's no rules in 3.6 about  
6 using valves to eliminate breaks. The rules have to do with  
7 how fast the break might be isolated, once the break occurs,  
8 but not having to do with whether you even have to postulate  
9 it. It would be interesting to go back on the case you've  
10 looked at to see how it escaped the 3.6.

11 MR. BECKNER: Okay.

12 MR. MICHELSON: This gentleman, I know, is well  
13 acquainted with it and maybe he has a better answer.

14 MR. BECKNER: John, do you have anything you want  
15 to add?

16 MR. O'BRIEN: John O'Brien, Office of Research.  
17 The issue is SRP 3.6.2 as it affects environmental  
18 requirements for equipment outside the containment.

19 MR. MICHELSON: Well, 3.6.1 is the one I want to  
20 address. 3.6.2 and 3.6.3 just give you further instructions  
21 on how to do it.

22 MR. O'BRIEN: Right. As Idaho will tell you very  
23 shortly, they have determined that any ISLOCA does not  
24 create safety problems for environmental qualification  
25 because there are redundant trains. You've always got one

1 train that can execute the safety function.

2 MR. MICHELSON: But the question was, did the --  
3 there's nothing in 3.6.1 that says you start out by saying,  
4 if you've got redundant trains, you don't look. It starts  
5 out by telling you what you have to look at and then how you  
6 analyze your way out of it. Did they actually look at it in  
7 the plants that you looked at?

8 MR. O'BRIEN: Did they actually look at it? Do  
9 you mean; did Idaho actually look to see?

10 MR. MICHELSON: Did you ever determine that they  
11 at least met the requirements of SRP 3.6.1?

12 MR. O'BRIEN: I don't know that.

13 MR. BECKNER: I think for the answers, we're going  
14 to have to get back to you.

15 MR. MICHELSON: Maybe Idaho, when they give us  
16 their presentation, can include that in their presentation.  
17 If it escaped it, I'd like a better answer. I'd like to  
18 know how it escaped the system?

19 MR. BECKNER: I think we've got to look at that  
20 and get back to you.

21 MR. CATTON: Bill, at the last meeting, I was  
22 under the impression that there was going to be some  
23 experimental determination of the fragility of piping. Is  
24 the lesser role of hardware the reason that that's not being  
25 done or was I mistaken?

1 MR. BECKNER: Okay, I can't answer that  
2 specifically; I wasn't here. There has been a lot of  
3 analytical work done on fragilities that I think will be  
4 presented today. Experimentally, I don't know. Gary  
5 Burdich would know.

6 MR. BURDICH: This is Gary Burdich. We do have  
7 some things to show you on the way we calculated the  
8 fragilities. I think --

9 MR. CATTON: I read your report, so I know what  
10 you do to calculate it, but I thought you had said that  
11 there was going to be some experimental work.

12 MR. BURDICH: There is ongoing experimental work  
13 that the program is aware of and is --

14 MR. CATTON: Maybe at the right time, you can tell  
15 us about that.

16 MR. BURDICK: Sammy.

17 MR. CATTON: On the other hand, I may have just  
18 misheard what we were told.

19 MR. DIAB: This is Sammy Diab. I'd like to  
20 respond to a few questions.

21 I was -- at the beginning of the program it was  
22 thought that this may be something that we can do within  
23 this program and we had some reservations from various  
24 groups and we decided not to actually pursue this testing,  
25 as a part of this program, anyway, of the ISLOCA Program.

1 MR. CATTON: Well, if the hardware plays as small  
2 a role as your reports indicate, maybe you don't need it at  
3 all.

4 MR. DIAB: We believe -- we thought that this  
5 fragility analysis was sufficient for the purpose.

6 MR. KERR: I don't see that the hardware plays a  
7 small part, if you include the piping and the hardware.  
8 Because whether or not one gets this break depends very much  
9 on the piping, I would think.

10 MR. CATTON: I would think so too.

11 MR. BECKNER: John.

12 MR. O'BRIEN: With respect to the question about  
13 experimentation, we hired a consultant, Everett Rodabaugh,  
14 to compare the analytical results with experimental data he  
15 had available. He confirmed that those analytical results  
16 were consistent with the information available. We did not,  
17 however, conduct new tests.

18 MR. CATTON: I would be nice if that were a part  
19 of your report.

20 MR. O'BRIEN: That statement, yes.

21 MR. CATTON: Well, or at least maybe even show a  
22 couple of comparisons so that one walks away convinced that  
23 the analysis is good.

24 MR. O'BRIEN: I could do that because I have the  
25 comparisons in my files. I could -- if you wish, I will see

1 that you get a copy.

2 MR. CATTON: Well, I would like to see it in your  
3 -- in your report on the pipe fragilities, because then your  
4 analysis has some meaning.

5 MR. O'BRIEN: We could do that too, but the report  
6 has been published already.

7 MR. BECKNER: No, no. I see Gary Burdick nodding  
8 his head, so I assume that that can be done.

9 MR. BURDICK: The -- the work on the fragility  
10 estimation, by IMPEL, that has been published. But we can,  
11 in the final report on this B&W plant ISLOCA study, add an  
12 appendix that will do exactly what you want.

13 MR. CATTON: All too often we have analytical  
14 results that don't have much basis. Here you have an  
15 opportunity to use analytical results and you do have a  
16 basis, so you ought to state it.

17 MR. BURDICK: We'll do that.

18 MR. SULLIVAN: Bill, through the slight  
19 imperfections in the LER rule, do you think that -- that  
20 precursors are not being recorded?

21 MR. BECKNER: I'm not sure, Harold. We're seeing  
22 quite a few come through. Yes, certainly that could happen,  
23 but we're seeing enough of them and they tend to -- when  
24 they tend to, typically, overpressurize a pipe or cause a  
25 leak -- just recently we had some where someone got a small

1 burn, those types of things readily come to the surface.  
2 But, yes, it's always a question of LERs, or are people  
3 reporting things where they almost -- almost pressurized a  
4 pipe, there are probably not. So there is a potential that  
5 we're seeing -- not seeing a complete set.

6 MR. SULLIVAN: So, you have some indication that  
7 it may be an even higher precursor rate?

8 MR. BECKNER: It could be higher, yes. I think,  
9 certainly, if someone almost does something, but they catch  
10 themselves, there would be a tendency not to want to report  
11 that.

12 MR. KERR: In that connection -- maybe I'm getting  
13 ahead of you, if so, I'll wait. But under the -- in the  
14 report, itself, under "Approach," it said: "This review  
15 included an identification." Then, among the things that  
16 were identified was "for those events that indicated an  
17 ISLOCA had occurred."

18 Have ISLOCAs occurred fairly frequently?

19 MR. BECKNER: I think what we're seeing is a lot  
20 of small precursors -- that we didn't get the ISLOCA, but we  
21 did overpressurize piping, that type of thing.

22 MR. KERR: Okay. So to say that an ISLOCA had  
23 occurred means that a precursor --

24 MR. BECKNER: I think that's -- yes. That's what  
25 we're seeing -- a lot of precursors, where piping is

1 overpressurized or inadvertently almost overpressurized.

2 MR. KERR: It seems to me that in people who  
3 aren't familiar with the way you're using language might  
4 misinterpret that.

5 MR. BECKNER: Now, we have had incidents, we have  
6 had a couple instances where there was a large amount of  
7 water that was, for instance, discharged outside the  
8 containment. There have been 1 or 2 of those, I'm not sure  
9 of the exact number.

10 So, you might call those ISLOCAs. Obviously they  
11 were recovered very quickly. So there have been several  
12 what you might want to go ahead and call them that.

13 MR. KERR: I just didn't realize before that one  
14 characterized a leak as a small break LOCA, but I'm willing  
15 to use that description if everybody else.

16 MR. BECKNER: Right. I think the main thing is  
17 where water has just been inadvertently discharged outside  
18 the containment; where you've -- you've opened up your high  
19 or low pressure interfaces. That's the events that have  
20 actually occurred.

21 MR. SULLIVAN: Is NRR generally happy with the  
22 accident management or the operating procedures that concern  
23 interfacing system LOCAs?

24 MR. BECKNER: I think that's what you'll hear  
25 today is that that's one of our concerns, that we're not --

1 we're not basically happy with them. They tend -- they tend  
2 to be varied; but, again, that's the primary concern.

3 MR. CATTON: So that the treatment of the ISLOCA,  
4 in part, is accident management?

5 MR. BECKNER: Yes, or procedures to prevent an  
6 accident, if view accident management as prevention.

7 MR. CATTON: But, within the IPE, I thought a lot  
8 of that's where accident management was going to be  
9 exercised? How can you split a piece of it off then?

10 MR. BECKNER: No. Accident management sort of  
11 follows the IPE. Accident -- accident management -- we'll  
12 make use of your IPE results to implement accident  
13 management.

14 MR. CATTON: Then you'll make use of a separate  
15 set of results of ISLOCA accident management. Why don't you  
16 just put them together?

17 MR. BECKNER: Well, I think, it's a historical  
18 thing -- it's that this is only being recently being coming  
19 up to speed. But right -- but most of the concerns, we're  
20 talking about procedures here, are not typically in full  
21 power, which is what the IPE covers. Most of the concerns,  
22 as far as procedures are when you're involving going up to  
23 power or -- or coming down. You know, that's when a lot of  
24 these valves are being opened and closed and that type of  
25 thing. So, in that sense, it's really outside of the scope



1 of the IPE, that IPE is limited to full power operation.

2 MR. KERR: Since the IPE was designed, presumably,  
3 to look at outliers, I never did realize it was restricted  
4 to operation at power, I thought it was looking for risks  
5 that might not have been recognized. Why should they be 2  
6 separate programs to look at these things?

7 MR. BECKNER: Yes. I think it's -- it's primarily  
8 historical is that the state of the art in PRA is primarily  
9 involved with full power operation. We're just starting to  
10 have PRA work done that is applicable to other than full  
11 power.

12 MR. SULLIVAN: Bill, is it a general lack of --  
13 what is the problem with the procedures? Is it not enough  
14 instrumentation, training or --

15 MR. BECKNER: Again, I'm getting in a little bit -  
16 - preempting what Idaho would say, but yes, there may be a  
17 procedure, for example, that says "close valve A before you  
18 open valve B," but there is not a caution and, in addition,  
19 there's not an understanding as to why you have to do that.  
20 So, yes, the procedure tends to be correct, but the operator  
21 is not aware that the reason you close them -- open or close  
22 them in that sequence is because you're dealing with a high  
23 pressure, low pressure interface, and the procedure lacks a  
24 caution and the operator, also, probably does not understand  
25 the importance of doing it in that sequence. That's an

1 example.

2 MR. SULLIVAN: So, it may be a combination of  
3 training, instrumentation to telling it that the pipe is  
4 really pressurized and --

5 MR. BECKNER: Yes. Again, I think we're getting  
6 into this type of stuff that -- that Idaho is going to  
7 present here.

8 MR. CATTON: I don't see any further questions,  
9 and we're already starting to get a little bit behind.

10 MR. BECKNER: Okay. The next speaker is going to  
11 be Sammy Diab, who's going to give a short overview of the  
12 inspection results.

13 MR. CATTON: Sammy, did you bring any slides?

14 MR. DIAB: I brought some slides. I didn't bring  
15 enough with me. I apologize for this. We'll be able to  
16 provide this later on in the day.

17 [Slide.]

18 MR. DIAB: My name is Sammy Diab. I work in  
19 applications branch, NRR.

20 You probably have seen some of this material  
21 before. I would like to recap and give you some kind of a  
22 status of the program at this point and also I would like to  
23 set the stage for Idaho and the Office of Research to talk  
24 to you about the analysis that was done for the B&W plant.

25 [Slide.]

1           MR. DIAB: Again, this is some kind of a  
2 progression from about where we come from as far as this  
3 issue is concerned. PRAs estimate that there is ISLOCA, is  
4 a --

5           MR. KERR: Excuse me, Mr. Diab. I understand that  
6 the Commission has asked presenters to the Commission not to  
7 read transparencies.

8           MR. DIAB: Okay. I am not trying to read it.

9           MR. KERR: It sounded to me as if you were reading  
10 from the first bullet and I was going to suggest that we  
11 could speed things up by just letting us read.

12           MR. DIAB: Fine. Basically we are coming from a  
13 background that said the intersystem LOCAS are low  
14 contributors to risk and then we looked around and we see  
15 that operating experience, operating occurrences seem to  
16 indicate, suggest that if our concerns are justified, we are  
17 seeing too many of ISLOCA-like events, things that we call  
18 ISLOCA precursors.

19           That is a different issue. I think you asked the  
20 question earlier about what is a leak and what is a  
21 precursor and what is an ISLOCA.

22           We consider events that lead to  
23 overpressurizations or spillages of low pressure system,  
24 though low pressure systems, to be useful to us as ISLOCA  
25 precursors.

1           That is what we define by ISLOCA precursor.

2           There has been, when you say leaks, a leak seems  
3 to indicate a small leak. A leak is a leak but a spillage  
4 we have seen events that provided 14,000 gallons or 68,000  
5 gallons of primary water going outside the containment,  
6 several thousand gallons, several hundred gallons. We call  
7 these significant ISLOCA precursors or ISLOCA-like events.

8           [Slide.]

9           MR. DIAB: We thought we might learn something if  
10 we look carefully into these events.

11           That is the reason for NRC embarking into this  
12 program, focused program to look at the ISLOCA risk, a fresh  
13 look at the ISLOCA risk to see if we can uncover something  
14 or if we can understand why we are seeing so many  
15 precursors.

16           This basically included a three-pronged approach  
17 or attack there -- assessment of operational events, and  
18 then from that we go into audit, fuel plants, hopefully  
19 varied different kinds of plants to see if we can learn  
20 something, and then we go into a detailed analysis of each  
21 one of the plants -- PRA, HRA and the rest.

22           [Slide.]

23           MR. DIAB: I will just describe briefly here the  
24 first two parts of this program and then the third part will  
25 be described later on by Research & Idaho.

1           The assessment of operational data, we looked at  
2 several events, ISLOCA-like events or precursors if you  
3 will, to understand how the events came about, how did we  
4 end up overpressurizing low pressure system or we end up  
5 spilling a significant amount of primary coolant outside and  
6 maybe even running the risk of uncovering the core.

7           We tried to understand the root causes for these  
8 events. That provided us with a good 'size laundry list of  
9 things one can look at when we go and audit a plant to see  
10 if that plant has something, you know, a vulnerability like  
11 this or this particular vulnerability. Can this plant have  
12 an event like that one we looked at?

13           Again, this was used to provide guidance for the  
14 inspectors when we sent them out to the plants.

15           Now comes after this the audit program. Within  
16 the guidance that we sent with the inspectors basically how  
17 one can prevent an ISLOCA from occurring, likelihood of  
18 early isolation of an ISLOCA, if one takes place how does an  
19 operation can stop or delay core damage and/or minimize the  
20 offsite consequences.

21           MR. KERR: Is what you are describing something  
22 that was done by NRR or something that was done by INEL or  
23 none of the above?

24           MR. DIAB: The guidance for the plant inspections  
25 was done by both NRR and INEL because they were an integral

1 part of the inspection teams so this guidance was handed out  
2 to all the teams.

3 MR. MICHELSON: Excuse me? When doing the  
4 inspection and looking to see what the problems might be,  
5 did they make, did the people doing the work make any kind  
6 of assumptions about possible single failures that might be  
7 incurred in the process of addressing the IS LOCA?

8 MR. DIAB: I am not really sure I understand the  
9 question.

10 MR. MICHELSON: I assume that you did an analysis  
11 of some sort when you went out and looked at the plant,  
12 which I gather was the process?

13 MR. DIAB: Right.

14 MR. MICHELSON: In doing the analysis, do you make  
15 any assumptions about the possible single failures such as a  
16 valve being -- that is supposed to be closed might be open,  
17 things of that sort?

18 MR. DIAB: Yes.

19 MR. MICHELSON: Was a single failure included in  
20 the analysis?

21 MR. DIAB: This is in the PRA analysis and Idaho  
22 will be able to address this.

23 MR. MICHELSON: PRAs don't have to make single  
24 failure analyses. They make probability predictions about  
25 the likelihood of the valve being closed and that is in the

1 PRA but if you are doing a deterministic, which I gather  
2 this must have been, and it is an inspection of some sort,  
3 then you have to make an assumption about whether the valve  
4 is open or closed.

5 MR. DIAB: If you are addressing the inspection  
6 themselves, I don't think that that was made, that  
7 assumption.

8 MR. MICHELSON: What did the inspection do or what  
9 was the purpose then, if it wasn't to try to verify some  
10 kind of --

11 MR. BURDICK: Gary Burdick from Research.

12 The inspection teams were armed with preliminary  
13 event trees which were drawn from P&IDs before the teams  
14 went to the plants so they did have a pretty good idea of  
15 what to look for.

16 MR. MICHELSON: In an event tree you can make some  
17 assumptions about, you know, whether the valve is open or  
18 closed along the way, and there is a branch in the tree  
19 according to which way it might be.

20 How many of those branches did they go down the  
21 adverse directions? Just one? Any or --

22 MR. BURDICK: Well, we have made a number of  
23 inspections and I can't speak to that exactly right here but  
24 they were armed -- I can say they were armed as well as they  
25 could be with qualitative information what to look for.

1           This does not mean that there is something there  
2           that they may not have missed.

3           MR. MICHELSON: No, it wasn't addressing what they  
4           might have missed. I am asking a real straightforward  
5           question. We talked extensively in the past in doing  
6           deterministic analyses as to whether or not you make an  
7           assumption of a single failure -- arbitrary, singular,  
8           active component failure.

9           In this case do you make such an assumption?

10          MR. BURDICK: Single active components?

11          MR. MICHELSON: Yes.

12          MR. DIAB: Let me try to answer this.

13          MR. BURDICK: Go ahead.

14          MR. MICHELSON: Isn't that kind of fundamental?

15          MR. DIAB: Thank you, Gary. The answer to your  
16          question is, Mr. Michelson, did we make an assumption, a  
17          deterministic assumption that one of the trains is not going  
18          to be available?

19          MR. MICHELSON: No, that wasn't my question.

20          A single active component such as you go into a  
21          certain operational sequence and then it turns out the motor  
22          operated valve you thought was closed was actually open.  
23          Now I can make that assumption and if it were, what trouble  
24          did I get in?

25          Was that included? Did you look at that kind of



1 an event or did you assume that everything was correct as  
2 you went along?

3 MR. BURDICK: I think we looked at more than  
4 single failures.

5 MR. MICHELSON: So you looked at multiple  
6 failures?

7 MR. BURDICK: Multiple failures, yes.

8 MR. MICHELSON: Okay. That is even more  
9 conservative, of course, to look for more than one possible  
10 failure. You must have found plenty of interfacing system  
11 LOCAs, then, if you made an assumption of more than one.  
12 Because in many cases, one is all that keeps you out of  
13 trouble.

14 MR. DIAB: The inter-system failures, or the  
15 systems that have, are exposed to high pressures, are  
16 limited. You have about four or five low-pressure systems.

17 MR. MICHELSON: That's right. Yes. But they are  
18 usually isolated by two isolation valves, and depending on  
19 where you're making your assumption of the break, it may  
20 even be between them, depending on the plant.

21 MR. DIAB: During the inspection, the question and  
22 answer, the inspectors looked at all possible ways of  
23 violating that high-to-low-pressure boundary.

24 MR. MICHELSON: Including single or even multiple  
25 random failures?

1           MR. DIAB: Including all types of failures. You  
2 ask, well, if that goes wrong, what if that opens or doesn't  
3 open. Assigning some values to the failures, individual  
4 failures, only took place in the PRA space.

5           MR. SULLIVAN: Gary, I guess the question is, did  
6 you find a single failure that would lead to an interfacing  
7 system LOCA?

8           MR. BURDICK: With respect to the B&W plant, I  
9 believe it's written into the inspection report that there  
10 was no single failure found at that plant.

11          MR. MICHELSON: Did you take interfacing system  
12 LOCAs to occur between the isolation valves at all or was  
13 that a no-break area in the B&W plant you looked at?

14          MR. BURDICK: Well, in the B&W plant we looked at,  
15 that's pretty hard to occur, because some of the valves are  
16 in fact welded, the check valves are welded together.

17          MR. MICHELSON: Well, these generally, although in  
18 a couple of systems they are check valves, in other systems  
19 they are motor-operated valves.

20          MR. BURDICK: In other scenarios, there are valves  
21 which do have piping. But no, we did not, in the inspection  
22 program, look at piping breaks between --

23          MR. MICHELSON: Between the isolation valves.

24          MR. BURDICK: Between valves, no.

25          MR. MICHELSON: Even though there are some cases

1 of fair long distance.

2 MR. DIAB: The isolation valves, in general, are  
3 both located inside the containment.

4 MR. MICHELSON: No, no, no, no. Isolation valves,  
5 you know GDC requires one inside and one outside. They  
6 aren't generally both inside.

7 MR. DIAB: Well, whatever is outside is very, very  
8 close to the containment.

9 MR. MICHELSON: Oh, yes. Yes. But outside.

10 MR. DIAB: And the mechanical engineering people  
11 will tell us that they have what they call safe, and are  
12 applied so strong that the break, if it is designed for  
13 2,500 pounds, then we're really not that interested in that  
14 part of the pipe.

15 MR. MICHELSON: So you really looked outside of  
16 the outboard isolation valve to even postulate your breaks;  
17 is that what you're saying?

18 MR. DIAB: In general, that's true.

19 MR. MICHELSON: Okay.

20 MR. DIAB: So that we can speed things up here, we  
21 have selected a few plants, PWRs. The idea was to get as  
22 much information about those plants that we can, and see  
23 what lessons we can learn from these plants.

24 And this was also considered as a very useful tool  
25 for the analysts, analysis teams, to get all information

1 they needed, especially about the human reliability analysis  
2 part, which includes interviews and assessments of certain  
3 performance shipping factors, which will be considered, will  
4 be discussed later on.

5 All the inspection reports are completed and out.

6 [Pause.]

7 MR. MICHELSON: Paul, while you're looking there,  
8 did you look at any boiling water reactors yet, from this  
9 particular viewpoint, or just the pressurized water --

10 MR. BURDICK: No boilers at this point.

11 MR. MICHELSON: So your conclusions, whatever  
12 conclusions you're stating today are PWR-type conclusions?

13 MR. BURDICK: That is correct.

14 MR. MICHELSON: Right. Okay.

15 MR. WILKINS: Let me pursue that a little further,  
16 because I was going to ask, how did you pick the three PWRs  
17 you did pick. Are they intended to cover the spectrum of  
18 all possible PWRs, or be representative at least?

19 MR. BURDICK: It was just one each: B&W,  
20 Westinghouse, and CE.

21 MR. DIAB: Let me try to answer that.

22 [Laughter.]

23 MR. WILKINS: I thought I had it answered.

24 MR. CATTON: The other answer was okay.

25 MR. WILKINS: You know, a Judge would tell you to

1 quit while you're ahead.

2 MR. DIAB: I thank you for volunteering to answer.

3 There was a set of criteria that we went after in  
4 order to pick a plant. Basically, the vendor type was very  
5 important. There were a couple of other important  
6 considerations. One of them is the performance of the  
7 plant.

8 And of course, we couldn't get the plants that we  
9 thought we would like to because of unavailability. So that  
10 was probably the most important criterion after the vendor  
11 type.

12 Well, there are a few --

13 MR. MICHELSON: If you're finished with that  
14 answer, let me ask just a follow-up question.

15 I guess you must have made some kind of a  
16 determination that you thought that PWRs were going to be  
17 worse off than the BWRs; is that right? And therefore, I  
18 mean if you had to make a choice and only look at one, you  
19 picked the PWR?

20 MR. DIAB: The idea of going after the PWRs first  
21 was basically the delta-P margin for the Ps is about twice  
22 as large as the margin for the boilers.

23 MR. MICHELSON: It depends on what system you're  
24 looking at as to whether that's true.

25 MR. DIAB: And the low-pressure systems are in

1 general about the same design pressure anyway. So,  
2 considering the low-pressure systems are 400 to 600 pounds  
3 at the design pressure, and the primary is 1,000 or 1,100 in  
4 one case and 2,200 in another case, we thought if we look at  
5 the Ps first, that's one consideration.

6 MR. MICHELSON: Do you think the piping on a  
7 boiler is just as heavy as the piping on the PWR? Yes, it's  
8 twice the pressure all right, but it's also much heavier  
9 piping on the primary side. So there's no problem there.  
10 It should be the boiler in that case. And on the secondary  
11 side, you better look at all the secondary systems that  
12 interface on a boiler. Some of them are relatively low  
13 pressure.

14 MR. DIAB: True.

15 MR. MICHELSON: Very low pressure in a couple  
16 cases.

17 MR. DIAB: We also have limited resources. We  
18 couldn't really attack both types of plants at once.

19 MR. MICHELSON: Okay. But your gut feeling was  
20 the PWRs were probably worse off.

21 MR. DIAB: Well, our gut feeling is, if we needed  
22 to start in one place, we picked the PWRs. And we're finding  
23 that there are probably some useful lessons that may very  
24 well be applicable to boilers as well.

25 [Slide.]

1 MR. DIAB: I have only the remaining viewgraph  
2 here, which is a preamble to the research. Extensive  
3 analysis, focused analysis here, looking at the human  
4 reliability analysis, fragility analysis of low-pressure  
5 systems, and the thermohydraulics to determine what  
6 pressures are at what points at the low-pressure system, as  
7 well as the timing that's involved for the scenario for the  
8 system LOCA. The timing I think becomes very important when  
9 one looks at the human reliability analysis.

10 That concludes my presentation to you this  
11 morning.

12 MR. KERR: I have a couple of questions.

13 First, I certainly agree that human performance is  
14 important, and has not been very well treated in a good many  
15 PRAs, not through any fault of the analyst. But it appeared  
16 to me as I read what happened here that a good bit of  
17 emphasis was put on human performance that might increase  
18 risk.

19 I didn't see a similar effort given to human  
20 performance that might decrease it.

21 Is my perception incorrect?

22 MR. DIAB: Respectfully so. And the reason is,  
23 when Idaho discussed an analysis, the recovery is a very  
24 important part of this. There is so much initiation, but  
25 there is also so much recovery. And the recovery of course,

1 is what saves it, in some cases.

2 MR. BECKNER: Bill, that was one of our concerns  
3 about the PRA results, is that it affected both sides, is  
4 that there was a large human contribution to the initiator  
5 and there was also a large human contribution to recovery.

6 So that's one reason we were still concerned, is  
7 that you've got uncertainties in the human element coming  
8 from both aspects. And so that's why we were still a little  
9 bit concerned about the precursors.

10 MR. KERR: My second question is about the concern  
11 expressed in the report that operators at Davis-Besse did  
12 not understand ISLOCA and its implications.

13 It appears also from the comments that at least  
14 the people who wrote the report felt that they should.

15 It's my feeling and correct me if I'm wrong that  
16 much of the emergency procedures that exist are based on  
17 what are called symptom-based LOCAs, which is interpreted by  
18 a good many people I think to say an operator doesn't really  
19 need to know what's going on. All he needs to do is to have  
20 some instrument readings and from that he can tell what he  
21 should be doing.

22 Indeed, I heard one of the staff members from  
23 Davis-Besse at a meeting recently who was discussing the  
24 Davis-Besse inspection and he said that we were criticized  
25 for the fact that the operators didn't understand small



1 break LOCA or didn't understand ISLCCAs but he said that  
2 really doesn't matter because we use symptom-based  
3 procedures and they don't have to understand what is going  
4 on.

5 Now is it -- is the staff after this exercise  
6 going to have another look at symptom-based procedures and  
7 maybe decide that that is not the way to go?

8 MR. DIAB: Well, let me comment on this.

9 The B&W plants do not have under emergency  
10 operating procedures sections that deal with intersystem  
11 LOCA as a large break outside containment.

12 MR. KERR: I guess I didn't make my question  
13 clear.

14 MR. DIAB: I am coming to the symptom-based  
15 procedures. The symptom-based procedures may in a B&W plant  
16 may lead you to a leak or a small break outside containment.

17 A small break outside containment will not be able  
18 to handle, our procedure will not be able to handle an  
19 intersystem, full-scale intersystem LOCA like the ones that  
20 we're concerned with in this analysis.

21 MR. KERR: How do you know?

22 MR. DIAB: Because that is the assessment of the  
23 people who reviewed the procedures.

24 MR. KERR: Well, then, it seems to me if that is  
25 the case and if this is a very significant LOCA then one

1 needs to have a look at the validity of symptom-based  
2 procedures generally.

3 MR. DIAB: Well, the symptom-based procedure is a  
4 valid concept. What seems to be missing here --

5 MR. KERR: Here is a very important place in which  
6 it turns out apparently not to be a valid concept.

7 MR. DIAB: Well, let me just comment to this.

8 You can have a concept but if you don't make  
9 provisions to use that concept efficiently then one can get  
10 into a point where the operators may in fact know or  
11 understand after some time into the event that they do have  
12 a large break outside containment but they don't know what  
13 to do with it.

14 MR. KERR: No, but you see, again maybe I am wrong  
15 in my interpretation of symptom-based LOCAs but I thought  
16 the philosophy was that an operator wasn't even supposed to  
17 worry about what the accident was; the symptoms would lead  
18 him to the correct procedures.

19 MR. DIAB: Well, I am not really sure that the  
20 operator is not supposed to worry. I think the operator  
21 needs to understand the events that are in general the  
22 background for the UPS. The symptom-based will help him.

23 MR. KERR: I have asked licensees on a number of  
24 occasions because I must say I am personally skeptical of  
25 symptom-based procedures, I have asked them suppose an

1 experienced operator gets into a situation in which his  
2 intuition and experience tells him that the procedures are  
3 wrong. What would you want the operator to do?

4 In all cases but one the answer has been follow  
5 the procedures.

6 Now what this says to me is that the people, most  
7 of the people who are developing and using symptom-based  
8 procedures do not depend on the operator's understanding and  
9 indeed they don't want to depend on the operator's  
10 understanding of what the accident may be.

11 MR. DIAB: Whoever puts the procedure together  
12 it's a collective effort.

13 MR. KERR: Mr. Diab, I know that and I respect it.  
14 I am simply saying that if the philosophy of symptom-based  
15 procedures seems to me to be don't worry about understanding  
16 what is going on, operator, follow the symptom-based  
17 procedures, and this seems to me to be a situation which is  
18 developing which says an operator does need to understand  
19 the significance of the actions he takes and to recognize  
20 the accident when he has an ISLOCA.

21 I may be misreading what I --

22 MR. BECKNER: Bill, I'm no expert in procedures so  
23 I don't know if the issue is symptom-based versus some other  
24 type of thing but what I am told by our EPG people that are  
25 working with us is that it goes back to the EPGs, is that

1 some vendor EPGs deal with ISLOCA events to a greater degree  
2 than others.

3 Presumably that means that some vendors then have  
4 dealt with ISLOCA within a symptom-based arena.

5 MR. KERR: No, but Bill, if they do they don't  
6 deal with it by saying you have an ISLOCA. They deal with  
7 it by not worrying about whether you have an ISLOCA or not.

8 As I read this report, the people who wrote the  
9 report felt it was very important that the operators  
10 understand the basis for an ISLOCA and understand when they  
11 had that specific accident.

12 MR. BECKNER: I think that comes through. Idaho  
13 came through with that, yes.

14 MR. KERR: I am not disagreeing with this. In  
15 fact, I tend to think it's sounder than the symptom-based  
16 procedures, but if it does turn out that that is a valid  
17 conclusion it seems to me one ought to re-look and maybe re-  
18 think the use of symptom-based procedures.

19 MR. DIAB: Dr. Kerr, this is only one plant that  
20 we're discussing. There are more than one plant. The  
21 second plant, for instance, does have procedures that may  
22 very well prove that the symptom-based procedure for  
23 intersystem LOCA are working.

24 MR. CATTON: I think you have completely missed  
25 the thrust of the dialogue that has gone by.

1 MR. DIAB: I'm sorry, I didn't hear it.

2 MR. CATTON: I think you have missed the thrust of  
3 the dialogue. Maybe we should just continue.

4 MR. DIAB: This basically concludes my  
5 presentation.

6 The analysis part will be discussed by Gary  
7 Burdick from the Office of Research.

8 [Slide.]

9 MR. BURDICK: That is who I am.

10 [Laughter.]

11 [Slide.]

12 MR. BURDICK: I want to give you a little  
13 introduction here.

14 Late last Winter or early in the Spring we met,  
15 had the first meeting with the ACRS on this program, and we  
16 promised to come back when we neared completion on the first  
17 plant study.

18 We're here. And as promised, you received a draft  
19 of that study, which is now a couple of months old. And  
20 some things have changed, and will change, I think, before  
21 the final draft is out. We do not want to have the draft  
22 that you have reviewed externally except by perhaps some  
23 other contractors. We do want to put the final draft,  
24 however, out for review by, in particular, the licensee, to  
25 give him a fair opportunity to examine the bases for our

1 analyses.

2 The final draft will differ significantly in, I  
3 think, the three areas indicated here, from what you have  
4 now in the draft.

5 MR. KERR: What is meant by saying it will differ  
6 in plant identification?

7 MR. BURDICK: We plan to keep the names of the  
8 plants off all three documents, because this is in fact a  
9 hybrid approach to analyzing these plants, as you will see.  
10 We are following an approach that, in fact, was recently  
11 recommended to the Commission by the ACRS. And that is, we  
12 try to analyze towards some average plant. And we've tried,  
13 as you will see in this study, to normalize our risk  
14 calculations to a quote unquote "average" plant.

15 We thought that this would enable us, from the  
16 meager information we had, that is, only three plant  
17 studies, to perhaps get some clearer idea of impacts of  
18 actions taken with regard to ISLOCA on the industry as a  
19 whole.

20 You'll see more of this as Idaho gets into their  
21 presentation.

22 [Slide.]

23 MR. BURDICK: There has been some mention of this  
24 already. There were past ISLOCA analyses and PRAs, and they  
25 have been weighed in the balance, and they were found

1 wanting in a number of areas, as indicated here.

2 In particular, these past PRAs did not account for  
3 the human contribution that we've been seeing in the  
4 operational events. And as was mentioned previously, this  
5 is what raised some new concern about the ISLOCA issue and  
6 the speed with which the issue was being addressed.

7 Was, in fact, the program properly focused to  
8 handle the human error content?

9 The program had previously a narrow hardware  
10 focus, simply on the testing of the PIVs, the thought being  
11 that if you got the pressure isolation valves not to leak,  
12 that that would solve the problem. However, that again  
13 ignored the human content, the possibility of humans  
14 activating valves, when they shouldn't.

15 [Slide.]

16 MR. BURDICK: So about a year and a half ago,  
17 research, that is Eric Beckjord, received a user request  
18 from Tom Murley, asking us to get involved in the five  
19 activities listed here, and to put the other four of these  
20 activities in a PRA framework which, after considering all  
21 of these activities in the formulation of a program, in  
22 response to that request, we decided that this was in fact  
23 how the GI-105 research program should be reorganized.

24 MR. MICHELSON: Let me ask, on the previous slide,  
25 you said there was little or no modeling beyond the PIV.

1 That suggests that there was modeling of the PIVs. Is that  
2 correct? When you did your PRAs, you put in probability  
3 that check valves would close tightly and so forth? You  
4 used a set of numbers for all of that?

5 [Slide.]

6 MR. BURDICK: Yes. But here I'm talking about  
7 past ISLOCA --

8 MR. MICHELSON: Yes. I understand --

9 MR. BURDICK: -- PRAs.

10 MR. MICHELSON: -- Yes. And you also at that time  
11 put in probability of isolation motor-operated valves being  
12 closed at the time, as a number?

13 MR. BURDICK: Yes.

14 MR. MICHELSON: Okay. So there was some  
15 accounting of human error in there to the extent that,  
16 indeed, the valve wasn't closed, but you put in a  
17 probability of that in there?

18 MR. BURDICK: There is a spectrum of ways that  
19 this problem was dealt with in the past. I don't think you  
20 can make one hard and fast --

21 MR. MICHELSON: But it was modeled, you think?

22 MR. BURDICK: In some cases, there was some  
23 modeling done; in other cases, no.

24 MR. MICHELSON: Well, this suggests that in all  
25 the cases, the modeling was done for the PIVs; it's just



1 that the deficiencies were beyond that.

2 MR. BURDICK: That's right. The modeling of the  
3 low-pressure systems is where the deficiencies --

4 MR. MICHELSON: But the PIVs were included in your  
5 models previously and you were satisfied. Maybe the numbers  
6 weren't good, but you did have them properly modeled?

7 MR. BURDICK: Not my models, but whoever did the  
8 analysis.

9 MR. MICHELSON: Whoever did the analysis.

10 MR. BURDICK: Right.

11 MR. MICHELSON: Certainly.

12 MR. BURDICK: There have been industry analyses as  
13 well as agency.

14 MR. MICHELSON: I wonder if that's the case. But  
15 I'll have to go back and refresh my memory.

16 MR. CATTON: In coming to your conclusion that  
17 hardware wasn't very important to the risk, did you use the  
18 more current thinking about MOVs, the reliability numbers,  
19 or did you use the 1150 numbers?

20 MR. BURDICK: Well, first of all, that's not my  
21 conclusion. Hardware plays a very important role here, in a  
22 number of --

23 MR. CATTON: Lesser role than the human factors.

24 MR. BURDICK: Oh, as far as --

25 MR. CATTON: You ranked the things that played a

1 role, and hardware was the bottom.

2 MR. BURDICK: As far as initiating the ISLOCAs?

3 MR. CATTON: Well, on both ends. As far as the  
4 initiation, the valve is open and you can't get it closed or  
5 the operator opens it, then can't get it closed. There's  
6 some reliability associated with the functioning of the  
7 isolation valves. What numbers did you use? Last time we  
8 discussed this, you were going to use the 1150 numbers, and  
9 not the more current thinking about MOVs. Which did you use  
10 in your study?

11 MR. BURDICK: That's going to be covered. We used  
12 a number of data sources to get reliability, failure  
13 information on --

14 MR. CATTON: That could shift the weighting a bit,  
15 if you used the 1150 numbers. But I'll wait.

16 MR. MICHELSON: The real problem, of course, is  
17 making sure the numbers reflect the conditions that exist at  
18 the time you are required to close the valve under the  
19 ISLOCA. And most of your data doesn't relate to a large  
20 delta-P and so forth, which is a rarity out in the world,  
21 but it's an actuality in this case.

22 MR. CATTON: That's just a part of it, Carl, it's  
23 both.

24 MR. MICHELSON: That's part of it; and they don't  
25 have numbers for that. They may say they do. They pull

1 something out. But we just don't know. The tests so far  
2 indicate highly likely they won't work.

3 MR. BURDICK: We will have a discussion of the  
4 engineering approach taken to calculating the likelihood of  
5 failure of these valves with various delta-Ps.

6 MR. CATTON: We're going to hear about this from  
7 Duane, I guess, Duane Hanson. Is that right? Background  
8 and approach?

9 MR. BURDICK: No, you are going to hear about that  
10 from Bill Galyean.

11 MR. CATTON: Oh. Okay. It says "interfacing  
12 system rupture probabilities."

13 MR. KERR: Be patient.

14 [Laughter.]

15 MR. BURDICK: Duane Hansen will give an overview,  
16 and touch upon each particular area, and then turn the  
17 program over to people who will talk about each of these  
18 areas in more depth.

19 MR. WILKINS: And we'll lock the door, if, at the  
20 end of the day, we still haven't got an answer to this  
21 question, and ask it again.

22 [Laughter.]

23 [Slide.]

24 MR. BURDICK: Our Generic Issue 105 resolution  
25 approach is to first assess the ISLOCA risk from PWRs.

1           And we're starting first with the ex-containment  
2 ISLOCAs because those are the riskiest. These have been  
3 indicated in past PRAs as, with all the warts they have,  
4 that, for Ps, the ex-containment ISLOCA is significant to  
5 dominant in its risk profile.

6           We plan to go on and add, as you see here, cover  
7 the rest of these bases, the external events; inside  
8 containment ISLOCAs; and finally do a cost benefit analysis  
9 to look at the reasonableness of potential fixes, hardware  
10 and perhaps human.

11           And then we're going to go on and look at the  
12 boilers. And Idaho has just recently started thinking about  
13 an exploratory study to do on the boilers, with an eye to  
14 using what we've now learned, in particular, with respect to  
15 the component fragilities, to perhaps get some idea of plant  
16 invulnerability or perhaps immunity to human actions. It  
17 may be that there are sufficient margins there, that for at  
18 least some of these systems, they may not overpressurize.

19           We're first taking a look at that, and we're  
20 taking that approach to be prudent, frugal. We have a  
21 limited amount of money, and, as you can see here, competing  
22 priorities.

23           MR. MICHELSON: Excuse me, before you go on. You  
24 talked, in the first bullet, about internal events analysis,  
25 and in your next bullet you talk about external events.

1           Now, relative to pipe breaks, some of which might  
2           be ISLOCAs, some of which might not, is that where you're  
3           drawing the line, that if it's an ISLOCA, it's an internal  
4           event; if it's any other pipe break outside of containment  
5           it's an external event? Is that where you're breaking this?

6           MR. BURDICK: No, no. The externals --

7           MR. MICHELSON: Where are you breaking it?  
8           Because you know, depending on which group I talk to,  
9           external events means something very different than internal  
10          events, and pipe breaks are thought to be external events  
11          when they're outside of containment. And you apparently  
12          don't, at least for ISLOCA.

13          MR. BURDICK: By external events, here, I mean the  
14          seismic, flood, fire --

15          MR. MICHELSON: Flood from external flooding  
16          coming into the building?

17          MR. BURDICK: We're even looking at the flooding  
18          caused by the LOCA itself.

19          MR. MICHELSON: Oh, you're separating, when you  
20          have an internal event you may also have an external event;  
21          is that what you're saying? Is that the way you're dividing  
22          it out?

23          MR. BURDICK: You're going to cover that, Bill?  
24          Are you going to talk to that?

25          MR. MICHELSON: If you can clear it up later,

1 fine.

2 MR. BURDICK: Okay.

3 MR. MICHELSON: It depends on who you talk to.

4 MR. GALYEAN: This is Bill Galyean. The  
5 distinction, I think, we're looking at ISLOCA specific  
6 events. Now, they can be caused by, in our terminology,  
7 internal events which are basically hardware failures,  
8 operator errors, that type of thing. But the bottom line  
9 is, things that, errors that violate the pressure isolation  
10 boundary, things that open the valves.

11 When we talk about external events, we use the  
12 same focus. However, we look at different causes. We look  
13 at earthquakes, fires, floods. Floods internal to the  
14 plant, due to pipe breaks, for example, abandoned pipe  
15 breaks.

16 MR. MICHELSON: That's a pressure-boundary  
17 failure, isn't it?

18 MR. GALYEAN: No, no. It can be like a process  
19 water line, just a service-water line.

20 MR. MICHELSON: That's a pressure boundary also.  
21 Anything that holds fluid is a pressure boundary.

22 MR. GALYEAN: Right. But in the ISLOCA  
23 terminology, when we refer to pressure boundary, we're  
24 referring to the pressure boundary for the primary system,  
25 okay, the primary coolant system pressure boundary.

1 MR. MICHELSON: Only up to the first isolation  
2 valve outside of containment.

3 MR. GALYEAN: Well, if your first one fails, then  
4 you have the second one, and that is then the pressure  
5 boundary.

6 MR. MICHELSON: If a pipe breaks beyond the second  
7 isolation valve, it's an external event?

8 MR. GALYEAN: No. Well, only in the sense that if  
9 that pipe break, okay, then causes the pressure boundary for  
10 the primary system to be violated. For example, you have a  
11 flood that gets into an electrical cabinet, affects some  
12 relays; the relays cause a motor-operated valve to open, and  
13 allow primary --

14 MR. MICHELSON: If I have a service-water failure,  
15 that's always an external event, even though the pipe  
16 ruptured?

17 MR. BURDICK: Not as --

18 MR. MICHELSON: Didn't lose any reactor fluid.

19 MR. BURDICK: Right.

20 MR. MICHELSON: But it's service-water --

21 MR. BURDICK: I think there's confusion here  
22 between the terms ex-containment and external, external  
23 event.

24 MR. MICHELSON: Well, yes, there's a great deal of  
25 confusion. That's why I was trying to clarify how you are

1 using the term, so I could understand the rest of the  
2 morning. And I'm not quite sure it's clear to me yet where  
3 you separate internal event water pressure boundary ruptures  
4 from external event pressure boundary ruptures. It's not  
5 clear to me. But apparently, a service-water outside of  
6 containment is --

7 MR. GALYEAN: We're talking about the cause of the  
8 primary system pressure boundary violation.

9 MR. MICHELSON: Okay. Clearly it won't be  
10 violated with a service-water.

11 MR. GALYEAN: Right.

12 MR. MICHELSON: Let's assume that it isn't.

13 MR. GALYEAN: Right.

14 MR. MICHELSON: That's an external event.

15 MR. GALYEAN: Well, it is in the sense -- it is;  
16 that's right. That is an external event.

17 MR. MICHELSON: Okay.

18 MR. GALYEAN: Because it's external to the system  
19 we are looking at.

20 MR. MICHELSON: But if somehow you lost reactor  
21 coolant in the process of the event, then it becomes an  
22 internal event?

23 MR. GALYEAN: No. It just becomes an external  
24 cause to an ISLOCA.

25 MR. MICHELSON: I'll give up at this point. I try



1 to get it more simplistic than apparently it's possible to  
2 state it. But other people have given me very simplistic  
3 answers that I can understand. This one I don't, to be  
4 perfectly frank.

5 MR. BURDICK: I have a schedule here that I'd like  
6 to come back at the end of the presentation by Idaho and  
7 talk about.

8 [Slide.]

9 MR. BURDICK: But I want to prepare you for their  
10 presentation in a couple of ways here.

11 I want you to bear in mind as they are going  
12 through their discussion that what they are talking about  
13 are outside containment ISLOCAs. Every time you see an  
14 ISLOCA in their presentation, that will refer to outside  
15 containment ISLOCAs.

16 Now, we'll talk about the approach, and we'll give  
17 you what we consider now to be pretty final results on the  
18 B&W plant. And I want you to bear in mind that the results  
19 that we're going to give you on the Westinghouse plant are  
20 at this point preliminary.

21 That concludes what I have to say except to  
22 introduce the Idaho team, led by Duane Hansen in the middle  
23 of the front row; Dana Kelly, to his left; Bill Galyean to  
24 his right; directly behind Dave Gertman.

25 Duane Hansen will lead off the Idaho presentation.

1 MR. KERR: One short question.

2 In reading the report, in a number of places, I  
3 got the impression that conservatisms were used in the PRA  
4 analysis.

5 Were the analysts instructed to be conservative  
6 when they had a choice?

7 MR. BURDICK: Bill, the analysts were repeatedly  
8 cautioned not to be conservative, but to be as realistic as  
9 they could, and this is in keeping with the severe accident  
10 policy statement, where the staff has been cautioned not to  
11 be conservative. And I agree with that philosophy. It's a  
12 double whammy when the staff makes, injects conservatisms  
13 into their studies, and then you may have some conservative  
14 approach taken by the regulator. We tried to avoid that.

15 MR. KERR: They should instruct their word  
16 processor to go through and remove those cases which  
17 conservatism appears in.

18 MR. SULLIVAN: Gary, can I ask you a question?

19 MR. BURDICK: Sure.

20 MR. SULLIVAN: I think Sammy, when he was doing  
21 his presentation, said that the risk was too high for  
22 interfacing, or they thought it was larger than the ERA.

23 Well, that means two things to me. Either they  
24 missed the consequences, or the probability is wrong. And I  
25 assumed that he meant the probabilities.

1           And then, the LERs are the only way that I know  
2           that they know that -- in fact, that seems to be the  
3           concern, the precursors from the LERs. But I never saw  
4           anybody take that and estimate, well, you know, they're  
5           twice too large or three times too large, factor of 10 too  
6           large. And then in the report it says, it gets into human  
7           factors. And it says, well, we are concerned because there  
8           are human factors involved, and we know that that's probably  
9           -- but I couldn't get a clear understanding of what the  
10          problem, what are they really concerned about, and are the  
11          LERs, the database and the LERs, saying that the precursors  
12          are way too large?

13           MR. BURDICK: There are a number of things to  
14          respond to in your comments there.

15           First of all, as Bill Kerr pointed out, there is a  
16          -- the word "precursor" means a lot of different things to  
17          different people. It's bandied about. And I believe AEOD  
18          has a precursor program still ongoing that defines what they  
19          mean within that program by precursor. IAEA has another  
20          definition. For the purposes of this program, we have a  
21          definition.

22           But before this program got started, there was a  
23          perception that there were perhaps more of these events  
24          occurring than should be. And that was one of the things  
25          about this program going.

1                   But you're going to see a little later on that I  
2 think our analysis enables us to understand what we are  
3 seeing, why we are seeing it, and that a lot of these events  
4 that we call precursors are not really precursors in the  
5 AEOD sense. They are things that happen because it's not a  
6 perfect world we live in. And these things are in fact  
7 benign events in a lot of cases.

8                   MR. CATTON: So you've reduced the probabilities?

9                   MR. BURDICK: Pardon me?

10                  MR. CATTON: The bottom line is you've reduced the  
11 probability side of the product?

12                  MR. BURDICK: No. We have not reduced the  
13 probabilities. The core damage frequency that we're coming  
14 out with is about what it has been in past studies, even  
15 though these studies did have warts and ignored the human  
16 content. But we also have a handle now on the frequency of  
17 the kinds of events we're seeing, and understand why we're  
18 seeing them. And actually, what we're seeing in the  
19 operational occurrences in the real-world events is pretty  
20 much in line with what we're coming out with in our studies  
21 here.

22                  MR. CATTON: Do you understand that?

23                  MR. SULLIVAN: Yes, I think I do.

24                  MR. CATTON: Could you explain it?

25                  MR. KERR: Ivan, you aren't supposed to understand

1 PRAs. Harold and I understand it.

2 MR. CATTON: I thought Harold asked a good  
3 question. Reduced risk, where did it come from, probability  
4 or consequences? I didn't understand the answer.

5 MR. KERR: I'll explain it to you.

6 MR. CATTON: Okay.

7 MR. SULLIVAN: So what you're saying is that the  
8 database that you have is consistent with the LER database,  
9 and the probabilities are roughly correct?

10 MR. BURDICK: They're in agreement.

11 MR. SULLIVAN: Okay. I'll accept that.

12 MR. BURDICK: Anything else?

13 [No response.]

14 MR. CATTON: I understand now.

15 [Laughter.]

16 MR. CATTON: I think, rather than have Duane start  
17 right now, we might take a break before that. I have five  
18 of, so we'll come back at ten after.

19 [Brief recess.]

20 MR. CATTON: The meeting will come to order.

21 The next speaker is Duane Hanson, Idaho.

22 MR. HANSON: All right. This morning I'm going to  
23 be briefly introducing to you the ISLOCA program by  
24 discussing the background and approach.

25 The approach was developed and intended to meet

1 the objectives that were discussed by Dr. Burdick in the  
2 previous presentation.

3 The program was basically structured around three  
4 steps. First, developing a methodology for assessing  
5 potential just for an ISLOCA. Then applying this  
6 methodology and refining it, based on the application. And  
7 then, finally, to generalize the findings in the form of an  
8 evaluation process.

9 I'm only going to be covering, briefly, the first  
10 step. In subsequent presentations we'll give you more  
11 detail on some of the unique aspects of this methodology and  
12 also on the applications.

13 [Slide]

14 MR. HANSON: Now, at the onset of this program we  
15 performed a review of some of the historical plant operating  
16 data in the form of the LERs. And this review as to  
17 identify the LERs and help us to better understand potential  
18 events at nuclear power plants.

19 We looked in several areas. We looked at the  
20 pressure isolation valve failures that could occur based on  
21 hardware, human causes.

22 We looked at misalignment of motor operated  
23 valves. Not necessarily only involved in low pressure  
24 systems, but those which would be involved and would have  
25 safety implications.

1           We also looked at what we called the occurrence of  
2 ISLOCA precursors. Here, when we speak of precursors, we're  
3 speaking of cases where a low pressure system was -- the  
4 pressure was increased as a result of incongruent  
5 communication with the RCS. Of course, speaking of cases  
6 where there were valves switch had problems, either  
7 maintenance or could fail, and also leaks from high pressure  
8 systems to the low pressure systems.

9           Now the results helped us to do several things.  
10 They helped us to identify potential types of human errors  
11 or hardware failures that could be important for an ISLOCA.  
12 They also provided us with some information in a limited  
13 number of cases as to failure rates on some types of  
14 pressure isolation valves.

15           We didn't find the information adequate to help us  
16 to develop human error failure probabilities, because of  
17 differences in the types of things being done, the context  
18 that they were being done under, and that timing, and these  
19 sorts of things.

20           Now, the insights that we gained from this review  
21 helped us to work out some of the details to put together an  
22 approach and a framework.

23           [Slide]

24           MR. HANSON: What I have shown here is an eight  
25 step process, which I would like to just briefly run through

1 with you and then come back, talk about each one of the  
2 steps in a little more detail. Then, as I indicated, as we  
3 go through the remaining presentations will provide  
4 significantly more detail on several of the steps.

5 MR. MICHELSON: Excuse me. Before you go on.

6 MR. HANSON: Yes?

7 MR. MICHELSON: In a case that you might  
8 experience an ISLOCA, one of the first mitigating steps  
9 might very well be to try to isolate this LOCA if it just  
10 opened up.

11 MR. HANSON: Yes.

12 MR. MICHELSON: To do that, you have to now go  
13 back and use, for instance, a motor operated valve.

14 MR. HANSON: Yes.

15 MR. MICHELSON: And are you including that in this  
16 previous slide? You've gone back and looked at the  
17 probability that the motor operated valve would close under  
18 the conditions now existing in the system, as opposed to any  
19 other data that you might have about how it works when  
20 there's no load on it?

21 MR. HANSON: No, we didn't. In our LER reviews we  
22 didn't look at the capability of valves to open and close.

23 MR. MICHELSON: No. I was thinking beyond LER,  
24 because LER didn't experience the LOCA, therefore, it didn't  
25 experience a probability -- I mean, it didn't experience a



1 data point for operation of the valve.

2 MR. HANSON: Yes. In the --

3 MR. MICHELSON: How do you do this for the case of  
4 -- you're doing an analysis. Now, what you do have indeed  
5 an ISLOCA to develop and how do you determine the  
6 probability litigation?

7 MR. HANSON: In our analysis of at least the B&W  
8 plant, we did look in detail at the sizing of the motor  
9 operators on valves that could be used to isolate the  
10 systems, and in that analysis, we used data that's come from  
11 testing that's going on, on valves, under the auspices of  
12 the NRC, and used that analysis to make a determination of  
13 whether the valves would open and close.

14 MR. MICHELSON: Now, how did you adjust the  
15 probability of failure from the numbers you might otherwise  
16 have used in order to do your PRA. What probability of  
17 failure do you now use, because you're -- this program  
18 doesn't develop numbers for the probability of failure.

19 It develops an understanding of why valves do fail  
20 under excessive flow or differential pressure. But that  
21 doesn't give you a probability number.

22 MR. HANSON: Now, we didn't, I guess, didn't  
23 estimate then the probability of failure of the valve  
24 itself.

25 MR. MICHELSON: Well, how do you do a PRA without

1 including that number?

2 MR. HANSON: Well, we do look at the probability  
3 the operator would close that valve. I don't really --

4 MR. MICHELSON: Well, that's the operator action,  
5 I will assume a probability of one that he did what he was  
6 supposed to. Now what's the probability the valve will  
7 close after having been instructed to close.

8 MR. GALYEAN: This is Bill Galyean. The short  
9 answer to your question is we didn't adjust the probability.

10 MR. MICHELSON: So when I'm looking at your --

11 MR. GALYEAN: It was a two step process. Okay?  
12 First, we checked to see if the valve operator was strong  
13 enough to operate under the delta P that it's experienced.

14 MR. MICHELSON: Um-hum.

15 MR. GALYEAN: And if it was strong enough to  
16 operate under that delta P, then we just used regular  
17 generic failure rate probability

18 MR. MICHELSON: In summary, since it was strong  
19 enough that it would behave just as well this day as any  
20 other day?

21 MR. GALYEAN: Right.

22 MR. MICHELSON: Which is not very good assumption  
23 since you know the friction factors have increased  
24 significantly. Now, maybe the motor is big enough, but  
25 maybe your friction factor estimate's not too good either.

1       Particularly if it's starting to get in severe galling, and  
2       the friction kind of goes out the window.

3               So, your probability clearly -- your probability  
4       of success clearly decreases. How much, I don't know. I  
5       was trying to find out if you knew, or how you even  
6       approached the question.

7               And the answer is, well, as long as the motor is  
8       big enough I'll assume it works just as good as if they were  
9       unloaded.

10              MR. GALYEAN: Okay.

11              MR. HANSON: The first step in our process here  
12       was to assess the potential for ISLOCA and that we did this  
13       by obtaining such information as P&IDs, procedures, and used  
14       these then to help us develop some preliminary eventiaries  
15       prior to gathering detailed information.

16              In the next step we gathered, we used these  
17       peliminary eventiaries to help us gather the information and  
18       we accomplished by an extended visit to the plant as part of  
19       the inspection team itself.

20              Information then was used to develop this --  
21       detailed information was used then to develop detailed  
22       eventiaries which included all the plant specific data that  
23       we had obtained.

24              The information then was used in two areas, and  
25       these two areas contain some probably some fairly unique

1 approaches and will be discussed in more detail in  
2 subsequent presentations.

3 We estimated the rupture potential for the plants,  
4 for the hardware that's involved in the plants, and also  
5 performed human reliability analysis and included in this  
6 errors of commission.

7 This information then all fed into the  
8 quantification of eventiaries which led, then, to  
9 consequence evaluations and, finally, a performance of  
10 sensitivity analysis to examine areas where additional  
11 insights, we felt, would be important.

12 Now that you have a kind of a general picture of  
13 the steps in the process, let me go back and talk --

14 MR. MICHELSON: Well, before you leave the general  
15 picture. If an ISLOCA worked or occurred, it's going to  
16 expose the area of the plant in the vicinity of the LOCA to  
17 a very harsh environment. And, depending on how quickly  
18 you get the valve closed and so forth, that will determine  
19 how harsh the environment is.

20 How did you determine the degree of harshness to  
21 the environment and whether or not the equipment would even  
22 be qualified to -- it needs to function -- would even be  
23 qualified to function under the conditions existing in the  
24 plant at the time.

25 Did you do that at all, or did you just assume it

1 was okay.

2 MR. HANSON: Well, we walked down the systems that  
3 had the potential to fail and looked at the redundancy and  
4 separation of the systems.

5 MR. MICHELSON: Well, the first thing you had to  
6 do, I think is to determine what the environment was that  
7 you would have to withstand so that when we did our walk  
8 down, you can make a judgment as to whether the equipment  
9 would even handle it or not.

10 Also, how far does the environment? Depending on  
11 how quickly it closes the valves in, environment may spread  
12 throughout the building.

13 MR. GALYEAN: What we did when we walked through  
14 the plant we looked at the areas where the ruptures were  
15 likely to occur. Then we said everything in that room, that  
16 area, would fail. We assumed that equipment is not  
17 qualified for 600 degrees fahrenheit that would result from  
18 the RCS. So, we just assumed everything in that room would  
19 fail.

20 It turns out that there is good separation of  
21 parallel of trains and there are redundant systems.

22 MR. MICHELSON: By good, do you mean the  
23 environment of this LOCA does not ever get into the same --

24 MR. GALYEAN: Well, I'm not going to say that. At  
25 the plant we looked at, everything with strong concrete

1 walls --

2 MR. MICHELSON: Well, what --

3 MR. GALYEAN: However, the doors, most of the  
4 doors are security doors and not water-tight doors. So --

5 MR. MICHELSON: They'll withstand the  
6 pressurization that you're going to get.

7 First of all, unless you can tell me you've made a  
8 determination of this environment, it's very difficult for  
9 me to believe what these barriers will have to withstand.  
10 And, if you haven't done your first piece of work, how can  
11 you make these judgments about the validity of barriers.

12 If you could tell me, yes, I've determined the  
13 environment and it's so many pounds pressure in that area,  
14 and so much temperature, so much water content, so many  
15 inches on the floor or whatever, if you've done that, fine.  
16 Then I could look at that and I can say, yeah, that should  
17 be okay. But, if you haven't done that, how can you make  
18 all these other determinations.

19 MR. GALYEAN: Well, we just took the expedient  
20 approach and just said everything failed in that area.

21 MR. MICHELSON: But that isn't the question. The  
22 question is how far does the environment go so I know how  
23 big the area is. And the area is more than this room and  
24 maybe the hallway out there, and maybe the next room,  
25 depending on how big the break is and how long it takes you

1 to isolate it. It may be the whole basement of the  
2 building, depending on what your analysis shows the  
3 environment to be. But if you haven't done the  
4 environmental analysis, how can you do all this other  
5 analysis?

6 MR. GALYEAN: Well, there's obviously an  
7 uncertainty. For example, how big is the leak, how long  
8 does it go on before it's detected and isolated. We're just  
9 compounding --

10 MR. MICHELSON: But that's a part of your PRA,  
11 isn't it?

12 MR. GALYEAN: Well, we do what we think is most  
13 prudent within the constraints that we have, obviously. And  
14 this is the approach we took.

15 MR. MICHELSON: I find it to be rather -- the  
16 staff apparently accepts this as an acceptable approach and  
17 has all the good answers as to why you don't need to  
18 determine what the environment is in order to determine  
19 things are all right.

20 MR. O'BRIEN: May I make a statement?

21 MR. MICHELSON: Certainly, anybody who can answer  
22 will be quite welcomed.

23 MR. O'BRIEN: The equipment that we're thinking  
24 about is inside the containment.

25 MR. MICHELSON: Well, outside of containment, now.

1 I'm not going to talk about inside the containment. I'm not  
2 even worried about inside the containment from this  
3 viewpoint. Only outside a containment.

4 MR. O'BRIEN: Oh.

5 MR. MICHELSON: No, I have no problem. I wouldn't  
6 want to raise it inside, because I don't think it's valid  
7 there.

8 MR. WILKINS: Carl, it seems to me --

9 MR. MICHELSON: Sure.

10 MR. WILKINS: Let me try to see if I can sharpen  
11 up this question. Because I'm not sure that they understand  
12 what you're driving at. I've heard you ask this question  
13 before.

14 MR. MICHELSON: Well, it's been asked so many  
15 times --

16 MR. WILKINS: So many times.

17 You know, you've got this thing in a room. It's  
18 all very well to say that we'll just forget about all the  
19 equipment in that room. But how do you know that you can  
20 confine the effects to that room, if you don't know that the  
21 pressure is below the pressure that it would take to break  
22 the barrier between that room and the next room, or between  
23 that room and the hallway?

24 MR. MICHELSON: A pound per square inch might be  
25 all it takes for doors like that to open the doors which are



1 normally doors.

2 MR. O'BRIEN: Our attempt again. For outside a  
3 containment it's true that we don't have assurance that the  
4 environment will spread to adjoining rooms --

5 MR. MICHELSON: Or will not spread.

6 MR. O'BRIEN: However, if there is any piping in  
7 adjoining rooms, they're normally postulated to rupture, and  
8 there would be some kind of protection against the  
9 environment.

10 I would also venture a plant, that if it's outside  
11 the containment, the building leaks. It's very hard to  
12 build up a substantial environment in adjoining areas  
13 because you will get leakage of the environment outside.  
14 Even in the steam tunnel, for instance, we have blow out  
15 panels to limit the pressure.

16 So, I don't feel -- I understand your concern, but  
17 I don't think it's a major concern, although we have not  
18 qualified it. But you have to understand the expense  
19 involved in qualifying that

20 MR. MICHELSON: I don't know that money has  
21 anything to do with safety. If there's a safety issue, you  
22 have to address it. If it costs more to do it you spend the  
23 money.

24 If it's an important enough safety issue, and  
25 that's what you have to determine. You have to make a

1 judgment. There has to be more than just talk off the top  
2 of the head. There has to be some calculation, some  
3 estimation of the pressure and the temperature in the room  
4 and so forth.

5 Then a judgment might be made as to whether the  
6 rooms, the doors -- the ventilation penetration's usually  
7 the one that gets you. The darn ventilation system will  
8 just transmit the steam to the next room anyway because it's  
9 on a common ventilation system, even though the door is  
10 good.

11 So you have to do some of this. First of all,  
12 though, you have to understand what environment we're going  
13 to expose equipment to. Then we determine how far that  
14 environment can extend. There may be an inverter right  
15 outside the door that can't stand water droplets, or can't  
16 stand over 150 degrees in the room, or whatever. And those  
17 conditions might easily be reached.

18 Now, if you do your analysis for the adjacent  
19 room, that's fine. But when you did that analysis did you  
20 assume that whatever happened there came back into the first  
21 room? You do -- unfortunately, you do these analyses a room  
22 at a time and you don't look to see how far the environment  
23 goes, and you just write off what's in the room. You can't.

24 You've got to write off whatever the zone of  
25 influence of the environment is, you've got to look at all

1 the equipment in that zone. And if you want to write it off  
2 as a simplistic approach, that's fine. But you've got to  
3 know the zone. And the zone is not the room in which the  
4 equipment is located necessarily.

5 MR. HOUSE: Well, we appreciate the comment. But  
6 this was really a judgment call, and we had to bound the  
7 analysis somewhere to live within the funding we had, and we  
8 did the best thing we could under the circumstances.

9 MR. MICHELSON: Now, the problem of bounding it  
10 even within the room gets into the next question. Is it a  
11 correct assumption just to assume all the equipment quits?  
12 Is that considered conservative? The answer may be no.

13 It may be worse when the equipment is exposed to  
14 the degraded environment and it misbehaves. It creates  
15 unwanted actions that you have to consider.

16 And this happens when you read LERs, a water  
17 system leaks through the floor and it gets to the equipment  
18 you hadn't even dreamed of here.

19 MR. HOUSE: Again, if we had world enough and  
20 time, you know, we could --

21 MR. MICHELSON: I'm not going to raise that issue  
22 other than to point out we aren't necessarily being  
23 conservative even in assuming the loss of equipment in the  
24 room.

25 Clearly, we're not conservative in not looking at

1 the environment if it extends beyond the room. We're quite  
2 non-conservative.

3 MR. SULLIVAN: Do I understand it correctly that  
4 you did not do a flooding common cause analysis? Is that  
5 what we're talking about?

6 MR. GALYEAN: That's correct.

7 MR. HOUSE: Yes.

8 MR. CATTON: If you have a line break in a small  
9 room and the type pressure, the high temperature, that can  
10 create chaos in the room you're in, as well as in the  
11 adjacent rooms. You can't ignore that.

12 All you have to do is visit the HDR containment in  
13 Germany. It does all sorts of neat things to adjacent  
14 rooms.

15 MR. O'BRIEN: That's inside the containment,  
16 though.

17 MR. CATTON: I'm talking about a room. If you  
18 have a break in one of the small rooms with equipment  
19 outside of the containment and it's got a door and it's got  
20 an adjacent room, the flow of steam and water and all that  
21 kind of stuff through those doorways just shreds things.

22 MR. MICHELSON: In fact, that's the only way you  
23 keep from blowing the walls out, is you blow the doors or  
24 the ventilation system out first. This relieves the  
25 pressure, but that relief thing goes into other parts of the

1 building unless you've provided relief panels that always  
2 assure it goes outside to the outside right away. Some  
3 people have done that for certain rooms.

4 MR. CATTON: And you have the calculational tools  
5 to address this.

6 MR. O'BRIEN: I guess the judgment call is that  
7 there would probably be piping in adjoining rooms and that  
8 those pipes are postulated to rupture. And the environment  
9 for equipment in adjoining rooms is more likely to be  
10 controlled, is governed by the ruptures in that room rather  
11 than in a room where the ISLOCA is going on.

12 However, the ISLOCA presents a more serious  
13 environment. But it has to spread, and it may spread to  
14 several rooms, each of which is venting.

15 I am familiar with the tests that were done at  
16 HDR.

17 MR. CATTON: The point I'm trying to make is that  
18 it doesn't necessarily have to be a judgment call. You  
19 could have used one of the codes that you guys have spent  
20 years creating to calculate it, and they're not expensive  
21 codes to run.

22 MR. O'BRIEN: Right.

23 MR. MICHELSON: But I do -- maybe you missed my  
24 point. I'm sure you didn't.

25 Never the less, I'd like to repeat. You did the

1 analysis one room at a time, and yes, you did the analysis  
2 in the next room, but when you did that analysis you didn't  
3 assume that this room had any environmental effects.

4 If you'd done the two together then you would have  
5 had the answer that you need. Maybe it's okay and maybe  
6 it's not. But you looked at one area at the time and if  
7 these could be well confined environmental areas so you're  
8 sure the environment didn't spread beyond that area, then  
9 it's a good analysis.

10 In these older plants it's not eas" to do. And in  
11 newer plants, even, we're still fussing about how good the  
12 barriers are between the areas that might have an adverse  
13 environment.

14 [Slide.]

15 MR. HANSON: The first step in our process, as I  
16 indicated, was to obtain plant-specific information, such as  
17 hardware descriptions, P&IDs, schematic drawings, operating  
18 procedures, emergency procedures that pertained to LOCAs and  
19 ISLOCAs, and then to use this information to help identify  
20 the systems that interface with the RCS that have components  
21 that could fail under high RCS pressure conditions.

22 You asked a specific question earlier about the  
23 piping between the check valves. We didn't consider that  
24 piping to fail, because it's rated at the RCS system  
25 pressure. We looked at the low-pressure systems in

1 particular.

2 We then determined the maximum interfacing system  
3 break size that would not result in what we judged to be  
4 core damage, and we screened the systems based on this break  
5 size.

6 We looked at the makeup systems, the rate which  
7 they could make up the amount of water available, and these  
8 sorts of things, to determine this break size. Breaks below  
9 that size, then, weren't considered in the analysis; and  
10 breaks above that size were considered as being potential  
11 risks for ISLOCA.

12 We then developed preliminary event trees for the  
13 ISLOCA, based on the initiators and sequences, in  
14 preparation for gathering more extensive plant information.

15 [Slide.]

16 MR. HANSON: The types of information that were  
17 gathered then, were gathered in our case in a plant visit as  
18 part of an inspection team, and we used the event trees to  
19 help us understand what things to look at in the procedures,  
20 what types of hardware to look at. And we specifically  
21 talked to those people who would be involved in the  
22 operations that looked like they have a potential to cause  
23 an ISLOCA, and also to look at the training that those  
24 people were given. And that would be both the  
25 procedures and in maintenance and testing.

1           We also gathered information on factors that could  
2 influence the performance of the people, for either  
3 detection, prevention, or mitigation, and looked for such  
4 things as workload, stress loads, environmental conditions  
5 that might be detrimental, and the general practices.

6           MR. CATTON: Under the last bullet, did you look  
7 at what the symptoms are that the operator is supposed to  
8 react to and whether or not the symptoms were indeed of the  
9 ISLOCA or were represented properly to the operator, whoever  
10 had to make a decision?

11           MR. HANSON: What we did there was, we looked at  
12 the procedures to see how the procedures would address the  
13 symptoms and whether they might lead you to understand that  
14 you had a break outside of your containment and needed to do  
15 some things differently than you would under normal LOCA  
16 conditions where the break was inside the containment.

17           MR. CATTON: Do you have to look to see whether or  
18 not the symptoms --

19           MR. HANSON: Yes.

20           MR. CATTON: -- that he finds properly represent  
21 what's going on? Was that done?

22           MR. HANSON: I don't know that we looked at  
23 symptoms specifically.

24           MR. GALYEAN: Well, we looked at the indications  
25 that would be available to the operators.



1 MR. HANSON: Right.

2 MR. GALYEAN: We looked at which alarms, and which  
3 indicators and which instrumentation would be available in  
4 the control room for the operator to refer to.

5 MR. CATTON: Okay. And did you ascertain whether  
6 or not the symptoms available to the operator were reliable,  
7 that there was no opportunity for him to interpret it in  
8 another way?

9 MR. HANSON: I think in the human reliability  
10 analysis, we --

11 MR. CATTON: My recollection is, in the early  
12 1980s, when the French decided to go to symptom-based  
13 procedures, this is one of the things they did. And they  
14 came to the conclusion that there was more instrumentation  
15 that was needed in order for the symptom-based procedures to  
16 do what they were supposed to do. As near as I can tell,  
17 that's never been done in this country, yet we have gone to  
18 the symptom-based procedures. The ISLOCA is a... of a step  
19 removed from what we usually think about, a symptom of  
20 something going wrong on the reactor itself.

21 I think you need to do that.

22 MR. HANSON: Okay. We did not look at the  
23 symptoms specifically. We did look at how you might detect  
24 the symptoms and look at how they interfaced in the  
25 procedures.

1 MR. SULLIVAN: Duane, I think you indicated that  
2 there is a problem in the procedures.

3 MR. HANSON: We believe, in the case of the B&W  
4 plant, that it would not adequately lead you to detection of  
5 your ISLOCA, at least in a very rapid manner.

6 MR. SULLIVAN: So the answer to Ivan's question  
7 is, there is a problem.

8 MR. HANSON: In the case of one particular plant.  
9 Yes.

10 MR. MICHELSON: Well, how severe the environment  
11 is is going to be determined by how long it takes you to  
12 find out where the ISLOCA is and get it isolated, so there  
13 is another uncertainty in even predicting the environment to  
14 begin with.

15 MR. HANSON: That's correct.

16 MR. MICHELSON: How long does it take until you  
17 figure out what to do? And we're not sure the  
18 instrumentation is too good, or some of it.

19 MR. KERR: In your evaluation of operator  
20 performance, did you determine whether one had roughly the  
21 same staff that was available in the earlier Davis-Besse  
22 incident?

23 MR. HANSON: The numbers of people; is that what  
24 you're speaking about?

25 MR. KERR: Well, the numbers or the same people.

1 I asked, because it seems to me that that group was rather  
2 ingenious in putting together a method for cooling the core  
3 under unusual circumstances, and I got the impression in  
4 reading this report that you felt that the staff that was  
5 there might not be very ingenious.

6 MR. HANSON: I'm not sure I would characterize it  
7 that way. I think we gave quite a bit of credit in the  
8 recovery for the plan for ingenious actions.

9 MR. KERR: Okay.

10 MR. MICHELSON: When you decided what they could  
11 do, did you take into account the environment existing where  
12 they might have to do their thing?

13 MR. HANSON: Yes.

14 MR. MICHELSON: Because clearly it's outside the  
15 control room.

16 MR. HANSON: That's right.

17 MR. MICHELSON: And how did you do that if you  
18 didn't calculate the environment from the ISLOCA? How did  
19 you determine people could get to where they needed to go  
20 and so forth?

21 MR. HANSON: In general, we didn't rely on people  
22 getting into areas in the aux. building that were anywhere  
23 near where the postulated rupture would be.

24 MR. MICHELSON: Yes, but how far the environment  
25 has spread from the point of origination I don't know, and

1 you, I don't think, know either. So how can you predict  
2 what parts the operators can get to?

3 Now, if it's clearly outside the aux. building,  
4 sure, there's rational reasons to believe that's fine. But  
5 once you enter the aux. building for an event occurring in  
6 the aux. building, unless you understand that event and know  
7 how long it took to isolate it, and so forth, I don't know  
8 how you can predict what operator actions you could perform.

9 MR. HANSON: As I recall, we didn't rely on the  
10 operator to take manual actions in the auxiliary building to  
11 isolate any of the ruptures.

12 MR. MICHELSON: That would be a conservative but  
13 correct way to do it, if you don't do the calculations of  
14 the environment.

15 MR. CATTON: Is this the incident where the  
16 operator really had to extend himself to get it done?

17 MR. HANSON: Extend himself in terms of --

18 MR. CATTON: Well, he got something done that was  
19 near impossible, and he really had to hustle.

20 MR. HANSON: I don't believe that was the case.  
21 We found there was quite a bit of time available, and in  
22 fact that's why we gave a lot of credit for recovery, is  
23 because there was a lot of time available for the operator  
24 to take action.

25 MR. CATTON: I must, I'm thinking about another

1 incident.

2 I don't remember, but apparently there was an  
3 incident where the operator really had to hustle from one  
4 place to another.

5 MR. MICHELSON: He knew, he had instrumentation to  
6 tell him what had happened. In this case, I don't know that  
7 he even knows what's happened.

8 MR. CATTON: Didn't he violate the procedures  
9 somehow when he did that?

10 VOICE FROM THE FLOOR: Yes, he did.

11 MR. WILKINS: He probably ran through some doors  
12 that he was not supposed to.

13 MR. CATTON: That's what I thought that he did,  
14 and that he no longer works for the utility.

15 [Slide.]

16 MR. HANSON: We then combined the hardware faults  
17 and the human errors to look at the sequences, and we  
18 examined sequences that were not only involved in the normal  
19 power operating mode, but also in startup and shutdown, and  
20 in fact, in the case of one particular plant, it was in the  
21 startup and shutdown that it appeared that there was the  
22 potential for the increased human error in causing an  
23 LSLOCA.

24 We then developed event trees, detailed event  
25 trees, based on three possible phases: an initiation phase,

1 where the breach would occur as a result of isolation  
2 boundary failures; and second then was events that would  
3 determine the rupture probability and location size, and  
4 this would be addressed in detail in step four, and in  
5 subsequent presentation; and then events that would involve  
6 detection and diagnosis and mitigation. And these events,  
7 of course, are related both to the human factors and to the  
8 capability, for instance, for valves to be able to close and  
9 isolate.

10 We then estimated the event thermal-hydraulic  
11 timing. These were quite simple calculations.

12 To be quite frank with you, Dr. Catton, I'm not  
13 sure what RELAP5/MOD2.5, whatever else it was --

14 MR. CATTON: Slash V3d3.

15 MR. HANSON: Yes. The calculation were really  
16 done in two different parts. The B&W plant was evaluated  
17 with MOD2.5 in the fairly simplified calculations that were  
18 made. The later plant, the Westinghouse plant, we used  
19 RELAP5/MOD3. The particular V3 whatever it is I don't think  
20 anybody here could answer that.

21 MR. CATTON: So in essence, what you did is some  
22 calculations with an undocumented code?

23 MR. HANSON: Well, in the case of MOD2.5, that was  
24 done when the MOD3 was being developed. So there was not a  
25 MOD3 available at that time.

1 MR. SULLIVAN: Ivan, that's close enough.

2 MR. CATTON: What?

3 MR. SULLIVAN: He's close enough.

4 MR. CATTON: You think so?

5 [Slide.]

6 MR. HANSON: Moving on, then. I don't want to  
7 spend very much time on this slide, because, as I indicated,  
8 there will be quite a bit more detail given in subsequent  
9 presentations, since this is a fairly unique feature.

10 To estimate the rupture potential, we relied on  
11 some work done by IMPEL to give us the median failure  
12 pressures and some distributions for the hardware.

13 We estimated the pressure drops in the lines in  
14 which the ISLOCA would occur, and there are pressure drops  
15 here because there are relief valves which open in these  
16 lines. They are not adequate to provide complete pressure  
17 protection, but they do cause significant pressure drops in  
18 the lines themselves.

19 We developed event trees. And these event trees  
20 are more along the lines of the NUREG 1150 event trees where  
21 we used a particular code that they had developed, to  
22 analyze them in a kind of a question and answer format, and  
23 then estimated the relative frequencies in a Monte Carlo  
24 approach of failure.

25 MR. KERR: Why did you use a log-normal

1 distribution for the failure probability of each piece of  
2 equipment, as the report indicates?

3 MR. HANSON: Do you want to address that, Bill?

4 MR. GALYEAN: Well, what we used was a log-normal  
5 distribution for the pressure capacity of each piece of  
6 equipment. And that's supported two ways.

7 One is that apparently material properties have  
8 been shown to be log-normal distributed random variables.  
9 And also, the pressure capacity turns out to be a function  
10 and a combination of products and quotients of a number of  
11 factors, which then also leads to a log-normal distribution.

12 Does that answer your question?

13 MR. KERR: Well, it's sort of the answer I  
14 expected to get, which is that you don't have data for this;  
15 it was just an assumption based on the fact that a log-  
16 normal distribution is easy to use.

17 MR. GALYEAN: Well, there is some support, at  
18 least analytical support, for the assumption. But, yes,  
19 it's basically an assumption.

20 MR. CATTON: Nothing wrong with that.

21 MR. KERR: Well, it may warp things in one  
22 direction or another if it isn't a correct assumption. I  
23 was just curious.

24 MR. O'BRIEN: John O'Brien from Research.

25 The limited data we have does suggest that the



1 log-normal distribution is adequate. Moreover, if you get  
2 into PRA space, virtually everybody uses log-normal  
3 distributions for capacities.

4 We have a long historical precedent. If you  
5 challenge that, you challenge PRA in general. And there is  
6 data to support it.

7 [Laughter.]

8 MR. WILKINS: I'm not sure that's a very cogent  
9 argument.

10 MR. MICHELSON: John, does that argument pertain  
11 to tubing and so forth, or just to ASME-class piping?

12 MR. O'BRIEN: Mostly it depends on piping.

13 MR. MICHELSON: Because tubing, you know, methods  
14 of determining wall thickness and everything, it's a whole  
15 different game. In fact, some of it is indeterminate, by  
16 the code, because it's a part of the supporting auxiliaries  
17 like the seal system on the pump and so forth.

18 How do I know, you know, where the rupture will be  
19 and so forth, unless you've analyzed each of these systems?  
20 I know you've analyzed the big piping, and that's how you  
21 drew some of your conclusions. But how about the small  
22 stuff? The instruments attached to the system, the tubing  
23 that takes the fluid and runs it through the seals and so  
24 forth, is all pressurized to whatever the suction of the  
25 system or the discharge is, depending on the pump.

1 MR. HANSON: When we looked at the minimum size  
2 break, it screamed out, the tubing.

3 MR. MICHELSON: In other words, you're not worried  
4 about one-inch tubing ruptures, you're only worried about  
5 bigger pipe breaks?

6 MR. HANSON: That's correct. We've found that,  
7 for instance, on a one-inch break, that there's adequate  
8 inventory in the BWST and adequate makeup to the BWST that  
9 you could extend the scenario --

10 MR. MICHELSON: I wouldn't worry about enough  
11 water around. I'd just worry about what it does to the room  
12 that it's flowing into and what it does to our safe shutdown  
13 capability. In other words, the environment that it  
14 creates, if you can show me a one-inch pipe doesn't create  
15 an adverse environment, then that's a good answer. Whether  
16 you have enough water to make up what it's doing is not a  
17 good answer, because that's not really the concern. The  
18 concern is what it's doing to equipment required for safe  
19 shutdown.

20 So you do, though, cut off at some certain size  
21 and have made some kind of a determination that those are  
22 not adverse environments from the viewpoint of the  
23 equipment; is that the way you do it?

24 MR. HANSON: We didn't, in the determination of  
25 the size, we did not look particularly at the effect on the

1 environment.

2 MR. GALYEAN: I think in most of these rooms,  
3 there are room sumps with sump pumps, which can pump  
4 approximately 150 gallons a minute total.

5 MR. MICHELSON: I wouldn't argue the one-inch  
6 system. I just was trying to figure out where your cutoff  
7 was.

8 MR. GALYEAN: On that basis, on the basis that the  
9 room sumps and sump pumps can handle these small leaks, we  
10 judge that --

11 MR. MICHELSON: How big is a leak from a seal on  
12 one of those pumps that you would have to contend with?

13 MR. GALYEAN: Well, basically, the criteria we  
14 used was if it was less than 200 GPM.

15 MR. MICHELSON: Maybe that's not an unreasonable  
16 number.

17 Now, you've determined, though, that a 200-GPM  
18 release of hot water, in fact reactor water is what we're  
19 talking about, at full temperature, and the source is at  
20 full pressure, that leak -- 200 gallons is all? Boy, that's  
21 not a very big leak being driven by 2,000 pounds pressure.  
22 I think a seal would give out bigger than that.

23 MR. GALYEAN: You have considerable --

24 MR. MICHELSON: These are not reactor coolant pump  
25 seals now by any means.

1 MR. GALYEAN: Right.

2 MR. MICHELSON: These are much, much less exotic  
3 seals. These are not designed for high pressure at all;  
4 these are 100-pound seals if it's 100-pound suction on the  
5 particular pump. And you're talking about putting 2,000  
6 pounds on it. You're talking about a catastrophic blowout  
7 of this seal, and I just wonder, how big is that? Do you  
8 have some feel for it?

9 MR. GALYEAN: First of all, the analysis that  
10 IMPEL has done predicts that the seals will not fail  
11 catastrophically.

12 MR. MICHELSON: Even with 2,000 pounds?

13 MR. GALYEAN: That's right.

14 MR. MICHELSON: What pressure-rated seal did they  
15 look at?

16 MR. GALYEAN: They looked at the pumps. They  
17 looked at the high-pressure injection pumps, then the low-  
18 pressure injection pumps.

19 MR. MICHELSON: I was thinking more of things like  
20 RHR pumps.

21 MR. GALYEAN: Well, that's low-pressure; for this  
22 particular plant, low-pressure and RHR are the same.

23 MR. MICHELSON: And air-suction is how high a  
24 pressure?

25 MR. GALYEAN: 300.

1 MR. MICHELSON: 300 pounds suction size?

2 MR. GALYEAN: Right.

3 MR. MICHELSON: So the seals are rated at least  
4 300 and presumably a little more. So a 300-pound seal gives  
5 how much flow with 2,000 pounds?

6 MR. GALYEAN: Well, I have to -- IMPEL's work has  
7 been published in a separate report. I don't have that --

8 MR. MICHELSON: Did they name a number, or do they  
9 just say it's a non-problem?

10 MR. GALYEAN: They name a number.

11 MR. MICHELSON: Okay. You don't recall what the  
12 number would be?

13 MR. GALYEAN: No, I don't recall what the number  
14 is.

15 MR. MICHELSON: That is really steaming up the  
16 room in a hurry, even 200 GPM, with that hot a water.

17 MR. SULLIVAN: Duane, how did you determine the  
18 time cutoff?

19 MR. HANSON: The time -- tell me what you mean by  
20 the time cutoff.

21 MR. SULLIVAN: If you assume that there is 200  
22 GPM, eventually you run out of water, right? So there has  
23 to be a time.

24 MR. HANSON: No. In fact, you don't, you would  
25 run, take an extremely long time to run out of water,

1 because of the size of the BWST and the capability to make  
2 up to the BWST. So they were approximately the same, the  
3 200-GPM leakage and the makeup. I think the makeup to the  
4 BWST is like 150 GPM and there's on the order of 450,000  
5 gallons of water in the BWST.

6 MR. SULLIVAN: But wasn't there a time cutoff in  
7 there that you said if you got past this time, you had  
8 enough time to correct the action?

9 MR. HANSON: I don't remember us giving the time  
10 cutoff.

11 MR. GALYEAN: Not explicitly.

12 MR. HANSON: No.

13 MR. GALYEAN: We assumed that it was on the order  
14 of days or weeks, that it was not a concern.

15 MR. MICHELSON: You mean 200 gallons a minute for  
16 weeks, into the reactor, into the auxiliary building? Is  
17 that what you're saying?

18 MR. GALYEAN: Right. Right.

19 MR. MICHELSON: And that was a non-problem for the  
20 redundant equipment needed to cool the core?

21 MR. GALYEAN: We assumed that, on the analysis  
22 that we did, we assumed that the break would be isolated  
23 long before that.

24 MR. MICHELSON: Oh. Wasn't that the question, how  
25 long before you isolate, stop this thing?

1 MR. GALYEAN: Right.

2 MR. MICHELSON: And what was the estimation of the  
3 isolation time?

4 MR. GALYEAN: For the high-pressure make-up  
5 sequences, it was four hours, and for the low-pressure DHR  
6 sequences, it was eight hours.

7 MR. MICHELSON: So, at the 400 gpm, 8-hour full,  
8 it was still a non-problem for the auxiliary building.

9 MR. GALYEAN: Two hundred gpm flow with a net --  
10 with 150 gpm discharge due to the sump pumps. So, it's a  
11 net --

12 MR. MICHELSON: Sump pumps aren't taking much of  
13 this. You know what happens when you flash 2,000 pounds of  
14 water at 560-80 degrees. You don't worry about the sump  
15 pumps.

16 MR. GALYEAN: That's right.

17 MR. MICHELSON: You worry about the steam running  
18 through the building.

19 MR. GALYEAN: The area where the leak occurs -- as  
20 we said before, everything has failed.

21 MR. MICHELSON: Yes, I got that part. But now,  
22 that steam never got out of this room, apparently.

23 MR. GALYEAN: Well, that's the assumption we made.

24 MR. MICHELSON: In four hours?

25 MR. GALYEAN: Right.

1 MR. MICHELSON: At 200 gpm volumetric flow into  
2 the break.

3 MR. WILKINS: With leaky doors.

4 MR. MICHELSON: Yes, the leaky doors.

5 [Slide.]

6 MR. HANSON: Our next step, then, was to perform  
7 the human reliability analysis, and again, there will be a  
8 detailed presentation on this. I have just listed the steps  
9 here that will be reiterated by David Gertman, and there are  
10 some unique things that were done here, and in fact, as he  
11 discusses them, we'll talk about errors of commission, which  
12 were looked at in detail.

13 [Slide.]

14 MR. HANSON: Based on the rupture probabilities,  
15 then, the rupture information, the human reliability  
16 analysis, and data on the hardware, we used these inputs,  
17 then, to quantify the event trees, both in the sequence  
18 initiators, which could either be hardware or human error  
19 initiated.

20 The rupture probabilities, then, of course, came  
21 from the combination of the IMPEL and INEL analysis, and  
22 detection diagnosis, isolation, and mitigation from the HRA  
23 results from the capabilities of valves, for instance, to  
24 close under the ISLOCA condition and from the capabilities  
25 of systems to scrub the fission products, because in our



1 case, when we're talking about mitigation, we're talking  
2 about mitigation of fission product release, and at least,  
3 in one of the particular plants we looked at, we didn't find  
4 a high likelihood that there would be mitigation of fission  
5 products.

6 MR. MICHELSON: How does your analysis now take  
7 account of -- you have a finite probability you weren't able  
8 to isolate the break. That's what your valve capability is  
9 involved.

10 Then, assuming that you went down the branch where  
11 you were unable to isolate the break and then your  
12 calculation went on to a new conclusion, but the new  
13 conclusion still said that the break was still confined to  
14 the one room in which the break occurred, even though you  
15 were unable to isolate this?

16 MR. GALYEAN: No, I wouldn't say that. I would  
17 say nothing else really matters. Once you start in the  
18 realm of core damage and releasing fission products to the  
19 environment, it doesn't matter whether the equipment in the  
20 next room fails.

21 MR. MICHELSON: Let's assume for the moment that  
22 your tree went down to the seal failure, so 200 gpm, and you  
23 said I can take 200 gpm forever, or for many hours. The  
24 analysis, though, says that I will just keep releasing this  
25 magnitude, and it still said the environment was confined.

1 MR. GALYEAN: Well, we say that during that time  
2 that the control room operators will get their act together  
3 and isolate the break.

4 MR. MICHELSON: If they can.

5 MR. GALYEAN: That's right.

6 MR. MICHELSON: Presumably, what they tried to do  
7 was isolate, and that's the valve that didn't work. Is that  
8 right?

9 MR. GALYEAN: No. I guess I don't follow that.

10 MR. MICHELSON: Well, you don't always have many,  
11 many valves back to the source. You may only have one  
12 inside the containment, maybe two, and those are the only  
13 ones protected, really, from this adverse environment, to  
14 begin with.

15 MR. GALYEAN: That's right. We assume those  
16 valves --

17 MR. MICHELSON: There was a finite probability  
18 they didn't work.

19 MR. GALYEAN: That's right.

20 MR. MICHELSON: That's what valve capability was  
21 all about.

22 MR. GALYEAN: That's right. And if the valve  
23 doesn't work, then you're going down to core damage and  
24 release to the environment.

25 MR. MICHELSON: You mean your tree just took you

1 right down to core damage?

2 MR. GALYEAN: That's right.

3 MR. MICHELSON: Okay. It didn't try to understand  
4 further what you might do. Okay.

5 MR. CATTON: So, there is some question here as to  
6 what unreliability you use for those valves.

7 MR. GALYEAN: Typically, we use both a combination  
8 of human error -- you know, the operators not doing what  
9 they're supposed to do -- and also the hardware failure  
10 probability or the valve failing to close, and we combine  
11 those two, and that's the failure probability.

12 MR. CATTON: And you used, essentially, 1150  
13 numbers.

14 MR. HANSON: No. We didn't use 1150 numbers. We  
15 used primarily generic data from a number of different  
16 sources. We didn't really draw any information from 1150.  
17 We probably used a number of the same sources 1150 used,  
18 although we haven't checked that to see if that were the  
19 case or not.

20 MR. CATTON: I would be interested in knowing what  
21 that unreliability number that you used was.

22 MR. HANSON: Reliability number for the closure of  
23 valves?

24 MR. CATTON: Right.

25 MR. HANSON: A particular valve?

1 MR. CATTON: Any of several valves which were key  
2 in redirecting the event.

3 MR. MICHELSON: I think you did tell me, though,  
4 earlier, that you looked at each of those key valves and  
5 determined the motor operator was more than adequate or at  
6 least adequate.

7 MR. HANSON: In the case of one plant, that's  
8 true.

9 MR. MICHELSON: Well, in the case of the one that  
10 we're going to get our numbers on, is that the case?

11 MR. HANSON: That's right.

12 MR. MICHELSON: Okay. However, you assumed that  
13 if the motor was big enough, then there was no effect on the  
14 probability of closure.

15 MR. CATTON: We know that's not right.

16 MR. MICHELSON: And we know that's not right. We  
17 went through that a little while ago. But that's the  
18 approach they used, I gather.

19 MR. HANSON: Did you not apply failure  
20 probabilities to those valves?

21 MR. GALYEAN: Right. The failure probability was  
22 then just a random hardware failure problem.

23 MR. HANSON: Generic.

24 MR. MICHELSON: Generic.

25 MR. HANSON: We didn't enhance that because they

1 were under higher pressure.

2 MR. MICHELSON: It's probably 1 in 1,000  
3 probability of failure. It's traditionally the one used.

4 MR. GALYEAN: That's approximate.

5 MR. MICHELSON: Well, we know that's maybe off a  
6 magnitude or two under these circumstances.

7 MR. KERR: Well, it depends on how many of these  
8 failures occurred at full power and how many may have  
9 occurred at start-up or shut-down. That would influence the  
10 valve performance to some extent.

11 MR. HANSON: That's correct, and it would also  
12 depend on the size of the break, because if it were a large  
13 break, the system would be at low pressure, and therefore,  
14 you might have enhanced flows, but the pressure may be down  
15 substantially.

16 MR. KERR: Did you use a source term for immediate  
17 shutdown after operating at full power in all cases? I  
18 notice you use an adjusted source term from the Oconee PRA,  
19 but was it a full power source term for all cases?

20 MR. HANSON: Yes, it was. What we tried to do was  
21 to be prudent in our analysis here. We didn't develop a  
22 source term for individual plants but used source terms from  
23 similar plants and then scaled them based on power, and we  
24 did use a full power source term.

25 [Slide.]

1 MR. CATTON: The MACCS code is a new code, isn't  
2 it?

3 MR. HANSON: It's one that was used in NUREG-1150.  
4 If that's new, I guess it's new.

5 FROM THE FLOOR: The old code was CRAC.

6 MR. HANSON: Yes.

7 MR. CATTON: This replaced it, as I understand.

8 MR. HANSON: That's correct.

9 We used a -- normalized to a site. We didn't use  
10 a site for the particular plant. The way we normalized to  
11 our site was to first identify an average site based on the  
12 -- in the United States, based on the weather-weighted  
13 population density that was published in the Sandia Siting  
14 Study.

15 This average site was then compared to those sites  
16 that had existing MACCS models and, in particular, those  
17 that were available from NUREG-1150, and selected a site  
18 based on a match, the closest to the average population  
19 density that we determined previously. This site was the  
20 Surry site, and therefore, the numbers you'll see on  
21 consequences are for the Surry site.

22 MR. SULLIVAN: Did you adjust the net data?

23 MR. HANSON: No.

24 MR. SULLIVAN: So, what you're saying is the Surry  
25 net data is like Davis-Besse.

1 MR. HANSON: No. We're saying we normalized to an  
2 average site. We're not saying how the consequences would  
3 relate to the plant at its site.

4 MR. SULLIVAN: I wouldn't exactly call that Davis-  
5 Besse from then on then.

6 MR. HANSON: I don't believe we have.

7 MR. SULLIVAN: In the report, it says that you  
8 selected those plants in the very front of it.

9 MR. HANSON: We selected those plants. We  
10 selected different sites.

11 [Slide.]

12 MR. HANSON: Our final step, then, is our  
13 sensitivity studies, and we used those to help us better  
14 understand the effects of what we determined to be important  
15 parameters.

16 We looked at the types of studies that should be  
17 considered, for instance, to help us evaluate the  
18 sensitivities to parameters that might have uncertainties  
19 that are large, uncertainties, for instance, in rupture  
20 probability of a component or piping that was determined to  
21 be very important, we examined.

22 We looked at estimating change in core-damage  
23 frequency to potential changes in the plant hardware  
24 operations, examined potential changes that might be made to  
25 enhance or to improve risk and, also, alternative methods of

1 establishing probabilities.

2 So, we're using our sensitivity studies to help us  
3 examine important parameters.

4 Now, the sensitivity studies that we're going to  
5 be talking about with you today, there are some in the  
6 report you have. We have done others, and we'll be  
7 discussing some of those today.

8 Before I finish up, though, I'd like to talk to  
9 you about, or share with you, two important pieces of  
10 information that have come about; one of them, at least,  
11 which has come about since the report was issued.

12 [Slide.]

13 MR. HANSON: We have performed some additional  
14 analysis based on the comments that we received on this  
15 draft report which you have and have reviewed, and as a  
16 result of that, the results we'll be presenting today don't  
17 exactly reflect the results that are in that report, because  
18 we have done things to, we believe, improve the analysis, in  
19 several different areas.

20 We have looked at the thermal-hydraulic estimates  
21 for the large and small break timing, and I believe someone  
22 brought up the fact that, in some cases, the analysis is  
23 mentioned as being conservative in the report.

24 So, we looked at a better estimate, what we  
25 believe to be a better estimate of the timing for large and



1 small breaks, and in fact, the timing, in most cases, was  
2 about a factor of two larger.

3 We also performed some additional HRA analysis to  
4 incorporate reviewers' comments and, also, to reflect the  
5 differences in timing that we obtained from the less  
6 conservative thermal hydraulic results.

7 We looked at, also, modifying our quantification  
8 approach to allow performance of uncertainty analysis. The  
9 original codes that we had used to perform the analysis were  
10 based primarily -- or were not capable of doing the types of  
11 uncertainty analysis that needed to be done here, and  
12 therefore, we changed the code and had to modify some of our  
13 quantification then.

14 MR. KERR: Your first bullet could be interpreted  
15 to mean that you are still using conservative estimates but  
16 just less conservative.

17 MR. HANSON: If you look at what can occur -- take  
18 an example of a small break. If you look at what can occur  
19 during a small break, you could probably get a range of time  
20 from what we published in the report you had, which was  
21 about four hours, probably out to infinity, just depending  
22 on what the operator would do and what he could do.

23 So, we tried to make best-estimate assumptions,  
24 but it's hard to -- you know, it's very difficult to say  
25 exactly what the operator will do, and so, you have to make

1 assumptions on what he will do, and some people might  
2 interpret those assumptions to be conservative. We didn't.

3 MR. KERR: So, your assumptions are not  
4 deliberately conservative --

5 MR. HANSON: That's correct.

6 MR. KERR: -- although they might be interpreted  
7 by others as being deliberately conservative.

8 MR. HANSON: That's right. Yes.

9 MR. CATTON: Duane, in your report, Harold has  
10 pointed out to me where you refer to Davis-Besse risk. If  
11 you stuck that plant into a different kind of population,  
12 maybe you ought to reword that, wherever it occurs.

13 MR. HANSON: Okay.

14 MR. CATTON: And this is in your conclusions.

15 MR. BURDICK: Let me repeat: The names of the  
16 plants are going to disappear in the final. It's just not  
17 really the Davis-Besse plant. We have done a normalization  
18 to a "average" plant to get the risk.

19 MR. CATTON: I hear you, but I am learning that  
20 you have to be very careful about context.

21 MR. BURDICK: Certainly.

22 MR. HANSON: We agree with that.

23 MR. SULLIVAN: After this meeting, it is not going  
24 to be anything but publicly known.

25 MR. HANSON: We understand that.

1           MR. BURDICK: That's true, and we will try to deal  
2 with that. We are going to give the licensee, Davis-Besse,  
3 a copy of the report to examine the bases, but still, it is  
4 a hybrid analysis.

5           We will try to make that clear, and we're going to  
6 try to do that with all three of these analyses, and the  
7 reason is we don't have the money or the time to examine  
8 each one of these plants. We have to somehow try to get an  
9 assessment of the industry, and we're trying to do that by  
10 an average plant approach.

11           It's the one thing that -- again, the ACRS has  
12 recommended to the Commission that the staff try to do it.

13           MR. KERR: Mr. Hanson, on page 12 of the report,  
14 under sensitivity studies, there are two sentences.

15           "Each sensitivity case was performed on the models  
16 themselves, rather than through some type of estimation  
17 technique. This not only provides for an accurate estimate  
18 of the issue importance on risk and core damage frequency  
19 but also allows for an estimation of the importance of  
20 models and modeling assumptions."

21           What does that mean? I didn't understand what it  
22 meant.

23           MR. HANSON: Do you want to address that, Bill?

24           MR. GALYEAN: First of all, if you're familiar  
25 with what was done in 1150, they had a code. I think they

1 call it RISKUE or something. That basically took the  
2 results of a number of different analytical codes, put it  
3 together, and then they used that to perform a number of  
4 sensitivity studies, where they sort of empirically varied  
5 the results to see what kind of final result they got.

6 When we do a sensitivity study, we start at step  
7 one and propagate that difference through the entire  
8 analysis. That's what's meant by the first part.

9 For the second part, because we're using all of  
10 our codes and all of the methods that we use, we can make  
11 some changes in, for example, the -- in some of the  
12 parameters, simply for the sake of testing that particular  
13 model's effect on the final results. We can exercise the  
14 models themselves to see what effect that has on the final  
15 results.

16 MR. KERR: By exercising a model, does that mean  
17 you change the model somewhat?

18 MR. GALYEAN: We can make some different  
19 assumptions, for example, on how we assume a different  
20 probability distribution for a certain parameter. We can  
21 change that probability distribution and see what effect that  
22 has on the final results.

23 We can try different -- well, that's basically the  
24 intent.

25 MR. KERR: Thank you.

1 MR. CATTON: And you're operating under the  
2 assumption, if it's RELAP 5, that 2, 2.5, and 3 are close  
3 enough that you don't have to worry about differences. Is  
4 that right? Right now, 2.5 just really bothers me.

5 MR. KERR: That's because he grew up in an age in  
6 which there were Roman numerals.

7 MR. CATTON: If it's not too important, that's one  
8 thing, but if it turned out that the thermal hydraulics  
9 calculations play an important part, then what were the  
10 changes between 2 and 2.5 and why did it go to 3?

11 MR. HANSON: In fact, the thermal hydraulics  
12 calculations were quite simple, and there were two types  
13 done.

14 One was basically a six-volume model of the entire  
15 reactor coolant system, including the interfacing system  
16 LOCA piping, and this was only to help us get a rough idea  
17 of what the break flow would be.

18 The other type of models were some fairly detailed  
19 models of the low-pressure piping, but the only intent here  
20 was to look at the pressure drop in that piping. If there  
21 had been enough time and the people available, a person  
22 could do that type of a calculation by hand. We felt,  
23 because of the variations we needed to look at, that it  
24 would be quicker to do it with the RELAP 5 code.

25 So, the calculations with the code are fairly

1 simple, and if you got back and read the appendix on how we  
2 estimated timing, our estimates of timing were basically  
3 very close to hand calculations themselves. We just tried  
4 to match break flow and injection flow and look at how long  
5 it took to empty the BWST.

6 MR. CATTON: The only thing is that you make a  
7 point in the report of having used RELAP 5/Mod 2.5/Version  
8 3d3.

9 MR. HANSON: I understand what you're saying.

10 MR. CATTON: I think, in a month, nobody is going  
11 to know what the hell that is.

12 MR. HANSON: I agree. And we will clarify that.

13 MR. CATTON: I think you should clarify that.

14 MR. HANSON: We will.

15 MR. CATTON: Either take it out or do something.

16 MR. HANSON: Right. I agree.

17 [Slide.]

18 MR. HANSON: The last thing I'd like to do is just  
19 to point out some important considerations to look for in  
20 the following presentations.

21 There are some things that -- I don't want to  
22 present the results at this time, but let me ask you, as we  
23 go through, to look at the effect of human actions as  
24 initiators for an ISLOCA -- this includes errors of  
25 commission -- and also to look at the relative contribution

1 of human errors and hardware failures to ISLOCA, core-melt  
2 frequency, and risk, and I think what you're going to see  
3 here is a distinct difference between some plants

4 The first plant we'll be talking about the B&W  
5 plant, and it has some distribution of relative  
6 contribution, but when we look at the Westinghouse plant,  
7 you're going to see something quite different, and of  
8 course, the Westinghouse plant are preliminary results, but  
9 they are different.

10 MR. MICHELSON: When you talk about "hardware  
11 failures" in the second bullet, do you mean the failures of  
12 equipment that were adversely influenced by the environment  
13 or just the valves that were required to isolate the ISLOCA?

14 MR. HANSON: Primarily in the area of initiators,  
15 hardware that could fail to initiate an ISLOCA.

16 MR. MICHELSON: These are hardware initiators.

17 MR. HANSON: Yes, although there would be some in  
18 the mitigation, as well.

19 MR. MICHELSON: But not consequential failures.  
20 Was a valve failure during mitigation considered a hardware  
21 failure?

22 MR. HANSON: Yes, it would be.

23 MR. MICHELSON: But the devices in the room that  
24 were failed by the break were not considered hardware  
25 failures. Is that where you draw the line?

1 MR. GALYEAN: I guess I don't understand the  
2 point. I mean the equipment's failed, and in our analysis,  
3 we assumed the equipment's failed.

4 MR. MICHELSON: This second bullet talks about  
5 "hardware failures." My question is what hardware? Does  
6 that include the hardware in the room that was --

7 MR. GALYEAN: Yes.

8 MR. MICHELSON: -- that was destroyed? Okay. So,  
9 you -- okay. And you're saying that that is still a minor  
10 contributor, that the human factor was the major  
11 contributor.

12 MR. HANSON: Well, I don't think that -- the slide  
13 doesn't say that. What it says is you need to pay attention  
14 to the relative contribution of the two.

15 MR. MICHELSON: Yes. Yes, you certainly do.

16 MR. CATTON: Your Executive Summary said that.

17 MR. KERR: On page 37 of the report, under human  
18 reliability analysis, I find the following sentences:

19 "It's also important to recognize that the total  
20 ISLOCA risk is not only from any single event, such as the  
21 early entry into DHR shutdown cooling procedure identified  
22 in this report. Rather, the identified risk is a  
23 significant example of an error of commission resulting in  
24 ISLOCA but not necessarily the only error of commission  
25 which could lead to similar events at other commercial



1 plants."

2 Then the sentence, "It is believed that this  
3 cognitive error is the most risk significant error." What  
4 "cognitive error"? There must be a sentence left out of the  
5 paragraph or something.

6 MR. HANSON: I think the Human Factors people are  
7 considering this error of commission to be an error of  
8 cognition.

9 MR. KERR: You mean all errors of commission are  
10 cognitive?

11 MR. HANSON: No, I don't believe so. The  
12 particular one we're talking about here turned out to be  
13 that type.

14 FROM THE FLOOR: What is the particular one you're  
15 talking about?

16 MR. HANSON: Early entry into the DHR shutdown.  
17 The sentence isn't clear.

18 MR. BURDICK: There is a little pronoun reference  
19 problem there. We can clear that up.

20 MR. KERR: Okay.

21 MR. BURDICK: This is going to be covered in  
22 detail shortly.

23 MR. KERR: Okay. Thank you.

24 MR. HANSON: We would encourage you, as we go  
25 through, to examine or to pay attention to the components

1 that would fail when exposed to overpressure -- this, I  
2 think, is at least one of the first attempts to predict one  
3 of the components and their relative fragilities -- and the  
4 importance of detection, diagnosis and isolation and  
5 mitigation in reducing risk, and I think we find that, in  
6 the case of the B&W plant, at least, there was quite a bit  
7 of credit given for these things that helped to mitigate the  
8 effects of an ISLOCA, and finally, the influence of  
9 procedures, instrumentation, and training on the  
10 capabilities of plant personnel to reduce ISLOCA risk.

11 MR. KERR: In that connection, on the bottom of  
12 page 53, there is a statement: "At Davis-Besse" -- and I  
13 realize that's going to be taken out of the report -- "there  
14 are no ISLOCA procedures available, and it is assumed until  
15 data are discovered to the contrary that there is an  
16 inherent background error rate in the reading and execution  
17 of procedures."

18 The people at Davis-Besse would say, I think, from  
19 conversations that I had with them, that they don't need  
20 ISLOCA procedures, that they have symptom-based procedures,  
21 and so, from their point of view, they do have ISLOCA  
22 procedures, and I think that the report ought to make that  
23 clear, because I think it's an important part.

24 MR. HANSON: This point has come up a number of  
25 times over the past six months as to the adequacy of the

1 existing procedures to handle an ISLOCA, and I guess it is  
2 our judgement that they wouldn't do that very well.

3 MR. KERR: I don't disagree with that, but I am  
4 saying I think, instead of making a statement that way --  
5 because I think it's an important point -- you should say  
6 they have procedures. symptom-based procedures, which were  
7 considered to be capable of handling this, but we don't  
8 think they will.

9 If it's true -- and I have no reason to doubt it --  
10 - it's an extremely important point, I think.

11 MR. HANSON: All right.

12 MR. BURDICK: It is an important point, and again,  
13 when you see the word "ISLOCA," you should read "ex-  
14 containment ISLOCA," and in some cases, the licensees will  
15 have LOCA procedures, they'll have ISLOCA procedures, but  
16 the procedures may not get them to the point where they  
17 understand they have an ex-containment ISLOCA.

18 MR. KERR: I'm not disagreeing with the  
19 conclusion, Gary. I think, from what I have seen, the  
20 conclusion is probably valid.

21 I'm saying that these guys, and perhaps other  
22 people, think they have procedures which will handle this.  
23 You have concluded that they are wrong, and if that's the  
24 case, I think it's important that this view get into the  
25 public domain fairly soon, so that people will look at it.

1 MR. CATTON: If the symptoms don't tell them about  
2 ISLOCA, they're not going to do them any good.

3 MR. MICHELSON: Is it true that there are some  
4 systems whose interface between high and low pressure is  
5 inside of primary containment?

6 MR. BURDICK: [Yes.]

7 MR. HANSON: [Yes.]

8 MR. MICHELSON: There are some? Can you give me  
9 one example so I get a feel for the kinds we're talking  
10 about?

11 MR. BURDICK: Core flood tanks, check valves.

12 MR. MICHELSON: Okay. Yes, quite right. Yes.  
13 That's the kind you're talking about. Okay.

14 [Slide.]

15 MR. HANSON: Let me just finish up by indicating  
16 what's going to be coming down the pike here in the next few  
17 presentations.

18 On your agenda, we show two presentations that  
19 would summarize the estimation of rupture potential. In  
20 fact, we have combined those into one presentation, and that  
21 will be presented by Bill Galyean, and Dr. O'Brien has  
22 agreed to support him if there are any detailed questions in  
23 the area of materials analysis, stress analysis.

24 Following his presentation, David Gertman will  
25 talk about some of the unique aspects of the human

1 reliability analyses. Then we'll have presentations on the  
2 overall results from the B&W plant, given by Bill Galyean  
3 again, then preliminary results from the Westinghouse  
4 evaluations, given by Dana Kelly, and then conclusions by  
5 Bill Galyean.

6 MR. CATTON: If you could keep the combined talk  
7 down to around 30 minutes, I would be in your debt.

8 MR. GALYEAN: I will do my best.

9 MR. CATTON: Thank you.

10 [Slide.]

11 MR. GALYEAN: Just to set the tone a little bit,  
12 we went into this analysis with the idea that we need to do  
13 accurate estimates or realistic estimates of the probability  
14 of ruptures in the interfacing systems. Specifically, we  
15 needed to identify which components are likely to rupture,  
16 what the likely rupture locations were, and also the size of  
17 the ruptures.

18 [Slide.]

19 MR. GALYEAN: The approach that we put together is  
20 basically a probabilistic approach. Because of the large  
21 uncertainties involved in this type of analysis, we didn't  
22 think a realistic, deterministic approach would be adequate.

23 Thereby, with this probabilistic approach, we can  
24 consider things such as preexisting flaws in equipment --  
25 for example, piping -- and also, we can handle uncertainties

1 with respect to variations in the expected pressures being  
2 seen by this equipment.

3 [Slide.]

4 MR. GALYEAN: I will just go through real quickly.

5 The calculation that we put together is basically  
6 a stress-strength calculation. The strength is based on the  
7 work done by IMPEL, who estimated the capacity, the pressure  
8 capacity of the interfacing system components. That work,  
9 by the way, has been published in a NUREG/CR. It came out  
10 about a month ago. It's just titled "Pressure-Dependent  
11 Fragilities for Piping Components," NUREG/CR-5603.

12 The stress on the system would then produce the --  
13 is generated by the pressures inside the interfacing  
14 systems. In estimating the stress, we included effects such  
15 as relief valves and flow restrictions, such as orifices and  
16 small pipe size and things of that nature.

17 MR. MICHELSON: With that approach, how do you  
18 estimate the rupture size?

19 MR. GALYEAN: Well, the rupture size is done in  
20 the first step, when the pressure capacity is being  
21 estimated.

22 MR. MICHELSON: You think the rupture size is  
23 independent of the degree of overpressurization, for  
24 instance?

25 [Slide.]

1 MR. GALYEAN: No, we don't think that.

2 MR. MICHELSON: How do you determine the rupture  
3 size in proportion to the degree of overpressurization?

4 MR. GALYEAN: Well, the rupture size is a function  
5 of internal pressure.

6 MR. MICHELSON: Yes. But how do you determine how  
7 big it is? Do you do that calculation?

8 MR. GALYFAN: Yes, we do that.

9 MR. MICHELSON: Some kind of a stress calculation  
10 which will predict the propagation of the crack and how far  
11 the thing splits open?

12 MR. GALYEAN: Yes.

13 MR. MICHELSON: Is that in that -- I got that  
14 document.

15 MR. GALYEAN: Yes.

16 MR. MICHELSON: It's in there?

17 MR. GALYEAN: Yes. There are estimates. There  
18 are pressure-dependent estimates of leak sizes and leak  
19 areas in this report.

20 MR. MICHELSON: And it's wall-dependent and so  
21 forth or stress-dependent somehow. You've got to relate it  
22 back to stress somehow.

23 MR. GALYEAN: That's right. That's right.

24 MR. MICHELSON: And that's in there. Okay.

25 MR. GALYEAN: That's right.

1 MR. MICHELSON: Good.

2 Now, how does that affect the probability of  
3 failure, since probabilities are based on experience or  
4 something, aren't they? And if there is no experience with  
5 these--

6 MR. GALYEAN: I think I will cover --

7 MR. MICHELSON: -- this database for this degree  
8 for several times over design.

9 MR. GALYEAN: I think I am going to get to most of  
10 these questions in just a few minutes.

11 MR. MICHELSON: Okay. I'll listen. Thank you.

12 MR. GALYEAN: The pressure capacity valuation, as  
13 I mentioned, done by IMPEL and published in the NUREG/CR,  
14 had three major objectives: first, to develop a methodology  
15 to do this work; second, to determine median failure  
16 pressures and their associated uncertainty; and lastly, when  
17 failures are expected to occur, determined the expected leak  
18 rates or leak areas.

19 [Slide.]

20 MR. GALYEAN: IMPEL was chartered or tasked to  
21 look at the interfacing systems that were identified  
22 previously in the analysis. Specifically, they are the  
23 decay heat removal, low-pressure injection system, which are  
24 one and the same system; high-pressure injection and the  
25 makeup and purification systems which, at the plant we



1 looked at, are two different systems.

2 All components in the systems were looked at;  
3 specifically, pipes, tanks, flanges, valves, and pumps.

4 MR. CATTON: If one wanted to track down how good  
5 the predictions were, how would you do it?

6 MR. GALYEAN: Well, for some pieces of equipment,  
7 there are test data available. Okay? Specifically, for  
8 like flanges, flange connectors, there have been tests run  
9 on flanges.

10 The pipes are probably -- there probably is no  
11 hard data available on pipes.

12 MR. HANSON: I think there are data available on  
13 pipes, some done by Oak Ridge.

14 MR. MICHELSON: Pipes are better at that.

15 Flanges, I am not aware of any where you use  
16 several times design pressure and saw what happened to the  
17 bolting. Are there data that tell you when a valve box is  
18 going to come flying off, at what pressure, because the  
19 bolting now yields and it all gives?

20 These have been done for over-design, but -- I  
21 mean overpressurizations, but not several times design.

22 MR. O'BRIEN: My name is John O'Brien.

23 In the case of valves, most of the information we  
24 have came from manufacturers. Those information were not  
25 analytically developed. The analytical stuff was for the

1 piping and the flanges.

2 MR. MICHELSON: But you certainly can calculate  
3 the fracture of the bolting. There is a pressure internally  
4 at which the bolts will all fracture and the thing will come  
5 apart.

6 MR. O'BRIEN: We could have done it that way,  
7 except that we had manufacturers data.

8 MR. MICHELSON: I'd like to have a feel for  
9 whether we're talking about four times design that that  
10 occurs at or ten times design. I don't know.

11 Certainly, some bounding kind of examination would  
12 be far more meaningful, wouldn't it?

13 MR. O'BRIEN: Yes. As I recall -- and I'm talking  
14 from memory -- for the cases of pumps and valves, they had  
15 substantial margin, like maybe a factor of two, three, or  
16 four.

17 MR. MICHELSON: Like pipes. They have substantial  
18 margin, too.

19 MR. O'BRIEN: Right.

20 MR. MICHELSON: But that doesn't help me much if I  
21 am trying to determine the leak size. If a valve bonnet  
22 comes off, I know what the leak size is, there is no doubt,  
23 and it's extremely large. But I'd like to know.

24 Maybe the bonnet bolting fails before that pipe  
25 fails. I don't know. I don't have any feel for this. And

1 I don't know that I have seen the data that tells me what  
2 will happen.

3 MR. O'BRIEN: It's usually the seals that fail.

4 MR. MICHELSON: I'm not worried about leaks. The  
5 seals will start failing, but these degrees of  
6 overpressurization, that leak isn't going to relieve the  
7 pressure enough.

8 MR. HANSON: The relative -- what fails first,  
9 second, or third, I don't think we got into in detail, but  
10 there are -- in their data, there are indications of when a  
11 flange would fail versus, say, a pipe that would be next,  
12 based on pressure.

13 MR. MICHELSON: Now, "fail," by definition, was  
14 leak, or "fail" means the bolting breaks.

15 MR. HANSON: As I recall, in cases of flanges,  
16 there were a couple of different leak areas looked at. A  
17 small leak, your bolts would relax and cause some separation  
18 of the flange faces.

19 MR. MICHELSON: If that relieved the pressure,  
20 that's as far as it would go.

21 MR. HANSON: That's right. And then there was a  
22 larger leak where, as I recall, the valves themselves  
23 failed.

24 MR. MICHELSON: The bolting.

25 MR. HANSON: The bolts failed.

1           MR. MICHELSON: That's where you can't relieve  
2 quick enough, and the pressure stays up, and it pops the  
3 bonnet off.

4           MR. HANSON: Yes.

5           MR. MICHELSON: I think it's more important to  
6 know that, perhaps, than even how the pipe can stand,  
7 because pipes are a much more predictable, much more  
8 conservatively-designed than perhaps are the flange  
9 boltings, for instance. People have ruptured bolts, and  
10 then you've got to know where the torque is on the bolt when  
11 you start out. There are a whole lot of things you've got  
12 to know.

13           These bolts are not worked as lightly as some  
14 people believe. Some of them are heavily worked, with a lot  
15 of normal torqueing.

16           MR. GALYEAN: That's right. We collected and  
17 IMPEL utilized such information such as the material used in  
18 the bolts, how far they were torqued, the type of material  
19 used in the gaskets.

20           The put in a factor to consider bolt relaxation,  
21 and they looked at the pressures required where the bolts  
22 would stretch both elastically and then plastically. These  
23 were all taken into account in the IMPEL work. Okay?

24           The bottom line was that they were trying to do a  
25 realistic pressure estimate on the capacity of this

1 equipment.

2 MR. MICHELSON: Well, assuming that you didn't get  
3 adequate relief from the leaks starting in the flange, did  
4 they predict at what point the flange bolting would fail, at  
5 what level of overpressure, four times design of the system?

6 MR. HANSON: Yes, they did.

7 MR. MICHELSON: So, it's about the same? Was that  
8 the answer they came up with?

9 MR. GALYEAN: It varies. It varies by the size of  
10 the flange. I mean when you start getting up into bigger  
11 and bigger flanges -- for example, a 150-pound flange and  
12 300-pound flange may each use 6 bolts, but then when they go  
13 to a 600-pound flange, they may use 12 bolts. Okay? So,  
14 it's not a smooth relationship.

15 MR. MICHELSON: But you don't have any rules of  
16 thumb, then.

17 MR. GALYEAN: No.

18 MR. HANSON: We just haven't looked at the data to  
19 see if those rules of thumb are available.

20 MR. KERR: But you developed a normal distribution  
21 for these, didn't you? You didn't just use one number.

22 MR. GALYEAN: That's right. That's right.

23 MR. SULLIVAN: I think there are three cases in  
24 there that it could go to. There is a leak, and then the  
25 valve -- ended up valve failure.

1 MR. GALYEAN: Are you talking about the flanges?

2 MR. SULLIVAN: Yes.

3 MR. GALYEAN: Okay. Very minuscule leaks, on the  
4 order of milligrams per second, and then you get up into a  
5 portion where the valves start to stretch elastically, and  
6 then you get up into higher pressures and the valves start  
7 to stretch plastically. Is this what you're referring to?

8 MR. SULLIVAN: Yes.

9 MR. GALYEAN: Okay.

10 MR. SULLIVAN: I can't believe that -- I couldn't  
11 ever see a case that you would only have a leak in a gasket.  
12 It looks like it would go from one case to the other.

13 Was that an important parameter?

14 MR. GALYEAN: It turned out not to be important.

15 Flange leaks were not very important, because  
16 typically, when you get up into the plastic -- when the  
17 valves start to stretch plastically, you're above the  
18 pressures at which we're interested, and in that in-between  
19 regime, where you're talking about the bolts stretching  
20 elastically, you're still talking about very small leak  
21 rates.

22 It's only when you start getting up into the  
23 elastic range where you start to develop large leak areas.

24 MR. SULLIVAN: Well, you know what the pressure  
25 is. Right?

1 MR. GALYEAN: That's right.

2 MR. SULLIVAN: And you can't leak enough out of a  
3 seal leak to make any difference at all.

4 So, it looks like it goes from one case to another  
5 one almost instantaneously.

6 MR. GALYEAN: I guess I don't understand the  
7 question.

8 MR. SULLIVAN: I'm saying if it leaks -- if we're  
9 depending on it leaking to relieve the pressure so that it  
10 doesn't go someplace else, then it just isn't going to  
11 happen.

12 MR. GALYEAN: That's right. We agree.

13 Flange leaks did not figure significantly into the  
14 analysis. Okay? They don't develop large enough. They  
15 don't develop large enough leak areas to depressurize the  
16 systems.

17 MR. MICHELSON: And the reason?

18 MR. GALYEAN: Because they're strong enough to  
19 withstand.

20 MR. MICHELSON: Well, suction sides of pumps have  
21 gate valves on them. You just go back far enough. The next  
22 device at the suction side is a valve, and it's generally a  
23 gate valve, although it may be globe.

24 But at any rate, there is a gate valve, and it  
25 will be a 150-pound valve, but it will not be rated for 900

1 or whatever, because it's all low-pressure piping. The  
2 suction of the pumps are rated this way. They can't take  
3 full pressure. And the piping is rated that way and so are  
4 the valves.

5 So, you're talking a 150-pound valve on a -- it's  
6 close to 2,000 pounds pressure if you've got the  
7 interspacing system LOCA developing.

8 MR. BURDICK: I think we're very much in danger of  
9 getting very confused here, because we're getting ahead of  
10 things. We don't know. We don't know that we are at full  
11 system pressure, because in this analysis, we analyzed  
12 sequences where you are coming down in pressure and you may  
13 be going up in pressure.

14 So, no, you do not know what pressure you're at.  
15 You don't know that you are at full 2,200 or 2,100.

16 MR. MICHELSON: You know the scenario you're  
17 analyzing, and you're saying there are no interfacing  
18 systems at scenarios at 2,200, then, I guess, that could  
19 affect this 150-pound valve. I think that's the bounding  
20 condition. If you're down in pressure, you're not going to  
21 blow the bonnet.

22 MR. HANSON: I'd suggest that maybe we just  
23 proceed with the presentation, and he will get into and, in  
24 fact, show you a ranking of probabilities of different  
25 components in a particular system rupturing and the



1 difference, whether they may be large leaks or small leaks  
2 and that sort of thing.

3 [Slide.]

4 MR. GALYEAN: To just finish up on this slide, as  
5 I mentioned, the pressure capacities are assumed to be log  
6 normal random variables, and the analysis assumed quasi-  
7 static pressure and temperature conditions, which was based  
8 on the simple RELAP 5 models that were developed and run.

9 [Slide.]

10 MR. GALYEAN: To just briefly touch on some of the  
11 results that were generated by IMPEL, as you can see, some -  
12 - all this equipment is from the DHR system at the B&W  
13 plant. There are 12-inch and 18-inch pipes on the DHR  
14 suction lines, and these are rated at 1,660 psi and 840 psi  
15 respectively.

16 Both of these are designed for 300 psi. Both of  
17 these, I think, are designed for 300 psi. The 300-psi-rated  
18 flange can take 2,250 psig, and also, the heat exchanger  
19 also turns out to be one of the weaklings in the system.

20 MR. MICHELSON: Now, you realize that valves are  
21 not designed with a particular rated bonnet flange. That's  
22 a part of the valve vendor's design.

23 MR. GALYEAN: Right.

24 MR. MICHELSON: It doesn't have a unique degree of  
25 conservatism. I don't know -- depending on how the valve

1 vendor has cast his body. It's all an integral cast  
2 arrangement.

3 MR. GALYEAN: Right.

4 MR. MICHELSON: You've got to do the analysis on  
5 the particular valve --

6 MR. GALYEAN: That's right.

7 MR. MICHELSON: -- and its flange, and it may or  
8 may not be as good as a 300-pound flange. I just don't  
9 know.

10 MR. GALYEAN: That's right.

11 MR. MICHELSON: And the bolting is the same  
12 argument.

13 MR. GALYEAN: We collected specific information on  
14 specific valves at the plant we were looking at.

15 MR. CATTON: From the valve vendor?

16 MR. GALYEAN: We collected vendor packages from  
17 the utility.

18 MR. CATTON: Well, you all know how optimistic the  
19 manufacturers can be.

20 MR. MICHELSON: And you were actually able to get  
21 a dimension drawing of the valve?

22 MR. GALYEAN: Yes.

23 MR. MICHELSON: That's unusual, because they don't  
24 like to give you those.

25 MR. GALYEAN: It was very difficult, and we are

1 forever in our debt to the utility for cooperating with us  
2 in this. We got vendor packages that had dimension design  
3 drawings and things for all the equipment we're looking at.

4 MR. HANSON: And in fact, the B&W plant is the  
5 only plant we have gotten that information on.

6 MR. GALYEAN: That's right.

7 MR. HANSON: We have not been able to obtain  
8 similar information from other plants.

9 MR. MICHELSON: One of the problems to be careful  
10 of on valve flanges is that they are cast, not forged, and  
11 there is a whole lot of difference in the homogeneity of the  
12 material. You just don't know how good it is.

13 MR. HANSON: I guess we did get that similar  
14 information from the Westinghouse plant, as well, on the  
15 valve bodies themselves, but not on the operators. It was  
16 the operator information we're missing.

17 [Slide.]

18 MR. GALYEAN: The local RELAP I alluded to before  
19 were developed using RELAP 5 models. We assumed -- these  
20 systems are -- all these systems are normally kept filled.  
21 The calculations assumed were simplified such that the  
22 calculations assumed a steady state RCS, which we believed  
23 is justified, that is, it's only very slightly conservative.  
24 Because the -- once the pressure isolation boundary is  
25 opened and the interfacing system is pressurized, it reaches

1 equilibrium very quickly.

2           There are some cases where small relief valves, in  
3 combinations with flow restrictions, flow orifices or small  
4 pipes will protect certain portions of the interfacing  
5 systems.

6           [Slide.]

7           MR. GALYEAN: These 2 sets of data then, the --  
8 the pressure capacities and the local system pressures were  
9 then combined in an event tree format, such that each --  
10 each component in the system was represented by a series of  
11 questions in the event tree.

12           MR. MICHELSON: Just let me ask, in the case of  
13 the pumps, of course, the same problem was with the valves,  
14 you don't have drawings of the thicknesses of the nozzles on  
15 the suction side of pumps. Did the vendors give you the  
16 information with which to do the stress analysis?

17           MR. GALYEAN: Yes.

18           MR. MICHELSON: Thank you.

19           MR. GALYEAN: The approach, it was a Monte Carlo -  
20 - once the event tree was developed, a Monte Carlo approach  
21 was -- was taken, whereby we sampled a reactor coolant  
22 system pressure and scale it, based on our RELAP models, for  
23 the different portions of the interfacing system, then  
24 extracted or sampled from pressure fragility distribution  
25 for each component and compared the 2.

1           As I mentioned, the local system pressures were  
2 assumed to be a function of RCS pressure, which we, in turn,  
3 assumed was -- was log normally distribution, or normally  
4 distributed, rather.

5           [Slide.]

6           MR. GALYEAN: Let's go through a -- a very -- an  
7 example very quickly. As I mentioned, we used the NUREG-  
8 1150 event tree code to perform this calculation. The local  
9 system pressure or the -- actually the reactor coolant  
10 system pressure was sampled and then scaled for different  
11 portions of the interfacing system. At the same time, and  
12 then for each component in -- in the interfacing system, a  
13 failure pressure was sampled and the 2 compared.

14           MR. MICHELSON: Now, what is your standard  
15 deviation on your failure predictions? I mean, your --  
16 you've tuned up very nicely the pressure -- the energetic  
17 source that's causing the potential failure, but how do you  
18 know how -- at what point a particular boundary fails? Did  
19 you have some kind of distribution on your calculation there  
20 too?

21           MR. GALYEAN: I guess I don't understand the  
22 question. The -- the local system pressure was assumed to  
23 be normally distributed, with a standard deviation.

24           MR. MICHELSON: How about the failure point now,  
25 to determine where the rupture was going to happen? How

1 good are your calculations on the pump nozzle, on valve  
2 flange and so forth? How good do you think they were, I  
3 should say?

4 MR. GALYEAN: The failure pressure, okay -- the  
5 work that IMPEL did, they generated a median failure  
6 pressure and a logarithmic standard deviation, okay, on --

7 MR. MICHELSON: That's the one you used here?

8 MR. GALYEAN: That's what we used. That's right.

9 MR. MICHELSON: So you depended on the goodness of  
10 those numbers?

11 MR. GALYEAN: That's right.

12 MR. MICHELSON: That's the one reported in the  
13 NUREG?

14 MR. GALYEAN: That's right.

15 MR. MICHELSON: Thank you.

16 [Slide.]

17 MR. GALYEAN: As I mentioned, the Monte Carlo  
18 simulation was run and, for those instances where failure  
19 was predicted to occur, it was binned in to a system failure  
20 category and where no failures occurred that was binned into  
21 a no failure category.

22 We did categorize the ruptures by largely small  
23 leaks and no failures. The probability of failure for a  
24 given situation then is just the number of Monte Carlo  
25 samples that -- that resulted in failure, divided by the

1 total number of observations made.

2 MR. MICHELSON: Over what range was the Monte  
3 Carlo --

4 MR. GALYEAN: Generally, we use 10,000 samples.

5 MR. MICHELSON: Yes, but I mean this was just for  
6 full power operation though?

7 MR. GALYEAN: Well, it depended on the specific  
8 sequence we were looking at. We looked at each sequence  
9 individually.

10 MR. MICHELSON: Okay. So, for a given sequence  
11 then, you went through --

12 MR. ALYEAN: That's right.

13 MR. MICHELSON: -- a number of samples.

14 MR. CATTON: How did you do this? Did you just  
15 assume -- randomly select a pressure and ask if it would  
16 fail?

17 MR. GALYEAN: Yes. We assumed a distribution up  
18 front. For example, that the initial RCS pressure was 22 --

19 MR. CATTON: Did the distribution and pressure at  
20 the device that you think might fail?

21 MR. GALYEAN: Well, yes. Well, we only sampled  
22 from the -- the RCS pressure once, and then we take that  
23 sample and scale it for different -- as we move through the  
24 interfacing system to account for things like flow losses  
25 and such.

1 MR. CATTON: But you have to assume some kind of  
2 flow?

3 MR. GALYEAN: That's right.

4 MR. CATTON: So, what kind of flow did you assume?

5 MR. GALYEAN: Well, it depends on -- again, it  
6 depends on the specific system. In almost all cases there  
7 are some relief valves, okay.

8 MR. CATTON: Okay, so you're assuming they flow  
9 through the relief valves --

10 MR. GALYEAN: That's right.

11 MR. CATTON: -- and then you calculate the  
12 pressure?

13 MR. GALYEAN: That's right.

14 MR. KERR: This is where RELAP/mod 2.5 comes in.

15 MR. CATTON: Oh, that's right. But, I guess, if  
16 you did that and it works out, where's the Monte Carlo part  
17 of this?

18 MR. GALYEAN: Well, it comes in -- in doing the  
19 sampling. We sample from distributions, we sample from a  
20 distribution of RCS and --

21 MR. CATTON: You have a piping system, you have  
22 flow through the relief valves. It seems to me that  
23 pressure is deterministic. Where's the randomness?

24 MR. MICHELSON: Yes.

25 MR. GALYEAN: Okay, the -- the internal pressure



1 may be deterministic, but the pressure capacities, the  
2 failure pressures are not.

3 MR. MICHELSON: Yes. But the uncertainties in  
4 those calculations are so large compared with the  
5 uncertainty in predicting pressure that it looks to me like  
6 you're wasting your time to start out by playing around with  
7 the source.

8 MR. KERR: What they're doing is logical.

9 MR. MICHELSON: Well, yes, it's logical, it's just  
10 a waste of time because you've got to recognize the  
11 uncertainty in the answer.

12 MR. GALYEAN: Well, it was must faster to do it  
13 this way than it was to do it by hand.

14 MR. CATTON: Well, it's always must faster to  
15 assume something probabilistically than to do the  
16 calculation.

17 MR. HANSON: There are some variations, not only  
18 just in calculating the pressure, but in, of course, the  
19 operating conditions of the plant. They don't operate  
20 always exactly at 2250; they operate 2250 plus or minus some  
21 value. So that was accounted for in the distributions.

22 MR. MICHELSON: But this rupture probability has  
23 got much bigger uncertainties than that on it.

24 MR. HANSON: That's correct.

25 MR. MICHELSON: It looks to me like you're

1 playing, you know, it's impressive to just make all these  
2 words, but I don't think it had anything to do with the  
3 outcome. The real outcome is how well can you predict these  
4 ruptures.

5 MR. HANSON: That's probably true; however, if we  
6 hadn't done it that way, then somebody probably would have  
7 asked us why we didn't account variabilities in operations.

8 MR. MICHELSON: You did a good job.

9 [Slide.]

10 MR. GALYEAN: Just for comparison sake, the  
11 calculation -- you can do the calculation by hand, if you so  
12 choose. It's analogous to what's done in seismic analysis.

13 MR. CATTON: I wasn't suggesting that at all. But  
14 why don't you just move along.

15 [Slide.]

16 MR. GALYEAN: I am going to go through a quick  
17 example of one of the calculations that was done. This is a  
18 diagram of the DHR let down line which is the -- one of the  
19 interfaces that we were looking at.

20 This -- this right here is the containment  
21 boundary; this is inside containment and this is outside  
22 containment. The pressure isolation valves that we're  
23 looking at are DH-12 and DH-11. What we did -- we created a  
24 simple RELAP 5 model of this system and then opened these  
25 valves and we nodalized the model to take -- so that we --

1 it would calculate pressures at different portions of the  
2 system.

3 For example, DH-12, there was a calculation, a  
4 pressure calculation done at DH-12, at the base of this 4-  
5 inch relief valve, in this 2 and a half inch bypass line and  
6 then downstream where the line also opens up again into 12  
7 inches. Then we opened up these valves and RELAP then  
8 calculated the pressure distribution in the interfacing  
9 system.

10 MR. MICHELSON: This was a 300-pound suction  
11 design?

12 MR. GALYEAN: That's right.

13 [Slide.]

14 MR. GALYEAN: This, then, is the RELAP output for  
15 those five pressure points, and you can notice here we're  
16 starting out at basically RCS pressures. This is the  
17 inboard pressure isolation valve. And then the three points  
18 that we looked at show a few hundred psi pressure drops as  
19 you move through the system, because of the effect of,  
20 primarily, the relief valves and various flow restrictions  
21 in the system.

22 You can also see that the equilibrium is reached  
23 very quickly. On the order of six or seven seconds, you  
24 reach equilibrium.

25 MR. MICHELSON: I don't know where these reds and

1 blue are. Can you tell us?

2 MR. GALYEAN: Yes.

3 [Slide.]

4 MR. GALYEAN: The uppermost graph is the DH12,  
5 which basically reflects the RCS pressure. The second graph  
6 or the second line is at the base of this relief valve.

7 MR. MICHELSON: That was that red one.

8 MR. GALYEAN: Yes, DH4849. The next one, which I  
9 think is green, was at this flow element up here, and this  
10 is a 2 1/2-inch bypass line, and this represents the third  
11 pressure calculation, and the last one, which I think is  
12 black, is in this -- opening up again into a 12-inch pipe,  
13 which is, I guess, about -- the label is 2733 or 2734.

14 MR. MICHELSON: Where is the flow beyond the  
15 relief valve?

16 MR. GALYEAN: There are more relief valves  
17 downstream, very small ones, but there are more relief  
18 valves downstream.

19 MR. MICHELSON: Now go to your chart and explain  
20 the large pressure valve beyond the relief valve, which is a  
21 steady-state one, not the instantaneous.

22 MR. GALYEAN: That's right.

23 MR. MICHELSON: You're dropping down beyond that  
24 relief valve to something on the order of 1,200 pounds?

25 MR. GALYEAN: That's right.

1 MR. MICHELSON: Because of these little reliefs?

2 MR. GALYEAN: There are flow restrictions.

3 MR. MICHELSON: If there is no flow, this pressure  
4 is gone.

5 MR. GALYEAN: That's right.

6 MR. MICHELSON: But there is flow, and that's the  
7 only thing that's attributing such a large pressure drop,  
8 and those are big pipes and little bleed points. I can't  
9 believe you've got --

10 MR. GALYEAN: There's a 2 1/2-inch pipe in  
11 between. This is in a 2 1/2-inch pipe, this pressure point  
12 right here. This is 12 inches. You're going down to 2 1/2  
13 inches.

14 MR. MICHELSON: That's immaterial. What's flowing  
15 through the pipe at the time?

16 MR. GALYEAN: That's right.

17 MR. MICHELSON: -- relief?

18 MR. GALYEAN: That's right.

19 MR. HANSON: There are several 1/2-inch relief  
20 valves, if I recall.

21 MR. GALYEAN: That's right.

22 MR. MICHELSON: This is not real clear.

23 MR. GALYEAN: This is just an example of the  
24 results that we're working with, the kind of results that we  
25 have predicted using RELAP.

1 MR. MICHELSON: But this has a great deal to do  
2 with whether ruptures occur or not.

3 MR. GALYEAN: That's right.

4 MR. MICHELSON: Not all plants have this many  
5 relief valves.

6 MR. GALYEAN: That's right.

7 MR. MICHELSON: If any. Generally, there's one on  
8 the suction of the pump to take care of check valve leakage.

9 MR. GALYEAN: That's right. Based on the IMPEL  
10 predicting the pressure capacities and the local pressures  
11 predicting through the RELAP run. The form on Monte Carlo  
12 simulation, and this is an example of a system failure  
13 probability.

14 This graph contains three mutually-exclusive  
15 events. Okay? That is the probability of having a large  
16 rupture, the probability of having no leak, and the  
17 probability of a small leak.

18 There is a precedence here. Whenever a large  
19 rupture occurred in a Monte Carlo example, it was binned  
20 into the large rupture category.

21 MR. MICHELSON: Now, the reason B&W has that large  
22 relief valve there, isn't that having to do with vessel  
23 overpressurization during shutdown?

24 MR. GALYEAN: That's right.

25 MR. MICHELSON: Other plants have tackled that

1 problem in different ways, rather than with the big relief  
2 valve. Is that right?

3 MR. GALYEAN: That's right.

4 MR. MICHELSON: Or does everybody have a big  
5 relief valve?

6 MR. GALYEAN: No.

7 MR. MICHELSON: Okay. If you don't have the big  
8 relief valve, this answer changes significantly.

9 MR. GALYEAN: That's right.

10 MR. MICHELSON: Okay.

11 MR. CATTON: What about the flow through the  
12 relief valves? Is that an important parameter?

13 MR. GALYEAN: Well, it is in the sense that it  
14 keeps the pressure down in the area of that relief valve.

15 MR. CATTON: My recollection of the EPRI results  
16 presented at a meeting in Santa Barbara several years ago,  
17 you can get fluctuations of a factor of two in the mass flow  
18 through these valves because of their complicated internal  
19 geometries and a sonic plane.

20 What would that do if this thing started to --  
21 mass flow started to fluctuate by a factor of two through  
22 the relief valve?

23 MR. GALYEAN: I guess we didn't consider that. We  
24 used the manufacturer's design rating for the capacity of  
25 the valve, how big it was.

1 MR. CATTON: If the relief valve flow rate is  
2 important, then you had better take a look at some of those  
3 EPRI studies.

4 MR. MICHELSON: You're also using the cold-water  
5 relief capacity on that suction side, I'm sure, and that's a  
6 lot different than the hot-water relief capability. It's a  
7 lot less.

8 MR. GALYEAN: Well, yes. We use it to estimate  
9 the relief size, the opening area.

10 MR. MICHELSON: But if it turns out that you  
11 didn't rupture, then it's saying those valves are big  
12 enough, and they are big enough for cold, but when the hot  
13 water starts getting to them, they're no longer big enough,  
14 and then the rupture occurs, and I don't think that's in  
15 your analysis, probably. That is a problem.

16 MR. CATTON: Do you understand the concern?

17 MR. GALYEAN: Yes, I understand.

18 MR. HANSON: As I recall, the EPRI relief valve  
19 testing, though, was more for code safety relief valves.  
20 These are much smaller relief valves. But I understand your  
21 point.

22 MR. CATTON: You still have to look at the  
23 reasons.

24 MR. HANSON: Yes. I understand your point.

25 MR. CATTON: It turns out it's where the critical



1 flow is within the valve that determines the mass flow, and  
2 it bounces around inside the valve.

3 MR. HANSON: And if, in fact, the relief  
4 capacities were less than we were calculating, then the  
5 pressures in the downstream piping would be higher.

6 MR. CATTON: There is also the impact on the  
7 piping system of having it vary a factor of two. Just the  
8 vibrations that would be sent up might shred the system.

9 MR. GALYEAN: The failure probabilities that were  
10 predicted using this model, as I mentioned, are shown on the  
11 graph. The one item you might take note of is the median  
12 failure pressure for the system, which is the DHR system,  
13 and that is the point at which you have a 50-percent  
14 probability of getting a large rupture. That translates  
15 into about 1,100 psi. And this is RCS pressure on the  
16 bottom scale, not local pressure. Okay?

17 MR. MICHELSON: What does this mean again, tell  
18 me?

19 MR. GALYEAN: Well, this represents the system  
20 pressure capacity, the system as a whole, as an aggregate.  
21 We can model individual pieces of equipment, for example,  
22 like IMPEL did, but then how do you combine those? And  
23 that's basically what the Monte Carlo simulation does.

24 It combines those individual components into a  
25 system, and we can get a system failure probability. And

1 here the system pressure capacity, then, you can interpret  
2 this 50 percent as the median system failure pressure  
3 capacity, which translates into 1,100 psi RCS pressure.

4 MR. MICHELSON: Now, that means, then, that there  
5 is a 50/50 chance of the rupture of this pipe.

6 MR. GALYEAN: Of a large rupture. If the RCS  
7 pressure is at 1,100 psi and you open the pressure isolation  
8 boundary, there is a 50-percent chance that you will get a  
9 rupture in the DHR system.

10 MR. MICHELSON: That's fairly high.

11 MR. MINNERS: You confused me when you said  
12 "rupture," and maybe it confused other people. There's a  
13 100-percent chance, at 1,100 pounds, of getting water out of  
14 the system. Okay? Fifty percent chance of a small leak, 50  
15 percent chance of a big one.

16 MR. GALYEAN: Yes, that's right. That's right.

17 MR. MINNERS: I don't know what you mean by  
18 "rupture."

19 MR. GALYEAN: That's right, yes.

20 MR. MICHELSON: Well, it looks like the rupture  
21 occurred, but 50 percent is also crossing at 1,100 pounds.

22 MR. GALYEAN: That's right. I was saying there's  
23 a 50-percent chance of getting a large rupture, and the  
24 other 50 percent of the time, you will get a small leak or a  
25 small rupture, evidenced by the red line, which also is --

1 you see, the no-leak probability is at zero. Okay?

2 MR. MICHELSON: There's also a 50-percent chance  
3 of getting a small leak at that pressure, and I don't know  
4 which it is.

5 MR. GALYEAN: That's right. That's right.

6 MR. CATTON: Which of them do, according to the  
7 manufacturers' data?

8 MR. MICHELSON: All of them do. There's a great  
9 uncertainty in this answer. They're not showing any  
10 uncertainty bands.

11 MR. CATTON: We know, Carl, from what the  
12 manufacturer said it took to close the valves, how far it  
13 off it was. This was a more difficult thing to estimate.

14 MR. MICHELSON: But it's also very difficult to  
15 predict exactly where the rupture of some of these castings  
16 and so forth are going to occur, because they're non-  
17 homogeneous. It's not like a pipe, even, which is generally  
18 quite homogeneous.

19 Valve castings, valve flange castings are very un-  
20 homogeneous. That's why they make them thick.

21 [Slide.]

22 MR. GALYEAN: This table simply tabularizes the  
23 information presented on the previous page, on the graph.  
24 This shows the failure probabilities for each individual  
25 piece of equipment in the DHP system. Here is a brief

1 description of that piece of equipment, the median failure  
2 pressure as estimated by IMPEL and then the failure  
3 probability, given this type of RCS.

4 This calculation was done simply to generate this  
5 table. We don't actually use this in the analysis. This  
6 just gives you a feel for -- you can go through and identify  
7 where the weak links are in the system, which we have  
8 identified with the stars.

9 The SMALL refers to the fact that if this piece of  
10 equipment fails, it will generate a small leak, rather than  
11 a catastrophic rupture.

12 MR. MICHELSON: Where are the valves on this list?

13 MR. GALYEAN: This is a motor-operated gate valve,  
14 a swing check valve. The P&ID on the next page of your  
15 handout shows a description of the system.

16 MR. MICHELSON: I'm not looking at the same list.

17 MR. GALYEAN: I believe so. As I said, the next  
18 page of the handout shows a P&ID, a simplified P&ID of the  
19 system, and if you want to go through, you can identify  
20 those components on the system. I'm not going to go through  
21 that right now.

22 [Slide.]

23 MR. GALYEAN: Just to quickly summarize this  
24 portion of the work, we come to the conclusion or the  
25 observation that ruptures are likely for most ISLOCA

1 sequences. We expect that these ruptures will occur very  
2 quickly, on the order of a few seconds; that relief capacity  
3 is not adequate to protect the interfacing systems. Flange  
4 and seal leaks are possible, but not expected to be large  
5 enough to protect other pieces of equipment and that  
6 ruptures of the pipe and the heat exchangers are most likely  
7 the result of ISLOCA types of sequences.

8 MR. SULLIVAN: Carl, it is interesting, from that  
9 table, if you look at it, that the pipes break and the  
10 valves don't.

11 MR. MICHELSON: I was trying to determine and I  
12 was going to ask the question; on a given valve, is the  
13 valve body that's predicted here, or is this a prediction of  
14 the weakest point, wherever that might be, including the  
15 bolting?

16 MR. GALYEAN: That's right. Generally, the valve  
17 failures are predicted to occur in the bolted bonnet, not  
18 the valve body itself.

19 MR. MICHELSON: So this is saying here that this  
20 will occur at 1660 pounds -- I'm sorry, 1704 pounds. I'm  
21 reading from the table, the fourth item down.

22 MR. KERR: That's the median.

23 MR. MICHELSON: It's got a distribution on it  
24 already.

25 MR. HANSON: If you look at the size of the breaks

1 on most of the valves, you'll see most of them have an SM,  
2 indicating a small break, which would be not the valve body  
3 failing but the bonnet.

4 MR. MICHELSON: A flange leak.

5 MR. GALYEAN: At this point, I think Dave Gertman  
6 is going to come up, or is it time for a break?

7 MR. CATTON: Since it's 12:00, I think we ought to  
8 each. Let's have lunch and come back at 1:00.

9 [Whereupon, at 12:00, the Committee recessed for  
10 luncheon, to be reconvened this same date at 1:00 p.m.]

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## AFTERNOON SESSION

[1.00 p.m.]

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2  
3 MR. CATTON: Why don't we get started. Mr.  
4 Gertman, go ahead.

5 [Slide.]

6 MR. GERTMAN: It's my pleasure to speak to you  
7 this afternoon on the human reliability analysis that was  
8 conducted in support of the evaluation of ISLOCA. As  
9 mentioned earlier by both Gary and Duane, we've gone back  
10 and done a more detailed HRA analysis and, as a result, some  
11 of the numbers have changed. Therefore, today's talk is  
12 mainly on the methods that we employed as part of our  
13 effort.

14 [Slide.]

15 MR. GERTMAN: What we have here is two dimensions  
16 which are key to understanding how human error occurs in  
17 power plants and other high technology systems. Basically,  
18 we have two dimensions here.

19 The first is the failure mode and we talk about  
20 omission and commission. Omission is skipping a step in a  
21 procedure or failing to take an action. Commission can be  
22 of a couple types. The first is the simpler and what you  
23 tend to see in PRAs, if it's represented at all, and that's  
24 your simple selection and execution errors.

25 That is when you go from a procedure and you try

1 to take a control action, you simply select the wrong switch  
2 out of a panel of switches or you go ahead to try to change  
3 a position indicator and you switch it to the wrong  
4 position. That would be an execution error.

5 Likewise, in terms of an activity to mention,  
6 there are two subsets to that. One is latent. Those types  
7 of errors, either omission or commission which lay dormant  
8 until another plant evolution, at which point the impact of  
9 that error becomes manifest. An example of that would be an  
10 inadvertent valve lineup which doesn't cause a problem until  
11 a monthly jog test or a quarterly stroke test is  
12 administered.

13 Again, the active is the kind associated with; if  
14 you were to model the human as initiator of a sequence of  
15 events, that would be an activator or an error taken in  
16 attempting to isolate a series of valves in recovering and  
17 you were to select the wrong one or not close it all the  
18 way. That would represent the activity that I mentioned.

19 It's interesting to note that almost all of the  
20 data that show up in contemporary PRAs show up under  
21 omission and show up in the active cell here. What we tried  
22 to do in this research program here is to move over to this  
23 side of the equation, because in our review of the LERs and  
24 other activities of plants, it becomes apparent that people  
25 makes these types of mistakes as well.



1           The problem is that they're not too well  
2 represented and there are not great denominators for these.  
3 Part of this effort was to try to move out of this confined  
4 space over into this part of the system.

5           [Slide.]

6           MR. GERTMAN: We conducted a review of some LERs.  
7 It's in Appendix A of the report for the B&W plant.  
8 Likewise, a study was conducted by the AEOD, some of which  
9 has been synopsized elsewhere by Sammy Diab. These are the  
10 types of errors that have occurred in operating facilities  
11 here in this country and it gave us a key as to what we  
12 might look for, what might be possibilities when we  
13 conducted our analyses.

14           These include: a bad valve assembly, attempting  
15 to seat a check valve by opening a motor-operated valve on  
16 the low pressure side, improper wiring of an interlock and  
17 miscommunication between controller/operators and INC  
18 technicians. In fact, this latter one is sort of important  
19 because, again, no other PRA or HRA efforts have gone to the  
20 trouble to try to say; what could be the contribution from  
21 miscommunication. We know that between people, it's part of  
22 the background human error rate for individuals.

23           I should mention, too, that the error rates that  
24 one finds in HRA are a bit different than the ones that you  
25 typically see for hardware numbers for PRA. If I were to go

1 ahead and get 7 telephones and line them down the length of  
2 this panel and have you all try to dial your home phone  
3 numbers a hundred times in quick succession, I can guarantee  
4 you pretty much that your error rate would be out there at  
5 E-1 or E-2.

6 A couple individuals may fail ten times, but  
7 almost all of you would fail at least two or three or four.  
8 This is the kind of numbers you see a lot of times in human  
9 factors. It is not what you are used to seeing with valves  
10 and pumps, so some of the error rates that we have in here  
11 may look a bit high to you, but in terms of human  
12 performance, when you see errors out at E-3 and E-4, that is  
13 a relatively low rate for human beings.

14 I think it's important to keep that in mind as we  
15 proceed. Now, what we tried to do was to use what I  
16 consider to be a unique, integrated approach to HRA. What  
17 was unique about it is that we used the Human Factors Team  
18 throughout the exercise. These were not just engineers that  
19 have been cross-trained in HRA or knew a little bit about  
20 human factors, but we had human factors involvement  
21 throughout.

22 The second thing is, we found a technique for  
23 identifying errors of commission.

24 MR. KERR: Excuse me, what is meant by "human  
25 factors involvement throughout?"

1 MR. GERTMAN: Starting with the identification of  
2 the preliminary event trees, going over the P&IDs, the  
3 operating procedures, actually being at the plant to  
4 walkdown some of these procedures, to perform task analysis,  
5 to conduct interviews --

6 MR. KERR: What sort of people did you have?

7 MR. GERTMAN: Human factors people. What were the  
8 degrees in?

9 MR. KERR: Human factors people can vary from  
10 psychologists to industrial engineers. I was just curious.

11 MR. GERTMAN: That's a fair question. My  
12 background is in experimental psychology. A Human Factors  
13 Engineer that we had from our group that went to Davis-Besse  
14 as part of the inspection team has been working in human  
15 factors for around 10 years, maybe 12. Orville Meyer, his  
16 degrees are in nuclear engineering and electrical  
17 engineering.

18 The group we had back in Idaho is comprised of 18  
19 or 19 people now. I guess it's 18. It's about 40 percent  
20 who have industrial engineering as their course work and  
21 roughly the remaining 55 of 60 percent have experimental  
22 psychology as a background.

23 MR. KERR: Thank you.

24 MR. GERTMAN: In addition, what we did is, we  
25 borrowed, kind of by analogy, a technique from sneak circuit

1 analysis which is called Sneak Analysis, to use as a method  
2 of determining an error pathway around what might be  
3 intended by a procedure within the system. I'll talk a  
4 little bit more about that later in some slides.

5 Also, in this study, we placed more emphasis on  
6 errors of commission like I showed you in that matrix. We  
7 modeled communication between people and for the first time  
8 in a PRA, unlike other contemporary efforts such as 1150, we  
9 considered the human as an initiator of events.

10 Finally, we evaluated performance shaping factors  
11 for errors of commission as well as omission. If you go to  
12 some of the sources, such as THERP, the Technique for Human  
13 Error Reliability Prediction by Swain and Gutman, which is  
14 NUREG 1278, it does allow for modification of failure rates  
15 for errors of omission and simple errors of commission such  
16 as execution and selection based on performance shaping  
17 factors.

18 What we tried to do here is take it over into the  
19 realm of decisionmaking as well.

20 [Slide.]

21 MR. GERTMAN: So taking the matrix that I showed  
22 you on the second slide, what we did was to go ahead and to  
23 apply it to five error categories, going from initiating  
24 events or initiating event errors all the way through  
25 mitigation.

1 I should say that, in our case here in terms of  
2 mitigation, we're saying isolation is taking those actions  
3 to stop the flow going to the right valves, whether they be  
4 in containment, primarily in containment here for the  
5 different sequences. But in terms of mitigation, since  
6 there were not hardware resources available to the personnel  
7 afterwards, we did not do extensive modeling in this area.

8 [Slide.]

9 MR. GERTMAN: It is reasonable to ask why errors  
10 of commission are not well-represented in contemporary PRA  
11 efforts. There's a few reasons for this.

12 First of all, methods for identifying and  
13 quantifying these errors are not well-developed. It's  
14 emerging. Methods for doing it for omission are well-  
15 developed. There are a number of data sources one can go  
16 to, and people tend to use, when performing HRA.

17 So again, what we tried to do was not only  
18 identify them and model them, but to go ahead and quantify  
19 them.

20 [Slide.]

21 MR. GERTMAN: In each of these areas, there were  
22 slight problems. The first was error identification, how  
23 you could go and find out where they might exist, aside from  
24 the routine task analysis you would do, and walk down of  
25 systems, and interviews with personnel.

1           The error representation, generally what you do,  
2   if you don't go to a source like human cognitive reliability  
3   model, where you would pick up table values based on the  
4   time available and the average time taken by a crew to  
5   respond, would be to do your modeling either in fault trees  
6   or HRA event trees. And the technique for HRA event trees  
7   is pretty well documented in Swain's work.

8           We went ahead and built on the HRA event trees,  
9   and came up with a slight modification of that to account  
10  for modeling the action subsequent to a decision-based  
11  error. And I will talk to that a little bit later.

12           In air quantification, we used the following  
13  sources. We used THERP, we used HCR, we used a reliability  
14  data bank sponsored by the NRC, called NUCLARR. And we also  
15  went to a model for decision-based errors and a data set  
16  called INTENT.

17           MR. WILKINS: Is it important to us to know what  
18  any of those things are?

19           MR. GERTMAN: I would say except for the latter,  
20  which is rather new, INTENT, these are the types of models  
21  and quantification techniques ordinarily used in the conduct  
22  of HRA.

23           MR. KERR: What he is saying is that everybody  
24  knows --

25           [Laughter.]

1 MR. MINNERS: It's documented.

2 [Laughter.]

3 [Slide.]

4 MR. GERTMAN: Okay. Error identifications include  
5 probable errors of commission. You normally identify a  
6 series of errors through task analysis. We were at the  
7 plant, both as part of the inspection team, and again on a  
8 second visit to gather data. You go ahead, you do  
9 interviews with a determined sample of personnel, a couple  
10 representatives from the different types of positions that  
11 would be involved in the sequences. You review the existing  
12 control room instrumentation. And you do this with human  
13 factors personnel, hopefully. You likewise sit down with  
14 systems analysts and PRA analysts on going over the  
15 operating schematics in this case at this B&W plant, the  
16 operating procedures, and the P&IDs. And this forms a lot  
17 of your knowledge base.

18 MR. KERR: A determined sample is not the same as  
19 a sample of determined, is it?

20 MR. GERTMAN: Well, I'm not sure what the latter  
21 means. I can tell you what I mean by a determined sample,  
22 if you like. And basically, it wasn't a stratified random  
23 sample. We knew a couple of the key positions that would be  
24 involved, and we tried to speak to one or two people in each  
25 of those positions, time permitting.

1           The people that were there on the inspection team  
2 also did double duty as they were acting as inspection team  
3 members. So there is some overlap. They were able to bring  
4 information back, but they were also sharing that other task  
5 of being participants in the inspection.

6           Then, here again is, we went to a sneak circuit  
7 analysis, and by analogy, and said we have unwanted pathways  
8 around a system, generally where you get a short-circuit.  
9 The equivalent of that for us is how do people, how might  
10 people work around an intended pathway within the system to  
11 cause an unwanted response.

12           So, to sum, we believe we have the means for  
13 identification of potential errors of commission; through  
14 this combination, we have the technology.

15           And in here, this is just saying that we were  
16 knowledgeable about the requirements of the different  
17 modeling techniques and quantification techniques so that we  
18 collected the right information while we were there.

19           MR. CATTON: Did you look into plant  
20 instrumentation symptoms versus operator perception?

21           MR. GERTMAN: We looked to see what was available  
22 in the control room. We differentiated between things which  
23 were on computerized displays versus things which were  
24 enunciated. We also, as part of the sensitivity, if we  
25 noticed that some instrumentation, in part of a system, such



1 like, well, let's say like a DHR system, was available only  
2 as a local indication in aux. building, and part of the  
3 sensitivity work that we're doing, we're saying suppose that  
4 information was brought into the control room, would that  
5 not be an aid?

6 So, in part of an ongoing study we're doing to  
7 decide now, we're looking at our base HEPs that we got from  
8 this first analysis and then going ahead and saying if we  
9 were to change things somewhat, what might be changed, what  
10 would be hypothesize would change, and what would happen to  
11 the error rate as a result of that. And we are looking at  
12 that question of bringing the information up.

13 MR. CATTON: I'm not sure I understood the answer.  
14 But when the operator is in the control room, and there is  
15 an intermediate system LOCA, what are the symptoms and how  
16 are they, how do they manifest themselves, the symptoms that  
17 he is supposed to respond to?

18 MR. GERTMAN: Well, in a lot of cases, you would  
19 have a makeup letdown mismatch. You might have that valve  
20 that was shown earlier in Bill's talk, the relief valve 4849  
21 opening up. You'd have the sump level indications in  
22 containment. You might have some pressures and temperatures  
23 around that suction side of the pump, before it fell apart,  
24 or that line fractured. And we looked at those things as  
25 being available. And then we just said what percentage of

1 that would be available to the person back in the control  
2 room. And then we tried to assess their ability to come to  
3 grips with that as a signature. And we, I should mention  
4 that we distinguished between the detection, the diagnosis,  
5 and the isolation in the following way. We sort of say that  
6 the detection is a detection that something is abnormal, in  
7 terms of the pressure, or that mismatch. We say the  
8 diagnosis is that we understand that we have this loss of  
9 RCS inventory and we're into a ISLOCA situation. And the  
10 isolation is the actions you take once you have the proper  
11 diagnosis.

12 MR. SULLIVAN: I can see why you got to where you  
13 are from the way that you started approaching this problem,  
14 is that there is a set of procedures that are symptom-  
15 oriented, and you wanted the guy to identify that he had an  
16 ISLOCA.

17 MR. GERTMAN: Well what we gave credit for was if  
18 the procedure, or going to different procedures, would take  
19 you specifically to the right combination of valves to  
20 isolate, then we gave credit.

21 If it would not direct you on that path, we didn't  
22 give credit for the isolation. What did help in the case is  
23 some of the timing information that Bill Galyean related,  
24 that indication was up for so many hours in the two cases he  
25 mentioned, four hours and eight hours, that we believed that

1 if the crew that happened to be in there at the time wasn't  
2 the exemplary crew that Bill Kerr referred to, but a  
3 different crew, or a crew at 3:00 O'clock in the morning,  
4 that there would be sufficient time to bring other people in  
5 that could come to the right conclusion. That's why the  
6 failure rates for both the detection and the diagnosis are  
7 rather low in the HRA study. Even though we highlight a  
8 variety of errors, we've also modeled in the recovery, due  
9 to the time arising.

10 Have I answered the question?

11 MR. SULLIVAN: I don't think so. It's a different  
12 approach --

13 MR. GERTMAN: Yes.

14 MR. SULLIVAN: -- that we're trying to get to.

15 You've assumed that he has to recognize, one method is just  
16 to follow the procedures. And did you ever look at that?

17 MR. GERTMAN: Yes. Yes, we did. And the  
18 procedures don't give much relief. There is an exception to  
19 an abnormal decay heat procedure. And when I look at a  
20 specific scenario, and I happen to go to that procedure, you  
21 know, I could call it the blue plague, or whatever, if I  
22 just follow that, that will take me to either the right pair  
23 of MOVs in the decay heat pit or it will take me to the  
24 right bypass valves. And in that case, in part of this  
25 reanalysis, we've gone back and given credit for that.

1           But again, we've indicated a low failure rate for  
2 the diagnosis as well as the function of the amount of time  
3 available. So the penalty, it's out there almost to a  
4 negligible, what is for us, a negligible human error  
5 probability, to begin with. And so there is quite a bit of  
6 credit given.

7           MR. SULLIVAN: Could you explain negligible human  
8 error probability?

9           MR. GERTMAN: Okay.

10          MR. SULLIVAN: In the context you used it, I  
11 didn't see the connection.

12          MR. GERTMAN: Okay. My opinion is, once you get  
13 past E minus 4, approaching 1E minus 5, in human error, you  
14 really are stretching the limits for people's performance.  
15 It's just not much better than that. You have to, you can  
16 put in recovery factors, but it's just not a credible number  
17 if you look at the error factors associated with guessing at  
18 numbers out to that extent.

19          People simply don't do much better than that.  
20 There's not much, there's no evidence I can think of to the  
21 contrary. If we were to switch industries for a second, I  
22 could tell you that the failure rate for seasoned pilots  
23 with crews approaching aircraft runway with their landing  
24 gear up and having to be called off on a vigil, is about 3  
25 out of 10,000, which is a pretty significant error by a

1 seasoned crew with years of experience, which you don't  
2 expect to happen. That is a very low frequency event.  
3 There's not much you can find out there out of 100,000 or  
4 certainly not out of a million, for people.

5 MR. MINNERS: So what error rate is the recovery  
6 here? I think that is the question.

7 MR. GERTMAN: Well, the recovery factor is in to  
8 raise the error rate to E minus 5 in a number of instances,  
9 which is about the best you would hope to do. And I  
10 wouldn't be comfortable putting down any number better than  
11 that for people.

12 MR. CATTON: That's E minus 5 core melt?

13 MR. GERTMAN: Oh, no. Just on the human error  
14 probability alone, which has to be factored in conjunction  
15 with the hardware and then propagated out.

16 MR. CATTON: Do you really believe that number?

17 MR. GERTMAN: I don't believe anything higher.

18 MR. WILKINS: That wasn't the question, I don't  
19 think. You're not going to push it any lower.

20 MR. CATTON: That, too. I was thinking more in  
21 terms of the other direction.

22 [Slide.]

23 MR. GERTMAN: Yes. Well, my personal belief is  
24 that it might be a little higher for people, in general,  
25 yes. One of the problems is that if you sign up to using a

1 particular model or method, you're somewhat constrained to  
2 follow the rules and assumptions of the model.

3 MR. CATTON: Even if they don't look right?

4 MR. GERTMAN: Well, you have to pick from what's  
5 available and choose the one whose method best matches to  
6 the situation at hand. Decision-based errors have a higher  
7 failure rate than some of these other things.

8 Now, when we've had the preliminary event trees  
9 that were designed sitting in concert with the systems  
10 analysts and PRA analysts, we had some preliminary events  
11 that suggested possible errors on the human side, and what  
12 we did is we applied sneak analysis from the bottom up to  
13 see if there were potential pathways up to this type of an  
14 error.

15 When you do sneak, of course, you're talking about  
16 getting around barriers, whether they be physical barriers  
17 or administrative barriers.

18 [Slide.]

19 MR. GERTMAN: One finding which was kind of  
20 important for the study is that we found a possibility for  
21 entry into early DHR cooldown, and we said that this could  
22 come from a number of sources here.

23 We had procedurally sanctioned to jumper open on  
24 PIV in that series. You had a mindset, where you were  
25 allowed by procedure to jumper interlocks, and the

1 administrative barriers were not identified, and I will get  
2 back to this point a little later on.

3 This suggested to us a sneak pathway for the error  
4 of commission related to early entry or to DHR cooldown in  
5 the opening of those valves.

6 [Slide.]

7 MR. GERTMAN: Once we had identified this, the  
8 next question to be dealt with is how could this be best  
9 represented?

10 There are some reasons for when you go ahead and  
11 model errors of commission somewhat differently than simple  
12 execution errors. Modeling intentional errors, you could  
13 use the word "decision-based," as well. They are quite  
14 different.

15 Once you make a decision which is less than  
16 optimal, you must conduct a series of actions in order to  
17 carry it out. You must look at these actions and see  
18 whether or not they have the potential to be successfully  
19 performed. You have to find out the errors rates for these.

20 In addition, we looked at kind of a unique aspect  
21 here, and this was that once you start on your pathway to  
22 complete this bad decision, if you have an error which  
23 precludes you continuing, that actually affords you some  
24 sort of recovery from your original decision error.

25 So, we wanted to be sure. We wanted to capture

1 that, as well.

2 So, trees -- and this means HRA event trees --  
3 mu' made to model the performance after the decision  
4 error has been made. We came up with a term, calling it a  
5 commission of entry, in order that it might be separated  
6 from the human error event tree, which normally is used to  
7 model omission and simple commissions.

8 MR. CATTON: That's kind of a strong statement,  
9 isn't it? "Any additional error allows recovery"? Oh,  
10 "allows." You might recover.

11 MR. GERTMAN: Yes, but --

12 MR. WILKINS: It throws you off the wrong track.  
13 The probability is that it is onto another wrong track.

14 MR. GERTMAN: You could exacerbate the situation,  
15 and this would probably be better as "some additional errors  
16 allow recovery." I'd agree with that.

17 MR. CATTON: So, how did you incorporate that into  
18 your HRA tree? Did you look at all possible things the guy  
19 could do that surrounded what his intention was?

20 MR. GERTMAN: Yes. We looked at the series of  
21 actions that would have to be carried out. I have to say  
22 that we didn't do an analysis to see -- a separate analysis  
23 to see if we could exacerbate the situation in any way. We  
24 just said once you intended to do this, as you go down that  
25 pathway, if you make errors, can you continue in your



1 decision, or do these errors give you some kind of recovery  
2 from your bad decision?

3 MR. CATTON: Don't you have to look at the  
4 symptoms and decide what he would do? Because that's the  
5 only thing that would make him change.

6 MR. GERTMAN: Well, this one is an initiator. So,  
7 there was a decision to enter into the situation.

8 MR. CATTON: He's just standing there watching  
9 everything go to hell, and he decides to do something and  
10 does the wrong thing.

11 MR. GERTMAN: Well, it's actually that decision  
12 and some of his actions that cause things to get bad.

13 MR. SULLIVAN: So, when he make an error, then  
14 that's an end event. You don't follow that anymore.

15 MR. GERTMAN: No. What we do is we say you have  
16 to combine the bad decision with the probability of  
17 executing that decision. So, you have to combine those.  
18 It's basically multiplied.

19 You need both the bad decision and the actions  
20 commensurate with executing the actions to support the  
21 decision.

22 MR. CATTON: Are most of the actions that are  
23 taken taken from the control room?

24 MR. GERTMAN: Some. Some involve sending  
25 personnel to other parts of the plant, which is an important

1 point, because what happens is in the postulated scenario,  
2 an I&C technician is sent out to jumper a valve which is  
3 normally not jumpered, and what we did in there is we  
4 modeled the possibility for the I&C technician actually  
5 refusing to perform the jumpering, based on the fact that he  
6 or she had not performed a jumpering of that valve before.

7 MR. CATTON: Or maybe they think there's too much  
8 hot water around.

9 MR. GERTMAN: Possible, also.

10 MR. CATTON: The reason I ask is one of the  
11 utilities is actually generating data via a simulator for a  
12 range of different kinds of accidents, and there you can  
13 follow this whole chain, right or wrong, until he either  
14 remedies it or it falls apart on him.

15 If I had to guess, I'd say that's the only really  
16 reliable kind of data.

17 MR. GERTMAN: I would have two comments, I guess.

18 If what we did is simply stop some valves or  
19 created an off-normal condition and we're watching the  
20 response, the simulator is an excellent device for picking  
21 up good data. But since this was going to be a decision,  
22 we'd have to set a scenario so they would come to that  
23 decision and then decide to act upon it.

24 So, it's a little more difficult than that.

25 MR. CATTON: You can't do that with a simulator?

1 MR. GERTMAN: I don't think, in this instance, it  
2 would be easy to do.

3 The second issue that you bring to light and one  
4 of my interests is if you talk to people doing the conduct  
5 of simulator studies is the human error probability  
6 estimates that one gets are very high in comparison to what  
7 are used in other methods. It is a good source of data.

8 But if you were to go over and look at the  
9 percentage of failures on licensing requal using the  
10 simulators and say, for these safety-critical actions,  
11 that's representative of potential failure rates, and if you  
12 have a failure rate of higher than 10 percent with these  
13 exams, then our HEP should not be on the order of E minus 2  
14 and E minus 3 and E minus 4; we've got a problem with a much  
15 higher error probability.

16 So, my sense is that it's someplace between those  
17 sort of data and something out there, E minus 5 and E minus  
18 6. But I think that the failure rates --

19 MR. CATTON: In the simulator, he makes a mistake;  
20 he remedies it before it goes very far. So, he's done two  
21 things. He's made a mistake, and he's corrected it, and if  
22 he doesn't quite correct it, like in your third bullet,  
23 maybe he does something, a third action that brings it back,  
24 and you don't have any of this. You just sort of have a  
25 perception of a number to place on the whole thing.

1 MR. GERTMAN: Well, we do have aspects to the  
2 recovery model. I was also going to say, in running some  
3 simulator trials -- or being involved with them, because I  
4 didn't actually run them -- at some utilities, when we ran  
5 six and seven crews on three and four scenarios, we did end  
6 up with failure rates, where crews, within the time  
7 allotted, failed to discover the error and take the  
8 appropriate actions.

9 So, I would say that even if it's not  $2 E$  minus 1,  
10 if it's down at  $1 E$  minus 1, I still think there is a high  
11 failure rate from that, and I think that would make the  
12 complexion of the situation look worse than perhaps it is  
13 realistically.

14 Had we had a simulator available to us at the time  
15 we were there doing an inspection, it was our intention to  
16 use one, and I think it's a good point to raise. If we had  
17 it, we would have more data.

18 MR. CATTON:  $E$  minus 5 is just awful small.

19 MR. GERTMAN: I agree.

20 [Slide.]

21 MR. GERTMAN: Why is quantification of intentional  
22 or decision-based errors of commission somewhat difficult?

23 Part of it is a lack of sufficient operational  
24 data to help come up with these error rates. Part of this  
25 problem is that we have some excellent case studies and

1 examples. We have a numerator, even if it's under-reported,  
2 in terms of near misses; but we simply don't have much in  
3 the literature in terms of denominators for decision-based  
4 errors.

5 We also know that decision-based errors are not as  
6 much time-driven as are other types of errors. Not to say  
7 that they're completely insensitive, but using a time  
8 estimate isn't a good way of either modeling or quantifying  
9 human errors in decision-making. You really can't tell much  
10 of the story of human performance that way. That's why time  
11 and motion studies out of the '40s and '50s just didn't do  
12 all of the job for industrial psychology that perhaps it  
13 could have.

14 We also know that if errors are cognitive in  
15 nature, they're influenced by performance shaping factors,  
16 such as quality of procedure, training and nebulous  
17 concepts, such as the awareness of a potential consequence  
18 to events, such as ISLOCA.

19 MR. CATTON: Or an ambiguity in the symptoms.

20 MR. GERTMAN: Yes.

21 MR. CATTON: That would enter on that number 3.

22 MR. GERTMAN: Yes, an ambiguity, I guess, from the  
23 -- either from the situation that the instrumentation might  
24 not be reliable or that the signature is not well defined or  
25 known.

1 MR. CATTON: Just that the signature could be one  
2 of several things.

3 MR. GERTMAN: So errors of their decision may  
4 occur -- what we're seeing is much in the thinking as in the  
5 doing. That's why we have that split between the decision  
6 and then what actions do you need to carry out the decision  
7 and that they're combined. Therefore, what the analyst does  
8 is go to some expert judgment techniques and employ those.

9 [Slide.]

10 MR. GERTMAN: That's kind of the  
11 omission/commission side of that matrix I presented to you  
12 in slide 2.

13 This slide deals with --

14 MR. CATTON: I thought you were going to tell us  
15 about the expert opinion process, expert judgment, like  
16 1150?

17 MR. GERTMAN: 1150 did use some expert judgment,  
18 but we did also. We made use of a -- a model and a data set  
19 developed at the INEL called INTENT and what it is is a  
20 list, on table 1, of 20 decision-based errors for which  
21 there are upper and lower bounds and basically, you travel  
22 below those bounds based on ratings of performance shaping  
23 factors.

24 It's -- the formulas and equivalents that the  
25 probability of finding that performance shaping value, which

1 is a composite of 11 factors is equivalent to the  
2 probability of picking a point between that other  
3 distribution with an upper and lower bound and a log normal  
4 assumption has been made in both cases. We use that  
5 technique for deriving rates for which there were not a good  
6 source of data anywhere else.

7 In terms of the latent dimension, the errors that  
8 surface involve inappropriate valve line-ups and most of  
9 these latent errors involve locally operated valves. I  
10 should also add that the status for a lot of these was not  
11 really available in the control room, other than through the  
12 locked verification log.

13 Additionally, there's a lack of procedural time to  
14 the potential for ISLOCA. They would give them a cue as to,  
15 if I had this type of a line-up, I could be at risk for some  
16 sort of ISLOCA consequence.

17 [Slide.]

18 MR. GERTMAN: What we're doing is we're conducting  
19 a sensitivity analysis now, which is going to evaluate the  
20 effects of the potential modifications. What we did is we  
21 hypothesized changes in a number of different areas. These  
22 included cautions, notes and warnings in different parts of  
23 procedures. We hypothesized the existence of an ISLOCA  
24 procedure. We precluded jumpering of interlocks as a way of  
25 doing business.

1           We went ahead, in terms of instrumentation, at the  
2 very minimum, we considered the addition of a valve status  
3 board, in the control room, which could go ahead and give  
4 you the status for some of these locally operated valves,  
5 which figured prominently in terms of ISLOCA.

6           Also, we said if there were more presentation of  
7 informational pressures, temperatures, levels and flows from  
8 parts of systems such as DHR available in the control room  
9 and not local to an aux building that we felt this would  
10 make an impact.

11           In training, we said, now there was a module,  
12 where none existed before, specific to ISLOCA and it was  
13 also in the alarms to be associated with an ISLOCA  
14 signature, so that the symptoms perhaps would be less  
15 confusing or ambiguous.

16           We also looked at recovery, that any kind of  
17 recovery, in this case, we don't mean mitigation because we  
18 consider that scrubbing of the release, but the isolation  
19 actions would be covered by procedures. These procedures  
20 would have check-offs and they would have independent  
21 verifications as well.

22           So the base case is the analyzed review, the task  
23 analysis, the documentation, the things that are the body of  
24 the report, therefore.

25           Then we went to standard quantification sources,



1 saying, if these things were changed, what would the  
2 resultant value be? This is in progress right now. Then  
3 we're going to go ahead and look at that delta. The  
4 sensitivity from what is, versus what could be.

5 I think there's also -- there will be a cost  
6 benefit analysis conducted. But certainly there's different  
7 types of costs associated with some of these changes versus  
8 others.

9 MR. KERR: This cost benefit will evaluate the  
10 effect on total plant risk?

11 MR. BURDICK: ISLOCA plant risk. ISLOCA risk.

12 MR. KERR: Well, I'm not interested in ISLOCA  
13 risk, I'm interested in plant risk. I might have a  
14 situation in which I would reduce ISLOCA risk significantly,  
15 at the cost of increasing plant risk, generally.

16 I mention that because one of the conclusions,  
17 after TMI, I think, was that control boards were confusing  
18 because of the amount of information that an operator had to  
19 assimilate. What I'm seeing here could be interpreted as  
20 asking an operator to assimilate additional information.  
21 This may be a wise thing to do if all one ever has to cope  
22 with is an ISLOCA. But that, of course, is not the case.

23 It seems to me that this sort of thing, if you're  
24 serious about using the results, must take into account the  
25 total plant and the total control board and not just an

1 ISLOCA.

2 MR. BURDICK: That's -- that's a very, very good  
3 point. We are, again, attempting to do the best job we can  
4 within constraints we have. To do another global study, to  
5 get a -- get a handle on these particular scenarios --

6 MR. KERR: I'm simply saying that you run the risk  
7 of making things worse if you don't do a system-wide study.

8 MR. BURDICK: I understand the problem.

9 MR. SULLIVAN: Could you go back to that for just  
10 a second. Can you tell me how you quantify the first  
11 bullet, first sub-bullet as --

12 MR. GERTMAN: This one is the addition of  
13 cautions, notes and warnings?

14 MR. SULLIVAN: Yes. How do you -- how do you  
15 quantify that? I got a -- I can go through every one of  
16 them and ask the same question, but I'd just like to get a  
17 sense.

18 MR. GERTMAN: Okay. If I give the simplest case,  
19 which is maybe going back to the data tables. You have, in  
20 the area for -- where actions are -- are guided by  
21 procedures, you have different values, depending on how long  
22 a procedure is, how detailed the procedure is; whether or  
23 not there's a second person behind the first; whether or not  
24 the people are operating strictly off the procedure, or have  
25 to go off into a knowledge-base realm and see, by analogy or

1 otherwise, where they should go on their next step.

2 There are different values ascribed to this.

3 Likewise, based on time, based on the interface, how well  
4 the information is presented, you have either higher or  
5 lower failure rates. So, actually, it's not all that  
6 difficult to do, just because of the manner in which the  
7 tables are set up for that particular source.

8 MR. SULLIVAN: I have never seen a table that said  
9 if you add cautions or notes that you would modify it any  
10 way.

11 MR. GERTMAN: I guess what I would say to that is  
12 that --

13 MR. SULLIVAN: You must have made some assumption.

14 MR. GERTMAN: Okay. I guess my point would be, is  
15 if it doesn't refer me to the impact, I would say that  
16 assessing there is a potential impact there is a step not  
17 covered within that particular procedure. It is expected  
18 knowledge base of that person and they have to recall that,  
19 versus reading it. It's not saying that things ought to be  
20 spoon-fed, but if they -- have a -- a high consequence and  
21 they aren't typical, spelling out adds a margin of recovery  
22 to the execution of the overall procedure.

23 MR. SULLIVAN: You can go ahead.

24 [S. ide.]

25 MR. GERTMAN: Because of unique approach we took

1 in terms of a team composition, working with an integrated  
2 group with the human factors and PRA systems engineer and  
3 the emphasis we placed on errors of commission, using new  
4 identification techniques such as Sneak and modules such as  
5 the commission of entry, and making use of existing  
6 quantification techniques and calling into play, performance  
7 shaping factors, we were able to reach the following  
8 findings and conclusions:

9 First of all, we think Sneak analysis is a general  
10 technique that offers promise for the identification of  
11 errors of commission and I would suggest that this applies  
12 outside of ISLOCA and for PRAs in general. Secondly, the  
13 errors of commission and latent errors prove to be risk  
14 dominant for ISLOCA at this particular B&W plant. It may  
15 not be the case in another one that you were to look at.

16 Third, the results supported the inspection team's  
17 findings about training and procedures and extended them to  
18 error quantification. Lastly, if we go back to some of the  
19 thoughts on the sensitivity analysis slide, the one before  
20 this, we believe there are some practical measures which  
21 might be available to lessen the risk related to the human  
22 error that was identified.

23 Lastly, I'd like to add that none of this really  
24 would have been possible unless we had gone way beyond the  
25 level of HRA as it's practiced in contemporary PRAs. Quite

1 simply, the job hasn't been extensive enough to date, and  
2 that's why you don't have errors of commission represented  
3 in other studies. It's not that people don't commit them.  
4 You can go to the LARs and see a lot of examples of that.

5 That concludes the presentation that I have.

6 MR. CATTON: Thank you.

7 MR. GERTMAN: Any questions?

8 MR. KERR: Is the Sneak analysis that you  
9 mentioned something new to this study, or have others used  
10 it for this same purpose?

11 MR. GERTMAN: Others have not used it in this  
12 context.

13 MR. KERR: Do you expect to publish that in some  
14 journal or other, or does it deserve that?

15 MR. GERTMAN: It was accepted last month in  
16 Reliability In Engineering System Safety, Apostalakis' [ph.]  
17 journal out of UCLA, so that will be available soon. If  
18 people need copies or would like to see it, we'd be happy to  
19 provide anybody with them.

20 MR. KERR: I would like to see a copy.

21 MR. GERTMAN: Is that true for the whole panel?

22 MR. BOEHNERT: Send me a copy and I will  
23 distribute it.

24 MR. CATTON: Now that you mention Apostalakis'  
25 [ph.] Journal, I read a series of editorials in it a few

1 months ago, maybe even a year ago where all of the different  
2 people that you were citing as you walked through this, took  
3 pot shots at each other.

4 MR. GERTMAN: Yes.

5 MR. CATTON: After reading that, I would suggest  
6 that even though you have E to the minus 4, your uncertainty  
7 might be 10 to the plus 4.

8 MR. GERTMAN: I'd say error factors of 5 and  
9 occasionally 10 are not uncommon in some of the estimates.

10 MR. CATTON: That's plus or minus E to the 1, a  
11 factor of 10; you're in really good shape.

12 MR. GERTMAN: Yes.

13 MR. CATTON: Much better than any of the rest of  
14 the analysis. I'm not sure I believe that.

15 MR. SULLIVAN: Would you say you're pushing the  
16 state of the art?

17 MR. GERTMAN: Yes.

18 MR. CATTON: Thank you. You're going to tell us  
19 about the B&W plant?

20 [Slide.]

21 MR. GALYEAN: I would like first to just quickly  
22 go through the entire process and then go through it a  
23 second time more slowly and in more detail. Initially --

24 MR. KERR: What is the process that you're going  
25 to discuss?

1 MR. GALYEAN: The analysis process that we went  
2 through when we looked at the B&W plant.

3 MR. KERR: Thank you.

4 MR. GALYEAN: Initially, after we did sort of a  
5 general background education where we looked at the  
6 historical experience, the LERs and collected what  
7 information we could on operational events and sort of  
8 educated ourselves to types of errors that are possible and  
9 could potentially occur at the plant we were looking at, we  
10 reviewed the B&W plant systems and operations.

11 Based on that, we put together or we postulated  
12 sequences that could occur that could lead to an ISLOCA  
13 situation. We developed event trees to model these  
14 sequences. We then approached the quantification part of it  
15 where we first looked at the initiation of these sequences.  
16 That can be either a hardware initiator; that is, a valve  
17 fails, or a human error initiator; that is, if an operator  
18 inappropriately opens a valve, or some combination of the  
19 two.

20 Then we looked at the systems that would be  
21 exposed to the high pressure RCS water. INPEL performed  
22 their fragility calculations. We did the local system  
23 pressure predictions, combining the two to generate system  
24 rupture probabilities.

25 Based on that, then we took a look again at the

1 human operator to estimate his performance in detecting  
2 diagnosis, isolation and mitigation. From that then, we can  
3 generate core damage frequency. At the same time --

4 MR. CATTON: Out of curiosity, you put the  
5 operator downstream of the probability distribution, if I  
6 track through those blocks.

7 MR. GALYEAN: I guess I don't understand. The  
8 operator appears both as an initiating event and then as a  
9 recovery event. Calculating consequences then, we took the  
10 approach where we relied mostly on existing literature.

11 We utilized the Oconee PRA for containment bypass  
12 Source Term. We scaled it to the plant we were looking at.  
13 We then normalized the consequences to an average site, as  
14 was alluded to before. Combining the core damage frequency  
15 and the conditional consequences, we then calculated risk.

16 We went on to perform some sensitivity studies  
17 which, again, I will get to in a little more detail later  
18 on, and generated some conclusions or observations.

19 MR. CATTON: An interesting study was done for BWR  
20 stability. They looked at all the possible paths you could  
21 go through and then they did the calculations all the way  
22 through that path. Then you go back and calculate the  
23 probabilities.

24 Then you wouldn't have to fool around with that  
25 distribution, would you?



1 MR. GALYEAN: I guess I don't understand the  
2 reference you're making to instabilities. I guess --

3 MR. CATTON: Boiling water reactor instability has  
4 been under study. One of the questions that comes up is;  
5 what's the bottom line, given you have a whole bunch of  
6 paths to get somewhere? The concern was that if -- you  
7 should track the thermal hydraulics through each one of  
8 these paths that you can follow. Then you can separately  
9 estimate the probabilities associated with it.

10 When you do that, any time you look at a given  
11 piece of equipment or something in your system, you have a  
12 really best guess at what its environment is. I get the  
13 feeling here that that was kind of separated.

14 MR. GALYEAN: I mean, we looked at the thermal  
15 hydraulic issues. I guess I still don't understand the  
16 point you're trying to make.

17 MR. KERR: Don't feel bad; I don't either.

18 MR. CATTON: For the boiling water reactor  
19 stability question -- whether it's a safety issue or not is  
20 separate -- what they did was, they went through and they  
21 looked at what the operator actions could be at a number of  
22 different stages as one of these things could evolve; he did  
23 something good, he did something bad, whatever he could do.

24 Then they would follow through this sort of  
25 decision process, actually doing the thermal hydraulic

1 calculations, so you had the thermal hydraulic environment  
2 that your equipment is exposed to, all along the path. This  
3 way, if you have to estimate a failure of something or  
4 other, you have the true conditions at that time.

5 MR. GALYEAN: I think I understand what you're  
6 getting at. The types of calculations you're suggesting, at  
7 least according to my understanding, is that they are very -  
8 - it's very expensive and time consuming to assemble these  
9 models. The actual code run may not take -- the RELAP or a  
10 lot of these codes do take a lot of computer time, and the  
11 number of scenarios that you could postulate is -- well,  
12 there are many, many of them.

13 To handle them all in this computer model  
14 intensive way is simply beyond our resources. That's  
15 something for the NRC to take up, I think.

16 MR. SULLIVAN: He's just telling you a different  
17 way. You get to the end result the same way.

18 MR. CATTON: A lot of it depends on what the  
19 operator does.

20 MR. SULLIVAN: No. Let him finish and then I  
21 think you'll be able to see.

22 MR. MINNERS: Don't you calculate the consequences  
23 of each branch of your event tree? Isn't that your  
24 question?

25 MR. GALYEAN: Yes.

1 MR. CATTON: Well, I'm wondering if he tracks  
2 thermal hydraulics through each one of those branches.

3 MR. MINNERS: That's what I mean. The pressure  
4 flow --

5 MR. CATTON: No, I didn't get that.

6 MR. GALYEAN: We didn't do detailed TH  
7 calculations on the aux building, for example. okay? We  
8 looked at the flows and the leaks, you know, the pressures  
9 inside the system, the ruptures and the leak rates, and then  
10 we said, Well, if it wasn't isolated, it goes to core damage  
11 and core melt, and then subsequently, a release to the  
12 environment occurs, and you have off-site consequences.  
13 That's what we did. I really can't speak to, you know, what  
14 you're referring to.

15 MR. SULLIVAN: Ivan, why don't you wait until you  
16 go to the event tree, because I think he's doing the same  
17 thing.

18 MR. CATTON: Okay. Continue.

19 [Slide.]

20 MR. GALYEAN: To just briefly go through the  
21 historical experience that we collected, we loosely use the  
22 term ISLOCA precursor loosely there. We collected  
23 information on approximately 18 events that basically  
24 involved human errors, combinations of hardware faults and  
25 human errors. One was even a generic materials problem.

1 MR. WILKINS: Wait a minute. Eighteen events?

2 MR. GALYEAN: Yes.

3 MR. WILKINS: You only listed 14, though.

4 MR. GALYEAN: I'm sorry.

5 [Laughter.]

6 MR. GALYEAN: Well, I just tried to summarize the  
7 most common, okay? There are a number of events that  
8 occurred somewhat unique, okay, and those are not listed  
9 here. That's just to give you an idea of the education  
10 process that we went through to familiarize ourselves with  
11 the types of things that are happening out in the industry,  
12 and the types of things that we can then, in turn, you know,  
13 look for in our analysis.

14 [Slide.]

15 MR. GALYEAN: When we looked at the B&W plant, we  
16 identified the ISLOCA interfaces and sequences that seemed  
17 most likely. We had a screening criteria that we applied,  
18 and that was one inch in smaller lines, and where the  
19 potential for a leak was smaller than 200 gallons per  
20 minute, we did not pursue it any further. This criteria is  
21 based on these items here, and that is that you would have  
22 so much time available that eventually, the operators would  
23 be able to recover the situation.

24 MR. MICHELSON: Why do you use Schedule 160 for  
25 your criterion on pipe size? That would be true on the

1 primary side, but not --

2 MR. GALYEAN: What we're trying to do is account  
3 for flow losses, okay, in a pipe.

4 MR. MICHELSON: Yes, but it's the pipe that  
5 ruptured that's going to be 50 feet long, and it's going to  
6 be out in the auxiliary building somewhere.

7 MR. GALYEAN: That's right, and --

8 MR. MICHELSON: And it's not necessarily Schedule  
9 160 if it's on the suction side of a pump. It very likely  
10 would not be.

11 MR. GALYEAN: That's right. Along the way, you  
12 will likely have more than 50 feet; you will likely have a  
13 number of flow restricting devices. Even an open valve will  
14 restrict flow. You have even friction losses in the pipe.  
15 You have release valves along the way. You have restricting  
16 orifices. So this was just sort of a rule of thumb that we  
17 put together that we can then use and constrain the problem  
18 we're looking at.

19 MR. MICHELSON: Now, the 200 gallons a minute is  
20 being driven by reactor pressure and temperature?

21 MR. GALYEAN: That's right.

22 MR. MICHELSON: And you're flashing it at a break  
23 point.

24 MR. GALYEAN: Into atmosphere pressure.

25 This then led to the identification of three

1 interfaces: the high pressure injection and low pressure  
2 injection lines, and then the DHR letdown line. These three  
3 then comprised five possible sequences which, from here on,  
4 I'll identify as the high pressure injection sequence, the  
5 make-up sequence, the LPI, and the start-up and shut-down  
6 sequences. I'm going to briefly go through each of these  
7 five sequences and just describe them.

8 [Slide.]

9 MR. GALYEAN: This is the high pressure injection  
10 interface. At the B&W plant, there are two trains of high  
11 pressure injection. Each train branches into two injection  
12 lines. This then represents one pair of those injection  
13 lines for one of those HPI trains.

14 Items to take note of is that these check valves  
15 -- here is the containment boundary. These check valves are  
16 welded back to back and cannot be individually leak tested.  
17 In our analysis, we treat them basically as a single valve,  
18 a single check valve, since you can only ensure that the  
19 pair is functioning as an isolation, not each valve is  
20 functioning independently.

21 There's a normally closed gate valve in the  
22 injection line. The check valve then further prevents back  
23 leakage back to the high pressure injection pump. There is  
24 a recirculation line back to the borated water storage tank.

25

1           A couple of operational issues to take note of are  
2           that these motor operated valves are stroke tested  
3           quarterly, okay. So four times a year, they open this  
4           valve, and this -- basically what we loosely refer to as a  
5           single check valve -- is providing the pressure isolation  
6           between the high and low pressure.

7           MR. MICHELSON: That's a non-loaded test, though?

8           MR. GALYEAN: That's right. In this case, it's a  
9           non-loaded test. Also monthly, the pump is flow tested,  
10          which means that this check valve has flow through it once a  
11          month.

12          They open up this recirc line back to the borated  
13          water storage tank for this test. So the danger or the  
14          potential is there that this recirc line is left in the open  
15          position inadvertently, that this check valve could stick in  
16          the open position, or that this check valve could stick in  
17          the open position when the month -- when the quarterly  
18          stroke test of this valve takes place, that you could have a  
19          back flow through this check valve, and either back to the  
20          borated water storage tank or back to the high pressure  
21          injection pumps.

22          MR. MICHELSON: You never convinced me I knew that  
23          the check valve receded. Do you have some means of knowing  
24          that?

25          MR. GALYEAN: Which check valve?

1 MR. MICHELSON: Twenty-two.

2 MR. GALYEAN: Twenty-two? No. And that's right.

3 MR. MICHELSON: They could be unseated for years.

4 MR. GALYEAN: That's right.

5 MR. MICHELSON: The same argument over here on  
6 these back-to-back ones?

7 MR. GALYEAN: Well, the pair of them are leak  
8 tested on every start-up, okay? So when the plant's  
9 starting up, they do leak test the pair to make sure that  
10 there's a positive isolation across this.

11 MR. MICHELSON: It's done through a leak-off?

12 MR. GALYEAN: That's right.

13 MR. SULLIVAN: What is the probability you use for  
14 those valves?

15 MR. GALYEAN: These valves?

16 MR. SULLIVAN: Yes.

17 MR. GALYEAN: Okay. It was an hourly failure rate  
18 somewhere on the order of ten to the minus eight per hour,  
19 okay, and then a yearly fault exposure time, I think is --  
20 I'd have to check to make sure, but --

21 MR. SULLIVAN: Did you give them credit for both  
22 valves?

23 MR. GALYEAN: No. We treated this as a single  
24 valve, okay, because, as I said, they cannot be individually  
25 tested.



1 MR. SULLIVAN: Even when you went to the  
2 probability tables?

3 MR. GALYEAN: That's right. That's right. The  
4 problem is that, you know, the assumptions -- I suppose the  
5 assumption to make is that through the entire history of the  
6 plant, that the leak test verifies that a single valve is  
7 functioning. The second valve then basically has a fault  
8 exposure time of the entire -- since it was installed, okay,  
9 which, in this case, it would be about 15 years, I believe.

10 MR. SULLIVAN: What you're assuming, really, is  
11 that one of those valves is always failed.

12 MR. GALYEAN: That's right. That's right.

13 MR. SULLIVAN: Which is probably not really  
14 correct.

15 MR. MICHELSON: It turns out, in some cases in  
16 operation, two or three of them have been found open, which  
17 we think is an extremely low probability finding, but  
18 nevertheless the case.

19 MR. SULLIVAN: You know, in the probability sense,  
20 in the best estimate sense --

21 MR. MINNERS: In 15 years, what's the probability,  
22 even if it's ten to the minus eight per valve?

23 MR. GALYEAN: Fifteen years worth of hours, 15,000  
24 hours.

25 MR. SULLIVAN: Yes, but what he's doing is

1 assuming one of them is always failed.

2 MR. GALYFAN: Yes.

3 MR. SULLI AN: He's assuming one is failed all the  
4 time in 15 years.

5 MR. GALYEAN: That's right.

6 MR. MINNERS: No, he's doing it per reactor year.

7 MR. CALYEAN: What we are assuming is that one of  
8 these two valves is in the failed state, simply because you  
9 cannot verify that they are both functioning.

10 MR. KERR: One of them would go through 15 years  
11 without failure, and the other one has always failed?

12 MR. GALYEAN: That's right. That's the assumption  
13 we're making, as I said, since we cannot verify that they  
14 are both functioning.

15 MR. KERR: That seems somewhat unlikely,  
16 physically.

17 MR. MICHELSON: But he's testing them once a year.  
18 Leakage was every three years, or one year?

19 MR. CALYEAN: Well, they do leak testing --

20 MR. MICHELSON: I thought you said at the  
21 beginning of each startup.

22 MR. GALYEAN: That's right, at the beginning of  
23 each startup.

24 MR. MICHELSON: And how many times is that, about  
25 once a year?

1 MR. GALYEAN: About once a year.

2 MR. MICHELSON: So you know once a year they're  
3 tight.

4 MR. GALYEAN: We know once a year the pair of them  
5 are tight.

6 MR. KERR: And that pair has never been disturbed  
7 for repair or anything since the plant started up.

8 MR. GALYEAN: Well, that may be. I don't know.  
9 This is the other half --

10 MR. MICHELSON: How frequently are those valves  
11 used for other than addressing an accident, the back-to-back  
12 check valves? When else do you have flow through them,  
13 during normal plant operation?

14 MR. GALYEAN: Not.

15 MR. MICHELSON: Not at all?

16 MR. GALYEAN: Not at all.

17 MR. MICHELSON: No filling of tanks or anything  
18 else is done through them?

19 MR. GALYEAN: No. They inject into the reactor  
20 coolant system.

21 [Slide.]

22 MR. GALYEAN: This is the other half of the high-  
23 pressure injection system. This is treated separately,  
24 because one leg is also used for normal makeup. So you've  
25 got a normal supply of makeup water into the reactor coolant

1 system through this injection leg. The arrangement  
2 otherwise is similar. You've got the two check valves  
3 rolled in back to back; you've got the normally-closed  
4 motor-operated valves, which are also stroke-tested monthly.  
5 And in this particular case -- or quarterly. Stroke-tested  
6 quarterly.

7 In this particular case, when this HP-2A valve is  
8 stroke-tested, the normal makeup continues. So this line is  
9 always pressurized to 2200 PSI. When this valve is opened,  
10 you then pressurize back to the check valve, and this  
11 portion of the piping, as a matter of routine.

12 Then you have the same possibility of the pump  
13 discharge check valve failing to see, and of the bypass line  
14 being inadvertently left open. In this case, then, it's  
15 just the single opening of this injection valve, and you  
16 would get your normal makeup water would be diverted, either  
17 back this way or back through the borated water storage  
18 tank.

19 In addition, since this line is used during normal  
20 makeup, you'd normally have to flow through these check  
21 valves so they are open, and then if that flow is diverted,  
22 these check valves are demanded to close, which is a higher  
23 failure rate, kind of failure mode, than if they are seeded  
24 and leak and --

25 MR. MICHE<sup>Y</sup>SON: But you don't know if they close?

1 MR. GALYEAN: That's right.

2 MR. MICHELSON: Close fully, at least.

3 MR. GALYEAN: That's right.

4 MR. MICHELSON: Now, I assume the makeup is a  
5 full-pressure makeup?

6 MR. GALYEAN: That's right.

7 MR. MICHELSON: And the suction side of the HP  
8 pump is what pressure, design pressure?

9 MR. GALYEAN: I believe -- I have to check -- but  
10 it's probably about 600 psi; but I'm not positive of that.  
11 I'd have to check.

12 MR. MICHELSON: So if the check valve sticks open,  
13 then you get the overpressurization?

14 MR. GALYEAN: That's right.

15 MR. MICHELSON: How about back to the borated  
16 water storage tank? Is that 2200 back through a restricting  
17 orifice?

18 MR. GALYEAN: There is a restricting orifice, and  
19 the borated water storage tank is vented to the atmosphere.  
20 So there is no chance of over-pressurizing the borated water  
21 storage tank.

22 MR. MICHELSON: Except for the pipe downstream --

23 MR. GALYEAN: That's right, except for the pipe  
24 that leads into it.

25 MR. MICHELSON: Yes. And that's the 300, 600, or

1 --

2 MR. GALYEAN: Yes, that's lower, that's probably  
3 300. Again, I'd have to check. It changes design rating as  
4 you move through the pipe.

5 [Slide.]

6 MR. GALYEAN: This is a diagram of the low-  
7 pressure injection interface. This probably closely, most  
8 closely comes to the Event V or V-sequence case. We've got  
9 two check valves normally open MOV.

10 And again, you've got two variations. You can  
11 have the failure of these check valves, the random hardware  
12 failure of the check valves and then back leaking into the  
13 low-pressure injection line, or you can have this pair of  
14 check valves fail, in which case you back leak to the core  
15 flood tank, which is inside containment.

16 There is a small relief valve here, but not enough  
17 to protect the system.

18 MR. SULLIVAN: The core flood tank would be  
19 identified quickly, right?

20 MR. GALYEAN: Yes. That was our assumption, was  
21 that the core flood tank, if it started to pressurize, would  
22 be identified relatively quickly.

23 MR. MICHELSON: What's the design pressure outside  
24 of containment on that system, the one you just had on?

25 MR. GALYEAN: The low-pressure injection system?

1 MR. MICHELSON: Yes, going to the left, where it  
2 is -- that's all 2,200 pounds?

3 MR. GALYEAN: No. It changes schedule right here  
4 at this check valve.

5 MR. MICHELSON: Inside of containment?

6 MR. GALYEAN: That's right.

7 MR. MICHELSON: So the interface, in this case,  
8 between high and low pressure, is inside of containment?

9 MR. GALYEAN: That's right.

10 MR. MICHELSON: Okay.

11 [Slide.]

12 MR. GALYEAN: Likewise, that's the case on the DHR  
13 letdown, which is this diagram here. Here's the containment  
14 boundary, and the schedule or the design change is right  
15 here at the second isolation valve, which again is inside  
16 containment.

17 This, okay, this is the reactor coolant system on  
18 this end. You go through, there's a pair of motor-operated  
19 isolation valves; there is a four-inch relief valve off of  
20 the 12-inch line. You go through the containment wall and  
21 into the DHR pump suction lines. There is a 2-1/2 inch  
22 bypass line, again, connecting to the 12-inch line.

23 These letdown isolation valves have a bypass  
24 around them where there are two locally-manually operated  
25 valves. This is installed so when they are shut down they

1 can perform, for example, MOVATS testing on these motor-  
2 operated valves and still keep their DHR running.

3 MR. MICHELSON: From the viewpoint of the  
4 containment isolation criteria, I guess the suction valves  
5 on the DHR are the outboard isolation? It's the only one  
6 you show outboard.

7 MR. GALYEAN: I'm sorry?

8 MR. MICHELSON: The containment usually requires  
9 an isolation valve inboard and another one outboard of the  
10 penetration.

11 In this case, I guess outboard of the penetration  
12 is way over there to the valves on the right-hand side; is  
13 that the plan?

14 MR. MINNERS: He's not a regulator. He doesn't  
15 know.

16 MR. MICHELSON: But you know.

17 MR. MINNERS: No, I don't know. I'm a researcher.

18 [Laughter.]

19 MR. MICHELSON: It's clearly not a good  
20 penetration; clearly the valve is, like I said, a little  
21 while back, a long way from the penetration. That one there  
22 I would guess is a long way. But it might not be. But it's  
23 got to be quite a ways just to put in the branches and all  
24 the other things he's showing.

25 MR. MINNERS: They just took it as it was.



1 MR. MICHELSON: And that's also low-pressure  
2 piping, the 12-inch, and if things go wrong, it's going to  
3 get the 2,200-pound impact.

4 MR. GALYEAN: Right. The sequence that we're  
5 postulating here is that as the plant is starting up, one  
6 pair or the other pair of these valves could be left open  
7 inadvertently, the plant could pressurize and result in a  
8 pressurization downstream.

9 I just might add that this particular sequence did  
10 not contribute very much because there's a very high  
11 likelihood that if they pressurized about 320 psi, that this  
12 relief valve would actuate and dump into the emergency  
13 containment sump and alert the operators that they have a  
14 situation on their hands before they would reach a pressure  
15 that could potentially rupture downstream equipment.

16 MR. MICHELSON: Now, how slowly do you think this  
17 is moving?

18 MR. GALYEAN: This is during plant startup, when  
19 the operators are pressurizing the primary system.

20 MR. MICHELSON: Okay. It's during startup, and  
21 then they're starting to fill the sump before he ever got  
22 the reactor pressure on up high enough to worry about.

23 MR. GALYEAN: That's right.

24 MR. MICHELSON: Okay.

25 MR. GALYEAN: That's right.

1 [Slide.]

2 MR. GALYEAN: The other sequence that we postulate  
3 for this DHR letdown line is during plant shutdown and that  
4 is that either the control room crew is depressurizing the  
5 primary system, shutting the plant down and they go enter  
6 into DHR cooling prematurely; that is, before the  
7 approximate 300 PSI threshold or point at which they would  
8 normally do so.

9 MR. MICHELSON: I thought there was a requirement  
10 on valve applications of that type, wherein when you were  
11 above the design pressure the downs' side, that the  
12 power had to be disconnected from the valves.

13 MR. GALYEAN: That's right.

14 MR. MICHELSON: The worry was fire and so forth.  
15 In these cases, is that true also?

16 MR. GALYEAN: Yes.

17 MR. MICHELSON: What they did is, they didn't  
18 follow that part of the procedure, I guess.

19 MR. GALYEAN: No. These valves are normally kept  
20 in a disabled state, but the important error, I guess, or  
21 the significant error is being made by the control room  
22 operators. They make a conscious decision to go into DHR  
23 shutdown, at which time they then go through the procedures.

24 MR. MICHELSON: You've got to go downstairs to do  
25 it. He can't do it from the control room.

1 MR. GALYEAN: Well, no, they can do it from the  
2 control room.

3 MR. MICHELSON: No, no, then he hasn't done it  
4 right, because the fire problem was fire in the control room  
5 or in the adjacent area that they were worried about.  
6 Therefore, they went to the breakers and disconnected the  
7 power at the breaker and you couldn't -- you had to go back  
8 and rack in the breaker to get started?

9 If they did it that way, then those acts would  
10 have to be omitted for this to happen. Either that or I  
11 guess he left the valves open and pulled the power.

12 MR. GALYEAN: No, that's not what we're  
13 postulating here.

14 MR. MICHELSON: All right.

15 MR. GALYEAN: We're saying that the valves are  
16 closed and they're in the position they're supposed to be  
17 in; that is, the control power is removed and the circuit  
18 breakers are open. The operators are shutting the plant  
19 down and they say, okay, it's time to enter into DHR  
20 cooling.

21 Now, what we're postulating is that they make that  
22 decision at an inappropriate time. Once they make that  
23 decision, then they go through the procedures and do what  
24 they have to do to open the valves; that is, close the  
25 circuit breakers, restore control power and then open the

1 valves.

2 MR. MICHELSON: They did it too early?

3 MR. GALYEAN: That's right.

4 MR. MICHELSON: That's a lot of things to do  
5 wrong.

6 MR. GALYEAN: Well, we've had a lot of discussion  
7 on this, and really it's only one wrong decision that's  
8 being made. Once they make that decision, then they pursue  
9 that course of action.

10 MR. MICHELSON: They had plenty of time to think  
11 about it while they were doing it because you can't do it  
12 quickly. It takes half an hour to go through that.

13 MR. GALYEAN: In the handout are the event trees  
14 for each of these five sequences. I was not planning on  
15 going through them individually unless someone has a  
16 question.

17 MR. WILKINS: Is this kind of event that you and  
18 Mr. Michelson were just discussing, what you call  
19 intentional error?

20 MR. GALYEAN: That's right. This is a cognitive  
21 error of commission, I guess, in the HRA.

22 MR. MICHELSON: If you've got a lot of time to  
23 think about it while you're carrying it out, then it's  
24 different than if it only requires a flip of the switch.  
25 That kind, you don't think about till later. This one,

1 you're doing a lot of things and somebody hopefully catches  
2 it before you get done.

3 MR. MINNERS: Is this what happened at TMI?

4 MR. MICHELSON: Oh, yes, at TMI, they just watched  
5 it for hours, sure. I don't say it can't happen. I'm just  
6 saying that there's a chance of catching it as opposed to  
7 those you can do quickly.

8 [Slide.]

9 MR. GALYEAN: The first one on my list here is the  
10 first sequence we talked about and that was the high  
11 pressure injection.

12 MR. CATTON: That's fine. When I look at that and  
13 take, operators failed to detect ISLOCA, and you've got 2  
14 times 10 to the minus 5.

15 MR. GALYEAN: Yes. This is really -- we were not  
16 real precise in our semantics here. What we're really  
17 saying is that the operators failed to detect an abnormal  
18 event. It's subsequent here that they then diagnose it as  
19 an ISLOCA.

20 MR. CATTON: Now, if I look down, I see that every  
21 one of them is the same.

22 MR. GALYEAN: In this particular sequence, that's  
23 right.

24 MR. CATTON: If I go to the next step, you go  
25 back. Again, it says that operators failed to diagnose

1 ISLOCA. I get the same number all the way down.

2 MR. GALYEAN: That's right, in this particular  
3 sequence, that's true. If you look at one of the others,  
4 you'll see that these numbers will vary, dependent on what  
5 happened previously. In this particular sequence --

6 MR. CATTON: The question I asked earlier is; how  
7 do you get there? Do you sort of track through the thermal  
8 hydraulics along that tree?

9 MR. GALYEAN: We track through the sequence of  
10 events through this tree, okay? For example, here we start  
11 out and say, there are three lines exposed to this potential  
12 failure during the course of the year. We say, okay, one  
13 pair of those back-to-back check valves could leak.

14 Okay, if that leaks, then the -- normally open --  
15 this is the stroke testing of that injection valve and so  
16 on. The decisions -- these events depend on what happened  
17 before.

18 MR. MINNERS: He wants to know if you calculated  
19 the consequences along that tree?

20 MR. CATTON: I don't think he does. I think he's  
21 answered my question.

22 MR. MICHELSON: Are you asking about environmental  
23 consequences or reactor conditions?

24 MR. CATTON: I was just curious that when you have  
25 a t like this and you somewhere down within the tree have

1 got a pipe that might rupture and you can get to it in a  
2 number of different ways.

3 MR. HANSON: There is only one event on that tree  
4 where the pipe ruptures. That's the one about right in the  
5 middle.

6 MR. CATTON: This is pretty much independent of  
7 thermal hydraulics; is really what it gets down to.

8 MR. HANSON: In that one event, the whole thermal  
9 hydraulics are centered in that one event.

10 MR. CATTON: Are there any events where that's not  
11 the case.

12 [S] de.]

13 MR. GALYEAN: This is the event tree for the low  
14 pressure injection sequence. If you notice, now the numbers  
15 in some cases are the same, but these vary and these vary,  
16 okay, which means that there's a dependency on the previous  
17 failures. When we get to this point, we say, well, what's  
18 the probability of this event, given this particular  
19 sequence of events which occurred previously?

20 MR. MINNERS: That wasn't the question.

21 MR. CATTON: You calculate your way through that?

22 MR. GALYEAN: Yes.

23 MR. HANSON: The thermal hydraulics aren't  
24 changing in the system up to the point of rupture. Then  
25 that's the event up there that says interfacing system

1 ruptures and that's where all your thermal hydraulics are  
2 centered, just in that one event.

3 MR. CATTON: In this particular case, you really  
4 don't have to?

5 MR. HANSON: That's right.

6 [Slide.]

7 MR. GALYEAN: I'll return now to that premature  
8 shutdown and I'd like to explain a little bit further, some  
9 of the issues that were addressed.

10 MR. SULLIVAN: Can I ask you another question  
11 about the -- you don't even have to turn back to it, I don't  
12 think. Those operator failures at 10 to the minus 5, have  
13 you seen numbers that low?

14 MR. GALYEAN: Well, that's what we used as our  
15 lower bound and if you -- you can postulate a potential  
16 sequence of events and be so specific in the context in the  
17 operating mode and things like that, that it's never  
18 happened, okay? What do you do in a case like that?

19 Our approach is to do it analytically, okay, and  
20 many times we get very low numbers, 10 to the minus 5.  
21 That's -- in our opinion, we use that as the lower bound on  
22 our operator error, and I don't know how else to do it.

23 MR. MINNERS: What do you mean by "seeing?" Do  
24 you mean in operating experience?

25 MR. SULLIVAN: For operating experience.



1 MR. MINNERS: I don't think you've seen that;  
2 that's my opinion.

3 MR. GERTMAN: What I wanted to say is; the  
4 situation is such that you may have five indicators up there  
5 for the operator or crew to view and for some time, perhaps  
6 hours. The possibility exists that if not the person, the  
7 second person or the third person is going to look at the  
8 indication and come to the correct decision.

9 Even if you say you don't need all five, if you  
10 needed to fail on detecting any of the five, then you'd  
11 multiply them out and you're out at E-14 or something of  
12 that nature, just through the modeling. If you say you  
13 require three out of five indicators to exist as a  
14 signature so that you could come to the correct conclusion,  
15 even so, you still come out with an almost negligible rate.

16 For the time horizon sufficiently short such as  
17 like one hour, one and a half hours or something like that,  
18 you would have a different rate. It's just the opportunity  
19 is great because it takes so long to get to core uncovering  
20 that we have those kinds of rates.

21 MR. KERR: Remember, Harold, he is breaking new  
22 ground.

23 MR. CATTON: That's true. They even have a  
24 probability on one of these of 3.98. That's really breaking  
25 new ground.

1 MR. GALYEAN: We don't mean to imply that kind of  
2 precision, it's just a calculation precision.

3 MR. CATTON: I think 3.98 is bigger than one.

4 MR. GALYEAN: Well, those are not probabilities;  
5 those are frequencies.

6 MR. CATTON: It says sequence probability.

7 MR. GALYEAN: Excuse my sloppy semantics then.  
8 Those are frequencies.

9 MR. CATTON: Incidence per year, so this  
10 particular one will happen four time a year?

11 MR. GALYEAN: That's right. I think that's  
12 identified as an okay entity. That's not a failure.

13 Getting into the premature entering the DHR  
14 cooling, we had no reason for picking a particular primary  
15 system pressure which the operators would get into or open  
16 those isolation valves. Therefore we put together a  
17 probability distribution as a function of RCS pressure so  
18 that we could weight the likely RCS pressure and carry that  
19 through to the calculating probability of a rupture.

20 Our feeling was that it was more likely the  
21 operators would go into DHR cooling a little bit early,  
22 contrasted with going into DHR cooling a lot early. Hence  
23 we put together this probability distribution which I am  
24 showing as a histogram, since that is how we used it.

25 It's just exponential with relative -- if you

1       assume a relative weight at 400 psi of one, the relative  
2       weight at 2200 psi would be ten to the minus three, so we  
3       are saying it's a thousand times less likely that they would  
4       go in the DHR cooling at 2200 compared to 400.

5               This is not the human error probability. This is  
6       simply the probability distribution of the human error -- if  
7       that makes sense -- I guess of the HEP -- the probability of  
8       a probability.

9               MR. WILKINS: Say that over again!

10              [Laughter.]

11              MR. GALYEAN: This is not the human error  
12       probability. This is how we weight the human error  
13       probability. We take the human error probability from the  
14       human reliability analysis, okay? That was generated. In  
15       this particular case it's two times ten to the minus three,  
16       okay, for the operators prematurely entering DHR cooling.

17              That says nothing about at what pressure they  
18       enter DHR cooling.

19              We then take that two times ten to the minus three  
20       and weight it by this probability distribution.

21              MR. WILKINS: So you sample from some distribution  
22       to get the RCS pressure.

23              MR. GALYEAN: That's right.

24              MR. WILKINS: Then you log normal distribution,  
25       right? Having picked that pressure then you decide --

1 MR. GALYEAN: No. This is before that.

2 MR. WILKINS: Then I really didn't understand it.

3 MR. GALYEAN: We use this to then postulate what  
4 the RCS pressure is.

5 MR. WILKINS: Ah, not the other way.

6 MR. GALYEAN: And then once we have a postulated  
7 RCS pressure, well, then we go through and do the Monte  
8 Carlo simulation to calculate the probability of a rupture.

9 [Slide.]

10 MR. GALYEAN: Combining this weighting of the HEP  
11 and the probability of getting a rupture, I've displayed on  
12 this table here, this shows numerically what you just saw on  
13 the previous graph. We took the HEP of two time ten to the  
14 minus three, weighted it over the range of RCS pressures.  
15 We then, we also tabulated the probability of rupturing the  
16 DHR system as a function of pressure. We then multiplied  
17 these two to get the weighted system rupture probability.

18 These numbers are the numbers then that appear on  
19 the event tree for this particular sequence.

20 [Slide.]

21 MR. GALYEAN: After going through the  
22 quantification of the event trees or doing the  
23 quantification of the event trees, every event tree end  
24 state was attached a plant damage state category.

25 The plant damage state categories we used are

1 large releases, mitigated, releases, a LOCA inside  
2 containment, a leak but no core damage, and an OK-  
3 overpressure where you have overpressurized the system but  
4 you did not generate any ruptures, and then a final category  
5 was just an OK, where nothing detrimental happened.

6 The core damage frequency then is just the sum of  
7 the large releases and the mitigated releases. We then went  
8 on to calculate the risk.

9 The risk measures we used were early fatalities,  
10 latent cancers and population dose.

11 MR. MICHELSON: Where's the LOCAs outside of  
12 containment?

13 MR. GALYEAN: These would be categorized as  
14 isolated LOCAs outside containment and would fall into the  
15 release category.

16 If you had a rupture which was then isolated and  
17 core damage prevented, that would fall into the leak but no  
18 core damage category.

19 In a case where you had a LOCA inside containment  
20 for example, if you overpressurized the core flood tank and  
21 it ruptured and resulted in a leak inside containment we did  
22 not pursue that further. As you will see, those numbers are  
23 quite small and they are basically within design basis. If  
24 you multiple that by the availability of ECCS system it  
25 would go even smaller, so we did not pursue those further

1 explicitly.

2 MR. MICHELSON: I thought you said that if you had  
3 a rupture outside of containment and you isolated it you now  
4 call it a leak category?

5 MR. GALYEAN: A plant damage state. We  
6 categorized that plant damage state as a leak but no core  
7 damage.

8 MR. MICHELSON: How long can it persist without  
9 being isolated before it changes from a leak without core  
10 damage to a leak with core damage?

11 MR. GALYEAN: For the two high pressure -- well,  
12 for the two HPI and makeup and purification sequences, okay,  
13 which we postulate eight hours to be available.

14 MR. MICHELSON: You're back to that eight hour  
15 idea that nothing is harmful that's done to the environment  
16 out there for eight hours?

17 MR. GALYEAN: That's right.

18 MR. MICHELSON: Because nothing is harmful to the  
19 core because we had plenty of makeup to the core.

20 MR. GALYEAN: That's right. For the low pressure  
21 sequences, the LPI and the two DHR sequences we assumed that  
22 there is four hours available. These were based on some  
23 simple hand calculations done that estimated that would  
24 calculate the time to core uncovering.

25 MR. MICHELSON: Yes, but you never did determine

1 what was happening to the environment that might effect core  
2 makeup capability.

3 MR. GALYEAN: We only postulated --

4 MR. MICHELSON: Beyond the room in which the event  
5 was occurring.

6 MR. GALYEAN: That's right.

7 MR. MICHELSON: That is an extremely serious  
8 shortcoming, at least in my view. When you start talking  
9 four to eight hours that is an extremely short-sighted view  
10 of the problem.

11 [Slide.]

12 MR. GALYEAN: The core damage frequency  
13 calculations generated this distribution due to or from the  
14 five sequences. That is the DHR shutdown sequence that is  
15 prematurely entering DHR shutdown contributes 70 percent.  
16 The low pressure injection sequence is about 23 percent and  
17 this is the makeup and purification sequence -- it's about 6  
18 percent.

19 MR. MICHELSON: You only got into trouble if you  
20 had a makeup problem, core uncovering problem?

21 MR. GALYEAN: Right. Core uncovering we equate to  
22 core damage.

23 [Slide.]

24 MR. GALYEAN: This just shows numerically what you  
25 saw on the previous chart. This has a little bit more

1 information in that the non-core damage sequences are also  
2 depicted here. That is, the LOCA inside containment  
3 sequences are also shown here. As I mentioned, very little  
4 probability.

5 The sequences that end in a leak outside  
6 containment but no core damage, see, are quantified here,  
7 and the cases where you had an overpressure but did not  
8 generate a leak were also quantified.

9 MR. MICHELSON: And that is a fairly high  
10 probability on your leaks with no core damage?

11 MR. GALYEAN: That's right, that's right.

12 This is consistent with the operational experience  
13 where we have seen -- these could be categorized as ISLOCA  
14 precursors similar to the kinds of events we have seen.

15 MR. MICHELSON: Well, there is a whole set out  
16 there that you don't see fortunately, and that's the case  
17 where you get these big leaks but get them isolated right  
18 away. Then again they appear as a no core damage leak.  
19 That's the next-to-the-last column, if I understood what you  
20 said.

21 Now what is the probability that when experiencing  
22 this very large break you are going to get the valve closed  
23 and get the breaks shut off. Well, that doesn't appear  
24 anywhere here.

25 MR. GALYEAN: I guess I don't understand your



1 comment.

2 FROM THE FLOOR: You overpressurize in the last  
3 column, don't you?

4 MR. MICHELSON: You overpressurize in the next-to-  
5 the-last column too.

6 MR. GALYEAN: This is where you have generated a  
7 rupture in the low pressure system --

8 MR. MICHELSON: You've got it isolated.

9 MR. GALYEAN: But then you subsequently isolate it  
10 and prevent core damage.

11 MR. MICHELSON: But he does the isolation with an  
12 extremely high probability of success.

13 MR. CATTON: If you used the German data, that  
14 number would jump by a factor of ten.

15 MR. MICHELSON: At least.

16 MR. CATTON: Well, they said 8 percent on  
17 reliability rather than the ten to the minus three.

18 MR. MICHELSON: It begins to get to be troublesome  
19 -- now you are using, I think, about ten to the minus three  
20 range

21 MR. CATTON: That's what their tree shows, ten to  
22 the minus three.

23 MR. KERR: I think the assumption is we always  
24 have to close against this total differential.

25 MR. CATTON: In this case, I am not sure what the

1 differential is, but if you vent through the pipe, you're  
2 closing against flow.

3 MR. MICHELSON: You're closing against virtually  
4 total differential.

5 MR. KERR: It depends on what's happened to the  
6 pipe.

7 MR. CATTON: Of course. I think that's what I  
8 said.

9 MR. KERR: You said ruptured it.

10 MR. CATTON: They have ruptured the pipe.

11 MR. GALYEAN: The isolation valves that we're  
12 relying on in this case have all been examined in light of  
13 the valve testing that's going on.

14 MR. CATTON: You didn't say that when we asked the  
15 question several times before.

16 MR. MICHELSON: You said the motor size was  
17 checked. That's all.

18 MR. GALYEAN: That's right.

19 MR. CATTON: If you have checked the motor size  
20 and you've checked the torque testing against the  
21 manufacturer's specifications, then you don't know that the  
22 valve will close, because the testing that's been done shows  
23 that it won't.

24 MR. GALYEAN: Let me explain what we did. Okay?

25 MR. CATTON: It might help.

1 MR. GALYEAN: The valve testing program going on -  
2 the tests are actually being done in Germany. Most of the  
3 work is sponsored by the NRC through the INEL. Okay?

4 And those people are putting together analytical  
5 models to reflect the results of the valve-testing program,  
6 and what we did, we collected the information from the  
7 utility, gave it to these people doing the valve testing,  
8 and said will these valves operate? Or tell us what the  
9 threshold is at which these valves will cease to operate?  
10 And in all cases, it was above 2,200 psi. Okay?

11 They took things such as friction factors, you  
12 know, the number of threads on the valve stem, the torque  
13 set limits.

14 MR. CATTON: Okay. That's enough.

15 MR. MICHELSON: It was under flow.

16 MR. GALYEAN: Yes. Well, to them, yes, it was  
17 under flow. It's the flow that you would see with whatever  
18 delta P would result.

19 MR. MICHELSON: What the earlier discussion was  
20 was what effect, if any, did this reflect, and how did it  
21 reflect, if at all, into the probability numbers, and the  
22 answer was no, you use the non-loaded probability numbers.

23 MR. GALYEAN: That's right. We went to these  
24 people doing the valve testing and said would these valves  
25 operate under these conditions? And they looked at it and

1 analyzed it, and they said yes. They told us what the  
2 threshold was at which they would cease to operate.

3 MR. CATTON: Did you tell them what the torque  
4 settings were?

5 MR. GALYEAN: Yes.

6 MR. CATTON: Okay. I thought it was a simple  
7 question, needed a one-line answer.

8 MR. MICHELSON: Well, it's a lot deeper question,  
9 I think, Ivan.

10 The problem is that you don't know -- even if the  
11 motor is big enough and even if you correct for friction  
12 factor, you don't know how to correct the probability of  
13 closure unless you use the non-loaded probability of  
14 closure.

15 MR. CATTON: Carl, the test I saw when I was in  
16 Germany, if they put two times the manufacturer's setting,  
17 the valve closed. It just carved its way shut.

18 Now, what this gentleman is saying is that  
19 apparently the torque settings are high enough to do that.

20 MR. MICHELSON: No, he didn't say that.

21 MR. CATTON: Didn't you just say that?

22 MR. GALYEAN: At the plant we're looking at, they  
23 use limit switch settings.

24 MR. CATTON: Are the limit switch settings high  
25 enough?

1 MR. GALYEAN: Yes.

2 MR. MICHELSON: You don't set those high.

3 MR. CATTON: He says they do. Either he is  
4 mistaken or --

5 MR. GALYEAN: The limit switch setting measures  
6 the length of travel the valve goes. Okay? When the valve  
7 is fully shut or 98-percent shut or whatever, it actuates a  
8 limit switch, and that then tells the valve operator to stop  
9 operating. Okay? It has nothing to do with torque.

10 MR. MICHELSON: You have the full torque of the  
11 motor available.

12 MR. GALYEAN: Exactly.

13 MR. MICHELSON: Now, the question is how much  
14 margin is there between what's needed for that condition and  
15 what the motor can produce? All you told me was the motor  
16 was bigger than what was needed. You didn't tell me if it  
17 was 5 percent bigger or 100 percent bigger. You said  
18 double, and I never heard them say that it was that kind of  
19 margin in these motors. He just says it was more than they  
20 calculated. Maybe 1 percent, I don't know.

21 MR. GALYEAN: I think those results -- I believe  
22 they're in the copy you have. The results of this  
23 calculation are in the report, in the appendix. I believe  
24 it's at the end of the system description appendix, which I  
25 believe is Appendix C.

1 MR. CATTON: That report is awful thick.

2 MR. GALYEAN: I know.

3 [Slide.]

4 MR. GALYEAN: Once we had the core damage  
5 frequencies calculated, we then went on to calculate  
6 consequences, as I alluded to before. The information on  
7 the B&W plant was taken from the Oconee PRA. We used the  
8 Sandia Siting Study to generate a site, a nationwide average  
9 site.

10 We then took this site average and compared it to  
11 the NUREG-1150 sites, so that we would then have a max input  
12 deck to use for calculating consequences. It turns out that  
13 Surry is very close to the national average, for a wind-  
14 weighted population density.

15 [Slide.]

16 MR. GALYEAN: The conditional consequences were  
17 calculating using MACCS. The Surry evacuation strategy and  
18 Oconee source term and release timing were used. We  
19 calculated conditional consequences for a range of  
20 decontamination factors. We equated a large release to a DF  
21 of 1 and a mitigated release to a DF of 10.

22 The mitigated release simply refers to some form  
23 of scrubbing of the release before it's released to the  
24 environment. The likely sources of this scrubbing could,  
25 for example, be aux building fire-protection spray system,

1 the sprinkler system, or if the release was considered --  
2 would be submerged.

3 MR. KERR: The dilution factor or whatever 's  
4 compared to what?

5 MR. GALYEAN: I'm sorry?

6 MR. KERR: You talk about a DF of 1. It's  
7 compared to what?

8 MR. GALYEAN: Well, no scrubbing. It's just the  
9 source term --

10 MR. KERR: Is this a source term in the vessel,  
11 the source term at the point of pipe rupture, or none of the  
12 above?

13 MR. GALYEAN: At the point of -- in the vessel.  
14 Well, it's not the inventory.

15 We took the source term from the Oconee PRA, and  
16 that was the containment bypass source term, what they had  
17 postulated for Event V, the V sequence. That's the source  
18 term we used.

19 MR. KERR: That was the actual release outside of  
20 containment?

21 MR. GALYEAN: In this particular case, it would be  
22 the release inside containment, would be a good analogy.  
23 It's not what we use, because by definition, we're talking  
24 about releases outside containment.

25 MR. CATTON: The vessel release out?

1 MR. MINNERS: You can't use the source term into  
2 the pipe, and the decontamination factor is just the -- the  
3 source term is what he used going into the pipe. Okay? And  
4 the decontamination factor just tells you what came out.

5 If it had a DF of 1, that means you multiply it by  
6 1, or you divide by 1.

7 MR. KERR: I understand that, Warren. I just  
8 didn't know whether what you used as going into the pipe was  
9 the full inventory of fission products.

10 MR. GALYEAN: No.

11 MR. KERR: What do you assume attenuated it, then?

12 MR. GALYEAN: Deposition inside the vessel.

13 MR. KERR: Okay. So, you don't take any credit  
14 for deposition along the piping.

15 MR. GALYEAN: No.

16 MR. KERR: And you don't take any credit for  
17 deposition inside the aux building.

18 MR. GALYEAN: That's right.

19 MR. SULLIVAN: In other words, those numbers have  
20 been determined.

21 MR. GALYEAN: I'm sorry?

22 MR. SULLIVAN: They have determined what the DFs  
23 in the aux building are.

24 MR. GALYEAN: We have looked at the available  
25 literature on aux building DFs. Those numbers -- well,



1 these numbers are consistent with what's published in the  
2 available literature. Some of the literature is not  
3 referenceable, and I don't know what else to say about it.

4 MR. CATTON: Why is that?

5 MR. GALYEAN: It's EPRI proprietary. They refer  
6 to it as licensable material.

7 MR. MICHELSON: Well, if they're using the same  
8 numbers, then are they simply saying that it's all occurring  
9 within the pipe, also?

10 MR. GALYEAN: Well, they did very detailed -- they  
11 used MAAP. Okay? And they have put together very detailed  
12 models of the aux building.

13 They looked at different aux building  
14 configurations. For example, are there three major  
15 compartments or two major compartments?

16 MR. MICHELSON: Why did they end up with the same  
17 answer you ended up with?

18 MR. GALYEAN: It's not the same answer. It is  
19 consistent, I think.

20 MR. MICHELSON: What does that mean?

21 MR. GALYEAN: It means we're in the same ballpark.

22 MR. MICHELSON: That means a factor of 10?

23 MR. GALYEAN: Yes.

24 MR. SULLIVAN: The numbers that I have seen of  
25 them are not those numbers.

1 MR. GALYEAN: That's right. But they're talking  
2 about different aux building configurations. They're  
3 talking about the availability of fire-protection sprays.  
4 They're talking about the likelihood that the risk will  
5 occur in a submerged pool of water.

6 MR. MICHELSON: Why did they think that?

7 MR. GALYEAN: Well, for the different scenarios or  
8 sequences that they postulated, and the particular  
9 configuration of aux building they looked at.

10 MR. MICHELSON: The pipe was always below water  
11 level.

12 MR. GALYEAN: Not always.

13 MR. MICHELSON: Below water release mains, I  
14 thought.

15 MR. GALYEAN: They did a number of sensitivity  
16 studies. I don't remember the exact number. Maybe it would  
17 be around 15-20 different variations, whether it's a large-  
18 break, a small break, the configuration of the aux.  
19 building, whether or not it would be submerged or not  
20 submerged. For the cases that most closely, are closest to  
21 the situation we're looking at, these numbers are consistent  
22 with what was done in the EPRI work.

23 [Slide.]

24 MR. GALYEAN: I don't believe that we got to this  
25 one. But the risk that was calculated -- again, this is on

1 a per-reactor year basis -- the 50-mile population dose, the  
2 latent cancers and early fatalities, in the situation that  
3 we looked at, all releases would be large releases. There  
4 was no potential for mitigating the release. We show it up  
5 there just for completeness sake, but in our particular  
6 situation, there would not be any mitigation. The release  
7 would not be submerged and there are no fire protection  
8 sprays in the area of the postulated release.

9 MR. KERR: What is the significance of total grid  
10 as associated with latent cancers?

11 MR. GALYEAN: This is NUREG 1150 terminology.  
12 Total grid refers to 1,000 miles from the plant site.

13 MR. KERR: I was going to say, the world is bigger  
14 than that, isn't it?

15 [Laughter.]

16 [Slide.]

17 MR. GALYEAN: Once we went through our analysis,  
18 we then sent back and said well, what areas are we most  
19 concerned about, which are the highest contributors to risk,  
20 and where are we most uncertain?

21 We picked two major areas to go back and perform  
22 sensitivity studies on.

23 The first was the effect of pipe rupture pressure  
24 uncertainty. The base case assumes a logarithmic standard  
25 deviation for a beta value of .036.

1           We said well, suppose we could reduce that to 0.1.  
2           This, it turns out is probably overly optimistic improvement  
3           in the uncertainty of the pipe rupture pressure.

4           We also then went back, and I showed you that  
5           probability distribution --

6           MR. KERR: Excuse me. What effect would the  
7           reduction of uncertainty have?

8           MR. GALYEAN: Well, it means your distribution of  
9           pipe failure pressures is much narrower.

10          MR. KERR: Yes. So what effect would this have on  
11          the results you found?

12          MR. GALYEAN: Well, I'll get to that in just a  
13          minute.

14          MR. KERR: Oh, okay.

15          MR. WILKINS: You chose to consider reducing the  
16          standard deviation --

17          MR. GALYEAN: That's right.

18          MR. WILKINS: -- rather than increasing it.

19          MR. GALYEAN: That's right. Well, IMPEL did the  
20          best job they could. They tried to be as realistic as they  
21          could. We have no reason to doubt their calculations.

22          MR. WILKINS: I just want to test my own intuition  
23          here. It seems to me that if you increase the standard  
24          deviation, you'd make things worse.

25          MR. GALYEAN: It depends if you're talking about

1 failure, if you're talking about exposing the system to  
2 pressures less than the median failure pressure. Okay. If  
3 you're on the --

4 MR. WILKINS: Other side.

5 MR. GALYEAN: -- the other side --

6 MR. WILKINS: -- the bigger pressure --

7 MR. GALYEAN: That's right. If you're talking  
8 about pressures greater than the median failure pressure,  
9 then narrowing the uncertainty can in fact increase the  
10 probability of failure, you see.

11 MR. WILKINS: All right. It's tricky.

12 MR. GALYEAN: The human factor sensitivity studies  
13 that we chose to perform were on that probability  
14 distribution that I showed you earlier, where you said well,  
15 suppose the distribution was, well, slightly different. And  
16 I'll get to that in just a minute.

17 [Slide.]

18 MR. GALYEAN: This is just a repeat of the graph  
19 you saw earlier this morning, which shows the system failure  
20 pressure for the DHR system.

21 I would just point out again the median failure  
22 pressure is about 1100 psi which says that if the operators  
23 enter, prematurely enter into DHR cooling at 1100 psi  
24 primary system pressure, there is a 50-50 chance that you  
25 will get a large rupture versus a small rupture.

1 [Slide.]

2 MR. GALYEAN: Changing that uncertainty parameter  
3 from .036 to 0.1 generated this failure probability graph.  
4 And you see that the median failure pressure has shifted  
5 down or up, but just slightly. You're now at about 1300  
6 psi. So what we're saying is that improving the  
7 uncertainty, probably more than is feasibly possible,  
8 results in a small difference in the system rupture  
9 pressure.

10 MR. CATTON: If I miscalculate the flow to the  
11 relief valve, I can make a significant difference in these  
12 numbers.

13 MR. GALYEAN: Yes

14 MR. CATTON: Because the slopes are really steep.

15 MR. GALYEAN: That's right. That's right.

16 [Slide.]

17 MR. GALYEAN: This just numerically displays the  
18 results of this particular sensitivity study in terms of  
19 core damage frequency and in terms of the plant damage  
20 states.

21 And you can see that the base case for this  
22 particular sequence, which is the DHR shutdown sequence,  
23 went from "1.6 times 10 to the minus 6" to "5.6 times 10 to  
24 the minus 7." So we're talking, well, basically a factor of  
25 3 reduction, not an order of magnitude.

1 MR. CATTON: It seems to me you ought to look at  
2 the sensitivity of your calculations of the flow rates.  
3 That would have a much more dramatic impact.

4 MR. GALYEAN: It would likely increase the  
5 pressure experienced in the interfacing system by a few  
6 hundred psi, probably.

7 MR. CATTON: It could easily be a factor of 2.

8 MR. MICHELSON: Of course they totally ignored the  
9 possibility the adverse environment is going to get beyond  
10 the room in which it's located, and that may throw these off  
11 many orders of magnitude, depending on the plant-specific  
12 case.

13 MR. CATTON: One at a time.

14 MR. MICHELSON: We're looking at the little ones.  
15 Although they're all big.

16 MR. CATTON: Well, it has to break before you get  
17 the adverse impact, so we'll do it sequentially.

18 MR. MICHELSON: All right. Touche.

19 [Slide.]

20 MR. GALYEAN: This, then, -- we went and did two  
21 variations on this probability distribution for the HEP.  
22 The base case is shown in blue, which is the same graph I  
23 showed you earlier. And that assumes a relative difference  
24 between 400 and 2,200 of about 1,000.

25 The case one looks at the situation where that

1 relative weight is increased to 10,000, and that is more  
2 heavily weighting it towards the lower pressures. That's  
3 depicted, as I said, as the red bar.

4 The green bar assumes a linear probability  
5 distribution, where it goes from 400 down to 1,000, and we  
6 say that it's impossible or they're not going to prematurely  
7 enter DHR cooling above 1,000 psi, that it's all going to  
8 happen, you know, below 1,000 psi.

9 MR. MICHELSON: Aren't there pressure interlocks  
10 on those valves as well, to prevent opening above a certain  
11 pressure?

12 MR. GALYEAN: Yes.

13 MR. MICHELSON: So even if the operator makes a  
14 human error, I'm not sure you can open them at 1,000.

15 MR. GALYEAN: I should have touched on this when I  
16 was talking about the sequences. There are two valves, DH-  
17 11 and 12, motor-operated valves.

18 One valve, the interlock apparently has a large  
19 dead band on it that inhibits it opening above 266 psi.

20 Now the plant procedures instruct the operators  
21 that at about 300 psi you enter DHR cooling.

22 Now, since this valve, since the interlock on this  
23 valve will not let it open above 266, the procedure has  
24 written into it a step that says if this valve won't open,  
25 jumper out the interlocks.



1 MR. MICHELSON: You mean the tech spec allows it?  
2 If that interlock is not functional, I thought you had to  
3 fix it in some certain time or the system becomes  
4 inoperable, and would you would go into a limiting  
5 condition.

6 MR. MINNERS: We don't have the regulators here  
7 today.

8 MR. MICHELSON: You can't operate with that  
9 interlock not working and do it so consistently that you  
10 even write a procedure to get around it.

11 MR. GALYEAN: We have copies of the procedures.  
12 And, as I said, it's written into the procedures.

13 MR. MICHELSON: It's unbelievable.

14 MR. GALYEAN: The error that we're actually  
15 postulating is that the operators make decisions to enter  
16 DHR cooling and inappropriately jump route both valves  
17 instead of just the one valve. And that's basically the  
18 error that we're postulating here.

19 MR. MICHELSON: The switch was working all right  
20 on one of the valves, it just wasn't on the other one?

21 MR. GALYEAN: Well, the term that the utility used  
22 was there was a large dead band on it.

23 MR. MICHELSON: Well, that means it's just not  
24 working right.

25 But apparently, that didn't affect but one of the

1 two valves as far as being able to open it at the proper  
2 pressure, which I think is around 325, something in that  
3 neighborhood.

4 MR. KERR: Is this sequence a significant  
5 contributor?

6 MR. GALYEAN: This is the highest contributor.

7 MR. KERR: Does the interlock turn out to be a  
8 major contributor?

9 MR. GALYEAN: Obviously, postulating that the  
10 operators would bypass these interlocks is fundamental to  
11 this error.

12 MR. MICHELSON: Are there any regulators in the  
13 room today?

14 [No response.]

15 MR. MINNERS: This is just the B&W plant.

16 MR. MICHELSON: That's got nothing to do with it.

17 [Slide.]

18 MR. GALYEAN: Now, using those three probability  
19 distributions, the base case and the two sensitivity cases,  
20 these are the results that were generated. As I said, as  
21 you saw before, the base case probability for the DHR  
22 shutdown is 1.6 times  $7$  to the minus 6.

23 Using the case 1, which, as I said, more heavily  
24 weights the same distribution but more heavily weights it  
25 towards the low pressures, reduces that down to 1 times 10

1 to the minus 6, and then using the linear model that says  
2 it's impossible, that they're going to do it above 1,000,  
3 that it will occur between 400 and 1,000 psi, effectively  
4 yields the same probability.

5 MR. MICHELSON: Now, since this is one of the more  
6 serious sequences, are there special recommendations that go  
7 with this particular one? You don't make recommendations  
8 for this report, I guess.

9 MR. GALYEAN: That's right.

10 MR. BURDICK: No. We're not going to make any  
11 recommendations in this report.

12 We do have a separate cost-benefit analysis that  
13 we -- where we will be looking at the -- at various  
14 combinations of fixes and quotes.

15 MR. MICHELSON: Is that a generic issue? No, it  
16 wasn't a generic issue, was it? It is?

17 So, when we see the generic issue resolution,  
18 that's when we'll see these results?

19 MR. BURDICK: That's correct.

20 MR. GALYEAN: Just to reiterate a little bit, this  
21 indicates that most of the risk occurs at -- that the  
22 operators would open the DHR let-down line in the lower  
23 pressure range.

24 That concludes my talk on the results for the B&W  
25 plant analysis.

1 MR. CATTON: If there are no questions, I'd like  
2 to take a 10-minute break.

3 [Brief recess.]

4 MR. CATTON: Let's hear about Westinghouse.

5 [Slide.]

6 MR. KELLY: Good afternoon.

7 My name is Dana Kelly. I'm from the Idaho  
8 National Engineering Laboratory.

9 I'm going to present some preliminary results from  
10 our ISLOCA analysis of a Westinghouse plant. It was a four-  
11 loop Westinghouse plant with an ice condenser containment.

12 [Slide.]

13 MR. KELLY: This presentation is going to be  
14 somewhat briefer than the ones that Bill gave. I'm not  
15 going to reiterate a lot of the details of the methodology.  
16 I am just going to focus on the results.

17 I'll talk first about the ISLOCA core-damage  
18 frequency, the scenarios that we examined in our screening  
19 analysis of the plant.

20 We looked at, first of all, overpressurization of  
21 the ND or the RHR system. This is the licensee's  
22 designation for the RHR system, looking at  
23 overpressurization of the ND system during startup, looking  
24 again at possibility of premature entry into shutdown  
25 cooling, a la the results for the B&W plant, and looking at

1 failure of check valves at the RCS pressure isolation  
2 boundaries.

3 [Slide.]

4 MR. KELLY: I'm going to quickly go over some  
5 simplified flow diagrams for the interfacing systems that  
6 came out of the screening analysis.

7 The first of these is the RHR or ND system. It's  
8 divided into two trains; one pump, one heat exchanger per  
9 train; suction for the train can be from either hot leg; two  
10 isolation valves inside containment; no manual maintenance  
11 bypass valves around these MOVs -- this is a later design; a  
12 relief valve on each one of the suction lines that relieves  
13 to the pressurizer relief tank located inside containment.

14 The containment boundary is not shown on this  
15 drawing, but it's just downstream of that relief valve tie-  
16 in.

17 MR. MICHELSON: The relief valve is inside of  
18 containment.

19 MR. KELLY: Yes, sir.

20 The discharge can be either to any of the four RCS  
21 cold legs or to two of the hot legs, which is normally  
22 during the recirculation phase of a loss-of-coolant  
23 accident. The discharge is cross-connected, and these  
24 valves are normally open during normal power operations,  
25 Mode 1.

1 [Slide.]

2 MR. KELLY: This slide shows the tie-in for the  
3 cold leg injection accumulators, four accumulators, one on  
4 each loop. It also shows the normal makeup from the two  
5 centrifugal charging pumps. One of these valves is  
6 incorrectly labeled. One is normally open during normal  
7 operations.

8 The tie-in is separate, not through the pressure  
9 isolation valves for the high-pressure safety injection  
10 system, as it was at the B&W plant.

11 MR. MICHELSON: What is the significance of the --  
12 I don't understand this one symbol. It's kind of two slash  
13 marks, where another line goes through in the other  
14 direction. Is that a cross-over or something?

15 MR. KELLY: Which one is that?

16 MR. MICHELSON: The previous.

17 MR. KELLY: This is just a cross-over, an Auto-Cad  
18 symbol for a cross-over, yes.

19 MR. MICHELSON: And I don't understand why you've  
20 got -- okay, I've got it.

21 MR. KELLY: These symbols here just indicate that  
22 the flow can go either direction. They're not indicated to  
23 be a three-way valve or anything like that.

24 Right here, for example, this is just the coming  
25 together of two flow paths, not a valve.

1 [Slide.]

2 MR. KELLY: The high pressure safety injection  
3 system, again, divided into 2 trains with 2 pumps, suction  
4 either from the refueling water storage tank, which is the  
5 injection phase, or piggy-backed off of the discharge of the  
6 ND pumps during the recirculation phase. Discharge to  
7 either the cold legs or the hot legs.

8 Again, we have the pressure isolation valves on  
9 each of the injection lines, 2 check valves. Each of the  
10 check valves is individually leak rate tested during start-  
11 up. This is somewhat different from some of the valves at  
12 the B&W plant that were welded together and could only be  
13 tested as a pair.

14 MR. MICHELSON: One of those check valves is some  
15 kind of a unique valve with a funny little symbol. What  
16 kind of valve is it?

17 MR. KELLY: I'd have to check.

18 MR. MICHELSON: You're giving 156 valve there.  
19 Funny looking symbol.

20 MR. KELLY: I cannot recall what the difference is  
21 between these 2 without going back and checking the details.

22 MR. MICHELSON: It could be that it's got an  
23 external actuator that rotates the flap or something --

24 MR. KELLY: I'm not sure.

25 MR. MICHELSON: But then the slash line in it

1 doesn't make sense.

2 MR. KELLY: It's -- it's not an external actuator,  
3 I know that, but I'm not sure exactly what the difference  
4 is.

5 MR. MICHELSON: All right.

6 MR. KERR: Are you sure this is not a circuit  
7 diagram for a transistor radio?

8 [Laughter.]

9 MR. MICHELSON: It is strange.

10 [Slide.]

11 MR. KELLY: This is a close-up of the interface  
12 that turned out to be -- contributor to ISLOCA risk at this  
13 Westinghouse plant. This shows the injection from each one  
14 of the RHR or ND trains going into either of the 4 cold legs  
15 through the 2 pressure isolation check valves. I put that  
16 up just because I know those flow diagrams are a little  
17 hard.

18 MR. MICHELSON: Where was the -- where was the  
19 interface on that drawing between high and low pressure?  
20 Was it at the -- the first check valve?

21 MR. KELLY: It's right here. It's right -- the  
22 pressure -- the break is right there on the RHR side of the  
23 second check valve.

24 MR. MICHELSON: Not the code class -- where did  
25 the pressure rating change?



1 MR. KELLY: Right there.

2 MR. MICHELSON: Right there, okay.

3 [Slide.]

4 MR. KELLY: There is an event tree for the  
5 dominant scenario in the slides. I didn't intend to go over  
6 it, but I'm willing to answer questions from it. I will be  
7 presenting the results for that dominant scenario.

8 MR. KERR: You said ND was their nomenclature for  
9 --

10 MR. KELLY: For the RHR system. It's also low-  
11 pressure safety injection as well.

12 MR. KERR: What does ND stand for, do you know?

13 MR. KELLY: I believe it's like nuclear decay heat  
14 or something along those lines. I'm not a hundred percent  
15 sure.

16 MR. KERR: Thank you.

17 [Slide.]

18 MR. KELLY: The first results of the ISLOCA core  
19 damage frequency results. We had 1 dominant contributor to  
20 core damage frequency with a mean core damage frequency of  
21 2.5 times 10 to the minus 6 per reactor year. That sequence  
22 involved failure of a pair of the injection check valves at  
23 the boundary between the ND system and the RCS. This is a  
24 classical Event V Sequence.

25 All the other sequences that we quantified were,

1 on an individual basis, less than 10 to the minus 8 per  
2 reactor year, and in most cases, they were very much less  
3 than that.

4 We did not find any credible human errors that  
5 could initiate an ISLOCA. This is a significantly different  
6 result from the B&W plant.

7 We found that the flange gaskets were not likely  
8 to fail when they were exposed in this dominant scenario to  
9 essentially full RCS pressure. This was primarily a factor  
10 of a different type of bolt being used; a stronger bolt with  
11 a higher torque value. This came out of the IMPEL results.

12 We found that a large break was most likely to  
13 occur at the tube-side cylinder of one of the ND heat  
14 exchangers. Remember, there are 2 trains and the 2 heat  
15 exchanges are essentially in parallel because of the open  
16 discharge cross-connect valves.

17 MR. MICHELSON: When you talk about flange  
18 gaskets, you're referring to valve bonnets?

19 MR. KELLY: No, sir. I'm talking primarily about  
20 piping flange gaskets.

21 MR. MICHELSON: Okay. You're not saying anything  
22 about the valves, in that case?

23 MR. KELLY: Not in this bullet here, no.

24 We have a 90 percent confidence interval on this  
25 core damage frequency that I've shown here. These are a per

1 reactor year, frequencies per reactor year.

2 [Slide.]

3 MR. KELLY: For the consequence analysis, we took  
4 a different approach than was used for the B&W plant,  
5 primarily because we had a different set of information  
6 available. We had a NUREG-1150 analysis in Sequoyah that  
7 was almost a sister plant to the plant that we were  
8 analyzing. We had available to us the full 1150 suite of  
9 codes and we used SEQSOR, in combination with partition, to  
10 generate, parametrically generate source terms for our  
11 dominant sequence.

12 MR. KERR: The -- as I remember, the Sequoyah  
13 source term, for this sequence, was an adaptation of the  
14 Surry source term?

15 MR. KELLY: Yes, sir, I believe that's correct.

16 MR. KERR: Yes. This is Surry twice removed.

17 MR. KELLY: You could probably make that  
18 characterization.

19 Again, we used version 1.5.11 of MACCS to generate  
20 offsite consequences, again, using meteorological input data  
21 from the Surry site.

22 For our base case we assumed an auxiliary building  
23 decontamination factor of 1. This was based on a walk-down  
24 examination of the auxiliary building. We'd found no  
25 general area fire protection sprays and, for our break

1 location, we could not determine any way that it would be  
2 flooded.

3 We did run some sensitivities on decontamination  
4 factor and I'll talk about those in a few moments.

5 The results from the consequence analysis, and  
6 these are conditional on the occurrence of core damage, are  
7 shown here. We report early and late in fatalities, when  
8 the 50-mile population dose.

9 MR. MICHELSON: Since the utility had done some  
10 work required to address the effects of pipe break, I assume  
11 that they had also done some work to determine what the  
12 environments are from -- from these interfacing system LOCA  
13 locations. Is that the case, or did you go and look or ask  
14 the utility if they'd done any analysis to tell you what the  
15 environment might be and the extent to which the environment  
16 might go?

17 MR. KELLY: The only analysis they had was the  
18 high energy line break analysis that they do. They did not  
19 have an analysis for us for --

20 MR. MICHELSON: This is a high energy line break.

21 MR. KELLY: Yes it is, but it was not included in  
22 their high energy line break analysis, because it's not a  
23 high energy line unless you have a failure of the isolation  
24 valves.

25 MR. MICHELSON: They must have broken -- oh yes it

1 is. You have to analyze it as a high energy line break and  
2 then take credit for isolation of it, but -- if it's  
3 normally open, and some of these lines are normally open.  
4 Did you look at their analysis of the high energy line  
5 break? They must have taken one at least at the terminal  
6 points?

7 MR. KELLY: We did not find this break location  
8 included in their high energy line break analysis.

9 MR. MICHELSON: Well, how about one close by,  
10 let's put it that way?

11 MR. KELLY: Excuse me?

12 MR. MICHELSON: How about 1 in the same room, at  
13 least?

14 MR. KELLY: I cannot say that we examined every  
15 line in the room with the heat exchanger, no.

16 MR. MICHELSON: No, but did you ask them if they  
17 had taken any high energy line breaks in the room where you  
18 found that you had an interfacing system LOCA?

19 MR. KELLY: No, we did not.

20 [Slide.]

21 MR. KELLY: The risk is of course obtained by  
22 multiplying the core damage frequency by the conditional  
23 consequences. These are the results on a per reactor year  
24 basis. Again, the same three risk measures.

25 MR. KERR: What do you consider to be the

1       uncertainties in the results of the MACCS code?

2               MR. KELLY: These are mean values reported out of  
3       MACCS. We have not looked at the uncertainty on either the  
4       source term generation or on the consequence analysis.

5               MR. CATTON: Has anybody?

6               MR. KELLY: For this study?

7               MR. CATTON: For the MACCS code.

8               MR. KELLY: MACCS -- I am going to conditionally  
9       answer that question as yes and try and leave it at that.  
10       It's a tough question to answer.

11              MR. KERR: You can always say no.

12              MR. KELLY: Well, I'm not sure that --

13              MR. KERR: Or maybe.

14              MR. KELLY: I think yes is closer to the truth  
15       than no.

16              MR. CATTON: Or you could say I don't know.

17              MR. MICHELSON: That would have been perfect.

18              [Slide.]

19              MR. KELLY: We looked at some sensitivity studies.  
20       The first of these was on the aux building DF.

21              We looked at a range of what we thought to be  
22       credible DFs for aux buildings of this particular design.

23              At the high end of the range we would be including  
24       buildings with fairly large area general fire sprays for  
25       example.

1           We modified SEQSOR to include the new DF and  
2 regenerated the source terms and then recalculated the  
3 consequences with MACCS.

4           The results, I've got some slides that follow this  
5 that show the results graphically. I wasn't going to cover  
6 those in detail but I'll summarize.

7           We found that the revaporization release that is  
8 modelled in SEQSOR turns out to be very important for the  
9 latent risk measures such as latent fatalities in the 50  
10 mile dose.

11           We found that increasing the DF beyond the --

12           MR. KERR: That's degradation where?

13           MR. KELLY: This is once the release, the fission  
14 products, have come out of the break, deposited on surfaces  
15 within the aux building, and then the volatile fission  
16 products over time because of their decay heat revaporizing  
17 the atmosphere and then leave the aux building.

18           It is a very slow release and that is about all I  
19 wanted to go into unless there are more detailed questions.

20           MR. KERR: Has there been any detailed treatment  
21 of the deposition inside the piping once the fission  
22 products leave the vessel, because there was not for  
23 Sequoyah, I believe.

24           MR. KELLY: Not to my knowledge. I believe one of  
25 the parameters in the SEQSOR equation does account for

1 deposition within the RCS but even if that were the case and  
2 I believe it is, it's still a parametric treatment. It's  
3 not a deterministic treatment by any means.

4 MR. KERR: That possibility is simply an unknown.

5 MR. KELLY: Yes, sir.

6 MR. KERR: That would seem to be, unless you know  
7 it to be negligible a fairly important thing to look at.

8 MR. KELLY: Possibly yes.

9 MR. MINNERS: People have looked at main steamline  
10 linkage valves on PWRs so that calculation has been done.

11 MR. KERR: If the information exists it would seem  
12 to me not a bad idea to include it in the consideration of  
13 this problem.

14 MR. KELLY: As I said, I think it is included as a  
15 parameter in the SEQSOR equation.

16 MR. KERR: I don't know what that means.

17 MR. CATTON: What is the SEQSOR equation?

18 MR. KELLY: It is essentially a parametric  
19 equation to give you a release fraction and by varying  
20 parameters you can vary things like the RCS, amount of RCS  
21 deposition, the fraction of iodine released in-vessel, those  
22 sorts of things.

23 MR. CATTON: And that is in the MACCS code?

24 MR. KELLY: No. It is in the SEQSOR code.

25 MR. KERR: Indeed, it is an empirical fit to



1 calculations made for the 1150 plants as I remember.

2 MR. KELLY: Yes. There were a series of source  
3 term code package runs made and then the information was  
4 extrapolated to fit into the SOR series of codes.

5 [Slide.]

6 MR. KELLY: The other sensitivity that we looked  
7 at, the uncertainty in the component failure probability,  
8 our base case in the IMPEL analysis assumed that there was a  
9 ten to the minus three probability of piping failure, heat  
10 exchange or cylinder failure, et cetera, when the applied  
11 stress was equal to the yield stress and that is how the  
12 logarithmic standard deviation on the failure pressure was  
13 arrived at.

14 We looked at sensitivities. IMPEL cautioned in  
15 their work that this could be a conservative assumption that  
16 if this turned out to dominate risk then you could look at  
17 other values. We decided to take a look at some other  
18 recommended values of ten to the minus four and ten to the  
19 minus five, generated new logarithmic standard deviation,  
20 and we found that there was no variance in the core damage  
21 frequency with these other assumptions. The primary reason  
22 that's driving that is the large failure probability given  
23 overpressurization of the tube side cylinder of the RHR heat  
24 exchangers.

25 MR. KERR: And there was no uncertainty in the

1 failure pressure of that component?

2 MR. KELLY: Relatively little. It is fairly  
3 narrow.

4 That is all I intended to present.

5 Bill Galyean in his next presentation is going to  
6 go over some general observations comparing both plants.

7 MR. SULLIVAN: Could you go back to the slide that  
8 you presented earlier. It says no credibility -- credible  
9 human errors identified.

10 Remember when you said that?

11 MR. KELLY: Yes.

12 MR. SULLIVAN: Can you give me the big picture of  
13 why that is true?

14 MR. KELLY: I don't want to steal too much of  
15 Bill's thunder but I can try.

16 I can give you -- let me do it by means of an  
17 example.

18 At the B&W plant you have the dominant sequence  
19 that is initiated by human error. It involves early entry  
20 into DHR in which one valve in a pair is fairly routinely  
21 bypassed by procedural instruction. The postulate would be  
22 and correct me if I stray here that if the operators had the  
23 intention to go on to DHR early, earlier than they should in  
24 terms of reactor pressure, that this procedural instruction  
25 to bypass one valve sort of conditions them to jumpering out

1 interlocks.

2 Therefore, they might be led to jumper out the  
3 interlock on the second valve. Is that a correct  
4 characterization?

5 MR. MICHELSON: Are you saying this pertains to  
6 Sequoyah as well?

7 MR. KELLY: No, we are not talking about Sequoyah  
8 other than for generation of the source terms.

9 MR. MICHELSON: Okay.

10 MR. KELLY: At the Westinghouse plant that we  
11 analyzed we looked into this same sequence in detail because  
12 it had been a dominant contributor at the B&W plant.

13 We did not find any kind of procedural  
14 instructions there to allow bypassing of interlocks in such  
15 a manner.

16 We found on the contrary there were numerous  
17 caution statements, administrative control of keys to, as  
18 Mr. Michelson pointed out, go down and restore power to  
19 these valves.

20 The training was such that operators if we even  
21 brought this up as a possibility, the reaction was very  
22 negative -- no, I would never do that, ever, under any  
23 circumstances. Their safety culture, if you want to call it  
24 that, was just contra-indicative to doing such a thing.

25 Everywhere we turned in looking at initiators that

1 could bring about an ISLOCA, a core damage sequence ISLOCA,  
2 we found a similar situation.

3 Now there is the situation where you could leave  
4 the valves open during startup, and we found there that that  
5 was somewhat more likely but as was the case at the B&W  
6 plant, the relief valve protection essentially prevents you  
7 from ever getting into serious trouble in that situation.  
8 It's just too unlikely that that would ever proceed to core  
9 damage even given that they do leave them open too long.

10 Does that answer your question, Mr. Sullivan?

11 So?

12 MR. CATTON: I have got just one more question.  
13 It's not really related to what you were talking about.

14 You are at Idaho, aren't you?

15 MR. KELLY: Yes, sir.

16 MR. CATTON: Do you have full documentation on the  
17 MACCS code?

18 MR. KELLY: We have a complete set of user  
19 manuals, programmer references and model runs.

20 MR. CATTON: Models and the correlations  
21 documentation?

22 MR. KELLY: Yes, sir.

23 MR. CATTON: And code assessment?

24 MR. KELLY: We have the MACCS verification, line  
25 by line verification that was done at Idaho.

1 MR. CATTON: Not the QA of the code but where they  
2 compared it with something else to get a feeling for its  
3 capability to predict things accurately.

4 MR. KELLY: I am not aware where MACCS has been  
5 validated against the CS&I standard problem or anything like  
6 that.

7 MR. CATTON: Okay. Thank you.

8 MR. KELLY: If you are aware of it, I would like  
9 to see it because I've been curious about that too.

10 [Slide.]

11 MR. GAYLEAN: I am going to try to summarize the  
12 insights and observations that we have collected during the  
13 course of this program. This will include both the analysis  
14 on the B&W plant and the analysis on the Westinghouse plant.

15

16 [Slide.]

17 MR. GAYLEAN: Just to summarize the historical  
18 experience and the education we received when we looked it  
19 over, I'd like to just to point out that the historical  
20 experience -- specifically things like LERs and event  
21 descriptions -- indicate that improper valve lineups and  
22 operator errors in mispositioning valves are relatively  
23 likely, and these types of events typically occur during  
24 plant evolutions, specifically during startup and shutdowns  
25 when a lot of things are going on.

1           Random, catastrophic failures of redundant valves  
2 and standby check valves where you've got to dump the P  
3 across it and you know it's seated; these types of failures  
4 are not supported by historical experience. We just don't  
5 see random, catastrophic failures of valves in this type of  
6 service, in the standby service.

7           We believe that this is attributable to the leak  
8 testing that occurs during startup which ensures thereby a  
9 positive isolation of the pressure boundary and that when  
10 leaks do occur, they tend to grow slowly and are detected at  
11 an early time.

12           [Slide.]

13           MR. GAYLEAN: Excuse my typo on the slide here. I  
14 think there might be a couple more. I was making changes on  
15 these last night. The B&W plant analysis generated findings  
16 that are dominated -- or, that is; that the core damage and  
17 risk are dominated by human error initiated sequence,  
18 specifically human errors during shutdown and routine  
19 testing, for example, the stroke testing of those motor-  
20 operated isolation valves on the injection lines.

21           The hardware failure initiated sequences are  
22 important, but were not dominant. We believe that the lack  
23 of procedures and training contributes to this ISLOCA risk;  
24 that is, a general lack of awareness contributes to the  
25 occurrence of precursors and initiators and in all cases

1 that we looked at, there would be hardware available for  
2 isolating and recovering from a postulated rupture.

3 [Slide.]

4 MR. GAYLEAN: We believe that at least for the B&W  
5 analysis that changes to procedures and training and  
6 instrumentation may reduce the plant ISLOCA risk and that  
7 based on our analysis, that damage from flooding and  
8 spraying and area effects was not risk-significant because  
9 of equipment separation of power level trains and redundant  
10 systems.

11 MR. MICHELSON: What is your basis for that  
12 conclusion?

13 MR. GALYEAN: Well, as I said, based on the  
14 analysis that we made, okay, --

15 MR. MICHELSON: But you didn't tell me you made  
16 that analysis.

17 MR. GALYEAN: We looked at the area local to the  
18 rupture, okay? We confined our analysis to the room in  
19 which the rupture occurred.

20 MR. MICHELSON: Did you determine the environment  
21 in the room in which the rupture occurred?

22 MR. GALYEAN: We said that, worst-case, everything  
23 in that room fails.

24 MR. MICHELSON: Okay, you just assumed there was a  
25 bad environment, but you didn't calculate it?

1 MR. GALYEAN: That's right. There are redundant,  
2 parallel trains and alternate systems that the operators  
3 would have available to maintain a covered core; that the  
4 heat exchangers and the large diameter low pressure piping  
5 were most likely places where a rupture would occur in these  
6 sequences.

7 [Slide.]

8 MR. GAYLEAN: The analysis on the Westinghouse  
9 plant; we found that administrative controls and general  
10 operator awareness greatly reduces the possibility or  
11 probability of human error initiated ISLOCA sequence. The  
12 core damage frequency and risk are dominated by the hardware  
13 failure of the pressure isolation check valves.

14 However, for the Westinghouse analysis, there  
15 would be much less time available for the operators to  
16 recover from an ISLOCA sequence and in addition, their  
17 procedures would require them to use a lot of their time in  
18 verifying and checking a number of other plant functions and  
19 indications, using up some of this time.

20 By the time they got to the point where they were  
21 identifying and diagnosing an ISLOCA, there would not be  
22 very much time available for actually isolating it.

23 MR. KERR: Do they have to identify it before they  
24 can follow their symptom-based procedures?

25 MR. GALYEAN: Well, they get into their symptom-



1 based procedure and it leads them to look at various  
2 indicators to, first, maintain that emergency core cooling  
3 systems are functioning, to go in and try to identify the  
4 source of the abnormal event. It says to look at these  
5 indicators, look in these areas, and then eventually they  
6 will get to a point where they say, okay, look at this  
7 indicator.

8 In fact, I think the next slide goes into a little  
9 more detail on this.

10 [Slide.]

11 MR. GAYLEAN: The symptom-based procedures for the  
12 Westinghouse plant; once the operators are in them, as I  
13 said, they are instructed to look and verify a number of  
14 plant functions and indicators and eventually get to the  
15 point where they start looking outside containment as the  
16 source of the rupture. There's a single computer alarm  
17 that's referenced, and, in fact, it's on the last page of  
18 their procedure.

19 Once they identify this radiation alarm, they can  
20 diagnose the situation as an ISLOCA and then attempt to  
21 recover from this particular situation. They do have to  
22 diagnose it first, before they can recover from it.

23 This is in contrast to the B&W analysis where the  
24 procedures -- a slightly different approach was taken. The  
25 procedures do not specifically address the scenarios that we

1 postulate.

2 The approach taken was to look at the indicators  
3 available to the operators and then to postulate what a  
4 reasonable person would do to characterize the situation.  
5 Also at the B&W analysis, there will be a lot more time  
6 available for the operators to recover from an event.

7 [Slide.]

8 MR. GAYLEAN: This is my last slide. Just to wrap  
9 this up, this comparison. Although precursor frequencies  
10 are relatively high; that is, the probability of having an  
11 ISLOCA type of an event is relatively high, there is also a  
12 very high probability of recovering before core damage  
13 begins.

14 MR. CATTON: You really dealing with the small  
15 difference between two big numbers?

16 MR. GALYEAN: I guess I don't understand what  
17 you're referring to.

18 MR. CATTON: A high probability of doing something  
19 that gets you in trouble and a high probability of recovery?

20 MR. GALYEAN: that's right.

21 MR. WILKINS: You need to multiply those numbers  
22 to calculate the probability that you get into trouble and  
23 out of it. Both of them is close to one, so the product is  
24 close to one.

25 MR. GALYEAN: For some specific plants, we believe

1 that the ISLOCA analysis typically found in PRAs is an  
2 incomplete description of ISLOCA risk composition; that  
3 human factors issues have potentially dominant influences on  
4 ISLOCA risk. That is, some plants are less likely to  
5 initiate an ISLOCA.

6 For example, in our Westinghouse analysis, that's  
7 what we found. But some plants are more likely to recover  
8 from an ISLOCA which is applicable to the B&W analysis that  
9 we did.

10 That concludes my presentation. If there are any  
11 questions or any other points you'd like to go over --

12 MR. CATTON: Are there any further questions?

13 MR. MICHELSON: May I missed it, maybe I wasn't  
14 here, or whatever.

15 In the case of RHR and heat exchangers, I think,  
16 as I recall, you said that the leak point was, of course,  
17 tube-side pressure.

18 MR. KELLY: Tube-side cylinder.

19 MR. MICHELSON: What's a tube-side cylinder?

20 MR. KELLY: That's come up before.

21 In what I call the heat-exchanger water box, where  
22 the primary coolant enters, goes it through the tubes, back  
23 out and out again, there is a divider plate and then a tube  
24 sheet. The cylinder is the outer part of the heat exchanger  
25 there, the cylindrical portion of the heat exchanger on the

1 water box boundary.

2 MR. MICHELSON: Okay. That's just unique to that  
3 particular design. There are several other RHR heat  
4 exchanger designs.

5 MR. KELLY: Yes, sir. This analysis was for a  
6 specific RHR heat exchanger.

7 MR. MICHELSON: Now, you looked at the tubes to  
8 see what their capability might be.

9 MR. KELLY: Yes, sir.

10 MR. MICHELSON: What did you find the capability  
11 of the tubing to be in terms of X times design before  
12 rupture?

13 MR. KELLY: Offhand, I don't recall what the value  
14 was. It was high enough that it did not present itself as a  
15 dominant failure mode.

16 MR. MICHELSON: Well, that's because the  
17 particular heat exchanger probably had a rather weak water  
18 box, and not all of them are designed that way.

19 MR. KELLY: Let me check. Just a second.

20 MR. MICHELSON: I just wondered, for the tubing  
21 itself, if you looked. I'm looking for some rules of thumb  
22 again. I have heard what these numbers are, but I haven't  
23 heard them verified.

24 MR. KELLY: I don't have the tube numbers with me.  
25 Sorry.

1           MR. MICHELSON: Typically, the studies that I have  
2 seen, they come out with rupture levels of much less than  
3 four times design for the tubes. The reason is because  
4 you've got to skinny up tubes as much as you can in  
5 designing heat exchangers, because there's a heat transfer  
6 that you're trying to accomplish. So, they come out about  
7 two times design.

8           Now, if this water box was less than two times  
9 design, then it would be the weak point. If it came out  
10 like three, then I would question whether you really looked  
11 at the tubes or whether these heat exchangers had very  
12 heavy-walled tube for some reason.

13          MR. KELLY: Well, we did look at the tubes. I can  
14 assure you of that. I don't have the data, though.

15          MR. MICHELSON: I would like to get that answer,  
16 if you could send it to Paul, and I'd like to know how  
17 many time design pressure for the heat exchanger will the  
18 tubes take before they rupture.

19          Apparently, it's a rather precise number, because  
20 these are drawn tubes. They're very homogeneous. You can  
21 make a real loop calculation and they could tell you almost  
22 exactly at what pressure they are rupturing.

23          MR. KERR: It's going to be a log normal  
24 distribution no matter what you call it.

25          MR. MICHELSON: If they're corroding, then it will

1 get that way. Otherwise, it won't be quite that situation.

2 But I just wondered if you came up with the same  
3 conclusion this study came up in terms of how many times  
4 design the tube will handle, and the reasons were -- they  
5 gave all the reasons why it was a pretty low number, and  
6 they all sounded like good rational reasons, because the  
7 heat transfer was controlling the design of those  
8 tubes.

9 There was no over-design from the wall-thickness  
10 viewpoint because of the heat-transfer problem.

11 [Slide.]

12 MR. BURDICK: This is Gary Burdick again.

13 I just want to briefly run over the schedule for  
14 the remaining studies.

15 Also, you'll notice that we plan to put the B&W  
16 study out as a NUREG/CR. The other two studies will be  
17 coming out as letter reports. This is a little cost-saving  
18 measure.

19 We hope to have all three of these plant studies  
20 by April of '91. The question mark there is there because  
21 we're uncertain as to when we're going to get some  
22 information from the CE plant. We understand they're  
23 starting to go into a refueling outage, and people are going  
24 to be very tied up there.

25 Another question mark here: We have an ISLOCA

1 evaluation procedures NUREG/CR planned. This will  
2 encapsulate all the insights, if you will, that we have  
3 gleaned from all these other analyses and possibly even from  
4 an abbreviated BWR study, if that looks like a reasonable  
5 way to go.

6 If not, there will be a larger BWR study similar  
7 to -- in scope to what we have done for the P's. In that  
8 case, this would be delayed somewhat.

9 I would like to take this opportunity to thank the  
10 team from Idaho. I think they have done a superb job for  
11 the agency. I am very proud of that team, and I think they  
12 did some very innovative, groundbreaking work, and I hope  
13 the Subcommittee here agrees with me.

14 I would like to thank the -- you, Mr. Chairman,  
15 and the Subcommittee members for taking the time to look at  
16 the draft report and to meet with us here today and give us  
17 your comments.

18 We would like to meet with you again sometime  
19 around the April timeframe, when we have all three studies,  
20 hopefully, completed by then.

21 MR. CATTON: Hopefully, by then, you will have  
22 some idea what the resolution is going to be?

23 MR. BURDICK: Hopefully, by then, we would have  
24 some idea of the resolution, yes.

25 MR. CATTON: Because it seems to me that that's

1 probably the next point at which we ought to meet.

2 MR. BURDICK: Right. We would like to come down  
3 there at that point with a proposed resolution to the issue.

4 MR. CATTON: The probabilities are so low that I'm  
5 wondering just what you are going to resolve or whether  
6 there is anything that needs resolution.

7 MR. BURDICK: Well, that's a very good point. If  
8 things continue the way they are going, it could be that the  
9 NRR information notice itself could suffice.

10 MR. CATTON: Thank you, Gary, and I'd like to  
11 thank the speakers from Idaho, as well, for very  
12 enlightening discussions.

13 I think the next thing on the schedule is  
14 Subcommittee discussion.

15 I think we can go off the record.

16 [Whereupon, at 3:50 p.m., the meeting was  
17 adjourned.]

18

19

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REPORTER'S CERTIFICATE

This is to certify that the attached proceedings before the United States Nuclear Regulatory Commission

in the matter of:

NAME OF PROCEEDING: NRC Program In Interfacing  
Systems Loca

DOCKET NUMBER:

PLACE OF PROCEEDING: Bethesda, Maryland

were held as herein appears, and that this is the original transcript thereof for the file of the United States Nuclear Regulatory Commission taken by me and thereafter reduced to typewriting by me or under the direction of the court reporting company, and that the transcript is a true and accurate record of the foregoing proceedings.

Marilynn Estep

Official Reporter  
Ann Riley & Associates, Ltd.

INTERFACING SYSTEM LOCA PROGRAM

PRESENTED TO

ADVISORY COMMITTEE ON REACTOR SAFEGUARDS  
THERMAL HYDRAULIC PHENOMENA SUBCOMMITTEE  
DECEMBER 12, 1990

WILLIAM BECKNER, CHIEF  
RISK APPLICATIONS BRANCH  
OFFICE OF NUCLEAR REACTOR REGULATION  
(301) 492-1089

## BACKGROUND

- \* GI-105, "INTERFACING SYSTEMS LOCA FOR LIGHT WATER REACTORS"
  
- \* OPERATING EVENTS OBSERVED, BOTH IN THE U.S. AND ABROAD, SEEMED TO INDICATE THAT THE LIKELIHOOD OF AN ISLOCA WAS HIGHER THAN ESTIMATED BY PRAs.
  
- \* NRR INITIATED AN ACCELERATED EFFORT TO EVALUATE ISLOCA RISK.
  - AEOD REVIEW OF RECENT OPERATING EXPERIENCE
  - NRR INSPECTIONS AND ROOT CAUSE ANALYSES
  - RES ENGINEERING AND PRA ANALYSES

TODAY'S MEETING

\* REGULATORY PERSPECTIVE

\* STATUS REPORT

- INSPECTION FINDINGS

- RESEARCH RESULTS

\* FUTURE SCHEDULES AND MILESTONES

\* SUMMARY OF INITIAL FINDINGS (SPECIFIC ACTIONS TO BE RECOMMENDED MUST AWAIT FINAL RESULTS).

## REGULATORY PERSPECTIVE

- \* PRELIMINARY FINDINGS SUGGEST THAT RISK FROM ISLOCA MAY NOT BE AS GREAT AS ORIGINALLY PERCEIVED. THEREFORE, NO FIRM BASIS FOR ACCELERATED REGULATORY ACTIONS. NRR WILL WAIT TO SEE WHAT REGULATORY ACTIONS, IF ANY, RECOMMENDED BY THE GI-105 PROGRAM.
  
- \* WHILE RISK FROM ISLOCA MAY NOT BE AS HIGH AS INITIALLY ANTICIPATED, NRR IS STILL CONCERNED ABOUT HIGH RATE OF ISLOCA PRECURSORS.
  
- \* ISLOCA PROGRAM HAS GENERATED USEFUL INFORMATION THAT SHOULD BE MADE AVAILABLE TO INDUSTRY.
  
- \* NRR HAS PREPARED A DRAFT INFORMATION NOTICE IN ORDER TO PROVIDE INITIAL FINDINGS TO UTILITIES AND TO INITIATE DISCUSSIONS WITH INDUSTRY GROUPS.
  
- \* TIMING OF SUCH DISCUSSIONS IS GOOD SINCE NRC'S PROGRAM IS NEARING COMPLETION AND INDUSTRY EFFORTS MAY ALSO HAVE PRODUCED INITIAL RESULTS.

ACRS LETTER ON ISLOCA OF 1/18/90

\* CONCERN ABOUT HOW RESULTS WILL BE USED

- CAUSES AND OPTIMAL MITIGATION STRATEGIES MAY BE HIGHLY PLANT-SPECIFIC
- INVOLVE COMPLEX HUMAN ACTIONS NOT WELL MODELED IN PRA<sub>s</sub>
- PRA<sub>s</sub> USED BY LICENSEES FOR IPE MAY NOT DEAL ADEQUATELY WITH ISLOCA ISSUES

\* POSSIBLE APPROACHES FOR RESOLVING

- INFORMATION DEVELOPED BY THE STAFF COULD BE USED IN PRA<sub>s</sub> PERFORMED FOR IPE TO ANALYZE ISLOCA - MAY NOT BE PRACTICAL AND COULD DELAY THE IPE<sub>s</sub>.
- RESOLUTION SEPARATE FROM THE IPE - MAY UNNECESSARILY BURDEN LICENSEES.
- INFORMATION DEVELOPED BY THE STAFF FURNISHED TO LICENSEES FOR INCORPORATION IN IPE WITHOUT EXPECTATION THAT IT BE COMPREHENSIVELY INCLUDED IN PRA<sub>s</sub>.  
RECOGNIZES THAT PRA IS ONLY ONE PART OF IPE PROCESS.

**RES STAFF PRESENTATION  
TO  
THE ACRS**

**ISLOCA RESEARCH PROGRAM**

**BY**

**GARY BURDICK  
SENIOR TECHNICAL ADVISOR  
DIVISION OF SAFETY ISSUES RESOLUTION  
OFFICE OF NUCLEAR REGULATORY RESEARCH**

**DECEMBER 12, 1990**

## INTRODUCTION TO RES PRESENTATION

- o IOU TO ACRS ON PROGRAM STATUS
- o DRAFT OF B&W PLANT STUDY DISTRIBUTION TO SUBCOMMITTEE AS AGREED
- o FINAL DRAFT FOR EXTERNAL REVIEW (1/91)
- o FINAL DRAFT WILL DIFFER SIGNIFICANTLY
  - QUANTIFICATION
  - EXPOSITION
  - PLANT IDENTIFICATION

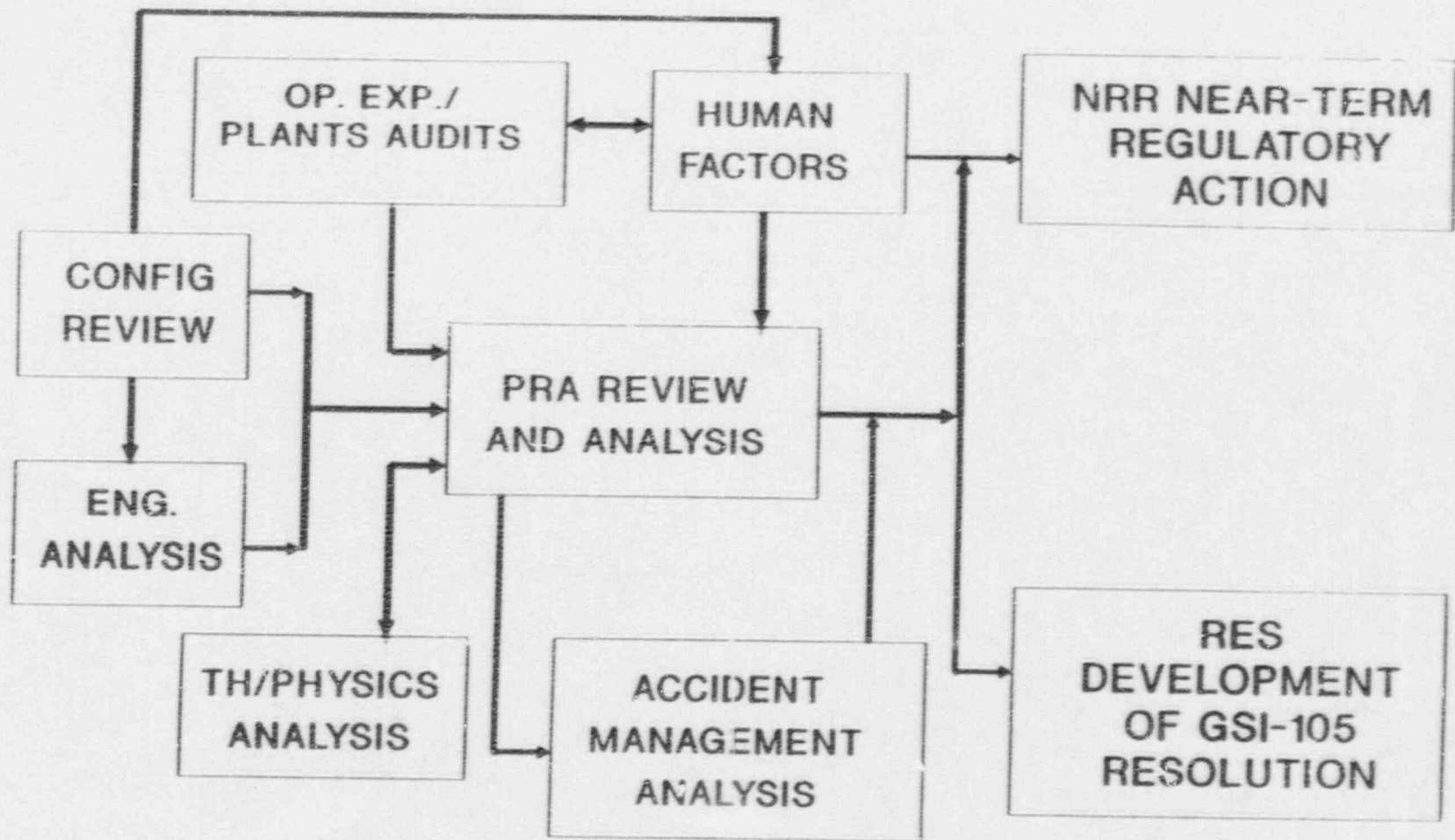


## PAST ISLOCA ANALYSES AND PRAs

- 0 DID LITTLE OR NO MODELING BEYOND PIVs
- 0 MADE RISK-IMPORTANT HARDWARE ASSUMPTIONS:
  - BREAK LIKELIHOODS
  - BREAK LOCATIONS
  - BREAK SIZES
- 0 DID NOT ACCOUNT FOR TYPES OF HUMAN ERRORS SEEN IN RECENT EVENTS
- 0 NARROW HARDWARE FOCUS
  - PIV LEAK TESTING COST/BENEFIT

## ISLOCA (GI-105) RESEARCH PROGRAM

- 0 EVALUATE LOW PRESSURE SYSTEMS FRAGILITIES UNDER HIGH PRESSURES/TEMPERATURES TO IDENTIFY LIKELY FAILURE LOCATIONS.
- 0 IDENTIFY SPECIFIC HUMAN ACTIONS AND ROOT CAUSES IMPORTANT TO ISLOCA FOR RECOMMENDING RISK REDUCTION ACTIONS.
- 0 DETERMINE ISLOCA SEQUENCE TIMING, FLOW RATES, ACCIDENT MANAGEMENT STRATEGIES, AND ISLOCA EFFECTS ON OTHER EQUIPMENT.
- 0 DEVELOP IMPROVED PRA FRAMEWORK TO EVALUATE HUMAN AND HARDWARE CONTRIBUTIONS TO ISLOCA.
- 0 ESTIMATE ISLOCA CONSEQUENCES AND IMPORTANT FACTORS FOR CONSEQUENCE REDUCTION.



RES ISLOGA PROGRAM FLOW CHART

## GI-105 RESOLUTION APPROACH

- o **ASSESS ISLOCA RISK FROM PWRs**
  - **EX-CONTAINMENT ISLOCA INTERNAL EVENTS ANALYSIS (B&W, WESTINGHOUSE, CE PLANTS)**
  - **ADD EXTERNAL EVENTS ANALYSIS**
  - **INSIDE CONTAINMENT ISLOCA ANALYSIS**
  - **COST BENEFIT ANALYSIS**
  
- o **ASSESS ISLOCA RISK FROM BWRs**
  - **PROGRAM FORMULATION PENDING**
  - **LESSONS LEARNED FROM PWRs ASSESSMENTS**
  - **COMPLETING PRIORITIES**

## ISLOCA RESEARCH PROGRAM

### SCHEDULE

- |   |                                  |        |
|---|----------------------------------|--------|
| o | B&W PLANT (NUREG/CR)             | 2/91   |
| o | WESTINGHOUSE (LETTER RPT.)       | 3/91   |
| o | CE (LETTER RPT.)                 | 4/91 ? |
| o | INSIDE CONTAINMENT (LETTER RPT.) | 2/91   |
| o | EXTERNAL EVENTS (B&W APP.)       | 2/91   |
| o | COST BENEFIT (LETTER RPT.)       | 2/91   |
| o | ISLOCA EVAL PROC. (NUREG/CR)     | 4/91 ? |

## ISLOCA RESEARCH PROGRAM PRESENTATION

- o **OUTSIDE CONTAINMENT ISLOCA ANALYSIS APPROACH**
- o **OUTSIDE CONTAINMENT ISLOCA ANALYSIS RESULTS ON A B&W PLANT**
- o **PRELIMINARY OUTSIDE CONTAINMENT ISLOCA ANALYSIS RESULTS ON A WESTINGHOUSE PLANT**

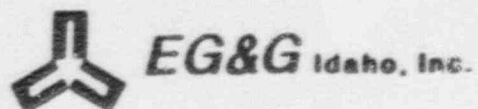


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**BACKGROUND AND APPROACH  
FOR ISLOCA EVALUATIONS**

**DUANE J. HANSON**

**DECEMBER 11, 12 1990**

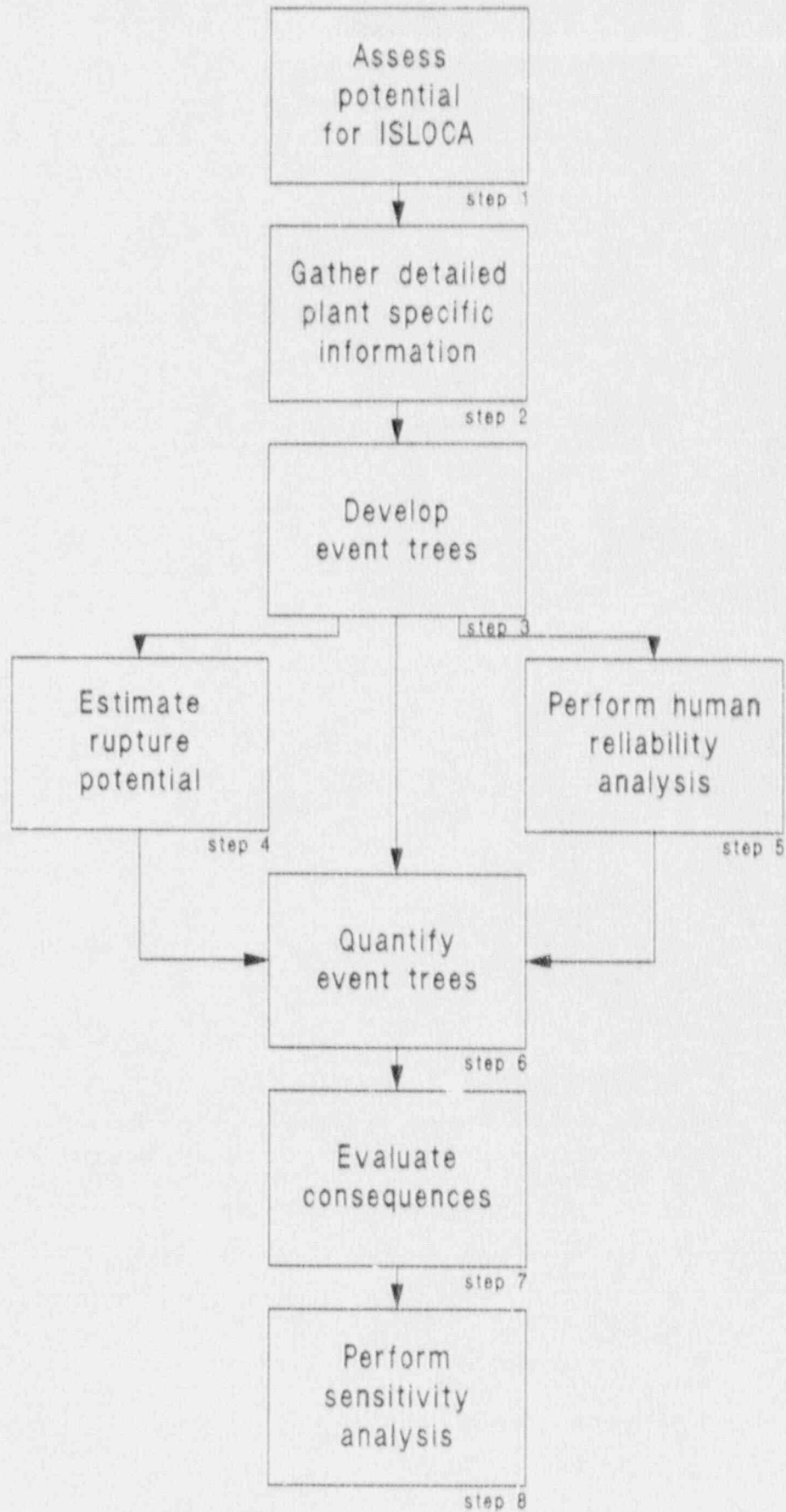


A REVIEW OF HISTORICAL PLANT OPERATING DATA PROVIDED INSIGHTS FOR DEVELOPING FRAMEWORK

- IDENTIFY AND EVALUATE LICENSEE EVENT REPORTS THAT INVOLVED:
  - PRESSURE ISOLATION VALVE FAILURES RESULTING FROM HARDWARE OR HUMAN CAUSES
  - MISALIGNMENT OF MOTOR OPERATED VALVES THAT HAD SAFETY IMPLICATIONS
  - OCCURRENCE OF ISLOCA PRECURSORS
  
- RESULTS PROVIDED INFORMATION ON:
  - POTENTIAL TYPES OF HUMAN ERRORS AND HARDWARE FAILURES IMPORTANT FOR AN ISLOCA
  - INFORMATION ON FAILURE RATES OF SOME TYPES OF PRESSURE ISOLATION VALVES
  
- RESULTS WERE NOT ADEQUATE TO DEVELOP HUMAN ERROR FAILURE RATES



# Approach for Evaluation of ISLOCA



## STEP 1 - ASSESS THE POTENTIAL FOR AN ISLOCA

- OBTAIN PLANT SPECIFIC INFORMATION ON HARDWARE AND OPERATIONS
- IDENTIFY ALL SYSTEMS THAT INTERFACE WITH THE RCS AND HAVE COMPONENTS THAT MAY FAIL AT HIGH PRESSURE
- DETERMINE THE MAXIMUM INTERFACING SYSTEM BREAK SIZE THAT WOULD NOT RESULT IN CORE DAMAGE AND SCREEN THE SYSTEMS
- DEVELOP PRELIMINARY EVENT TREES FOR ISLOCA INITIATORS AND SEQUENCES

## STEP 2 - GATHER DETAILED PLANT SPECIFIC INFORMATION

- INFORMATION ON CAPABILITIES AND LIMITATIONS OF HARDWARE THAT COULD BE INVOLVED IN AN ISLOCA
- INFORMATION ON PROCEDURES AND GUIDELINES DURING STARTUP, POWER OPERATION, SHUTDOWN, AND EMERGENCY OPERATING PROCEDURES THAT MAY AFFECT ISLOCA
- INFORMATION ON MAINTENANCE AND IN-SERVICE TEST PRACTICES
- INFORMATION ON FACTORS THAT COULD INFLUENCE HUMAN PERFORMANCE FOR DETECTION, PREVENTION, AND MITIGATION

### STEP 3 - DEVELOP FINAL EVENT AND FAULT TREES

- COMBINE HARDWARE FAULTS AND HUMAN ERRORS FOR IMPORTANT SEQUENCES (STARTUP, POWER OPERATION, SHUTDOWN)
  
- DEVELOP TREES BASED ON THREE POSSIBLE TYPES OF EVENTS
  - INITIATING EVENTS THAT RESULT IN THE BREACH OF PRESSURE ISOLATION BOUNDARIES
  
  - EVENTS THAT DETERMINE RUPTURE PROBABILITY, LOCATION, AND SIZE
  
  - EVENTS THAT INVOLVE DETECTION, DIAGNOSIS, ISOLATION, AND MITIGATION
  
- ESTIMATE EVENT THERMAL-HYDRAULIC TIMING

## STEP 4 - ESTIMATE RUPTURE POTENTIAL

- ESTIMATE THE MEDIAN FAILURE PRESSURE, ITS EXPECTED DISTRIBUTION AND VARIANCE, AND THE POTENTIAL LEAK RATE FOR EACH COMPONENT
- ESTIMATE THE PRESSURE EACH COMPONENT WILL BE EXPOSED TO BASED ON THE POTENTIAL INITIATING EVENTS AND PRIMARY SYSTEM CONDITIONS
- DEVELOP AN EVENT TREE FOR EACH SYSTEM TO COMPARE THE EXPECTED LOCAL PRESSURE AND ESTIMATED FAILURE PRESSURE FOR THE IMPORTANT COMPONENTS
- ESTIMATE THE RELATIVE FREQUENCY OF EQUIPMENT FAILURES USING A MONTE CARLO SIMULATION TO RANDOMLY SELECT A SYSTEM PRESSURE AND COMPARE IT TO A RANDOMLY SELECTED COMPONENT FAILURE PRESSURE

## STEP 5 - PERFORM HUMAN RELIABILITY ANALYSIS

- ENSURE THAT THE INITIAL EVENT TREES REPRESENT THE HUMAN ACTIONS
- IDENTIFY AND SCREEN HUMAN ACTIONS THAT CAN INFLUENCE SAFETY DURING AN ISLOCA
- DEVELOP DETAILED DESCRIPTIONS OF THESE IMPORTANT HUMAN ACTIONS
- SELECT AND APPLY AVAILABLE TECHNIQUES TO MODEL THE IMPORTANT HUMAN ACTIONS
- DEVELOP NEW MODELS WHERE EXISTING TECHNIQUES DO NOT REPRESENT POSSIBLE HUMAN ACTIONS
- ESTIMATE HUMAN ERROR PROBABILITIES (HEPs) AND ESTABLISH UNCERTAINTY RANGES

## STEP 6 - QUANTIFY EVENT TREES

- SEQUENCE INITIATORS
  - GENERIC HARDWARE FAILURE DATA
  - HRA RESULTS
  
- RUPTURE PROBABILITIES
  - ESTIMATES OF EQUIPMENT FAILURE FREQUENCIES
  
- DETECTION, DIAGNOSIS, ISOLATION, AND MITIGATION
  - HRA RESULTS
  - VALVE CAPABILITIES
  - CAPABILITY OF SYSTEMS TO SCRUB FISSION PRODUCTS

## STEP 7 - NORMALIZE CONSEQUENCES TO AN AVERAGE SITE

- ESTABLISH SOURCE TERMS BASED ON EXISTING INFORMATION
  
- SELECT A SITE BASED ON EXISTING MACCS MODELS
  - IDENTIFY AN AVERAGE SITE FOR THE UNITED STATES BASED ON THE WEATHER WEIGHTED POPULATION DENSITY IN THE SANDIA SITING STUDY
  
  - SELECT A SITE FROM THE FIVE NUREG-1150 PLANTS BASED ON THE CLOSEST MATCH TO THE AVERAGE POPULATION DENSITY
  
- CALCULATE HEALTH EFFECTS USING THE MACCS CODE



## STEP 8 - SENSITIVITY STUDIES

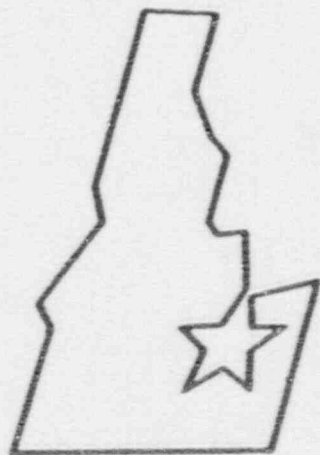
- EVALUATE THE SENSITIVITY TO PARAMETERS THAT HAVE A RELATIVE LARGE UNCERTAINTY IN THEIR VALUES
- ESTIMATE THE CHANGE IN CORE DAMAGE FREQUENCY FROM POTENTIAL CHANGES TO PLANT HARDWARE AND OPERATIONS
- EXAMINE ALTERNATIVE METHODS OF ESTABLISHING PROBABILITIES

**ADDITIONAL ANALYSES ARE BEING PERFORMED BASED  
ON COMMENTS ON THE DRAFT REPORT**

- **DEVELOP LESS CONSERVATIVE THERMAL-HYDRAULIC ESTIMATES OF LARGE AND SMALL BREAK TIMING**
- **PERFORM ADDITIONAL HRA TO INCORPORATE REVIEWERS COMMENTS AND TO REFLECT DIFFERENCES IN TIMING**
- **MODIFY THE QUANTIFICATION APPROACH TO ALLOW PERFORMANCE OF UNCERTAINTY ANALYSES**
- **EXAMINE ADDITIONAL SENSITIVITIES**

**IMPORTANT RESULTS TO CONSIDER DURING  
THE FOLLOWING PRESENTATIONS**

- 0 EFFECT OF HUMAN ACTIONS AS INITIATORS FOR ISLOCA**
- 0 RELATIVE CONTRIBUTION OF HUMAN ERRORS AND HARDWARE FAILURES TO ISLOCA CDF AND RISK**
- 0 COMPONENTS THAT WOULD FAIL WHEN EXPOSED TO OVERPRESSURE**
- 0 IMPORTANCE OF DETECTION, DIAGNOSIS, ISOLATION, AND MITIGATION IN REDUCING RISK**
- 0 INFLUENCE OF PROCEDURES, INSTRUMENTATION, AND TRAINING ON THE CAPABILITIES OF PLANT PERSONNEL TO REDUCE ISLOCA RISK**



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## RUPTURE PROBABILITY CALCULATIONS

W. J. GALYEAN

DECEMBER 12, 1990



**EG&G** Idaho, Inc.

INEL

**COMPREHENSIVE ISLOCA ANALYSIS REQUIRES  
ACCURATE ESTIMATION OF RUPTURES**

**ISLOCA EVALUATION REQUIRES PREDICTION AND UNDERSTANDING OF  
INTERFACING SYSTEM RESPONSE TO OVERPRESSURIZATION.**

**0 NEED TO IDENTIFY:**

- WHICH COMPONENTS ARE LIKELY TO RUPTURE**
- LIKELY RUPTURE LOCATION**
- SIZE OF RUPTURE**

## OVERPRESSURE RUPTURES OF INTERFACING SYSTEMS ARE TREATED PROBABILISTICALLY

0 UNCERTAINTIES (BOTH TOLERANCE AND CONFIDENCE) IN  
SPECIFIC CONDITIONS PRECLUDES REALISTIC-DETERMINISTIC  
ANALYSIS:

- COMPONENT PRESSURE CAPABILITIES (E.G. PRE-EXISTING  
FLAWS),
- EXPECTED LOCAL SYSTEM PRESSURES (E.G. VARIATIONS IN  
SYSTEM CONFIGURATIONS AND OPERATIONS).

**RUPTURE PROBABILITY CALCULATIONS REQUIRE  
BOTH STRESS AND STRENGTH INFORMATION**

**RUPTURE PROBABILITY DETERMINED BY TWO FACTORS:**

**0 PRESSURE CAPACITY OF INTERFACING SYSTEM COMPONENTS**

**- PERFORMED BY ABB-IMPELL.**

**0 PRESSURES SEEN BY INTERFACING SYSTEM COMPONENTS**

**- INCLUDES EFFECTS OF RELIEF VALVES AND FLOW  
RESTRICTIONS (ORIFICES, PIPE SIZE, CHOKE PLANES).**

## **PRESSURE CAPACITY EVALUATION HAD THREE MAJOR OBJECTIVES**

- 0 DEVELOP A METHODOLOGY TO PROBABILISTICALLY ASSESS FLUID SYSTEM COMPONENTS WHEN SUBJECTED TO HIGHER THAN DESIGNED PRESSURES AND TEMPERATURES.**
- 0 DETERMINE MEDIAN FAILURE PRESSURE (LOGNORMAL) AND ASSOCIATED UNCERTAINTY FOR FLUID SYSTEM COMPONENTS.**
- 0 FOR POSTULATED FAILURES DETERMINE EXPECTED LEAK RATES OR LEAK AREAS.**



ALL MAJOR COMPONENTS IN INTERFACING  
SYSTEMS WERE EVALUATED

DECAY HEAT REMOVAL - LOW PRESSURE INJECTION, HIGH PRESSURE  
INJECTION, AND MAKEUP & PURIFICATION SYSTEMS EXAMINED.

- 0 PIPES (ALL STAINLESS STEEL)
- 0 TANKS, VESSELS AND HEAT EXCHANGERS
- 0 FLANGES
- 0 VALVES (PACKING, FLANGED BONNETS)
- 0 PUMPS (CASING, SEALS)

ESTIMATING REALISTIC FAILURE PRESSURES WAS A  
PRIME CONSIDERATION

- 0 PRESSURE CAPACITIES BASED ON MATERIAL PROPERTIES OR ACTUAL TEST DATA (RATHER THAN CODE OR DESIGN).
- 0 PRESSURE CAPACITY ASSUMED TO BE A LOGNORMAL RANDOM VARIABLE.
- 0 QUASISTATIC PRESSURE AND TEMPERATURE CONDITIONS ASSUMED:
  - BASED ON RUNS OF SIMPLE RELAP5 MODELS OF INTERFACING SYSTEMS

**MANY LOW PRESSURE RATED COMPONENTS NOT  
CAPABLE OF WITHSTANDING RCS PRESSURES**

**MEDIAN LARGE-RUPTURE FAILURE PRESSURES:**

0	12" SCHEDULE-20 PIPE	1660 PSIG
0	18" SCHEDULE-10 PIPE	843 PSIG
0	12" 300-PSI FLANGE	2250 PSIG
0	DHR HEAT EXCHANGER:	
	- TUBE SHEET FLANGE	893 PSIG
	- PLASTIC COLLAPSE HEAD BUCKLING	1030 PSIG
	- CYLINDER RUPTURE	1630 PSIG

## LOCAL INTERFACING SYSTEM PRESSURES PREDICTED USING SIMPLE RELAP5 MODELS

RELAP5 MODELS OF INTERFACING SYSTEMS WERE BUILT AND RUN.

- 0 INTERFACING SYSTEMS NORMALLY KEPT FILLED
- 0 CALCULATIONS ASSUMED STEADY STATE RCS
  - JUSTIFIED (VERY SLIGHTLY CONSERVATIVE) BY RAPID PRESSURIZATION OF INTERFACING SYSTEM (I.E. 5-7 SECONDS)
- 0 PRESSURE EQUILIBRIUM ESTABLISHED VERY QUICKLY - DEAD ENDED (CLOSED) SYSTEMS PRESSURIZE VIRTUALLY INSTANTANEOUSLY.
- 0 SMALL RELIEF VALVES IN COMBINATION WITH FLOW RESTRICTIONS MAY PROTECT PORTIONS OF SYSTEMS.

## INTERFACING SYSTEM EVENT TREE MODEL USED TO SIMULATE O.P. RESPONSE

- 0 EACH INTERFACING SYSTEM COMPONENT REPRESENTED BY AN EVENT ON THE EVENT TREE
  
- 0 INTERFACING SYSTEM LOCAL-PRESSURES ESTIMATED BY RELAP5 RUNS
  - OVERPRESSURE REPRESENTED AS "INITIATING EVENT"
  
- 0 PROBABILITY DISTRIBUTIONS ASSUMED FOR BOTH FAILURE PRESSURE AND LOCAL SYSTEM PRESSURE:
  - COMPONENT PRESSURE FRAGILITIES MODELED LOGNORMALLY,
  - LOCAL SYSTEM PRESSURES ARE A FUNCTION OF RCS PRESSURE, WHICH IS ASSUMED TO BE NORMALLY DISTRIBUTED.

INTERFACING SYSTEM RUPTURE PROBABILITIES ESTIMATED BY  
MONTE CARLO SAMPLING EVENT TREE

EVNTRE-CODE DEVELOPED DURING NUREG-1150 PROGRAM UTILIZED  
FOR CALCULATION.

- 0 LOCAL SYSTEM PRESSURE SAMPLED FROM POSTULATED NORMAL  
DISTRIBUTION (E.G. MEAN 2100 PSIG, STD-DEV 50 PSI).
  
- 0 COMPONENT FAILURE PRESSURE SAMPLED FROM POSTULATED  
LOGNORMAL DISTRIBUTION, E.G. 12-INCH SCH20 PIPE: MEDIAN  
1660 PSIG, LOG-STD-DEV 0.36.

INTERFACING SYSTEM RUPTURES ESTIMATED BY  
MONTE CARLO SAMPLING EVENT TREE (CONTINUED)

FOR EACH COMPONENT IN THE INTERFACING SYSTEM, MONTE CARLO  
ROUTINE SAMPLES A LOCAL SYSTEM PRESSURE, A FAILURE  
PRESSURE AND COMPARES THE TWO, IF:

- 0  $P_L > P_F$ , THEN COMPONENT RUPTURES,
- 0  $P_L < P_F$ , THEN COMPONENT DOES NOT RUPTURE.
- 0 RUPTURE PROBABILITY IS FRACTION OF MONTE CARLO  
OBSERVATIONS RESULTING IN RUPTURES.

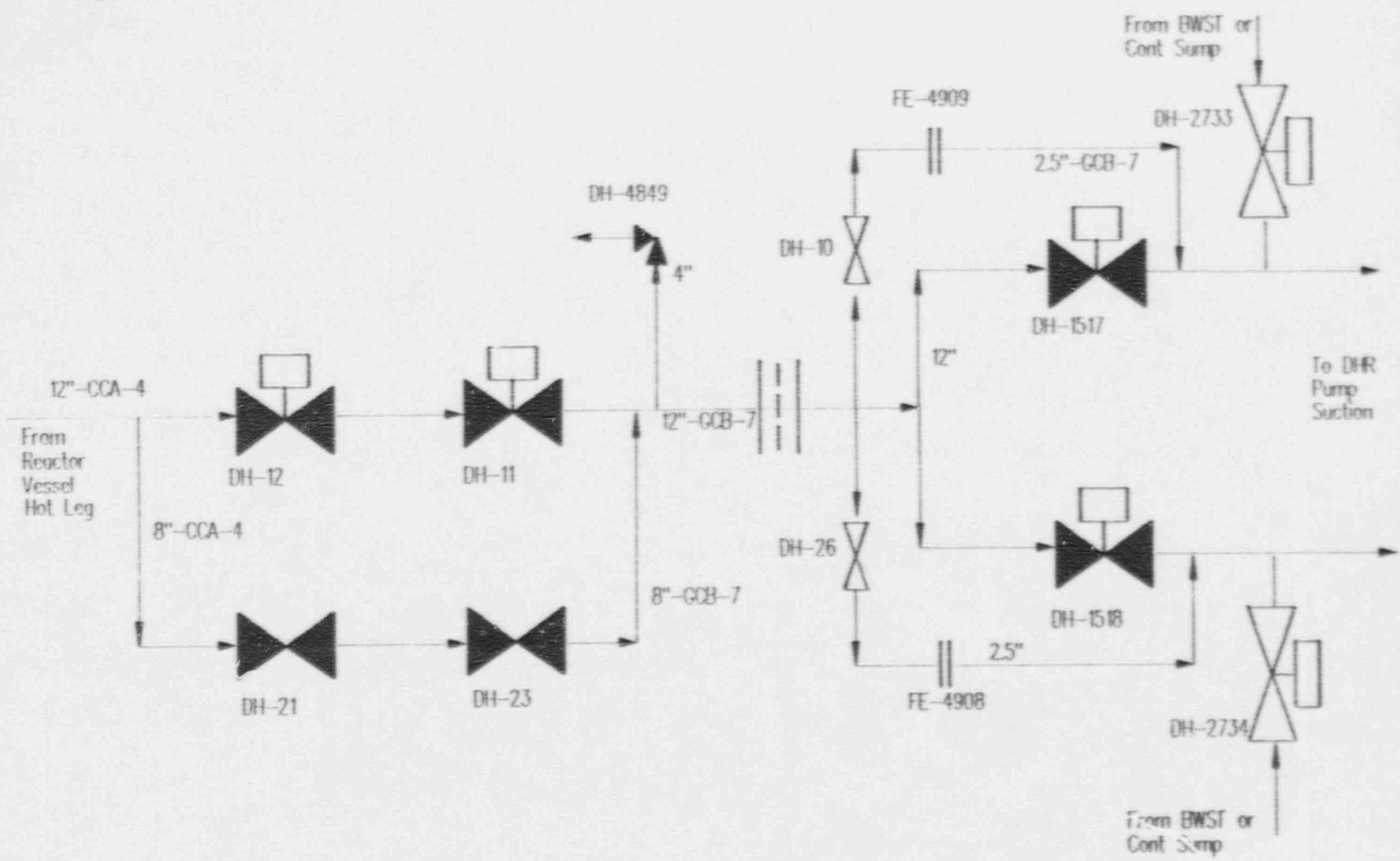
COMPONENT FAILURE PROBABILITIES CAN BE  
CALCULATED UTILIZING SEISMIC FAILURE EQUATION

- 0 PROBABILITY OF FAILURE AT 2100 PSIG FOR A 12-INCH SCH20  
PIPE (MEDIAN = 1660 PSIG, LOG-STD-DEV = 0.36)

$$\begin{aligned}\text{PROB}(\text{FAIL PRESS} < 2100 \text{ PSIG}) &= \text{PHI}((\text{LN}(2100) - \text{LN}(1660)) / 0.36) \\ &= \text{PHI}(0.65) \\ \text{PROBABILITY OF RUPTURE} &= 0.742\end{aligned}$$

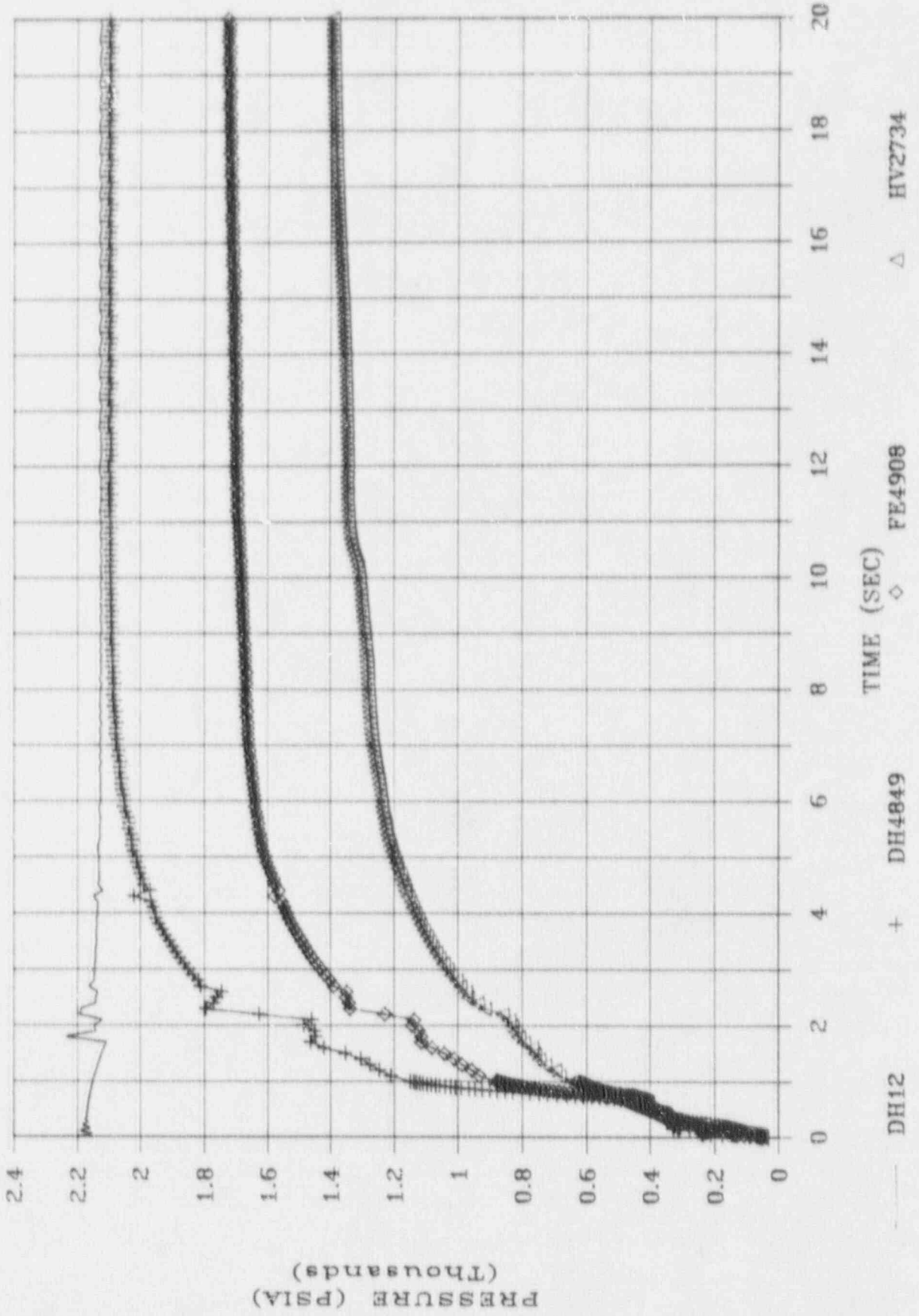
- 0 (REF: R. P. KENNEDY ET AL, NUCLEAR ENGINEERING AND  
DESIGN, VOL.59, NO.2, AUGUST 1980.)





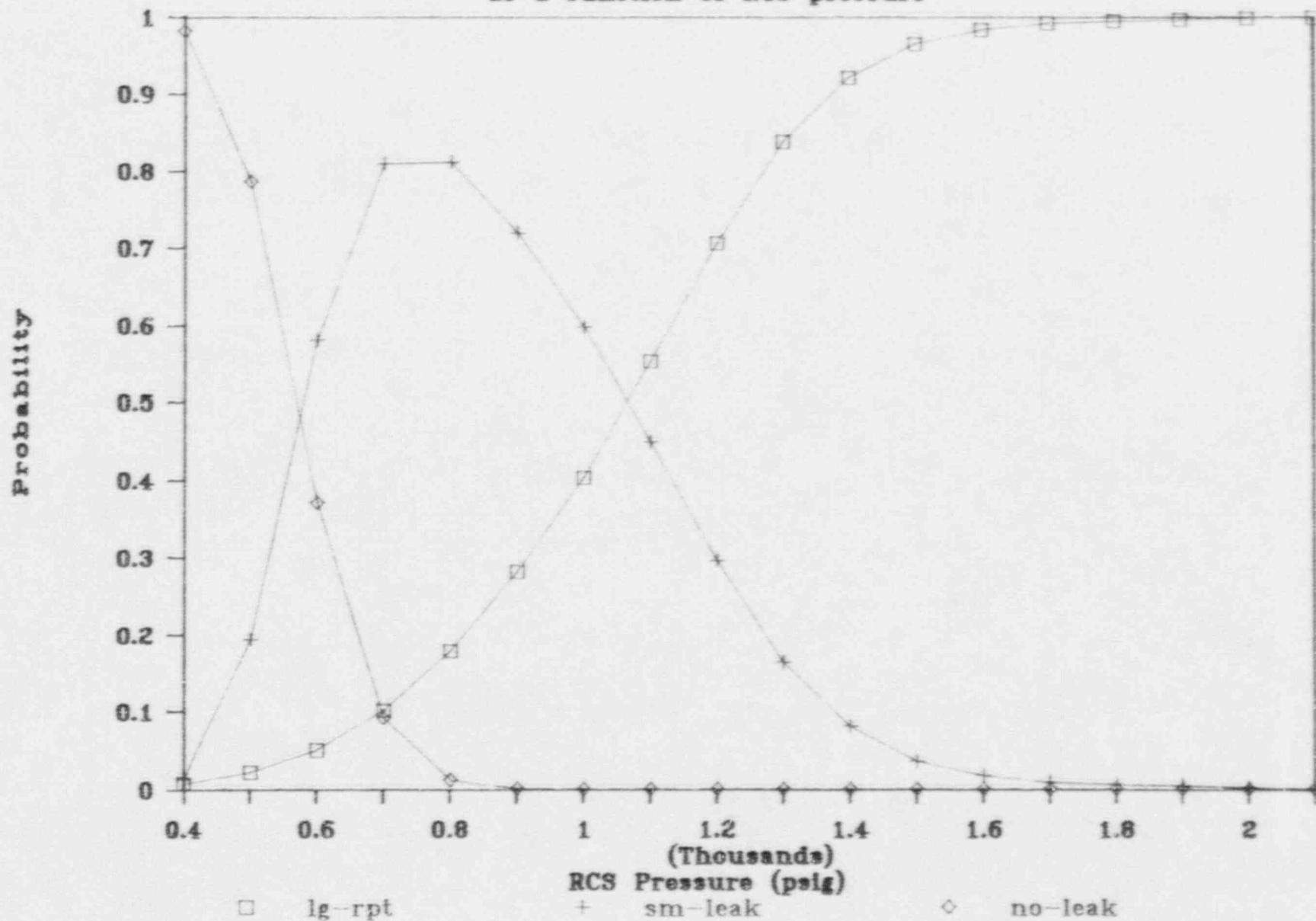
# DHR SHUTDOWN

2200 PSIA, 600 F



# DHR Letdown System Rupture Probability

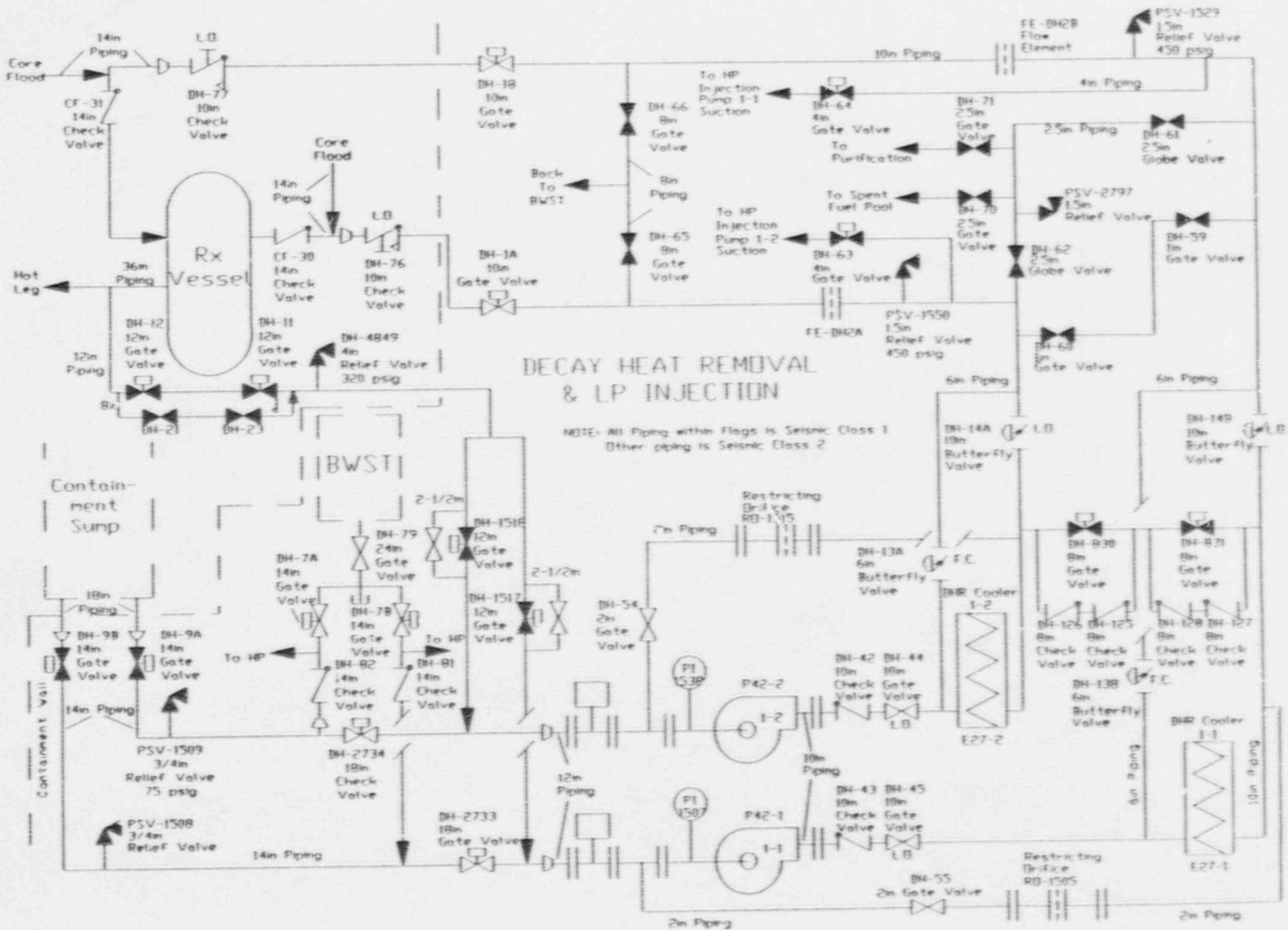
as a function of RCS pressure



DHR LETDOWN SYSTEM COMPONENT RUPTURE DATA

MEDIAN RCS PRESS = 1250 (UNIFORM BETWEEN 300 AND 2200 PSI).  
 MEDIAN SYSTEM PRESSURE AT DH-4849 = 1188. PSIA.  
 MEDIAN SYSTEM PRESSURE AT DH-2734 = 818. PSIA.

COMPONENT	DESCRIPTION	MED. FAIL PRESS	FAILURE PROB.
DH-4849			
12"-GCB-7	PIPE, SCH. 20	1660	* 0.2553
DH-2734			
DH-1517	12" MOGV, 300 PSI	1704	0.013 SM
18"-GCB-8	PIPE, SCH. 20	1488	* 0.1072
DH-2733	18" MOGV, 300 PSI	2277	5.0E-4 SM
18"-HCB-1	PIPE, SCH. 10S	843	* 0.447
14"-HCB-1	PIPE, SCH. 10S	1090	* 0.2695
DH-81	14" SwCV, 150 PSI	1445	0.0675 SM
12"-GCB-8	PIPE, SCH. 20	1660	0.0712
12GCBA	FLANGE, 300 PSI	2250	0
12GCBb	FLANGE, 300 PSI	2250	0
12GCBc	FLANGE, 300 PSI	2250	0
P42-1	DHR PUMP 1-1	2250	3.0E-4 SM
10"-GCB-1	PIPE, SCH. 20	1984	0.0315
10GCB1A	10" FLANGE, 300 PSI	2485	0
DH-43	10" SwCV, 300 PSI	2016	2.5E-3 SM
DH-45	10" HWGV, 300 PSI	2170	9.0E-4 SM
E271T	DHR HX TUBE SHT	432	* 0.8546 (50% SM)
E271P	DHR HX PLASTIC COL	1030	0.05988
E271C	DHR HX CYL. RUPT.	1630	0.0448
E271A	DHR HX ASYM HD. BKL	2030	9.2E-4 SM
E271A	10" OUT-F, 300 PSI	2485	0
E271B	10" IN-F, 300 PSI	2485	0
6"-GCB-10	PIPE, SCH. 10S	1585	0.0822
10"-GCB-10	PIPE, SCH. 20	1984	0.0295
8"-GCB-10	PIPE, SCH. 20	2503	7.3E-3
DH-128	8" SwCV, 300 PSI	1242	0.142 SM
4"-GCB-2	PIPE, SCH. 10S	2075	0.022
FE-DH2B	10" FE, 300 PSI	2485	0



LARGE RUPTURES OF INTERFACING SYSTEMS  
ARE LIKELY FOR MOST ISLOCA SEQUENCES

WHEN EXPOSED TO FULL RCS PRESSURE AND TEMPERATURE RUPTURES  
ARE EXPECTED TO OCCUR VERY RAPIDLY

- 0 INTERFACING SYSTEMS WILL REACH MAXIMUM PRESSURE WITHIN  
5 TO 7 SECONDS
  - RELIEF CAPACITY IS NOT ADEQUATE TO PROTECT  
INTERFACING SYSTEM
- 0 FLANGE AND SEAL LEAKS ARE POSSIBLE BUT ARE NOT EXPECTED  
TO BE LARGE ENOUGH TO PROTECT OTHER EQUIPMENT
- 0 PIPE RUPTURES AND FAILURES OF HEAT EXCHANGERS ARE MOST  
LIKELY



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**AN APPROACH TO  
IDENTIFYING AND QUANTIFYING  
HUMAN ERROR IN  
SUPPORT OF ISLOCA**

**HAROLD S. BLACKMAN  
DAVID I. GERTMAN**

**DECEMBER 11TH AND 12TH, 1990**



**EG&G Idaho, Inc.**

**OBJECTIVE OF THE HRA WAS TO IDENTIFY THE  
SPECTRUM OF ERRORS ASSOCIATED WITH ISLOCA**

**FAILURE MODE DIMENSION**

**OMISSION**

**COMMISSION**

**LATENT**  
**ACTIVITY**  
**DIMENSION**  
**ACTIVE**




**RECENT EVENTS AT OPERATING REACTORS HAVE IDENTIFIED HUMAN ERRORS AS ISLOCA PRECURSORS.**

**HUMAN ERROR CONTRIBUTED TO THESE EVENTS THROUGH SEVERAL MECHANISMS:**

- **IMPROPER VALVE ASSEMBLY**
  
- **ATTEMPTING TO SEAT CHECK VALVE BY OPENING MOV ON LOW PRESSURE SIDE TO INCREASE DIFFERENTIAL PRESSURE**
  
- **IMPROPER WIRING OF RHR LETDOWN INTERLOCK**
  
- **MISCOMMUNICATION BETWEEN CONTROL OPERATOR AND I&C TECHNICIANS**

## **AN INTEGRATED APPROACH TO HRA WAS USED**

- **ENSURE ALL TYPES OF ACTIONS WERE CONSIDERED FOR PRELIMINARY EVENT TREES**
- **IDENTIFY AND SCREEN HUMAN INTERACTIONS WHICH MAY BE RISK SIGNIFICANT**
- **DEVELOP A DETAILED DESCRIPTION OF IMPORTANT HUMAN ACTIONS**
- **SELECT AND APPLY APPROPRIATE MODELING TECHNIQUES**
- **DEVELOP NEW MODELS WHERE EXISTING TECHNIQUES DO NOT REPRESENT POSSIBLE HUMAN ACTIONS**
- **QUANTIFY THE PROBABILITIES FOR THE VARIOUS HUMAN ACTIONS**
- **DOCUMENT THE INFORMATION FOR TRACEABILITY**

**THE MATRIX FOR ACTIVITY AND FAILURE MODE DIMENSIONS WAS APPLIED**

- **FIVE ERROR CATEGORIES CORRESPONDING TO EVENTS WERE REVIEWED**

- 1. INITIATING ERRORS**
- 2. ERRORS IN DETECTION**
- 3. ERRORS IN DIAGNOSIS**
- 4. ERRORS IN ISOLATION**
- 5. ERRORS IN MITIGATION**

## **ERRORS OF COMMISSION ARE NOT USUALLY MODELED IN CONTEMPORARY PRA EFFORTS**

- **METHODS FOR IDENTIFYING AND QUANTIFYING ERRORS OF OMISSION FOR USE IN CONTEMPORARY PRA ARE WELL DEVELOPED**
- **METHODS FOR IDENTIFYING AND QUANTIFYING ERRORS OF COMMISSION ARE LESS WELL DEVELOPED**
- **PRESENT STUDY SOUGHT METHODS TO IDENTIFY, MODEL, AND QUANTIFY ERRORS OF COMMISSION**

**THREE METHODOLOGICAL STEPS REQUIRED DIFFERENT APPROACHES  
FOR ERRORS OF COMMISSION**

- **ERROR IDENTIFICATION**
- **ERROR REPRESENTATION**
- **ERROR QUANTIFICATION**

**ERROR IDENTIFICATION BROADENED TO INCLUDE PROBABLE ERRORS  
OF COMMISSION**

- **ERRORS ARE NORMALLY IDENTIFIED THROUGH TASK ANALYSIS**
- **DATA COLLECTION IS KEYED TO HRA QUANTIFICATION  
TECHNIQUES**
- **STUDY APPLIED A VARIATION OF SNEAK ANALYSIS TO  
IDENTIFY POTENTIAL ERRORS**

**SNEAK ANALYSIS EMPLOYS STRUCTURED QUESTIONS TO IDENTIFY UNDESIRABLE PATHS AROUND THE INTENDED PATH**

**EXAMPLE QUESTIONS FROM SNEAK ANALYSIS ARE:**

- **IS IT POSSIBLE FOR THE OPERATOR TO TAKE ACTIONS OTHER THAN THOSE WHICH ARE INTENDED?**
- **ARE THERE BARRIERS TO PREVENT THE OPERATOR FROM TAKING IMPROPER ACTIONS?**
- **CAN THE BARRIERS BE CIRCUMVENTED?**

**EXAMPLE FINDING FROM SNEAK ANALYSIS:  
THE POTENTIAL FOR EARLY ENTRY INTO DHR COOLDOWN**

- **WE FOUND**
  - **ADMINISTRATIVE BARRIERS NOT IDENTIFIED**
  - **OPERATORS ROUTINELY BYPASS PHYSICAL BARRIERS BY JUMPERING INTERLOCKS**
  - **PROCEDURALLY SANCTIONED TO JUMPER ONE PIV**
  
- **THIS SUGGESTED A SNEAK PATH FOR THE ERROR OF COMMISSION RELATED TO PREMATURELY OPENING VALVES**



## **ERROR REPRESENTATION**

- **IMPORTANT TO MODEL INTENTIONAL ERRORS OF COMMISSION SOMEWHAT DIFFERENTLY THAN COMMISSION ERRORS WHICH ARE SIMPLE EXECUTION ERRORS**
- **ONCE AN ERROR OF INTENTION IS MADE AND A COURSE ESTABLISHED CONTINUING TO SUCCESSFULLY FOLLOW THAT COURSE CONTINUES THE ERROR**
- **ANY ADDITIONAL ERROR (OMISSION OR COMMISSION) ALLOWS RECOVERY FROM THE ORIGINAL ERROR**
- **TREES MUST MODEL CREW PERFORMANCE AFTER THE DECISION ERROR HAS BEEN MADE**
- **THUS THE PROBABILITY OF THE OPERATORS SUCCESSFULLY OPENING THE VALVES MUST BE COMBINED WITH THE PROBABILITY OF THE OPERATORS DECIDING TO COMMIT THE ERROR**

## QUANTIFICATION OF INTENTIONAL ERRORS OF COMMISSION

- INSUFFICIENT OPERATIONAL DATA EXISTS TO SUPPORT THE QUANTIFICATION OF ERRORS OF COMMISSION RELATED TO ERRONEOUS INTENT
- ERRORS OF INTENT ARE NOT TIME DRIVEN BUT ARE CONSCIOUS DECISIONS ON THE PART OF THE OPERATOR
- ERRORS ARE COGNITIVE IN NATURE AND ARE INFLUENCED BY PERFORMANCE SHAPING FACTORS SUCH AS QUALITY OF PROCEDURES, TRAINING, AND MORE NEBULOUS CONCEPTS SUCH AS ISLOCA AWARENESS
- ERRORS OCCUR IN THE THINKING AS MUCH AS IN THE DOING
- THEREFORE THE ANALYST MUST USE EXPERT JUDGEMENT TECHNIQUES FOR HUMAN ERROR QUANTIFICATION

**THE B&W HRA ANALYSIS FOR OUTSIDE CONTAINMENT ISLOCA  
LED TO THE IDENTIFICATION OF POTENTIAL LATENT ERRORS**

- **ERRORS INVOLVED INAPPROPRIATE VALVE LINEUPS**
- **MOST LATENT ERRORS INVOLVED LOCALLY OPERATED VALVES**
- **LACK OF PROCEDURAL TIE-IN TO POTENTIAL FOR ISLOCA**

**A SENSITIVITY ANALYSIS IS BEING CONDUCTED WHICH WILL EVALUATE THE EFFECTS OF THE FOLLOWING POTENTIAL MODIFICATIONS:**

● **PROCEDURES**

- **CAUTIONS, NOTES, AND WARNINGS ADDED**
- **HYPOTHESIZE A PROCEDURE FOR ISLOCA**
- **PRECLUDE JUMPERING OF INTERLOCKS**

● **INSTRUMENTATION**

- **ADDITION OF VALVE STATUS BOARD**
- **PRESENTATION OF INFORMATION ON PRESSURES, TEMPERATURES, LEVEL, AND FLOW**

● **TRAINING**

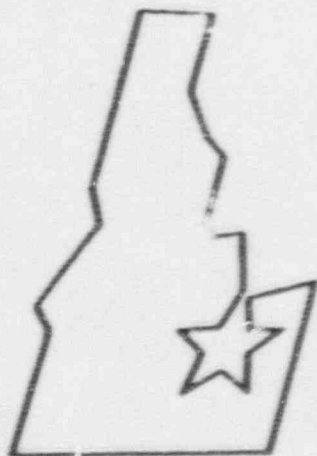
- **FORMAL TRAINING ON ISLOCA, ASSOCIATED ALARMS, NEW PROCEDURES**

● **RECOVERY**

- **ALL TASKS COVERED BY PROCEDURES, CHECKOFFS, AND INDEPENDENT VERIFICATION**

## **HRA FINDINGS AND CONCLUSIONS**

- **SNEAK ANALYSIS SHOWS PROMISE FOR THE IDENTIFICATION OF ERRORS OF COMMISSION**
- **ERRORS OF COMMISSION AND LATENT ERRORS PROVED TO BE RISK DOMINANT FOR ISLOCA AT THIS B&W PLANT**
- **RESULTS SUPPORT THE INSPECTION TEAM FINDINGS REGARDING TRAINING AND PROCEDURES AND EXTEND THEM TO ERROR QUANTIFICATION**
- **PRACTICAL MEASURES TO LESSEN THE RISK RELATED TO HUMAN ERROR HAVE BEEN IDENTIFIED**



**Idaho  
National  
Engineering  
Laboratory**

## B&W PLANT RESULTS

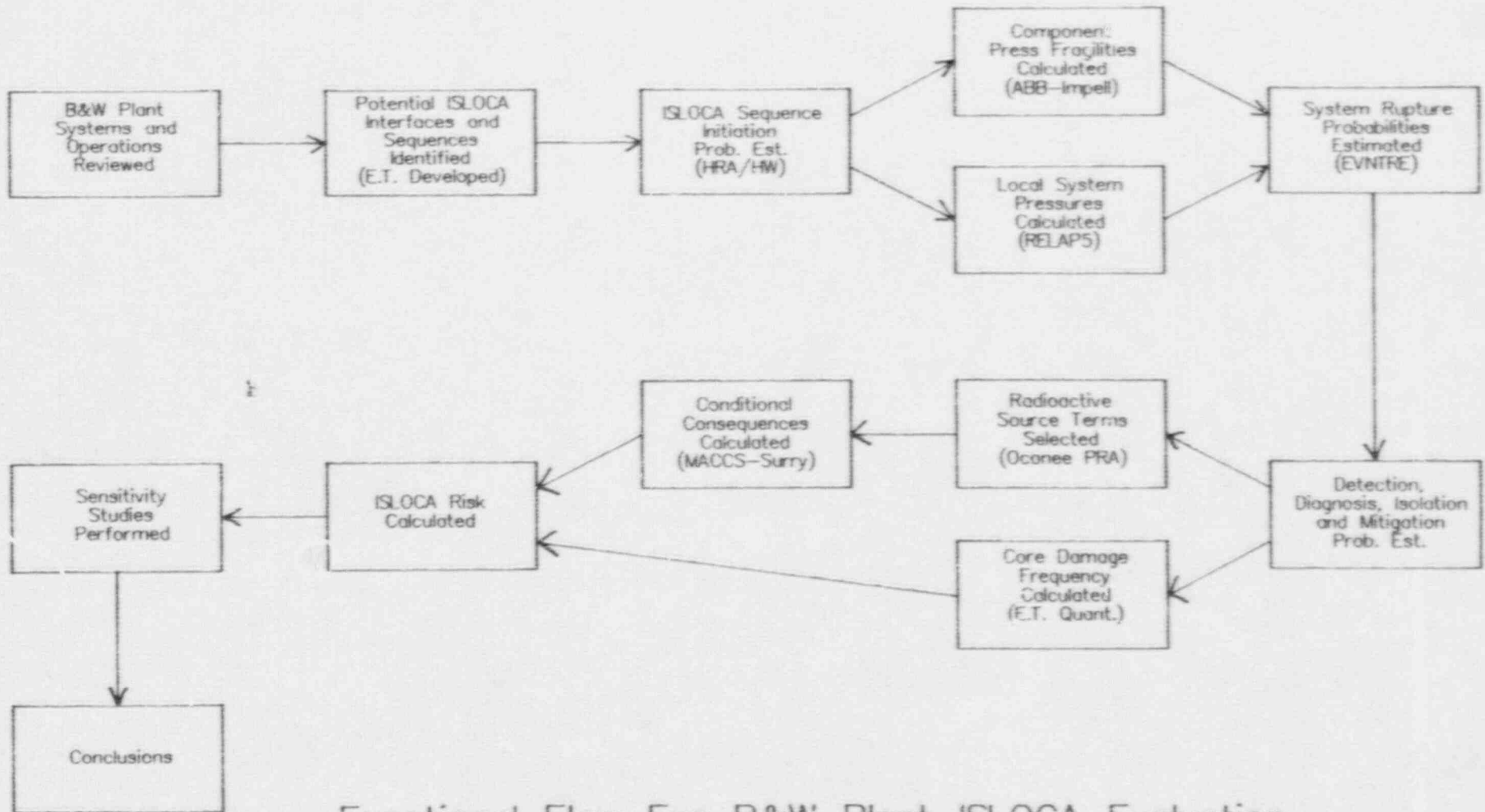
W. J. GALYEAN

DECEMBER 12, 1990



**EG&G** Idaho, Inc.

INEL



Functional Flow For B&W Plant ISLOCA Evaluation

## 18 "PRECURSOR" EVENTS WERE EXAMINED IN DETAIL

### OF THE 18 EVENTS:

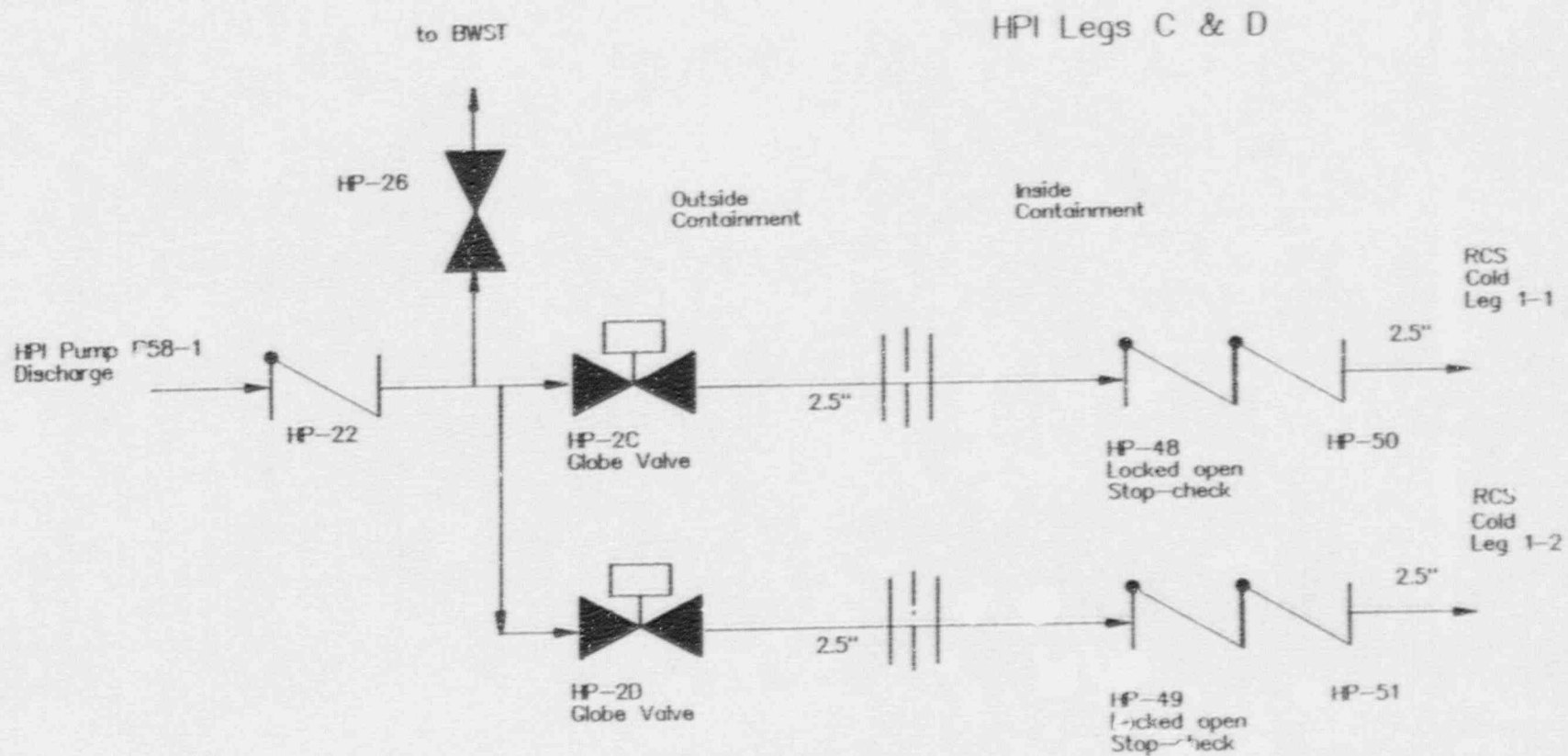
- 0 SIX INVOLVED A PRE-EXISTING LEAKING VALVE THAT WAS DETECTED WHEN PERIODIC TEST OPENED INJECTION VALVE.
- 0 THREE INVOLVED AN OPEN CHECK VALVE THAT WAS DETECTED WITHOUT VIOLATION THE PRESSURE ISOLATION FUNCTION.
- 0 THREE RESULTED WHEN CR OPERATORS ATTEMPTED TO DEPRESSURIZE THE RHR (LEAKING CHECK VALVE ALLOWED RC TO BACKFLOW INTO THE RHR).
- 0 TWO INVOLVED A GENERIC PROBLEM OF STRESS CORROSION CRACKS ON ANCHOR DARLING VALVE RETAINING BLOCKS.



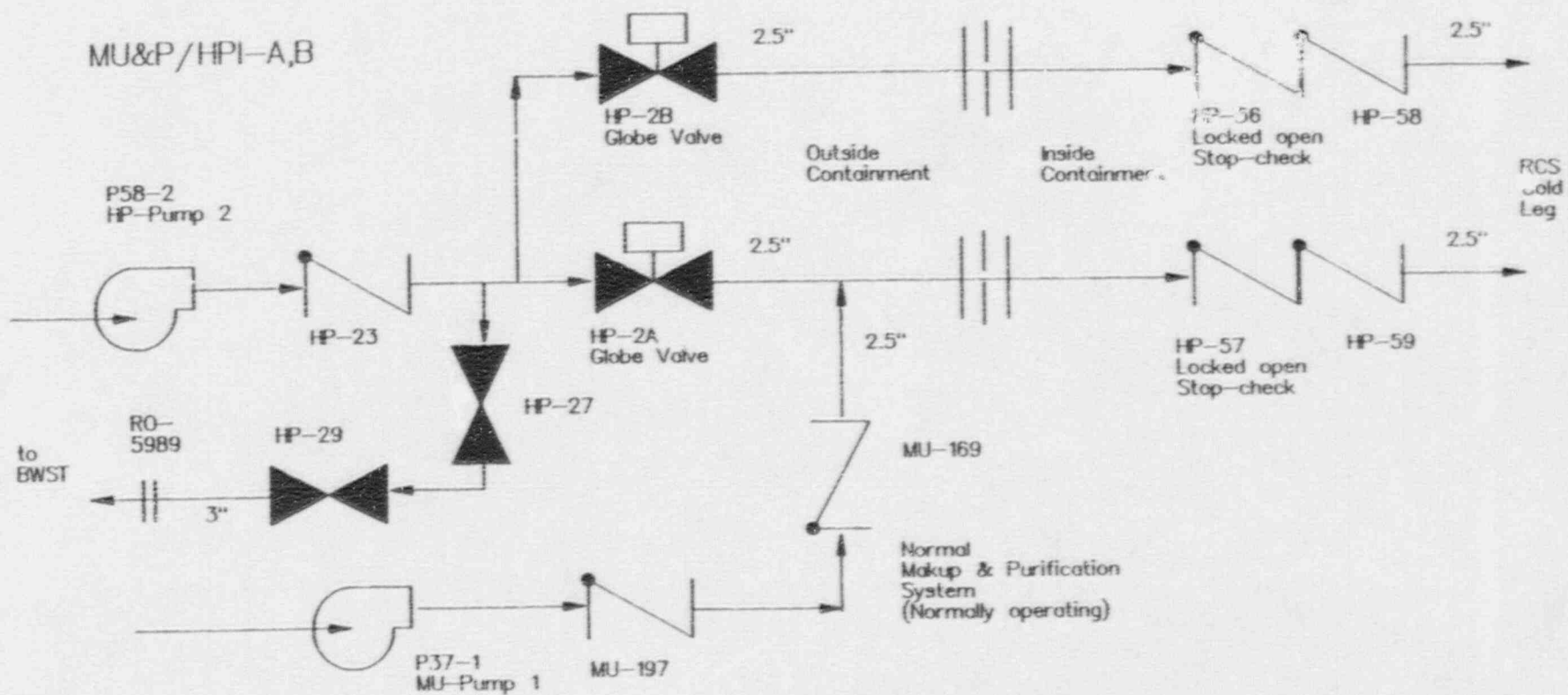
REVIEW OF B&W SYSTEMS AND OPERATIONS LEADS TO  
IDENTIFICATION OF ISLOCA INTERFACES AND SEQUENCES

- 0 1-INCH AND SMALLER LINES, AND <200 GPM DEEMED RISK  
INSIGNIFICANT
  - 50-FOOT 1"-SCH160 PIPE WILL PASS ABOUT 200 GPM
  - BWST ABOUT 450,000 GAL W/ MAKEUP OF ABOUT 150 GPM
  - MU&P PUMPS RATED AT 150 GPM EACH
  
- 0 THREE ISLOCA INTERFACES IDENTIFIED: HPI, LPI, AND DHR  
LETDOWN
  
- 0 FIVE POSSIBLE ISLOCA SEQUENCES IDENTIFIED:
  - HPI
  - MU&P/HPI
  - LPI
  - DHR-STARTUP
  - DHR-SHUTDOWN

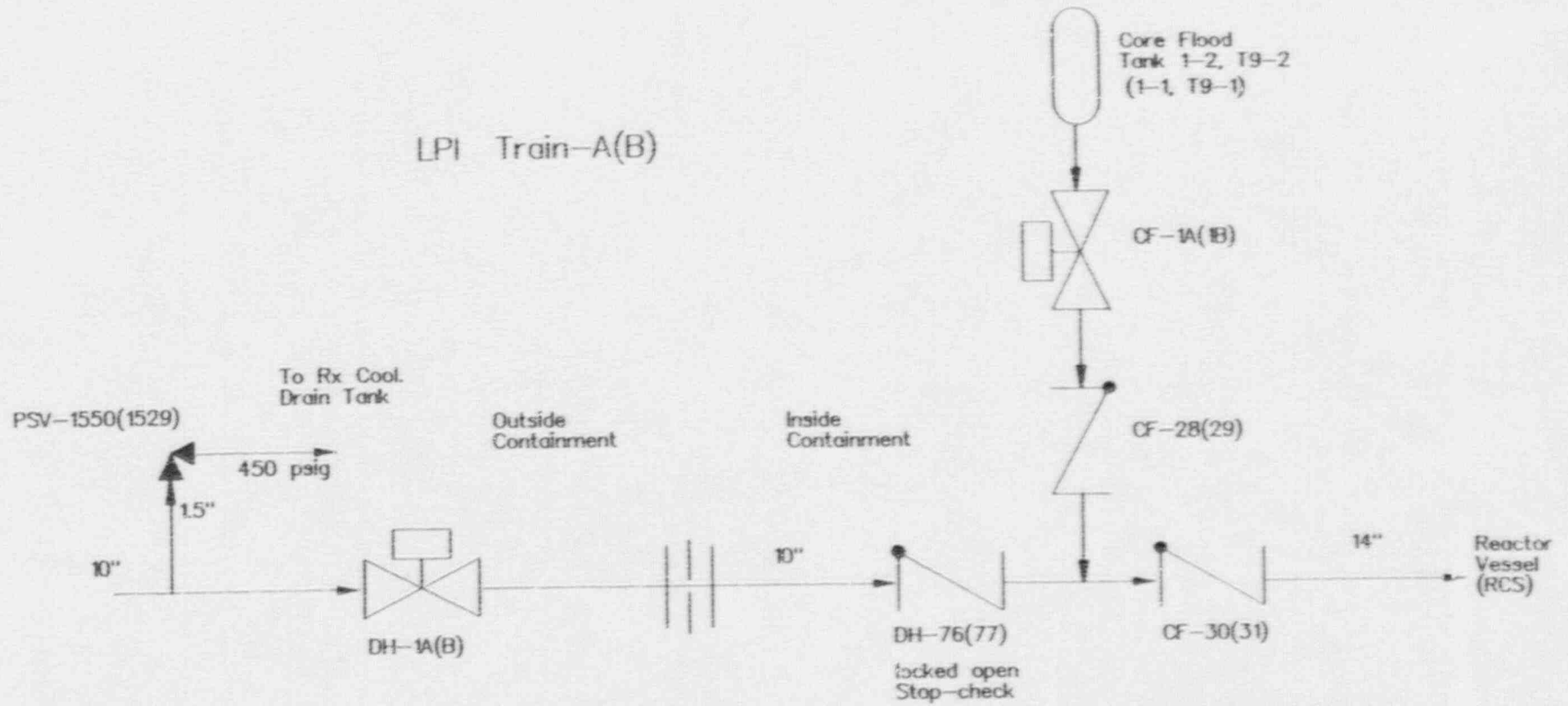
# HPI Sequence Initiated by MOV Stroke Test in Combination With Backleakage of Two Check Valves



# MU&P Sequence Initiated When HP-2A is Stroke Tested and HP-57/59 Fail to Close



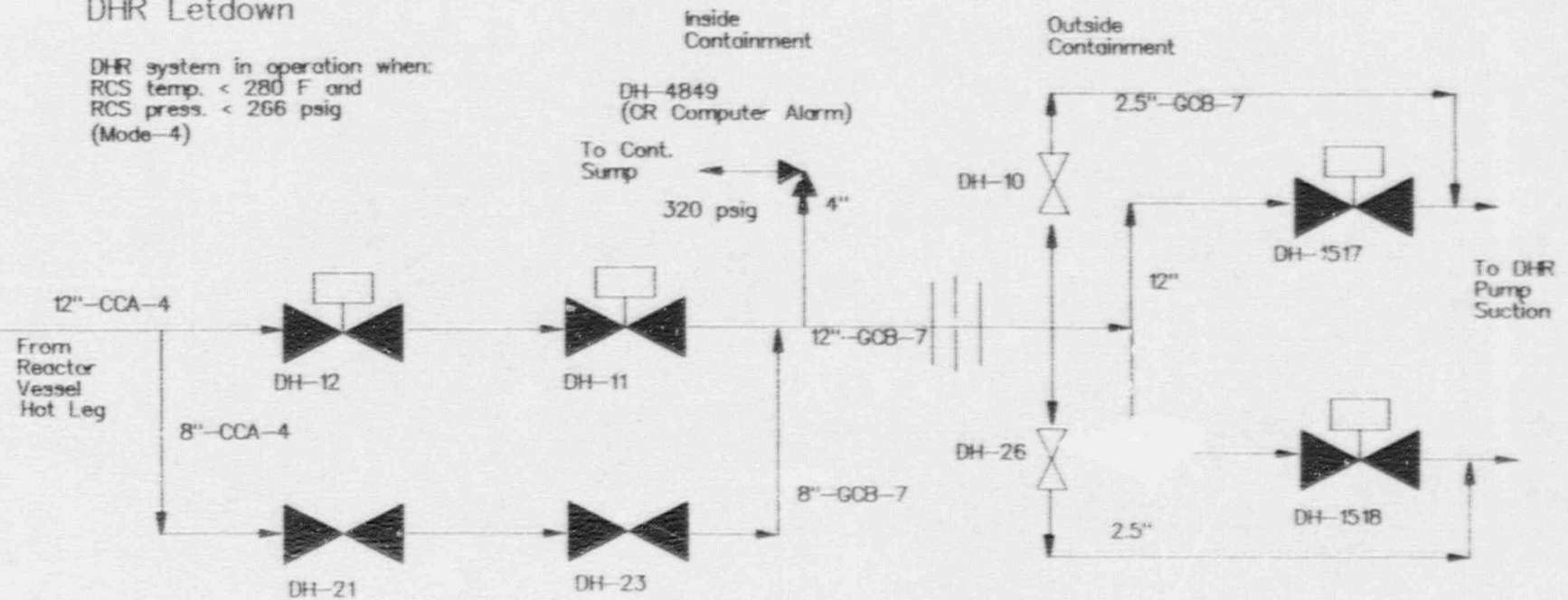
# LPI Sequence Comprises the Hardware Failure of Two Series Check Valves



# DHR-SU Sequence Characterized by Plant Startup (RCS Pressurization) With Letdown Valves (DH-11/12 or DH-21/23) Left Open

## DHR Letdown

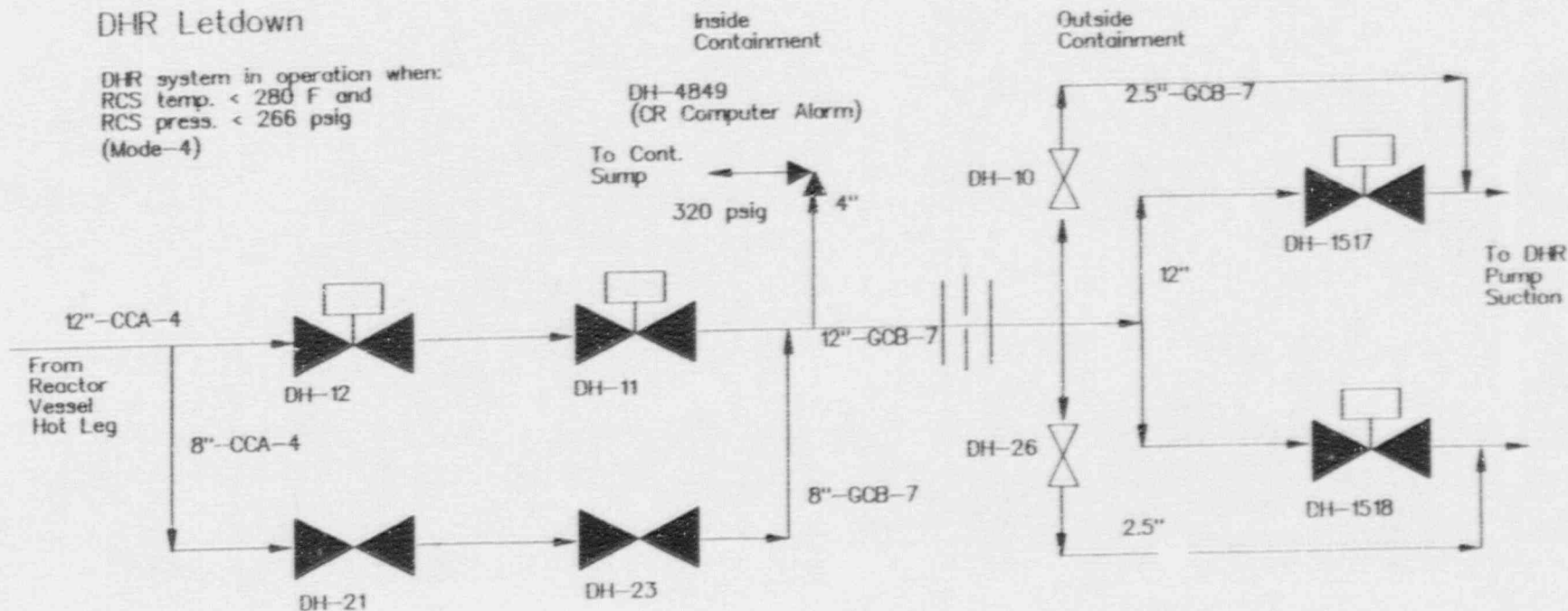
DHR system in operation when:  
RCS temp. < 280 F and  
RCS press. < 266 psig  
(Mode-4)



## DHR-SD Sequence Involves the Premature Opening of the Letdown MOVs (DH-11/12) During Shutdown

### DHR Letdown

DHR system in operation when:  
 RCS temp. < 280 F and  
 RCS press. < 266 psig  
 (Mode-4)



plant Ops at Power. 4-qtrs/yr x 3-lines	Ckv PIVS HP-56/58 Becklieck	MDV HP-26 Nora Closed is Opened	HPI to BWSI Vent Line Left Open	Ckv HP-23 Nora. Free Becklieaks	Inter- facing Systems Ruptures	Operators fail to detect ISLOCA	Operators Fail to Diagnose ISLOCA	Operators fail to isolate ISLOCA	Release not Mitigated	Seq. Prob.	Class	Seq#
M1	HC1	HR1	HV1	HC2	HRP	HD2	HDA2	HI2	HPI	1.20E+01	OK	1
										0.00E+00	OK	2
										1.56E-03	OK-op	3
										1.56E-08	OK-op	4
										1.09E-07	LK-ncd	5
										1.41E-08	LK-ncd	6
										0.00E+00	RL2-mit	7
										1.14E-08	RL2-1g	8
										0.00E+00	RL2-mit	9
										1.07E-08	RL2-1g	10
										0.00E+00	RL2-mit	11
										2.86E-11	RL2-1g	12
										2.71E-06	OK-op	13
										4.05E-07	LK-ncd	14
										3.07E-10	LK-ncd	15
										0.00E+00	RL1-mit	16
										2.47E-12	RL1-1g	17
										0.00E+00	RL1-mit	18
										2.34E-12	RL1-1g	19
										0.00E+00	RL1-mit	20
										6.23E-15	RL1-1g	21
										3.12E-11	OK-op	22
										2.18E-10	LK-ncd	23
										2.83E-09	LK-ncd	24
										0.00E+00	RL2-mit	25
										2.28E-11	RL2-1g	26
										0.00E+00	RL2-mit	27
										2.15E-11	RL2-1g	28
										0.00E+00	RL2-mit	29
										5.74E-14	RL2-1g	30

Plant Ops at Made-1 (qtr/yr)	MOV HP-2A Leaks Extern'lly	HPI-SMST Vent Line Lef	MOV HP-2A Norms Closed 16 Opene	CKV PIVS-SP-57/59 Norms Ops	CKV HP-23 Norms Free Becklks	Ops FIC HP-2A MOV	HPI line Vented to BWST	Inter-facing System Rpts	Ops Fail to Detect ISLOCA	Ops fail to diagnose ISLOCA	Ops Fail to Isolate ISLOCA	Releases not Mitig'd	Seq. Prob.	Class	Seq#
M1	HPX	HV1	HP1	HC1	HC2	HM2	HV2	HPP	HD2	HDA2	HI2	HMI			
1.00E+00	1.00E+00	1.00E+00	1.00E+00	1.00E-03	1.00E-03	1.00E-03	1.00E+00	1.30E-01	1.00E-04	7.50E-03	1.00E-03	1.00E+00	0.0	OK	1
													3.99E+00	OK-OP	2
													3.99E-03	LK-ncd	3
													3.99E-04	LK-ncd	4
													0.0	OK	5
													2.77E-05	OK-OP	6
													4.14E-06	LK-ncd	7
													3.13E-09	LK-ncd	8
													0.0	OK	9
													2.53E-11	RL1-mit	10
													0.0	RL1-1g	11
													2.39E-11	RL1-mit	12
													0.0	RL1-1g	13
													6.37E-13	RL1-mit	14
													1.04E-07	RL1-1g	15
													7.26E-07	OK-OP	16
													9.40E-06	LK-ncd	17
													0.0	RL2-mit	18
													7.58E-08	RL2-1g	19
													0.0	RL2-mit	20
													7.16E-08	RL2-1g	21
													0.0	RL2-mit	22
													1.91E-09	RL2-1g	23
													0.0	RL2-mit	24
													7.93E-03	OK-OP	25
													6.39E-05	LK-ncd	26
													6.94E-06	OK-OP	27
													1.04E-06	LK-ncd	28
													7.85E-10	LK-ncd	29
													0.0	RL1-mit	30
													6.33E-12	RL1-1g	31
													0.0	RL1-mit	32
													5.98E-12	RL1-1g	33
													0.0	RL1-mit	34
													1.60E-13	RL1-1g	35
													2.08E-10	OK-OP	36
													1.46E-09	LK-ncd	37
													1.88E-08	LK-ncd	38
													0.0	RL2-mit	39
													1.52E-10	RL2-1g	40
													0.0	RL2-mit	41
													1.43E-10	RL2-1g	42
													0.0	RL2-mit	43
													3.63E-12	RL2-1g	44
													8.80E-04	LK-ncd	45
													0.0	OK	46

Makeup & Purification System ISLOCA ET for BSW. BW-MJ. IRE 12/07/90



Plant Ops at Pwr (Mode-1, 2-lines)	CkV CF-30 backleaks	CkV DH-76 backleaks	CkV CF-28 backleaks	Interfacing System Ruptures	Operators Fail to Detect ISLOCA	Operators fail to diagnose ISLOCA	Operators Fail to Isolate ISLOCA	Release not mitigated	Seq. Prob.	Class	Seq#
M1	LC1	LC2	LC3	LRP	LD2	LDA2	LI2	LMI			
									2.00E+00	OK	1
									1.51E-03	OK	2
									5.51E-06	OK-op	3
									5.39E-07	LK-ncd	4
									6.00E-09	LOCA-ic	5
									5.45E-12	LOCA-ic	6
									5.45E-12	LOCA-ic	7
									0.0	OK-op	8
									5.64E-06	LK-ncd	9
									0.0	REL-mit	10
									3.79E-07	REL-ig	11
									0.0	REL-mit	12
									6.08E-08	REL-ig	13
									0.0	REL-mit	14
									6.08E-11	REL-ig	15

BSW LPI ISLOCA Event Tree BW-LP.TRE 12/07/90

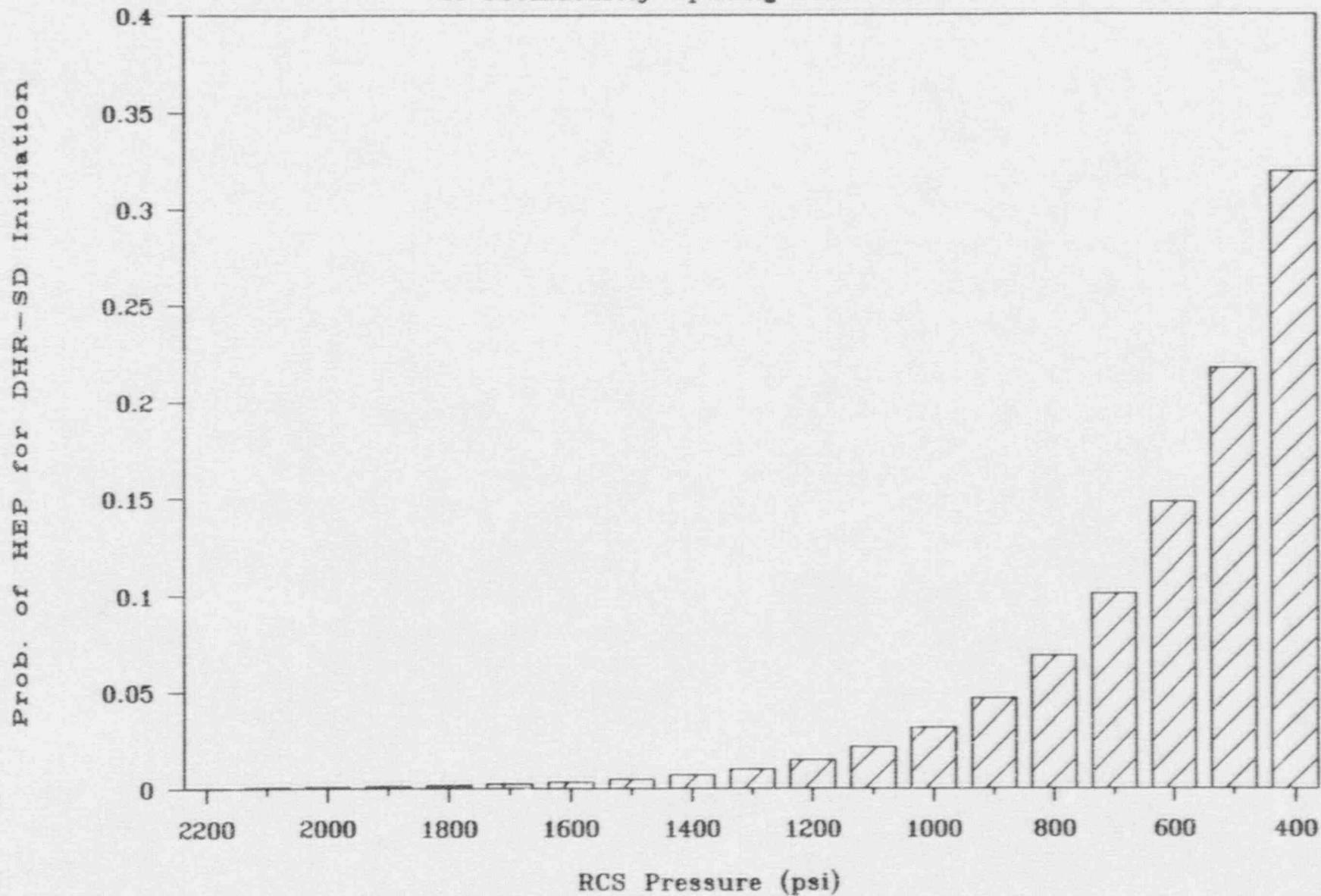
plant Heatup Mode-3 (Startup)	DHR MOVeDh-11/12 left op	Pzr htr interlok fails	DHR XVe Dh-21/23 left op	DHR r/v Dh-4B49 fails to open	DHR r/v Dh-4B49 fails to recld	Dhr fail to detect Dhr Op	Dpr fail to isolate (HR)	Rupture of low press eye	Dpr fail to detect ISLOCA	Dpr fail to diagnose ISLOCA	Dpr fail to isolate ISLOCA	Dpr fail to mitigate release	Seq. Prob.	Class	Seq#
M3-SU	DM1-SU	DIL-SU	DM2-SU	DV1-SU	DV2	DM1-SU	D11-SU	DPP-SU	DM2-SU	DA1-SU	D12-SU	DM1-SU	9.94E-01	OK	1
													2.06E-04	LK-ncd	2
													8.77E-07	LK-ncd	3
													1.87E-08	LOCA-1C	4
													8.92E-12	LOCA-1C	5
													8.76E-07	OK-op	6
													0.0	OK-op	7
													1.65E-08	LK-ncd	8
													0.0	REL-mit	9
													2.27E-09	REL-1g	10
													0.0	REL-mit	11
													1.87E-13	REL-1g	12
													0.0	REL-mit	13
													0.0	REL-1g	14
													0.0	REL-1g	15
													7.86E-12	LK-ncd	16
													0.0	REL-mit	17
													1.08E-12	REL-1g	18
													0.0	REL-mit	19
													0.0	REL-1g	20
													0.0	REL-mit	21
													0.0	REL-1g	22
													6.70E-03	OK	23
													5.57E-07	LK-ncd	24
													1.68E-09	LK-ncd	25
													2.52E-11	LOCA-1C	26
													1.70E-14	LOCA-1C	27
													1.69E-09	OK-op	28
													0.0	OK-op	29
													2.18E-11	LK-ncd	30
													0.0	REL-mit	31
													4.00E-13	REL-1g	32
													0.0	REL-mit	33
													0.0	REL-1g	34
													0.0	REL-mit	35
													0.0	REL-1g	36
													0.0	REL-1g	37
													1.66E-14	OK-op	38
													0.0	LK-ncd	39
													0.0	REL-mit	40
													0.0	REL-1g	41
													0.0	REL-mit	42
													0.0	REL-1g	43
													0.0	REL-mit	44

86W DHR Letdown (Startup) ISLOCA E.T. BW-SU TRE 12/07/90

Plant Cooldown Mode-3 (Shutdown)	DHR MOVs DH-11/12 Opened too soon	Rupture of low press sys	Operators fail to detect ISLOCA	Operators Fail to Diagnose ISLOCA	Operators fail to isolate ISLOCA	Operators fail to mitigate release	Seq.Prob.	Class	Seq#
M3-SD	DM1-SD	DRP-SD	DD2-SD	DDA1-SD	DI2-SD	DMI-SD			
							9.98E-01	OK	1
							1.10E-03	OK-op	2
							6.76E-04	LK-ncd	3
							2.24E-04	LK-ncd	4
							0.0	RFL-mit	5
							2.02E-08	REL-lg	6
							0.0	REL-mit	7
							1.69E-06	REL-lg	8
							0.0	REL-mit	9
							2.26E-09	REL-lg	10

ISLOCA E.T. for B&W DHR Letdown (Shutdown) BW-SD.TRE 12/07/90

# Probability Distribution (PDF) of HEP of Prematurely Opening DHR-letdown



DHR SYSTEM RUPTURE PROBABILITIES (WEIGHTED BY THE HEP OF  
PREMATURELY OPENING DH-11/12) AS A FUNCTION OF RCS PRESSURE  
(PIPE FAILURE PRESSURE LOG-STD-DEV = 0.36)

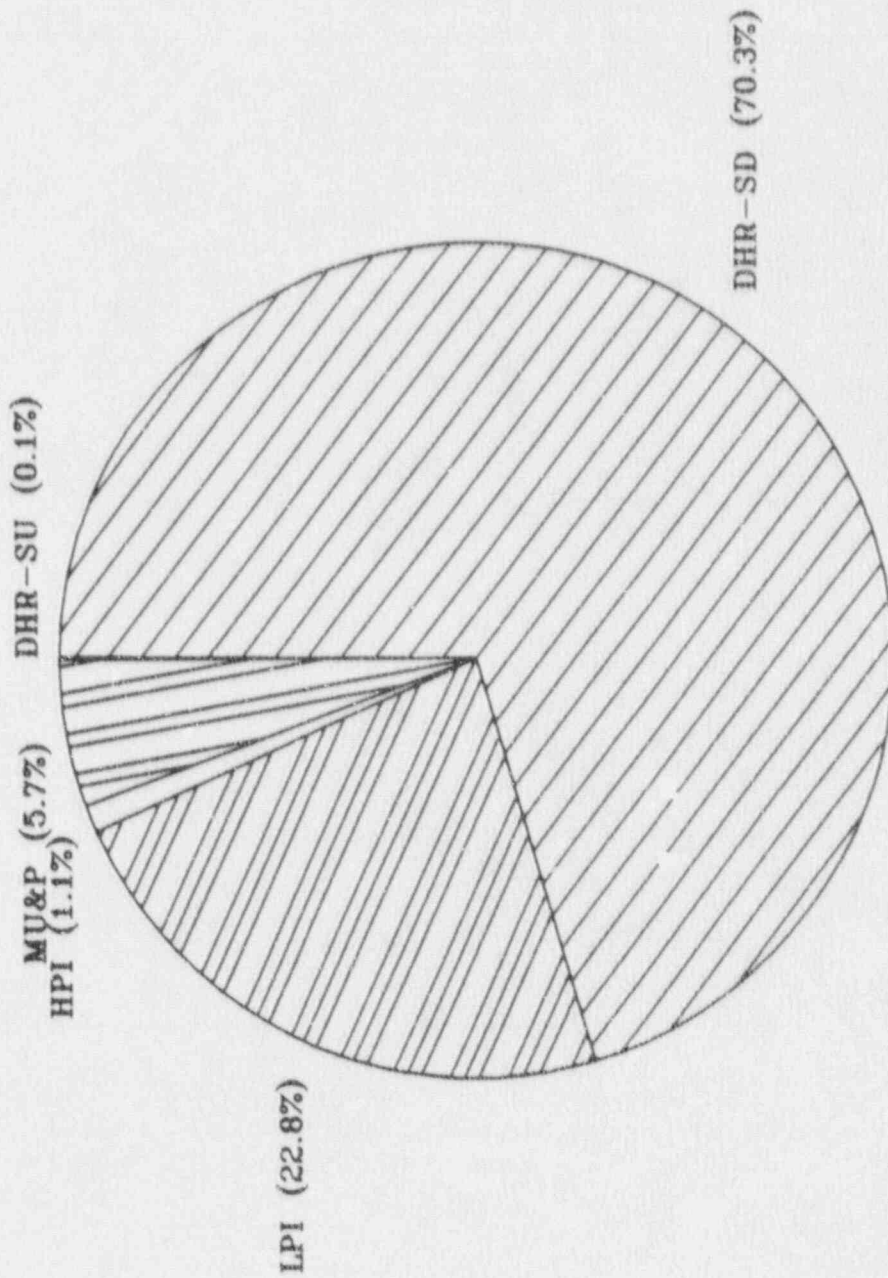
RCS PRESSURE (PSIG)	HEP	SYSTEM RUPTURE PROB.			HEP-WEIGHTED SYSTEM RUPTURE PROB.		
		LARGE	SMALL	NO-LEAK	LARGE	SMALL	NO-LEAK
2200	6.5E-07	1	0	0	6.5E-07	0	0
2100	9.4E-07	0.999	0.001	0	9.4E-07	9.4E-10	0
2000	1.4E-06	0.997	0.003	0	1.4E-06	4.2E-09	0
1900	2.0E-06	0.995	0.005	0	2.0E-06	1.0E-08	0
1800	3.0E-06	0.994	0.006	0	3.0E-06	1.8E-08	0
1700	4.2E-06	0.991	0.009	0	4.2E-06	3.8E-08	0
1600	6.5E-06	0.983	0.017	0	6.4E-06	1.1E-07	0
1500	9.4E-06	0.964	0.036	0	9.1E-06	3.4E-07	0
1400	1.4E-05	0.920	0.080	0	1.3E-05	1.1E-06	0
1300	2.0E-05	0.836	0.164	0	1.7E-05	3.3E-06	0
1200	3.0E-05	0.705	0.295	0	2.1E-05	8.9E-06	0
1100	4.2E-05	0.551	0.449	0	2.3E-05	1.9E-05	0
1000	6.5E-05	0.403	0.597	0.0001	2.6E-05	3.9E-05	6.5E-09
900	9.4E-05	0.281	0.718	0.001	2.6E-05	6.8E-05	9.4E-08
800	1.4E-04	0.178	0.810	0.012	2.5E-05	1.1E-04	1.7E-06
700	2.0E-04	0.100	0.899	0.091	2.0E-05	1.6E-04	1.8E-05
600	3.0E-04	0.050	0.580	0.370	1.5E-05	1.7E-04	1.1E-04
500	4.2E-04	0.021	0.193	0.786	8.8E-06	8.1E-05	3.3E-04
400	6.5E-04	0.007	0.012	0.981	4.6E-06	7.8E-06	6.4E-04
	0.002				0.113	0.338	0.549

## SEQUENCES QUANTIFIED BY PDS, CDF AND RISK

- 0 EVENT TREES USED TO GENERATE PLANT DAMAGE STATE FREQUENCIES:
  - RELEASE-LARGE,
  - RELEASE-MITIGATED,
  - LOCA-INSIDE CONTAINMENT,
  - LEAK-NO CORE DAMAGE
  - OK-OVERPRESSURE
  
- 0 CORE DAMAGE FREQUENCY SUM OF RELEASE-LARGE (REL-LG) AND RELEASE-MITIGATED (REL-MIT) PLANT DAMAGE STATES (PDS).
  
- 0 RISK MEASURES:
  - EARLY FATALITIES
  - LATENT CANCERS (TOTAL GRID)
  - POPULATION DOSE (50-MILE)

# B&W Plant ISLOCA CDF Distribution

ISLOCA Sequence Total 2.3E-6/Rx-yr



**B&W PLANT DAMAGE STATE FREQUENCIES  
FROM ISLOCA SEQUENCES (PER RX-YR)**

SEQUENCE	CDF	REL-LG	REL-MIT	LOCA-IC	LK-NCD	OK-OP
DHR-SD	1.6E-6	1.6E-6	0.0	0.0	9.2E-4	1.1E-3
MU&P	1.3E-7	1.3E-7	0.0	0.0	1.1E-3	1.2E-2
HPI	2.4E-8	2.4E-8	0.0	0.0	2.1E-6	2.9E-3
DHR-SU	2.0E-9	2.0E-9	0.0	1.7E-8	2.8E-4	8.3E-7
LPI	5.2E-7	5.2E-7	0.0	9.1E-9	1.1E-5	1.1E-5
<b>TOTALS</b>	<b>2.3E-6</b>	<b>2.3E-6</b>	<b>0.0</b>	<b>2.6E-8</b>	<b>2.3E-3</b>	<b>1.6E-2</b>



**SOURCE TERMS AND SITE DATA ESTIMATED  
UTILIZING EXISTING INFORMATION**

- 0 INFORMATION ON B&W PLANTS IS LIMITED, SOURCE TERM AND  
RELEASE TIMING TAKEN FROM OCONEE PRA (NSAC/60)**
  
- 0 INDUSTRY-WIDE AVERAGE SITE POPULATION ESTIMATED USING  
SANDIA SITING STUDY (NUREG/CR-2239)**
  
- 0 NUREG-1150 SITES COMPARED TO AVERAGE POPULATION, SURRY  
SELECTED AS REPRESENTING AVERAGE SITE (FOR MACCS INPUT)**

**CONDITIONAL CONSEQUENCES CALCULATED USING MACCS  
AND NUREG-1150 SECOND DRAFT**

- 0 MACCS-PC VERSION 1.5.11**
  
- 0 SURRY EVACUATION STRATEGY (NUREG-1150), OCONEE SOURCE  
TERM AND RELEASE TIMING (NSAC/60)**
  
- 0 CONDITIONAL CONSEQUENCES CALCULATED FOR A WIDE RANGE OF  
DECONTAMINATION FACTOR (1-1000)**
  - LARGE RELEASE DF=1**
  - MITIGATED RELEASE DF=10**
  
- 0 CONSEQUENCE MEASURES:**
  - EARLY FATALITIES**
  - LATENT CANCERS (TOTAL GRID)**
  - POPULATION DOSE (50-MI.)**

ISLOCA RISK (PER RX-YR) FOR B&W PLANT  
(OCCONEE SOURCE TERM SCALED TO B&W PLANT POWER,  
AND THE SURRY SITE)

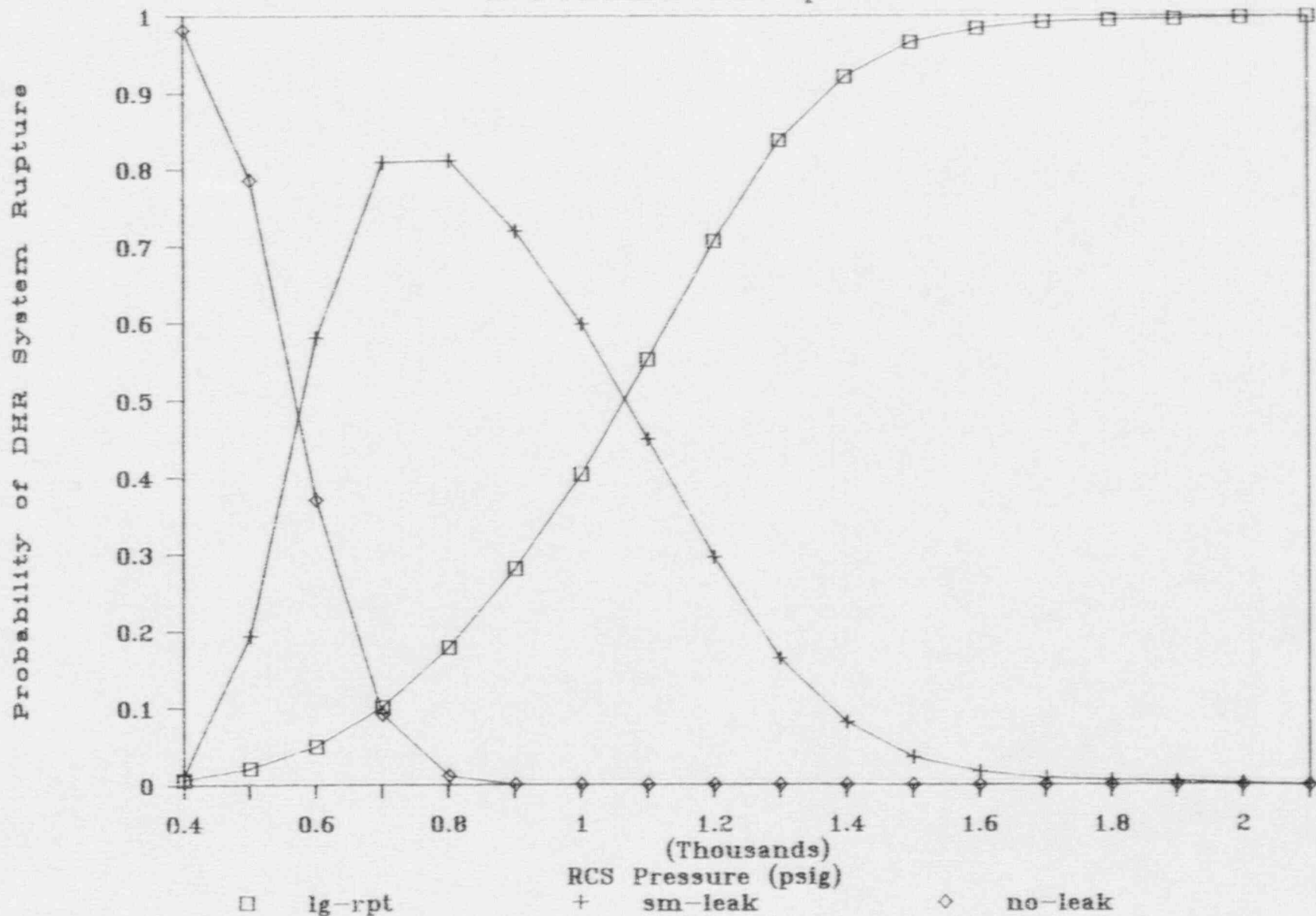
<u>RISK MEASURE</u>	<u>REL-LG DF=1</u>	<u>REL-MIT DF=10</u>	<u>TOTAL</u>
POPULATION DOSE (PERSON-REM, 50-MI.)	6.4	0.0	6.4
LATENT CANCERS (TOTAL GRID)	1.0E-2	0.0	1.0E-2
EARLY FATALITIES	8.1E-8	0.0	8.1E-8

## SENSITIVITY STUDIES PERFORMED ON TWO KEY ASPECTS OF ANALYSIS

- 0 SENSITIVITY ISSUES CHOSEN BECAUSE THEY ARE SIGNIFICANT CONTRIBUTORS TO RISK AND THERE EXISTS RELATIVELY LARGE UNCERTAINTY IN THEIR ESTIMATION.
  
- 0 EFFECT OF PIPE RUPTURE PRESSURE UNCERTAINTY ON DHR-SD CDF:
  - BASE CASE LOGARITHMIC STANDARD DEVIATION = 0.36,
  - SENSITIVITY CASE LOGARITHMIC STANDARD DEVIATION = 0.1.
  
- 0 HUMAN FACTORS SENSITIVITIES:
  - PDF OF HEP FOR INITIATION OF DHR-SD SEQUENCE.

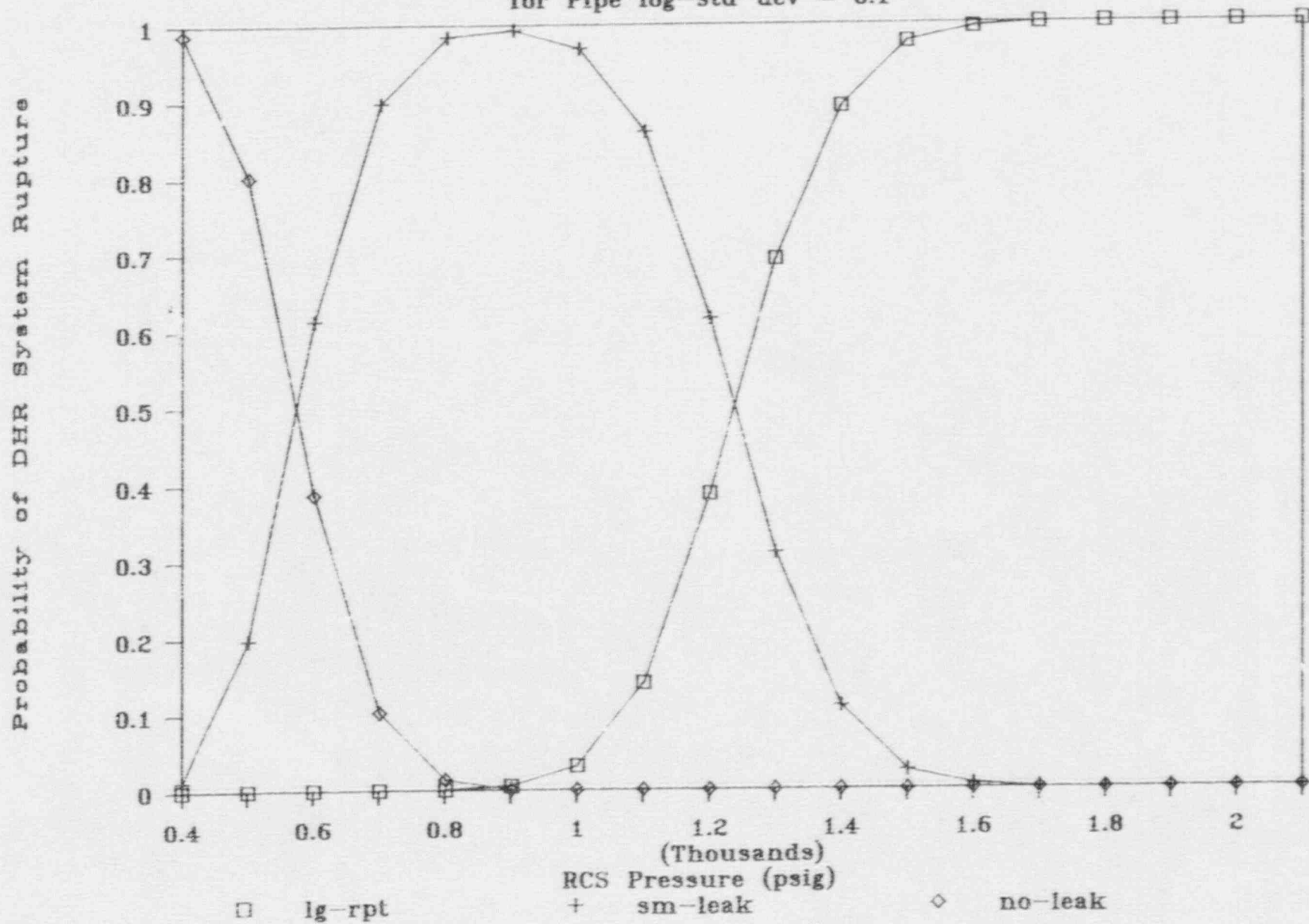
# DHR Letdown System Rupture Probability

as a function of RCS pressure



# DHR Letdown Sys Rupt Prob vs RCS Press

for Pipe log-std-dev = 0.1



SENSITIVITY OF PIPE RUPTURE PRESSURE UNCERTAINTY ON DHR-SD  
SEQUENCE CORE DAMAGE FREQUENCY (PER RX-YR)

BASE CASE, LOG-STD-DEV = 0.36  
SENSITIVITY CASE, LOG-STD-DEV = 0.1.

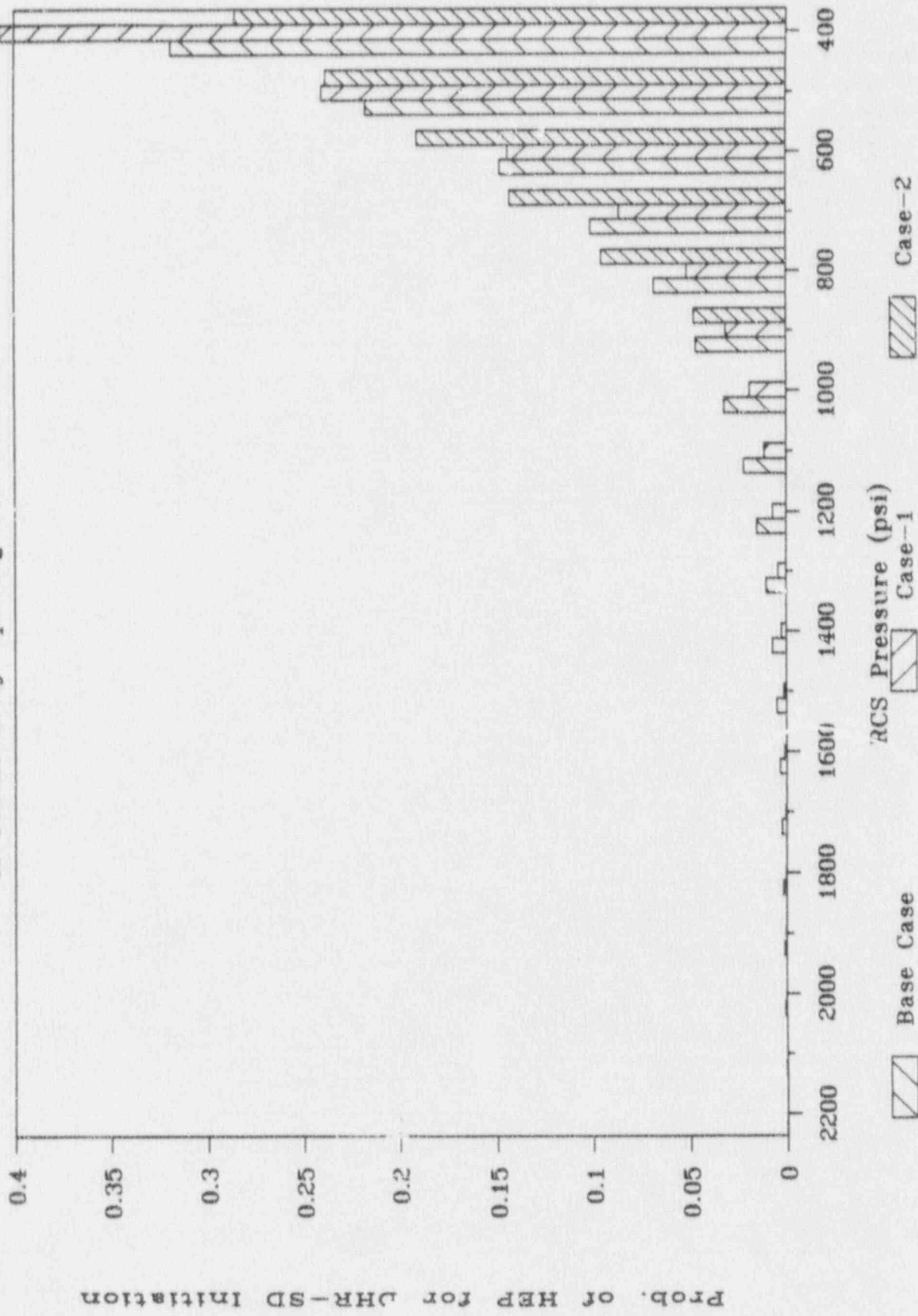
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<u>DAMAGE STATE</u>	<u>BASE CASE</u>	<u>SENSITIVITY CASE</u>
OK-OP	1.1E-3	1.1E-3
LK-NCD	9.2E-4	8.8E-4
LOCA-IC	0.0	0.0
REL-MIT	0.0	0.0
REL-LG	1.6E-6	5.6E-7
DHR-SD TOTAL CORE DAMAGE	1.6E-6	5.6E-7

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# Probability Distribution (PDF) of HEP

of Prematurely Opening DHR-letdown





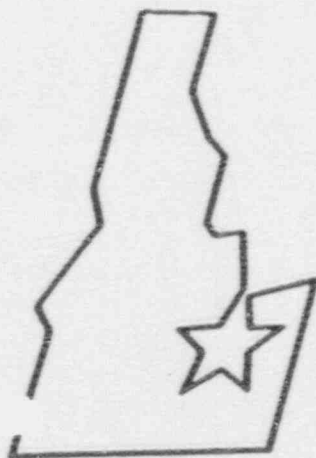
SENSITIVITY OF PRESSURE DEPENDENT HEP ON DHR-SD  
SEQUENCE CORE DAMAGE FREQUENCY (PER RX-YR)

BASE CASE: HEP RELATIVE WEIGHT AT 2200 PSIG =  $1E-3$ .  
 SENS. CASE #1: HEP RELATIVE WEIGHT AT 2200 PSIG =  $1E-4$ .  
 SENS. CASE #2: HEP LINEAR BETWEEN 400-1000 PSIG.

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<u>DAMAGE STATE</u>	<u>BASE CASE</u>	<u>CASE #1</u>	<u>CASE #2</u>
OK-OP	1.1E-3	1.3E-3	1.1E-3
LK-NCD	9.2E-4	7.1E-4	9.0E-4
LOCA-IC	0.0	0.0	0.0
REL-FRT	0.0	0.0	0.0
REL-LG	1.6E-6	1.0E-6	9.2E-7
DHR-SD TOTAL CORE DAMAGE	1.6E-6	1.0E-6	9.2E-7

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**Idaho  
National  
Engineering  
Laboratory**

**PRELIMINARY RESULTS  
OF ISLOCA ANALYSIS  
OF A WESTINGHOUSE  
FOUR-LOOP REACTOR**

**DANA L. KELLY**

**DECEMBER 11 AND 12, 1990**

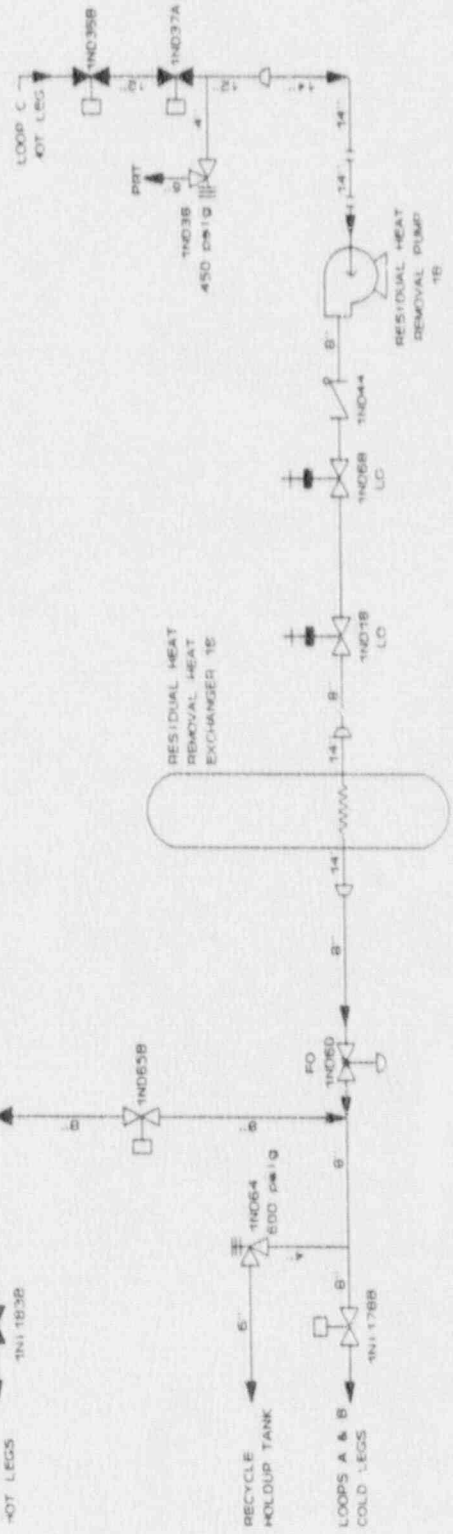
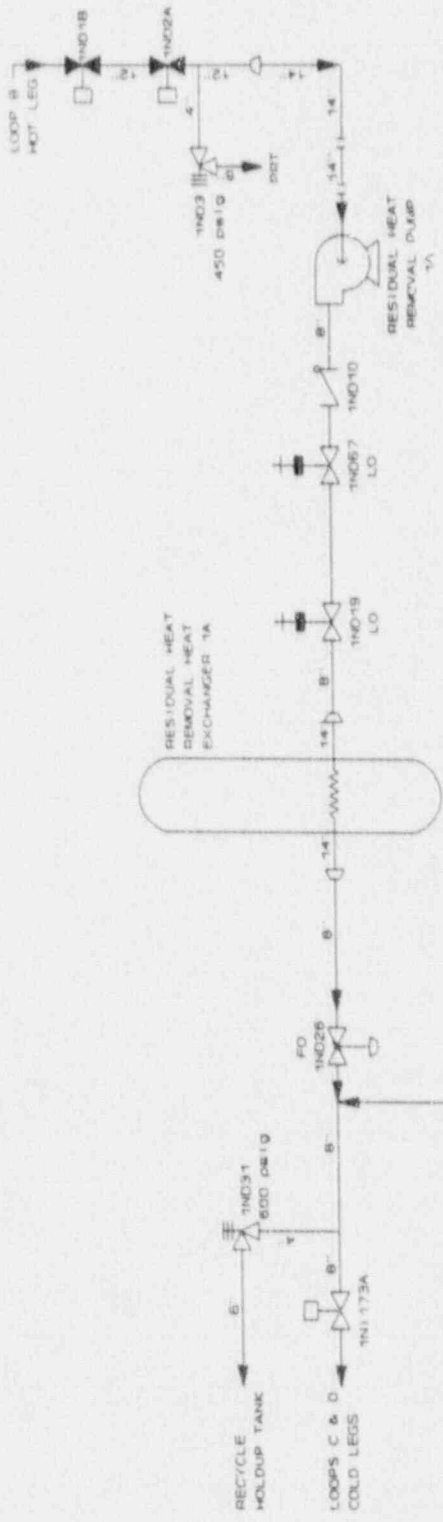


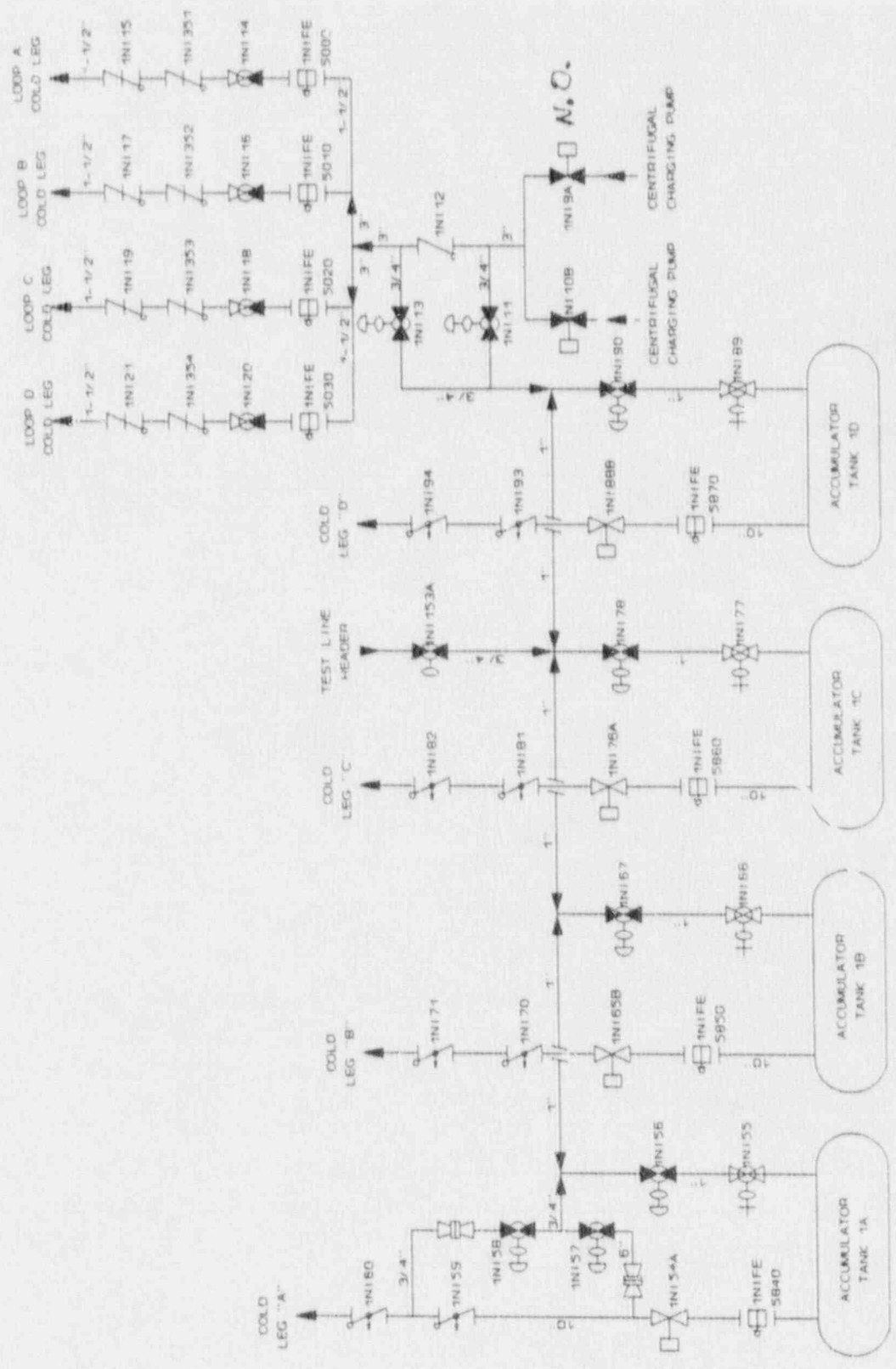
**EG&G Idaho, Inc.**

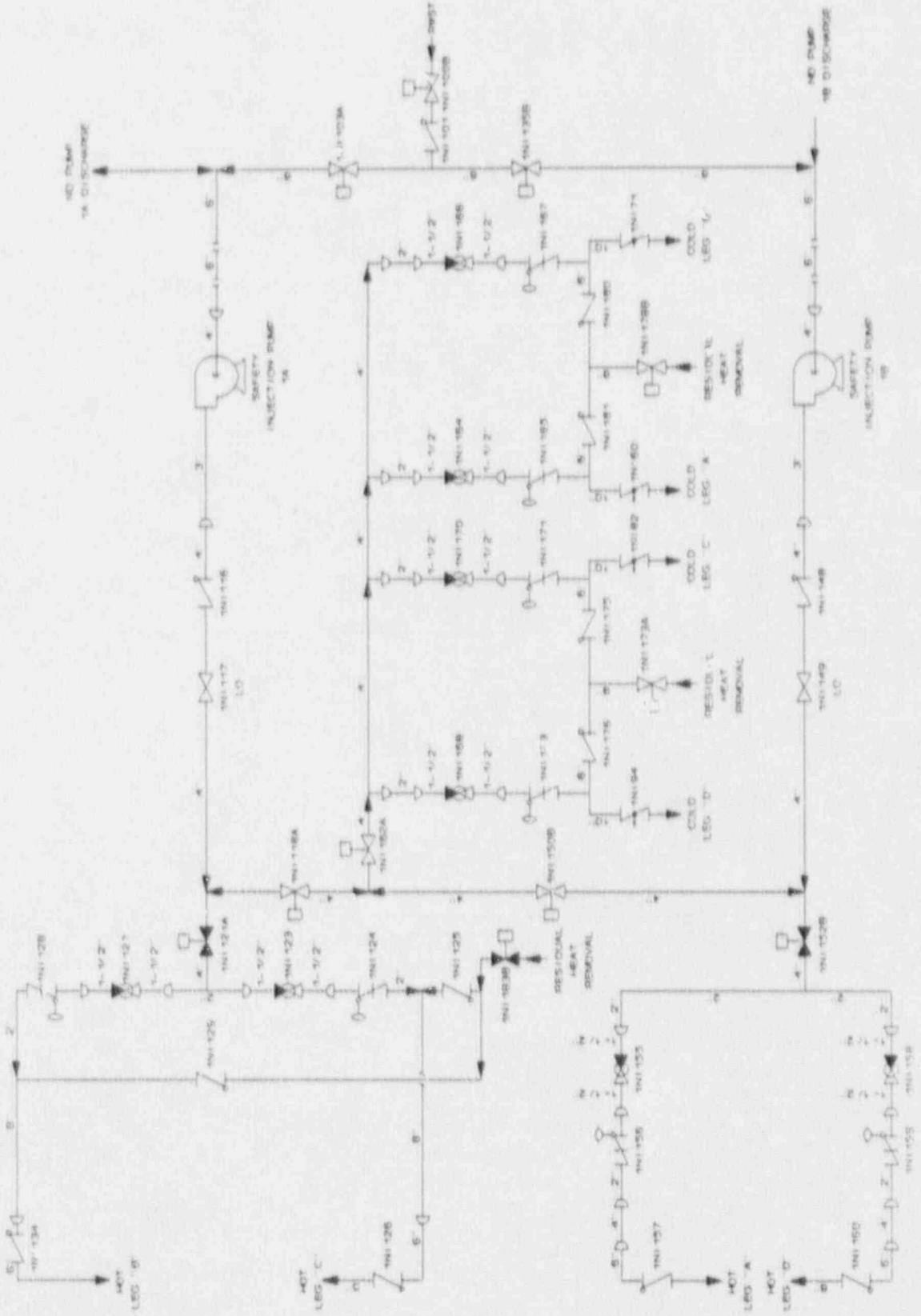
## CORE DAMAGE FREQUENCY

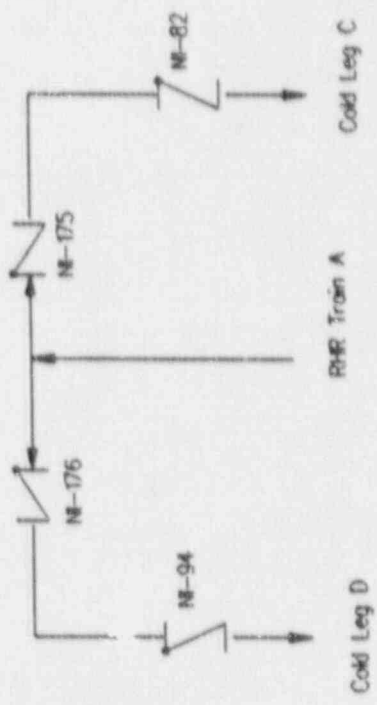
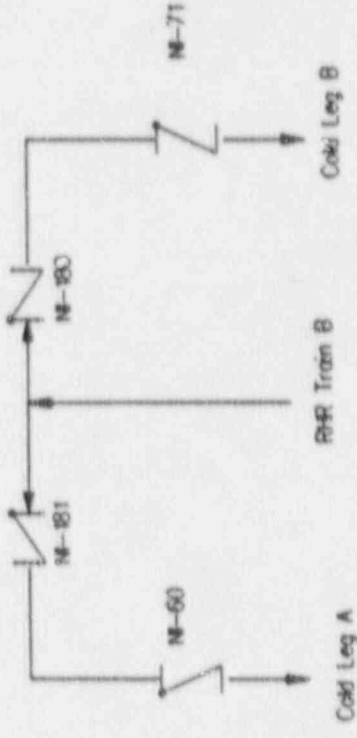
### 0 SCENARIOS EXAMINED IN SCREENING ANALYSIS

- OVERPRESSURIZATION OF ND SYSTEM DURING STARTUP
- PRELIMINARY ENTRY INTO SHUTDOWN COOLING
- FAILURE OF CHECK VALVES AT RCS PRESSURE ISOLATION BOUNDARIES









NO INC Cold Leg CVs Fail	Relief Valves NO-31854 FTO	Operators Fail to Detect Overpressure	NO System Ruptures Outside Containment	Operators Fail to Detect LOCA	Operators Fail to Diagnose ISLOCA	Operators Fail to Isolate ISLOCA	Release Not Mitigated	Seq. Freq.	End State
CV-L	RV-FTO	OP-FTO	NO-RUPT	FTD-LOCA	DIAG-LOCA	OP-FTC-2	REL-MIT		
		1.00E+00						0.00E+00	LK-ncd
			9.80E-01					3.28E-07	LK-ncd
				6.07E-02				1.35E-05	REL-mit
					6.70E-02			0.00E+00	REL-mit
1.64E-05				6.07E-02				5.49E-07	REL-1g
								0.00E+00	REL-mit
								1.01E-06	REL-1g
								0.00E+00	REL-mit
								9.75E-07	REL-1g
								0.0E+00	
	2.10E-04							6.89E-11	OK-OP
		1.00E+00						2.84E-09	LK-ncd
			9.80E-01					0.00E+00	REL-mit
				6.07E-02				1.15E-10	REL-1g
					6.70E-02			0.00E+00	REL-mit
								2.12E-10	REL-1g
								0.00E+00	REL-mit
								2.05E-10	REL-1g



## CORE DAMAGE FREQUENCY RESULTS

- o ONE DOMINANT CONTRIBUTOR TO CDF
  - MEAN CDF OF  $2.5 \times 10^{-6}/Y$
- o ALL OTHER SEQUENCES  $< 10^{-8}/Y$
- o NO CREDIBLE HUMAN ERRORS IDENTIFIED THAT COULD INITIATE AN ISLOCA
- o FLANGE GASKETS AND SEALS NOT LIKELY TO FAIL
- o LARGE BREAK MOST LIKELY AT ND HEAT EXCHANGER TUBE-SIDE CYLINDER
- o 90% CDF CONFIDENCE INTERVAL OF  $6.1 \times 10^{-10}$  TO  $7.9 \times 10^{-6}$

## CONSEQUENCE ANALYSIS

- o SEQSOR/PARTITION USED TO GENERATE SOURCE TERMS (AS IN NUREG-1150)
- o MACCS 1.5.11 USED TO CALCULATE OFFSITE CONSEQUENCES BASED ON SURRY SITE
- o AUX. BLDG. DF OF 1.0 IN BASE CASE
- o RESULTS - CONDITIONAL ON CORE DAMAGE
  - 100 EARLY DEATHS
  - 5360 LATENT DEATHS
  - 50-MILE DOSE OF  $6.1 \times 10^6$  PERSON-REM

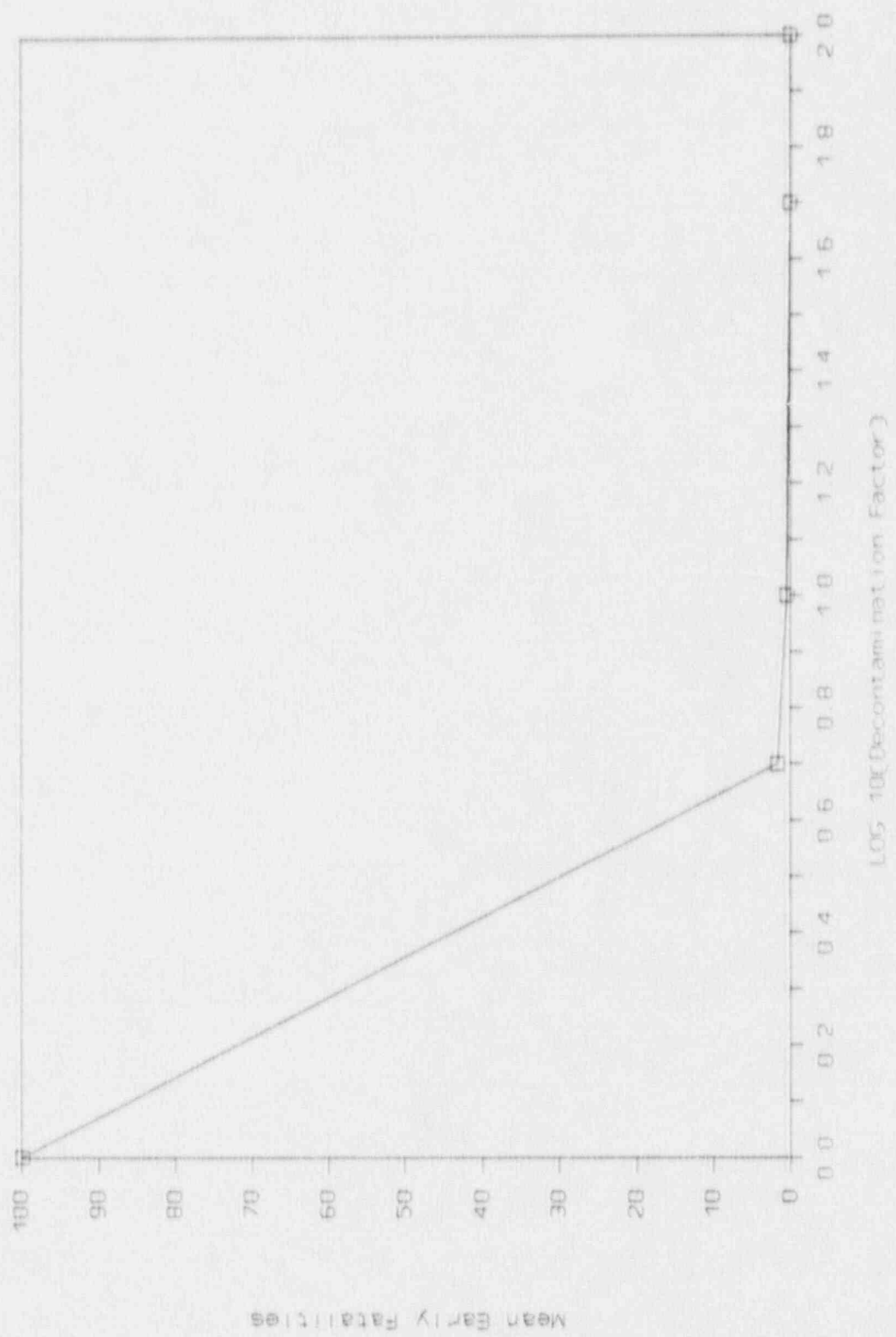
## OFFSITE RISK

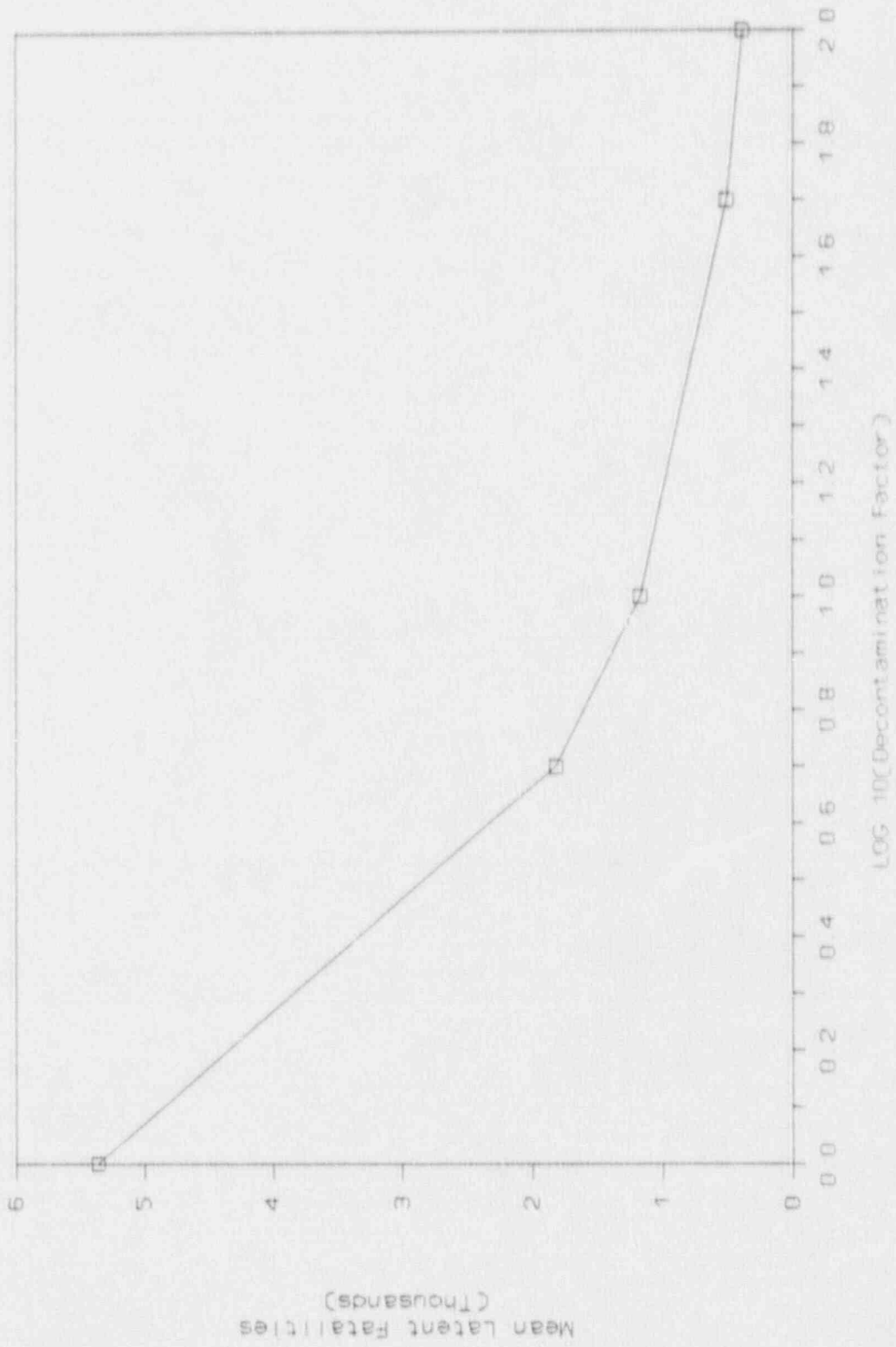
- o RISK = CDF X CONSEQUENCES
  
- o RESULTS - PER REACTOR-YEAR
  - $2.5 \times 10^{-4}$  EARLY DEATHS
  
  - $1.3 \times 10^{-2}$  LATENT DEATHS
  
  - 50-MILE DOSE OF 15.3 PERSON-REM

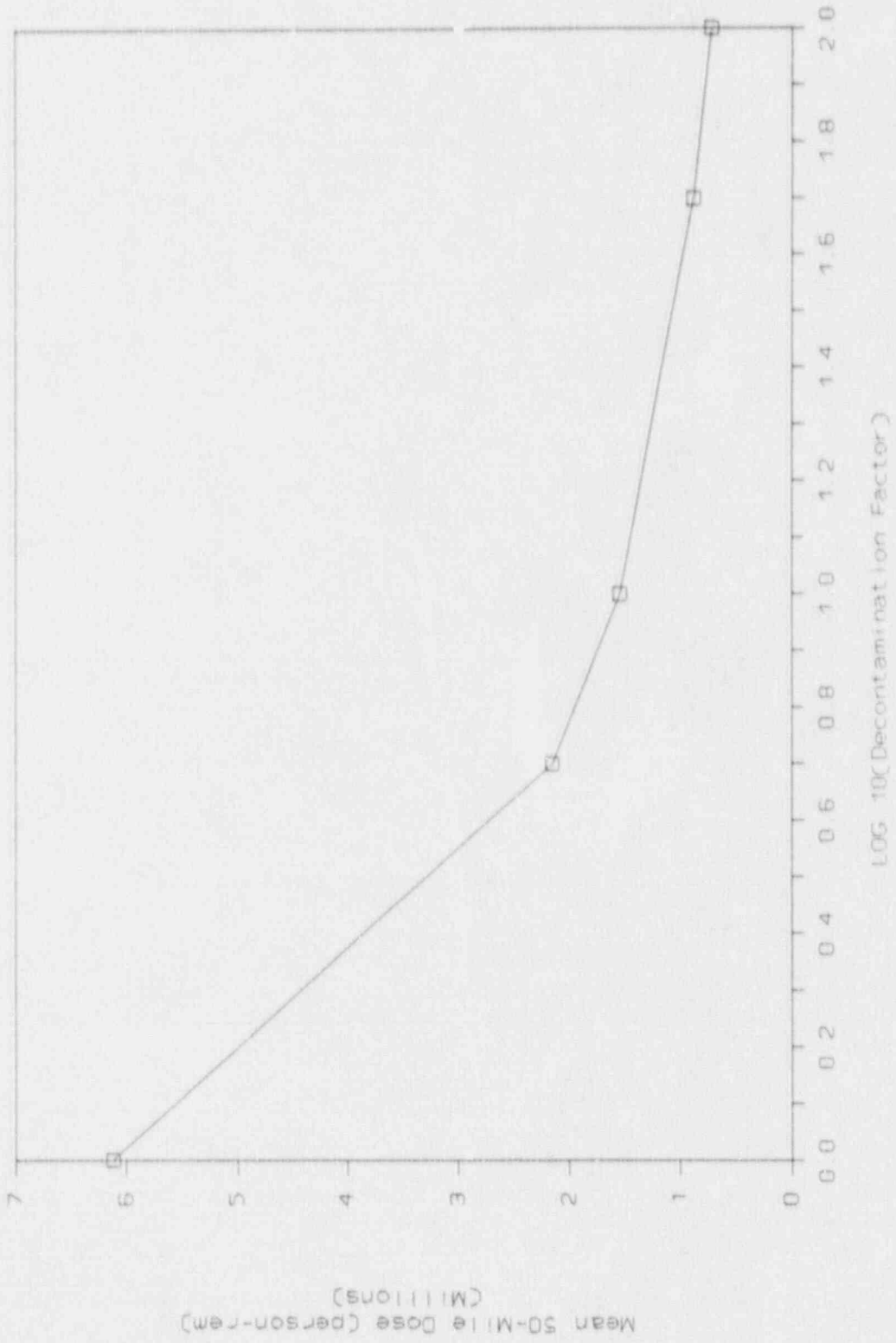
## SENSITIVITY STUDIES

### o AUX. BLDG. DF

- RANGE OF CREDIBLE DFs SELECTED (1-100)
- SEQSOR MODIFIED AND NEW SOURCE TERMS GENERATED
- NEW CONSEQUENCES CALCULATED WITH MACCS
- RESULTS
  - 1) REVAPORIZATION IMPORTANT FOR LATENT RISK MEASURES
  - 2) INCREASE IN DF (>5) HAS LARGEST EFFECT ON EARLY FATALITIES, SMALL EFFECT ON OTHER RISK MEASURES



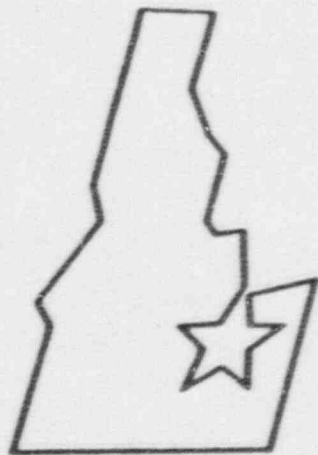




## UNCERTAINTY IN COMPONENT FAILURE PROBABILITY

- 0 BASE CASE ASSUMED  $10^{-3}$  PROBABILITY OF FAILURE AT YIELD
- 0 SENSITIVITIES ASSUMED  $10^{-4}$  AND  $10^{-5}$  PROBABILITY OF FAILURE AT YIELD
- 0 RESULTS IN NO VARIANCE IN CDF
- 0 FAILURE OF ND HEAT EXCHANGER TUBE-SIDE CYLINDER DOMINATES





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**OBSERVATIONS**

**W. J. GALYEAN**

**DECEMBER 12, 1990**



**EG&G Idaho, Inc.**

## ISLOCA PRECURSORS INITIATED BY MULTIPLE HUMAN ERRORS OR COMBINATIONS OF HUMAN ERRORS AND HARDWARE FAULTS

### HISTORICAL EXPERIENCE INDICATES:

- 0 IMPROPER VALVE LINEUP AND OPERATOR ERRORS IN MISPOSITIONING VALVES - RELATIVELY LIKELY.
  - EVENTS TYPICALLY OCCUR DURING PLANT STARTUP AND SHUTDOWN OPERATIONS.
  
- 0 RANDOM-CATASTROPHIC FAILURES OF REDUNDANT VALVES IN STANDBY - NOT SUPPORTED.
  - LEAK TESTING DURING STARTUP ENSURES POSITIVE ISOLATION BETWEEN RCS AND LOWER PRESSURE RATED SYSTEMS.
  - LEAKS DO OCCUR, BUT GROW SLOWLY AND ARE DETECTED WHILE VERY SMALL.

B&W PLANT OBSERVATIONS FOR ISLOCA  
OUTSIDE CONTAINMENT

- 0 CDF AND RISK DOMINATED BY HUMAN ERROR INITIATED SEQUENCE
  - HUMAN ERRORS DURING SHUTDOWN AND ROUTINE TESTING
  - HARDWARE FAILURE INITIATED SEQUENCES IMPORTANT BUT NOT DOMINANT
  
- 0 LACK OF PROCEDURES AND TRAINING CONTRIBUTES TO ISLOCA RISK
  - GENERAL LACK OF AWARENESS CONTRIBUTES TO OCCURRENCE OF ISLOCA PRECURSORS AND INITIATORS
  - HARDWARE WOULD LIKELY BE AVAILABLE FOR ISOLATING AND RECOVERING FROM A RUPTURE

## B&W PLANT OBSERVATIONS (CONTINUED)

- 0 CHANGES TO PROCEDURES, TRAINING AND INSTRUMENTATION MAY REDUCE ISLOCA PLANT RISK.
  
- 0 DAMAGE BY FLOODING OR SPRAYING OF ADJACENT EQUIPMENT IS NOT RISK SIGNIFICANT OWING TO ADEQUATE EQUIPMENT SEPARATION AND REDUNDANT SYSTEMS.
  
- 0 HEAT EXCHANGERS AND LARGE-DIAMETER, LOW-PRESSURE PIPING (ON PUMP SUCTION SIDE) MOST LIKELY TO RUPTURE IN A ISLOCA SEQUENCE.

## PRELIMINARY WESTINGHOUSE PLANT OBSERVATIONS

- O ADMINISTRATIVE CONTROLS, OPERATOR TRAINING AND FUNCTIONING INTERLOCKS GREATLY REDUCE THE PROBABILITY OF HUMAN ERRORS INITIATING ISLOCA SEQUENCES.
  
- J DOMINANT CONTRIBUTORS TO CDF AND RISK ARE HARDWARE FAILURES OF PIV CHECK VALVES.
  
- O FOR SOME ISLOCA SEQUENCES, RELATIVELY LITTLE TIME AVAILABLE INCREASES THE "FAIL-TO-RECOVER" PROBABILITIES.

PRELIMINARY WESTINGHOUSE PLANT CONCLUSIONS (CONTINUED)

RELATIVELY HIGH HEP'S FOR DETECTION, DIAGNOSIS AND ISOLATION A RESULT OF THE FOLLOWING:

- O LIMITED NUMBER OF CONTROL ROOM INDICATIONS AVAILABLE FOR ISLOCA SEQUENCES
  - ISLOCA INDICATION RELIES MAINLY ON SINGLE ALARM (RADIATION)
  
- O PROCEDURES RUN OPERATORS THROUGH POSSIBLE INSIDE-CONTAINMENT LOCA'S BEFORE CONSIDERING POSSIBILITY OF ISLOCA
  - ALARM NOT REFERENCED UNTIL LAST PAGE OF PROCEDURE
  
- O OPERATOR WORKLOAD VERY HIGH AND THREAT STRESS PRESENT (PROCEDURES CALL FOR SITE EVACUATION)

## GENERIC OBSERVATIONS

- 0 ALTHOUGH "PRECURSOR" FREQUENCIES ARE RELATIVELY HIGH, THE PROBABILITY OF RECOVERING BEFORE CORE DAMAGE BEGINS IS ALSO VERY HIGH.

### FOR SPECIFIC PLANTS:

- 0 ISLOCA ANALYSES TYPICALLY FOUND IN PRAS MAY BE INCOMPLETE DESCRIPTIONS OF ISLOCA RISK COMPOSITION.
- 0 HUMAN FACTORS ISSUES (PSFs, ERRORS OF COMMISSION, INSTRUMENTATION, ETC.) HAVE POTENTIALLY DOMINANT INFLUENCES ON ISLOCA RISK.
  - SOME PLANTS ARE LESS LIKELY TO INITIATE AN ISLOCA
  - SOME PLANTS ARE MORE LIKELY TO RECOVER FROM AN ISLOCA

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:	DOC. DATE:	NOTARIZED:	DOCKET #
9012190187	90/12/11	NO	
FACIL: 50-29	Yankee-Rowe Nuclear Power Station,	Yankee Atomic Elect	05000029
50-348	Joseph M. Farley Nuclear Plant, Unit 1,	Alabama Power	05000348
50-364	Joseph M. Farley Nuclear Plant, Unit 2,	Alabama Power	05000364
50-315	Donald C. Cook Nuclear Power Plant, Unit 1,	Indiana &	05000315
50-316	Donald C. Cook Nuclear Power Plant, Unit 2,	Indiana &	05000316
STN-50-528	Palo Verde Nuclear Station, Unit 1,	Arizona Publi	05000528
STN-50-529	Palo Verde Nuclear Station, Unit 2,	Arizona Publi	05000529
STN-50-530	Palo Verde Nuclear Station, Unit 3,	Arizona Publi	05000530
50-313	Arkansas Nuclear One, Unit 1,	Arkansas Power & Light	05000313
50-368	Arkansas Nuclear One, Unit 2,	Arkansas Power & Light	05000368
50-317	Calvert Cliffs Nuclear Power Plant, Unit 1,	Baltimore	05000317
50-318	Calvert Cliffs Nuclear Power Plant, Unit 2,	Baltimore	05000318
50-293	Pilgrim Nuclear Power Station, Unit 1,	Boston Edison	05000293
50-261	H.B. Robinson Plant, Unit 2,	Carolina Power & Light C	05000261
50-324	Brunswick Steam Electric Plant, Unit 2,	Carolina Powe	05000324
50-325	Brunswick Steam Electric Plant, Unit 1,	Carolina Powe	05000325
50-400	Shearon Harris Nuclear Power Plant, Unit 1,	Carolina	05000400
50-440	Perry Nuclear Power Plant, Unit 1,	Cleveland Electric	05000440
50-237	Dresden Nuclear Power Station, Unit 2,	Commonwealth E	05000237
50-249	Dresden Nuclear Power Station, Unit 3,	Commonwealth E	05000249
50-254	Quad-Cities Station, Unit 1,	Commonwealth Edison Co.	05000254
50-265	Quad-Cities Station, Unit 2,	Commonwealth Edison Co.	05000265
50-373	LaSalle County Station, Unit 1,	Commonwealth Edison C	05000373
50-374	LaSalle County Station, Unit 2,	Commonwealth Edison C	05000374
STN-50-454	Byron Station, Unit 1,	Commonwealth Edison Co.	05000454
STN-50-455	Byron Station, Unit 2,	Commonwealth Edison Co.	05000455
STN-50-456	Braidwood Station, Unit 1,	Commonwealth Edison Co	05000456
STN-50-457	Braidwood Station, Unit 2,	Commonwealth Edison Co	05000457
50-213	Haddam Neck Plant, Connecticut Yankee Atomic Power Co		05000213
50-247	Indian Point Station, Unit 2,	Consolidated Edison Co.	05000247
50-255	Palisades Nuclear Plant, Consumers Power Co.		05000255
50-341	Enrico Fermi Atomic Power Plant, Unit 2,	Detroit Edis	05000341
50-269	Oconee Nuclear Station, Unit 1,	Duke Power Co.	05000269
50-270	Oconee Nuclear Station, Unit 2,	Duke Power Co.	05000270
50-287	Oconee Nuclear Station, Unit 3,	Duke Power Co.	05000287
50-369	William B. McGuire Nuclear Station, Unit 1,	Duke Powe	05000369
50-370	William B. McGuire Nuclear Station, Unit 2,	Duke Powe	05000370
50-413	Catawba Nuclear Station, Unit 1,	Duke Power Co.	05000413
50-414	Catawba Nuclear Station, Unit 2,	Duke Power Co.	05000414
50-334	Beaver Valley Power Station, Unit 1,	Duquesne Light C	05000334
50-412	Beaver Valley Power Station, Unit 2,	Duquesne Light C	05000412
50-250	Turkey Point Plant, Unit 3,	Florida Power and Light C	05000250
50-251	Turkey Point Plant, Unit 4,	Florida Power and Light C	05000251
50-219	Oyster Creek Nuclear Power Plant, Jersey Central Powe		05000219
50-302	Crystal River Nuclear Plant, Unit 3,	Florida Power Co	05000302
50-289	Three Mile Island Nuclear Station, Unit 1,	General PU	05000289
50-320	Three Mile Island Nuclear Station, Unit 2,	General PU	05000320
50-321	Edwin I. Hatch Nuclear Plant, Unit 1,	Georgia Power C	05000321
50-366	Edwin I. Hatch Nuclear Plant, Unit 2,	Georgia Power C	05000366
50-424	Alvin W. Vogtle Nuclear Plant, Unit 1,	Georgia Power	05000424
50-425	Alvin W. Vogtle Nuclear Plant, Unit 2,	Georgia Power	05000425
50-458	River Bend Station, Unit 1,	Gulf States Utilities Co.	05000458
STN-50-498	South Texas Project, Unit 1,	Houston Light'ing & P	05000498
STN-50-499	South Texas Project, Unit 2,	Houston Lighting & P	05000499
50-461	Clinton Power Station, Unit 1,	Illinois Power Co.	05000461
50-331	Duane Arnold Energy Center, Iowa Electric Light & Pow		05000331
50-322	Shoreham Nuclear Power Station, Long Island Lighting		05000322
50-309	Maine Yankee Atomic Power Plant, Maine Yankee Atomic		05000309
50-298	Cooper Nuclear Station, Nebraska Public Power Distric		05000298
50-443	Seabrook Nuclear Station, Unit 1,	Public Service Co.	05000443



50-333	James A. FitzPatrick Nuclear Power Plant, Power Autho	05000333
50-220	Nine Mile Point Nuclear Station, Unit 1, Niagara Powe	05000220
50-410	Nine Mile Point Nuclear Station, Unit 2, Niagara Moha	05000410
50-245	Millstone Nuclear Power Station, Unit 1, Northeast Nu	05000245
50-336	Millstone Nuclear Power Station, Unit 2, Northeast Nu	05000336
50-423	Millstone Nuclear Power Station, Unit 3, Northeast Nu	05000423
50-282	Prairie Island Nuclear Station, Unit 1, Northern Stat	05000282
50-306	Prairie Island Nuclear Station, Unit 2, Northern Stat	05000306
50-263	Monticello Nuclear Generating Plant, Northern States	05000263
50-285	Fort Calhoun Station, Unit 1, Omaha Public Power Dist	05000285
50-387	Susquehanna Steam Electric Station, Unit 1, Pennsylva	05000387
50-388	Susquehanna Steam Electric Station, Unit 2, Pennsylva	05000388
50-344	Trojan Nuclear Plant, Portland General Electric	05000344
50-267	Fort St. Vrain Nuclear Generating Station, Public Ser	05000267
50-272	Salem Nuclear Generating Station, Unit 1, Public Servi	05000272
50-311	Salem Nuclear Generating Station, Unit 2, Public Serv	05000311
50-312	Rancho Seco Nuclear Generating Station, Sacramento Mu	05000312
50-206	San Onofre Nuclear Station, Unit 1, Southern Californ	05000206
50-361	San Onofre Nuclear Station, Unit 2, Southern Californ	05000361
50-362	San Onofre Nuclear Station, Unit 3, Southern Californ	05000362
50-416	Grand Gulf Nuclear Station, Unit 1, Mississippi Power	05000416
50-417	Grand Gulf Nuclear Station, Unit 2, Mississippi Power	05000417
50-259	Browns Ferry Nuclear Power Station, Unit 1, Tennessee	05000259
50-260	Browns Ferry Nuclear Power Station, Unit 2, Tennessee	05000260
50-296	Browns Ferry Nuclear Power Station, Unit 3, Tennessee	05000296
50-327	Sequoyah Nuclear Plant, Unit 1, Tennessee Valley Auth	05000327
50-328	Sequoyah Nuclear Plant, Unit 2, Tennessee Valley Auth	05000328
50-390	Watts Bar Nuclear Plant, Unit 1, Tennessee Valley Aut	05000390
50-391	Watts Bar Nuclear Plant, Unit 2, Tennessee Valley Aut	05000391
50-438	Bellefonte Nuclear Plant, Unit 1, Tennessee Valley Au	05000438
50-439	Bellefonte Nuclear Plant, Unit 2, Tennessee Valley Au	05000439
50-445	Comanche Peak Steam Electric Station, Unit 1, Texas U	05000445
50-446	Comanche Peak Steam Electric Station, Unit 2, Texas U	05000446
50-346	Davis-Besse Nuclear Power Station, Unit 1, Toledo Edi	05000346
50-271	Vermont Yankee Nuclear Power Station, Vermont Yankee	05000271
50-280	Surry Power Station, Unit 1, Virginia Electric & Powe	05000280
50-281	Surry Power Station, Unit 2, Virginia Electric & Powe	05000281
50-338	North Anna Power Station, Unit 1, Virginia Electric &	05000338
50-339	North Anna Power Station, Unit 2, Virginia Electric &	05000339
50-397	WPPSS Nuclear Project, Unit 2, Washington Public Powe	05000397
50-460	WPPSS Nuclear Project, Unit 1, Washington Public Powe	05000460
50-266	Point Beach Nuclear Plant, Unit 1, Wisconsin Electric	05000266
50-301	Point Beach Nuclear Plant, Unit 2, Wisconsin Electric	05000301
50-305	Kewaunee Nuclear Power Plant, Wisconsin Public Servic	05000305
STN-50-482	Wolf Creek Generating Station, Wolf Creek Nuclear	05000482
50-155	Big Rock Point Nuclear Plant, Consumers Power Co.	05000155

AUTH.NAME	AUTHOR AFFILIATION
WILKINSON, I.E.	Limitorque Corp.
RECIP.NAME	RECIPIENT AFFILIATION
	Office of Nuclear Reactor Regulation, Director (Post 870411)

SUBJECT: Part 21 rept re potential for failure of SMB 00 torque switch roll pins depending on operating conditions. Utils requested to perform review of std operating conditions of installed actuators w/heavy spring packs.

DISTRIBUTION CODE: IE19D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 11  
 TITLE: Part 21 Rept (50 DKT)

NOTES: STANDARDIZED PLANT	05000528
Standardized plant.	05000529
Standardized plant.	05000530
Application for permit renewal filed.	05000400

Application for permit renewal filed. 05000440  
 License Exp date in accordance with 10CFR2,2.109(12/22/72). 05000237  
 Standardized Plant. 05000454  
 Standardized Plant. 05000455  
 Standardized Plant. 05000456  
 Standardized Plant. 05000457  
 Lpdr 1cy PDR Documents. 05000247  
 License Exp date in accordance with 10CFR2,2.109(3/1/74). 05000255  
 LPDR 2cys AMDTS to FSAR. ASLB 1cy. 05000413  
 LPDR 2cys AMDTS to FSAR. ASLB 1cy. 05000414  
 LPDR 2cys Transcripts. LPDR 2cys PDR Documents. 05000412  
 Application for permit renewal filed.  
 License Exp date in accordance with 10CFR2,2.109(4/9/72). 05000219  
 RGN 1/YOUNG,F 1CY 05000289  
 RGN 1/YOUNG,F 1CY 05000320  
 Authority to operate suspended per 7-20-79 or/er.  
 Application for permit renewal filed. 05000425  
 Standardized plant. LPDR 2cys & 3cys Transcripts. 05000498  
 Standardized plant. LPDR 2cys & 3cys Transcripts. 05000499  
 05000461  
 1Cy:J.Aron,IE. 05000322  
 LPDR 1 cy. 05000443  
 License Exp date in accordance with 10CFR2,2.109(10/7/73). 05000245  
 NRR/LONG,W. 05000263  
 LPDR 1 cy Transcripts. 05000387  
 LPDR 1 cy Transcripts. 05000388  
 HINSON,C. 1cy. 05000267  
 05000312  
 License Exp date in accordance with 10CFR2,2.109. 05000206  
 Application for permit renewal filed. 05000417  
 1 Copy each to: B.Wilson,S. BLACK 05000259  
 1 Copy each to: S.Black,B.WILSON 05000260  
 1 Copy each to: S. Black,B.WILSON 05000296  
 1 Copy each to: S. Black,B.LITTLE,B.WILSON 05000327  
 1 Copy Each to: S. Black,B.LITTLE,B.WILSON 05000328  
 1 Copy each to: S.Black,B.WILSON 05000390  
 1 Copy each to: S. Black,B.WILSON 05000391  
 1 Copy each to: S. Black,B.WILSON 05000438  
 1 Copy each to: S. Black,B.WILSON 05000439  
 05000445  
 05000446  
 Basdekis,D 1 cy. 05000346  
 M. Fairtile, 1 Cy. 05000271  
 1cy NMSS/IMSB/PM. 05000280  
 1cy NMSS/IMSB/PM. 05000281  
 05000338  
 05000339  
 Standardized Plant. 05000482

RECIPIENT ID CODE/NAME	COPIES LTRR ENCL	RECIPIENT ID CODE/NAME	COPIES LTRR ENCL
PD1-3 LA	1 0	PD2-1 LA	1 0
PD3-1 LA	1 0	PD5 LA	1 0
PD4-1LA	1 0	PD1-1 LA	1 0
PD1-1-LA	1 0	PD3-3 LA	1 0
PD3-2 LA	1 0	PD1-4 LA	1 0
PD2-3 LA	1 0	PD2-2 LA	1 0
PDNP LA	1 0	PD4-2 LA	1 0
PD4-1 LA	1 0	PD1-2 LA	1 0
KREBS,M.	1 0	LA	1 0
PD1-3 PD	1 1	PD2-1 PD	1 1

PD3-1 PD	1	1	PD5 PD	1	1
PD4-1PD	1	1	PD3-3 PD	1	1
PD3-2 PD	1	1	PD1-4 PD	1	1
PD1-1 PD	1	1	PD2-3 PD	1	1
PD2-2 PD	1	1	PD1-4	1	1
PDNP PD	1	1	PD4-2 PD	1	1
PD4-1 PD	1	1	PD1-2 PD	1	1
HEBDON, F	1	1	PD	1	1
SEARS, P	1	1	HOFFMAN, S	1	1
COLBURN, T.	1	1	TRAMMELL, C	1	1
TRAMMELL, C.	1	1	ALEXION, T.	1	1
PETERSON, S	1	1	MCDONALD, D.	1	1
EATON, R	1	1	LO, R	1	1
LE, N.	1	1	BICKER, D	1	1
HALL, J. R.	1	1	SIEGEL, B	1	1
OLSHAN, L.	1	1	PULSIFER, R.	1	1
SANDS, S	1	1	WANG, A	1	1
WILLIAMS, F	1	1	HOLIAN, B	1	1
WANG, J	1	1	WIENS, L	1	1
REED, T	1	1	JABBOUR, K	1	1
DeAGAZIO, A.	1	1	DeAGAZIO, A	1	1
AULUCK, R	1	1	DROMERICK, A	1	1
SILVER, H	1	1	HERNAN, R	1	1
MASNIK, M	1	1	HOOD, D	1	1
ABBATE, C.	1	1	DICK, G. F.	1	1
HICKMAN, J	1	1	BROWN, S	1	1
NRR/TROTTIER	1	1	O'CONNOR, P	1	1
LEEDS, E	1	1	LABARGE, D	1	1
BRINKMAN, D	1	1	MARTIN, R.	1	1
BOYLE, M	1	1	VISSING, G	1	1
JAFFE, D	1	1	DIANNI, D.	1	1
LONG, B.	1	1	WALKER, W	1	1
THADANI, M	1	1	BEVAN, R	1	1
ERICKSON, P.	1	1	STONE, J	1	1
REYNOLDS, S	1	1	KALMAN, G	1	1
KOKAJKO, L.	1	1	KINTNER, L	1	1
ROSS, T.	1	1	DONOHEW, J	1	1
TAM, P	1	1	CLIFFORD, J	1	1
NRR/FIELDS, M	1	1	LYNCH, D	1	1
FAIRTILE, M	1	1	BUCKLEY, B	1	1
ENGLE, L	1	1	ENG, P. L.	1	1
ADAMS, A	1	1	SAMWORTH, B	1	1
NRR/DAVIS, M	1	1	PICKETT, D	1	1
STRANSKY, R	1	1			
INTERNAL: AEOD/DSP/TPAB	1	1	NRR/DOEA/OGCB11	2	2
NRR/DRIS/RVIB9D	1	1	<u>REG FILE</u> UI	1	1
RES/DSIR/EIB	1	1	RG1	1	1
RG2	1	1	RG3	1	1
RG4	1	1	RG5	1	1
EXTERNAL: INPO RECORD CTR	1	1	NRC PDR	1	1
NSIC SILVER, E	1	1			
NOTES:	21	21			

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