

GENERAL ELECTRIC

NUCLEAR POWER
SYSTEMS DIVISION

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MFN 053-83
JNF 015-83

March 15, 1983

U.S. Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
Washington, DC 20555

Attention: Mr. D.G. Eisenhut, Director
Division of Licensing

Gentlemen:

SUBJECT: IN THE MATTER OF 238 NUCLEAR ISLAND
GENERAL ELECTRIC STANDARD SAFETY ANALYSIS REPORT (GESSAR II)
DOCKET NO. STN 50-447

REVISED DRAFT RESPONSES

Attached please find revised final draft responses to selected questions of the Commission's August 25, 1982 and November 15, 1982 information requests. Only modifications (new or revised) to the responses of the referenced letters are provided. Responses are provided in the attachments as indicated below:

<u>Attachment Number</u>	<u>Branch</u>
1	Power Systems
2	Reactor Systems

Sincerely,



Glenn G. Sherwood, Manager
Nuclear Safety & Licensing Operation

Attachments

cc: F.J. Miraglia (w/o attachments)
D.C. Scaletti

C.O. Thomas (w/o attachments)
L.S. Gifford (w/o attachments)

ATTACHMENT NO. 1

DRAFT RESPONSES TO
POWER SYSTEMS BRANCH
QUESTIONS

430.04
(8.3.1)

The undervoltage relaying described in Section 8.3.1.1.7 of your FSAR, by itself, will not protect the Class 1E equipment against a degraded voltage condition. Branch Technical Position PSB-1 contained in Chapter 8 of the Standard Review Plan (SRP) requires that a second level of undervoltage protection be provided to protect Class 1E equipment against degraded voltage conditions. Describe your compliance with this position for Class 1E, Divisions 1, 2 and 3.

Response

The ~~design~~ ^{GBSSAR II} design is based on a stable grid voltage conditions with maximum fluctuation of $\pm 5\%$ at the interface points (Refer to Note 4 of Fig. 8.3.2 "6900 V S/L Buses E & F").

The Applicant is requested to perform a voltage analysis of his system and guarantee that he can meet the above requirement.

With reference to the Branch Technical Position, PSB-1, ~~the~~ the following comments apply:

Paragraph B.1

The ~~design~~ ^{GBSSAR II} design provides Bus Undervoltage relaying for divisions 1 & 2, and 73% for division 3 (HPCS), set at 70% [^] to detect a loss of the off site power at the class 1E buses and isolate these buses from the BOP.

The feeder undervoltage relaying provide a second level of undervoltage protection which satisfy the following requirements as stated in PSB-1

B.1.a) The selection of undervoltage and time delay set points will be determined from an analysis of the voltage requirements of the class IE loads at all onsite system distribution levels;

B.1.b.1) The ~~design~~ ^{CESSAR II} design provides a time delay setting for the feeder undervoltage relaying to insure the existence of a sustained degraded voltage condition. Division 1 and 2
Following this delay, an alarm in the control room will alert the operator to the degraded condition. The operator would have the option, if necessary, to separate the class IE distribution system from the degraded offsite power system and perform a manual bus transfer to the other offsite power source or the Diesel Generator.

Division 3
Following this delay, if the degraded voltage condition still persists, loss of offsite power operational sequence is started. This sequence includes automatic tripping of the offsite power feeder breaker, starting of the NPC S D/G and transfer of the Division 3 bus from offsite

to the D/G. Offsite breaker open indication, D/G running indication and the D/G breaker closed indications provide the control room operator the necessary information.

B.1.b.2) The ~~design~~ ^{GESSAR II} design does not provide a second time delay as suggested in the PSB-1.

Division 1 and 2

It is left up to operator discretion to isolate the class IE buses, required, as stated in B.1.b.1 above.

Division 3

The HPCS (Division 3) bus is automatically separated from the offsite power system upon a sustained degraded voltage condition as described in B.1.b.1 above for Division 3.

GESSAR II complies.

B.1.c.1(2) ~~At~~ Refer to Fig. 8.3-2 "6900 volt Single Line Buses E & F", and Fig. 8.3-1(2) "HPCS Power System - Simplified One Line Diagram".

B.1.C.3

Division 1 and 2

GESSAR II complies. Refer subsection 8.3.1.1.7(2).

Division 3

The HPCS is an independent bus and has no common trippings with Division 1 or 2. No load shedding is required for the HPCS bus loads.

B.1.C.4

Division 1 and 2

The voltage sensors (feeder under voltage relaying) do not automatically initiate the disconnection of the offsite power sources whenever the voltage set point and time delay limits have been exceeded. Instead, an alarm is initiated in the Control Room, and the isolation can be done manually by the operator.

Division 3

The voltage sensors (feeder under voltage relaying) automatically initiate the disconnection of the offsite power sources whenever the voltage set point and time delay limits have been exceeded.

B.1.c.5) The ~~design~~ ^{GESSAR II} design provides means for device testing and calibrating during plant operation.

B.1.c.6) GESSAR II complies.

B.1.d) The Technical Specifications will include limiting conditions for operations, surveillance requirements and will be provided by the Applicants.

The trip set points and the allowable values for the second-level voltage protection sensors and associated time delay devices ^{are plant unique items} which will be provided by the Applicant.

Paragraph B.2

The GESSAR II design does not provide automatic load shedding for Division 1 or 2 in case of sustained degraded voltage above 70% of rated. The Division 3 bus loads require no load shedding.

Paragraph B.3

~~A voltage drop calculation~~ ^{was performed which shows that} A voltage drop calculation, all safety related buses down to the 480 volt level, provide full load operation voltages for safe continuous operation of all energized loads, based on a BOP supply voltage of $6.9 \text{ kV} \pm 5\%$

Paragraph B.4

This recommended testing procedure will be addressed in the pre-operational test procedures.

QUESTION 430.14

State in Section 8.3.1.1 of your FSAR, whether the nuclear system protection system (NSPS) non-Class 1E power supplies which feed the "B" scram solenoids have a separate and redundant Class 1E protective package installed between the power supply and bus consisting of overvoltage, undervoltage and underfrequency protection. If not, this package should be installed to protect the solenoids against a condition which could fail them in the unsafe direction. Discuss the susceptibility of the load drivers to power supply anomalies such as over/undervoltage, over/under-frequency, voltage transients, voltage spikes, EMI and harmonics. The protective package must provide protection against any conditions which would fail the load drivers in the unsafe (i.e., shorted or closed) direction.

RESPONSE:

Current NSPS ^{non-1E power supply} design by GE consists of ~~four~~ ^{two} independent Uninterruptable Power ^{supplies} ~~systems~~ (UPS) ^{similar to Clinton design. Refer to Sec. 8.3.1.1.4.2 markup}. Each includes a battery charger, 125 VDC battery, for detail an inverter, ~~static bypass switch~~, an Electrical Protection Assembly (EPA), a 480-120V regulating transformer, a manual bypass (inverter bypass) switch and essential metering devices for the UPS.

The EPA consists of over-under voltage and under frequency monitoring circuitry and an output disconnecting device (circuit breaker). The EPA provides over-under voltage and under frequency protection to the RPS loads and related power supply associated with the scram pilot valve solenoids and the MSIV pilot valve solenoids by disconnecting the bus from the input power whenever the UPS output voltage and frequency deviates beyond the preset limits. These limits are to be established by field calculations. The EPA is designed to meet the IEEE-323 and IEEE-344 requirements.

A second supply is through the 480-120V regulating transformer, ~~and the isolation transformer~~. The regulating transformer provides voltage regulation of $\pm 1\%$. It is furnished with a harmonic distortion filter to reduce the maximum output distortion to 5% RMS. The regulating transformer is virtually immune to lightning or transient surges on the line and has a low audible noise level of 65 dB at 5 feet. The transformer is qualified for IEEE-344 and IEEE-323 requirements.

The power supply through the bypass circuit, including regulating transformer ~~and the isolation transformer~~ is also monitored by the EPA as described above. The new load driver cards are designed to meet the requirements of IEEE-472 and are capable of operation within voltage variations of 24-200V AC or DC. *They also operate on square wave pulses and are therefore insensitive to harmonic voltages from their power supply.*

A 30.14 text modification

8.3.1.1.4.2 Nuclear Systems Protection System (NSPS) Power Supply

The NSPS power supply is shown in Figure 8.3-1 and in Figures 8.3-20a, b, c, ^d, with each bus supplying ~~Class 1E~~ power for the independent trip systems of the Nuclear Systems Protection System (NSPS). Four NSPS control power buses (Divisions 1, 2, 3 and 4) have been established. They are each normally supplied independently from inverters which, in turn, are supplied from the DC buses of the corresponding ^{NSPS} division. Use of solid-state static transfer switches makes it possible to energize the NSPS control power buses from alternate Class 1E AC sources for added continuity. The second input to the transfer switch is from a regulating transformer, connected to the same ^{ESF} divisional power as the battery supplying the inverter for ^{corresponding NSPS} Divisions 1, 2, and 3. ~~For the Division 4 alternate supply, a Division 4 regulating transformer is used.~~ A manual bypass switch is provided to facilitate manual transfer of ~~alternate supply~~ ^{for each NSPS bus} the bus feed from the inverter to the alternate source.

The NSPS power supply buses are designed to provide power to the four-division ^{NSPS} logic system that operates the RPS and other safety functions controlled by the NSPS. These buses also supply power to ~~RPS and Nuclear Steam Supply Shutoff System (NS4) solenoid valves~~ neutron monitoring system and parts of the process radiation monitoring system and leak detection instrumentation. Power is applied so as to prevent inadvertent operation of the reactor scram ~~NSSC~~ initiation or ECCS initiation upon loss of any single power supply. Actual functioning of the NSPS is covered in Sections 7.2, 7.3 and 7.4.

➔ INSERT "A"

Routine maintenance can be conducted in equipment associated with the NSPS Power Supply. Inverters and solid-state switches can be inspected, serviced and tested channel by channel without tripping the RPS, logic.

* Note: Figure 8.3-1 will be modified to match the "new" Figures 8.3-20a through 8.3-20d.
8.3-5

CESSAR II

Section 8.3.1.1.4.2

INSERT "A"

Two nondivisional RPS power supply buses have also been established. Each of the two nondivisional RPS buses is normally supplied independently from an inverter which in turn is supplied from a separate nondivisional DC bus. Use of ^a manual transfer switch for each of these buses makes it possible to energize each bus from an alternate nondivisional AC source for added continuity. The second input to the transfer switch is from a regulating transformer, connected to the same nondivisional power bus as the battery supplying the inverter for the corresponding RPS bus. The RPS power supply buses are designed to provide power to the RPS scram and Nuclear Steam Supply Shutoff System (NS⁴) solenoid valves.

8.3.1.1.4.2.1 Components

Each of the four essential NSPS power supplies includes the following components:

- (1) a power distribution cabinet, including the NSPS 120 VAC bus and circuit breakers for the individual loads;
- (2) a solid-state inverter, to convert 125 VDC battery power to 120VAC NSPS power;
- (3) a solid-state transfer switch to sense inverter failure and automatically switch to alternate power;
- (4) a 120V/120V isolation transformer to provide noise isolation for the alternate 120 VAC power supply; ~~and~~
- (5) a 480V/120V transformer for the alternate^e power supply;
- (6) a manual bypass switch to manually transfer NSPS supply from inverter to an alternate source; and
- (7) a power monitor to monitor the power supply anomalies such as ^{8.3-6} over/under voltage, under frequency and provide trip signal when the preset limits are exceeded.

The nondivisional portion of the NSPS power supply consists of the following:

- (1) a power distribution cabinet, including the 120 VAC nondivisional bus and circuit breakers for the individual loads;
- (2) a solid-state inverter to convert 125 VDC battery power to 120 VAC NSPS power;
- ~~(7) a solid state transfer switch, and to sense inverter failure and automatically switch to alternate power;~~
- ~~(7) a 120V/120V isolation transformer for each of the two nondivisional power supplies;~~
- (3) a 480/120V transformer for the alternate power supply;
- (4) a manual bypass switch to manually transfer NSP supply from inverter to an alternate source; and
- (5) a power monitor to monitor the power supply anomalies such as ^{8.3-6} over/under voltage, under frequency and provide trip signal when the preset limits are exceeded.

8.3.1.1.4.2.2 Power Sources

The NSPS power supply sources consist of three types of power.

(1) Class 1E 120 VAC; (2) non-Class 1E 120 VAC; and (3) Class 1E 125 VDC.

- (1) Class 1E 120 VAC: Four ^{NSPS} divisional 120 VAC buses are each fed by a 480V Class 1E power supply via two paths. The normal path is from the normal battery charger to a divisional battery bus which powers an inverter. (The battery can also be fed by nonessential AC power ^{ed} and alternate battery charger.) The alternate path is direct, through a Class 1E stepdown transformer.
- (2) Non-Class 1E 120 VAC: ^{Two} ~~A single~~ nondivisional 120 VAC ^{RPS} bus ^{es are} fed by ~~one of two~~ ^{independent} 480 VAC nondivisional power supplies. A separate stepdown transformer is provided ~~for each 120 VAC load circuit on this power supply~~ ^{alternate input to the transfer switch}.
- (3) Class 1E 125 VDC: The nuclear system protection system also utilizes 125 VDC power from the Class 1E batteries.

8.3.1.1.4.2.3 Operating Configuration

The four 120 VAC essential power supplies operate independently, providing four divisions of inverter power supplies for the NSPS. The normal lineup for each division is through an essential 480 VAC power supply, the normal battery ^{the static transfer switch and the manual bypass switch} charger, and the inverter. Transfer from the inverter, directly to the essential AC source is done automatically in case of inverter failure, or manually for maintenance or testing. Annunciation in the control room is provided for the following: switching to the alternate source; inverter failure, and manual bypass. The nonessential 120 VAC ^{RPS} power supply supplies independent power to the ^{RPS} scram solenoids and the ~~scram~~.

8.3.1.1.4.2.3 Operating Configuration (Continued)

MSIV solenoids for isolation. The nonessential 120 VAC bus is normally lined up to the preferred 480 VAC nondivisional power supply. Transfer to the alternate nondivisional power supply is done ~~automatically~~ ^{manually} on loss of preferred power or ~~manually~~ ^{or testing} for maintenance. Control room annunciation is provided for transfer to the alternate source.

8.3.1.1.5 Class 1E Electric Equipment Considerations

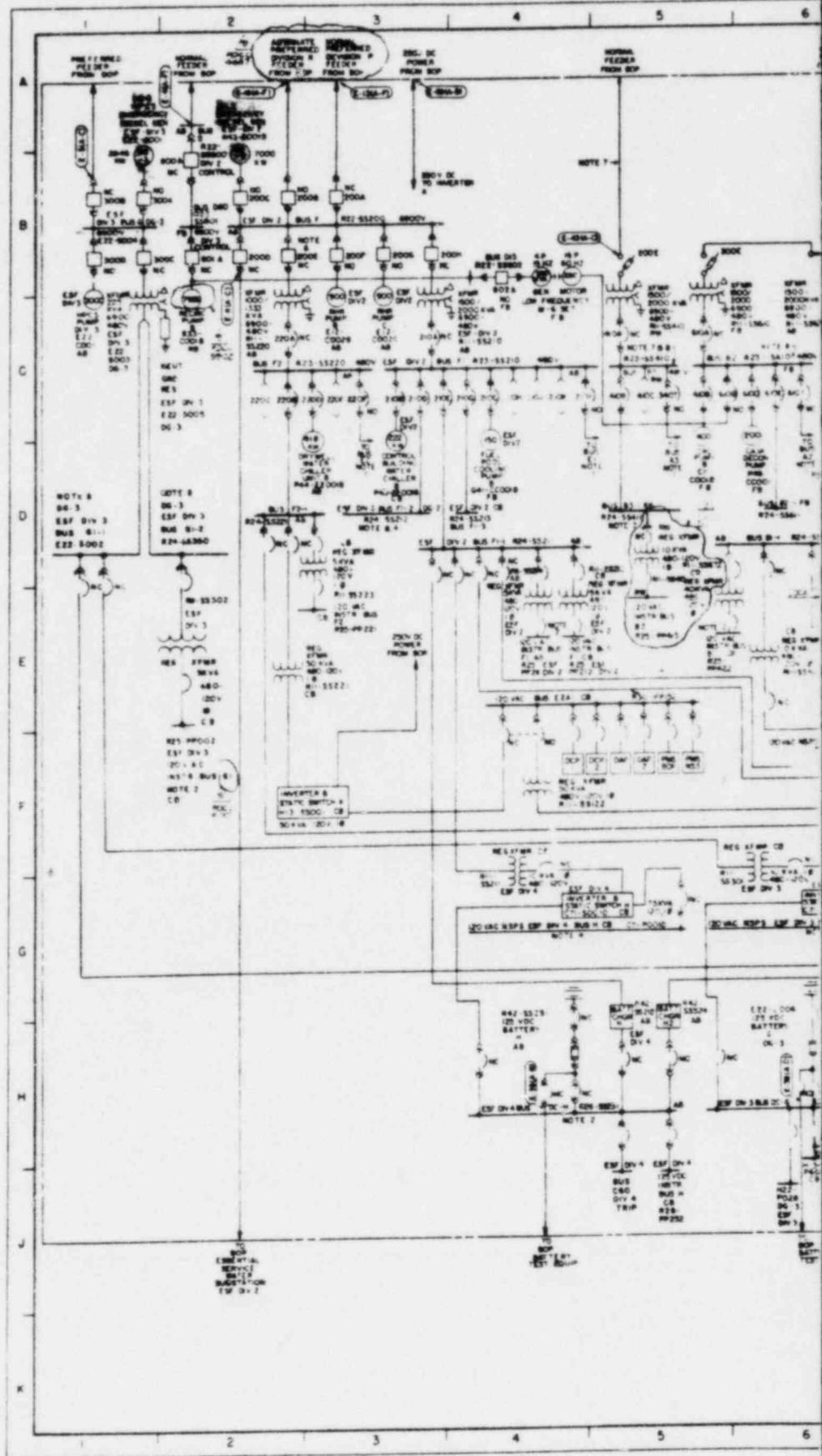
The following guidelines are utilized for Class 1E equipment.

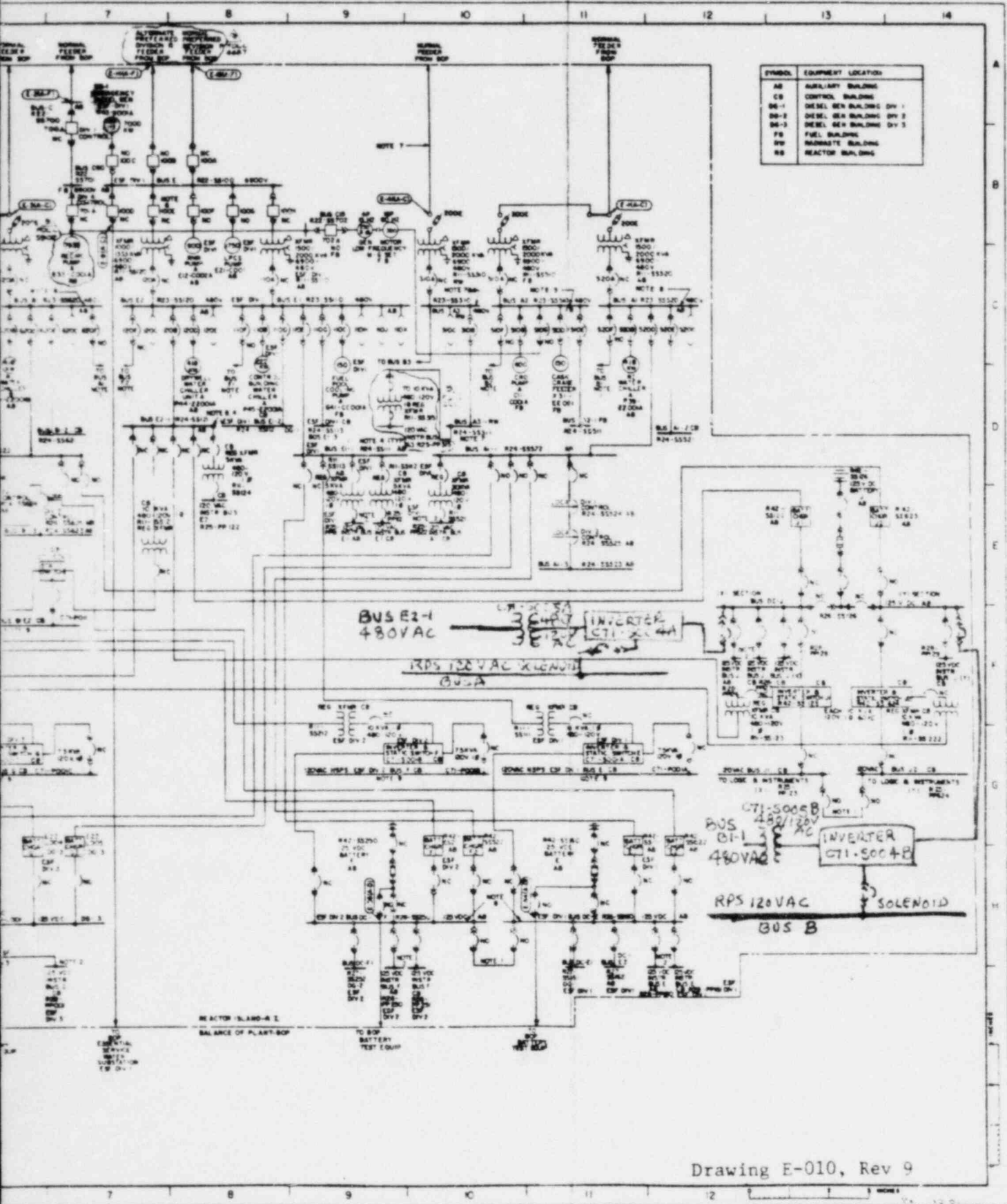
8.3.1.1.5.1 Physical Separation and Independence

Equipment of one division is segregated from equipment of other divisions and nondivisional equipment, in accordance with IEEE Std 384-1974, Regulatory Guide 1.75 and General Design Criterion 17. The overall design objective is to locate the divisional equipment and its associated control, instrumentation, electrical supporting systems and interconnecting cabling such that separation is maintained among all divisions. Divisional separation is achieved through the use of barriers and spatial separation. The latter is enhanced by totally enclosed raceways.

Redundant divisions of electric equipment and cabling are located in separate rooms or areas and/or are provided with spatial separation, such that no single event may disable more than one of the redundant divisions or prevent safe shutdown of the plant.

Cables entering the drywell area from the containment area utilize a standard conduit sleeve and conduit seal. The seals are located in each divisional sector and at elevations to serve the equipment inside the drywell and to maintain acceptable spatial separation



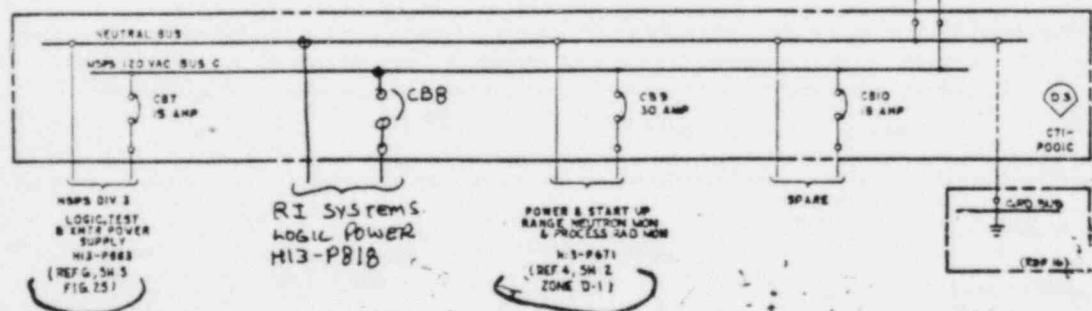
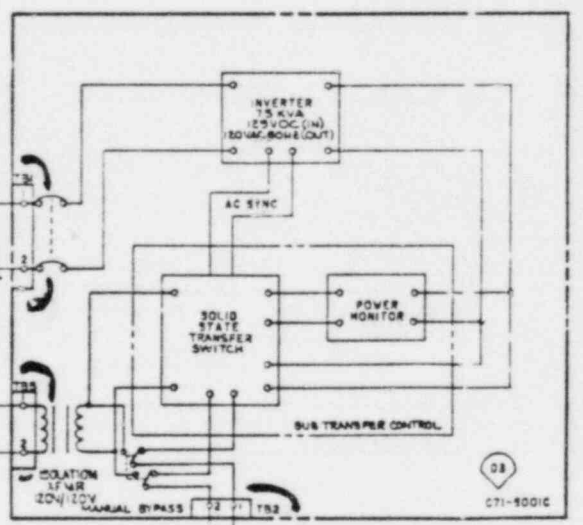
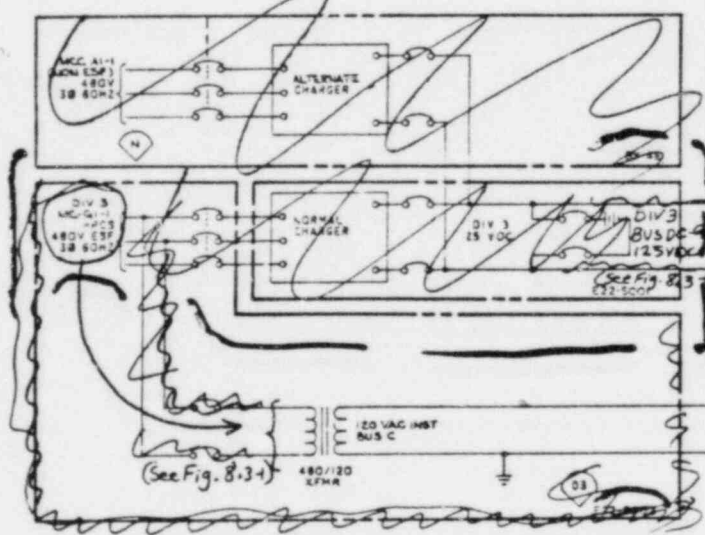
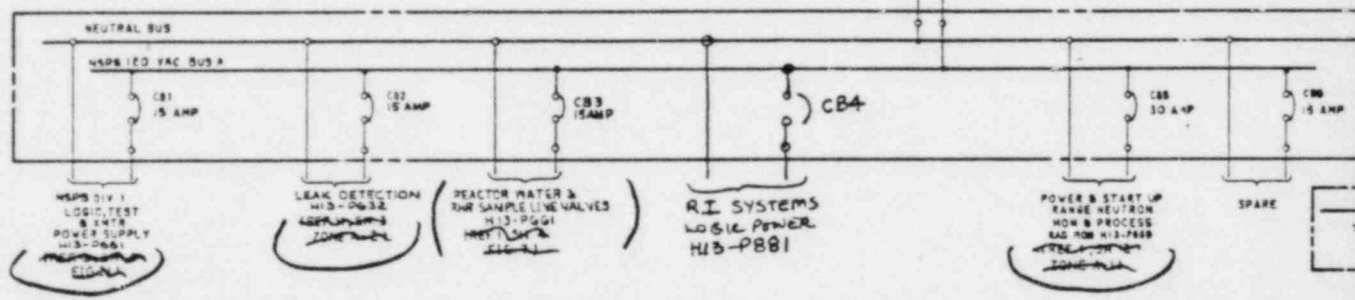
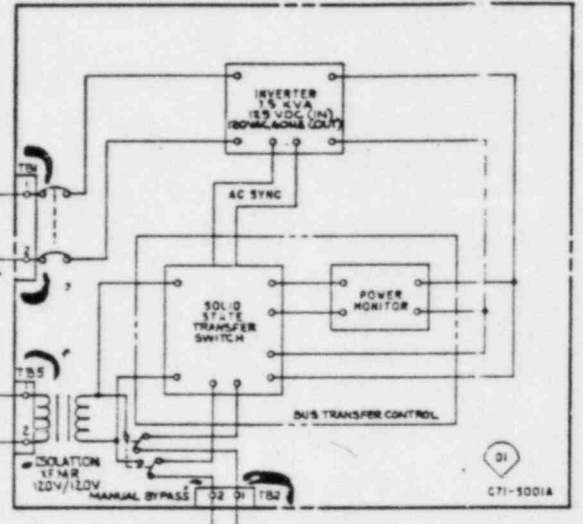
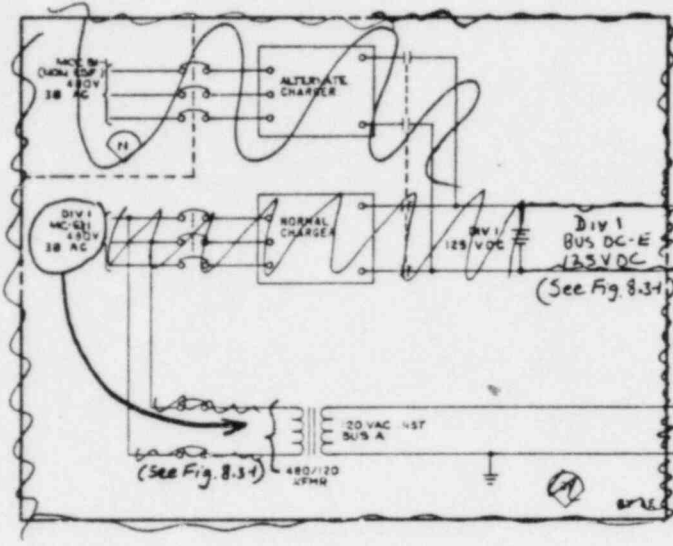


SYMBOL	EQUIPMENT LOCATION
AB	AUXILIARY BUILDING
CB	CONTROL BUILDING
DB-1	DIESEL GEN BUILDING DY 1
DB-2	DIESEL GEN BUILDING DY 2
DB-3	DIESEL GEN BUILDING DY 3
FB	FUEL BUILDING
RB	RADIOACTIVE BUILDING
SB	REACTOR BUILDING

Drawing E-010, Rev 9

UPDATE FIG. 8.3-1 AS MARKED

Figure 8.3-1. Nuclear Island Single Line AC & DC Aux Power System



HPL NO. C71-1060

NUCLEAR SAFETY RELATED
 DIVISION 1 THRU 4



FIG 1

LOGIC TO LOGIC OPTICAL ISOLATOR

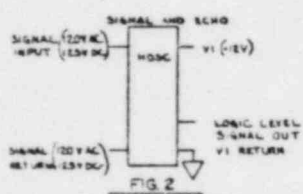


FIG 2

HIGH VOLTAGE LEVEL INPUT DIGITAL SIGNAL CONDITIONER

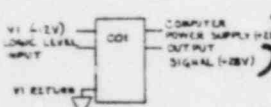


FIG 3

COMPUTER OPTICAL ISOLATOR

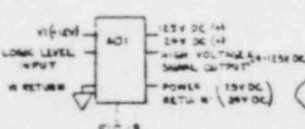


FIG 4

AMPLIFIER OPTICAL ISOLATOR (ALSO USED FOR TRANSMIT TEST) LOGIC LEVEL INPUT

NOTES:

1. THE LOADS SHOWN ARE ESTIMATED NOT MEASURED QUANTITIES. AC LOADS ARE BASED ON 80 Hz.
2. NEUTRAL BUS SHALL BE GROUND AT THE NEUTRON MONITORING CABINET IN EACH DIVISION.
3. INVERTER ASSEMBLIES TO BE LOCATED IN EQUIPMENT ROOM IN CLOSE PROXIMITY OF ASSOCIATED EST BATTERY.
4. UNLESS OTHERWISE INDICATED, THE FOLLOWING REFERENCE DESIGNATIONS SHOWN ON THIS DIAGRAM ARE PREFIXED WITH C71A.

REFERENCE DOCUMENTS

1. 821-1090 VUC. ST. SUPPLY SHUTOFF SYS ELEM DIAG (B21W)
2. 821-1060 AUTO DEPRESSURIZATION SYS ELEM DIAG (B21C)
3. C71-1060 CONTROL ROD DRIVE HYD SYS ELEM DIAG (C11B)
4. C51-1070 START-UP PGE NEUT MON SYS ELEM DIAG (C51A)
5. C51-1080 POWER RANGE NEUT MON SYS ELEM DIAG (C51B)
6. C71-1050 REACTOR PROTECTION SYSTEM ELEM DIAG (C71A)
7. E12-1050 RESIDUAL HEAT REMOVAL SYS ELEM DIAG (C12A)
8. E21-1050 LOW PRESS CORE SPRAY SYS ELEM DIAG (E21A)
9. E22-1050 HIGH PRESS CORE SPRAY SYS ELEM DIAG (E22A)
10. E22-1070 HPCS POWER SUPPLY SYSTEM ELEM DIAG (E22B)
11. E31-1050 LEAK DETECTION SYSTEM ELEM DIAG (E31A)
12. E51-1050 REAC CORE ISLR ILS SYSTEM ELEM DIAG (E51A)
13. G33-1050 REACTOR WTR CLEAN-UP SYS ELEM DIAG (G33A)
14. G41-1050 FUEL POOL ILS & CLNUP SYS ELEM DIAG (G41A)
15. Z1A5794 INVERTER ASSEMBLY PURCHASE SPEC.
16. A42-4000 SPECIAL WIRE & CABLE SPEC.
17. REMOVED
18. A42-4100 NSPS BLOCK DIAGRAM ELEC EQUIP SEPARATION SPEC.
19. A42-4050

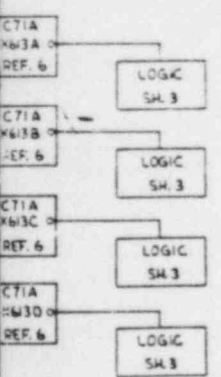
EQUIPMENT IDENT SYMBOLS

- OX - CLASS IE, DIV X, NUCLEAR SAFETY RELATED
- AK - ASSOCIATED WITH AND TREATED AS CLASS IE, DIV X
- N - NON-DIVISIONAL
- SSX - SPECIAL SOLENOID POWER FOR RPS SOLENOIDS
- LSX - SPECIAL SOLENOID POWER FOR NS4 (MSIV) SOLENOIDS
- ▽ - INDICATES SIGNAL COMMON
- ⊕ - INDICATES PANEL POWER GROUND BUS
- - INDICATES PGC LINE CODE
- - INDICATES TERMINATION CABINET
- - INDICATES BAY
- - INDICATES TERMINATION MODULE
- - INDICATES TERMINATION MODULE TERMINAL NOS
- - INDICATES WIRE IDENT
- Y - TPI = TEST PULSE INPUT
- Y - TPO = TEST PULSE OUTPUT

INTERFACED	LOCATED ON THIS SHEET
1	1
2	1
3	1
4	1

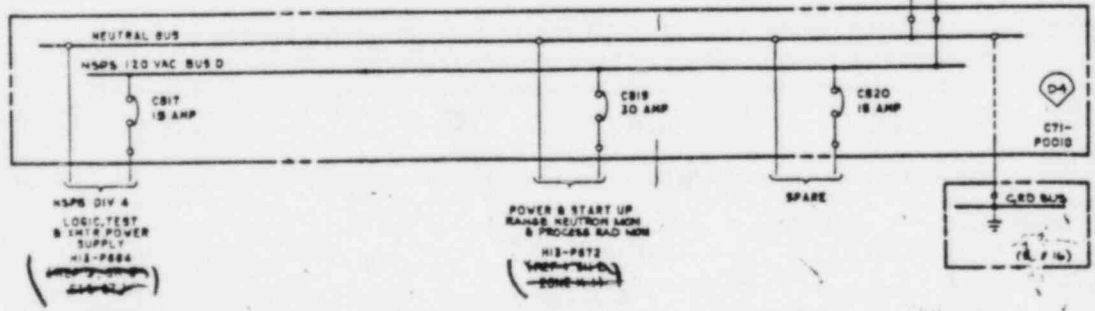
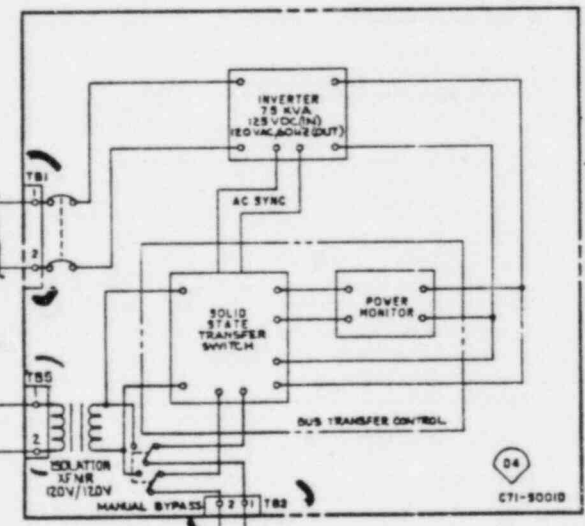
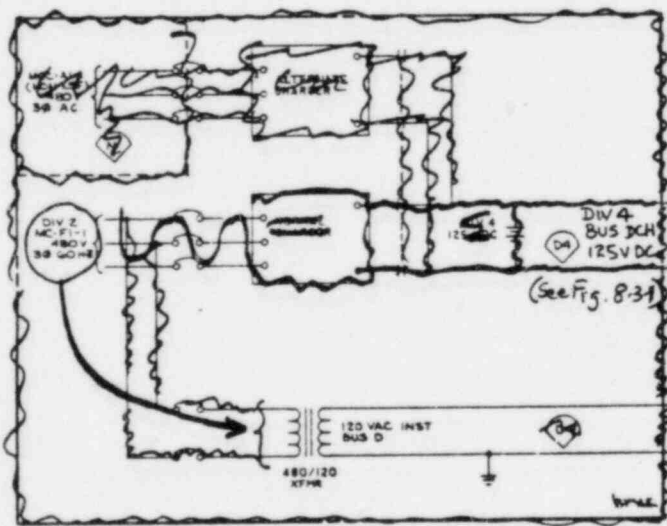
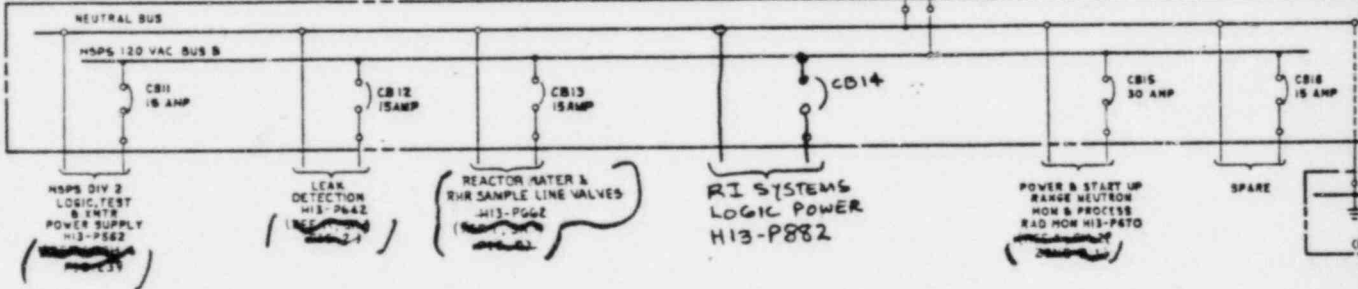
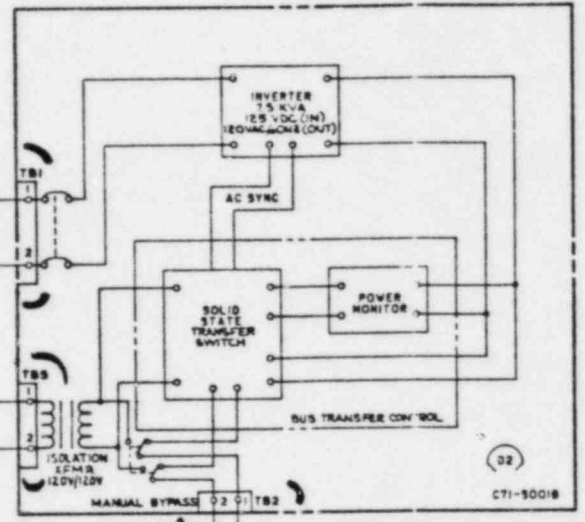
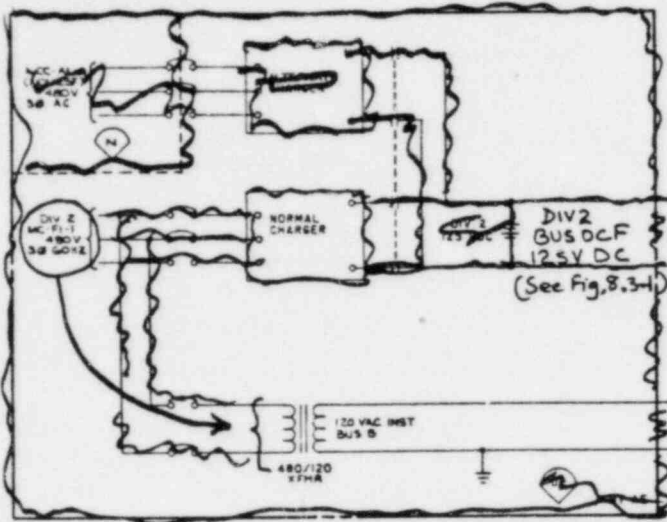
LINE CODES LAST USED IN THIS SHEET NONE

UPDATE GESSAR II FIG. 8.3-20a AS PER THIS DWG.



RPS POWER SUPPLY (REF. 8)

NO.	REV.	DATE	BY	CHKD BY	APP'D BY	DESCRIPTION
1	1	11/28/77
2	1
3	1
4	1



DZ
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 10 11/25
 P. 16)

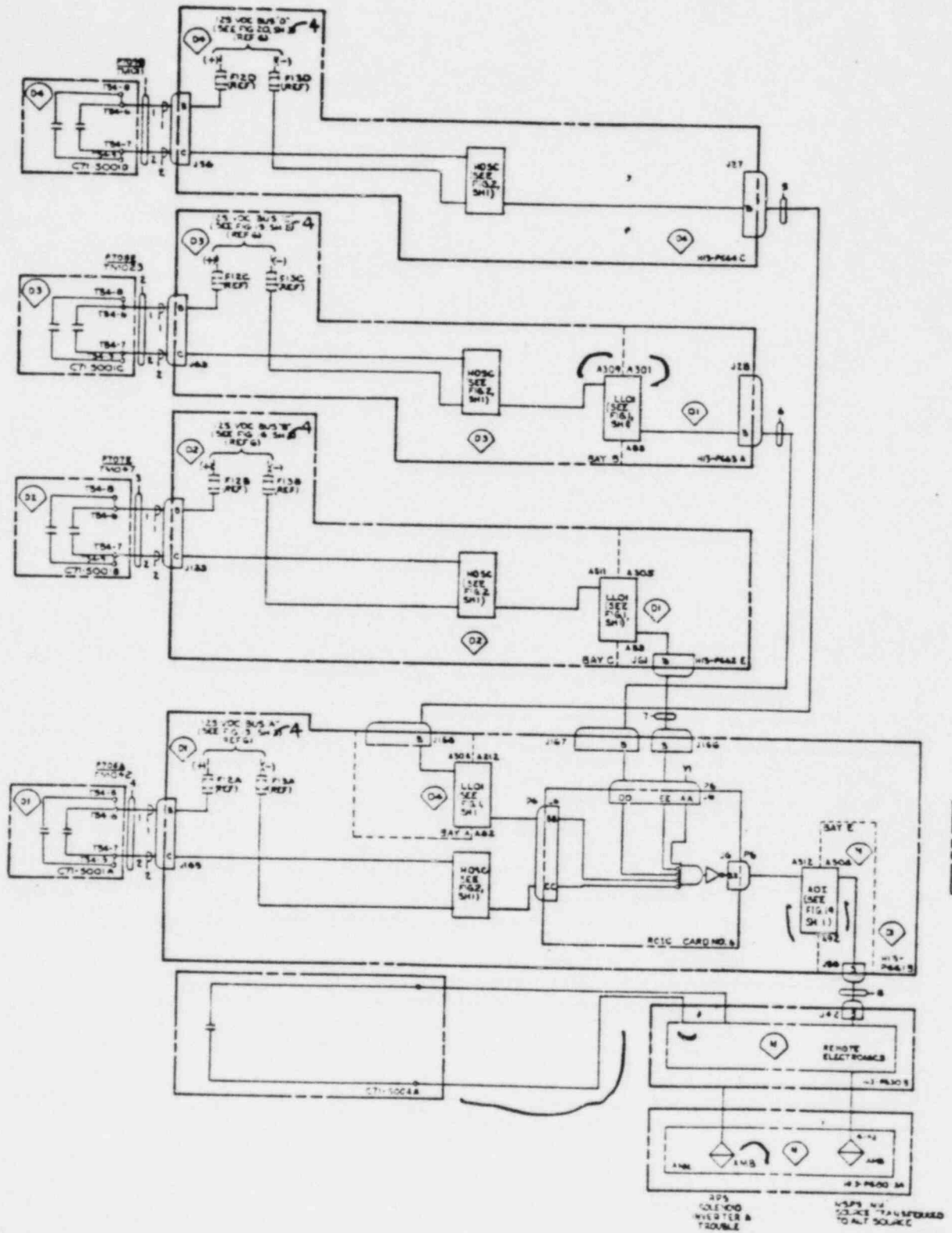
UPDATE GESSAR II FIG. 8.3-200B AS PER THIS DWG.

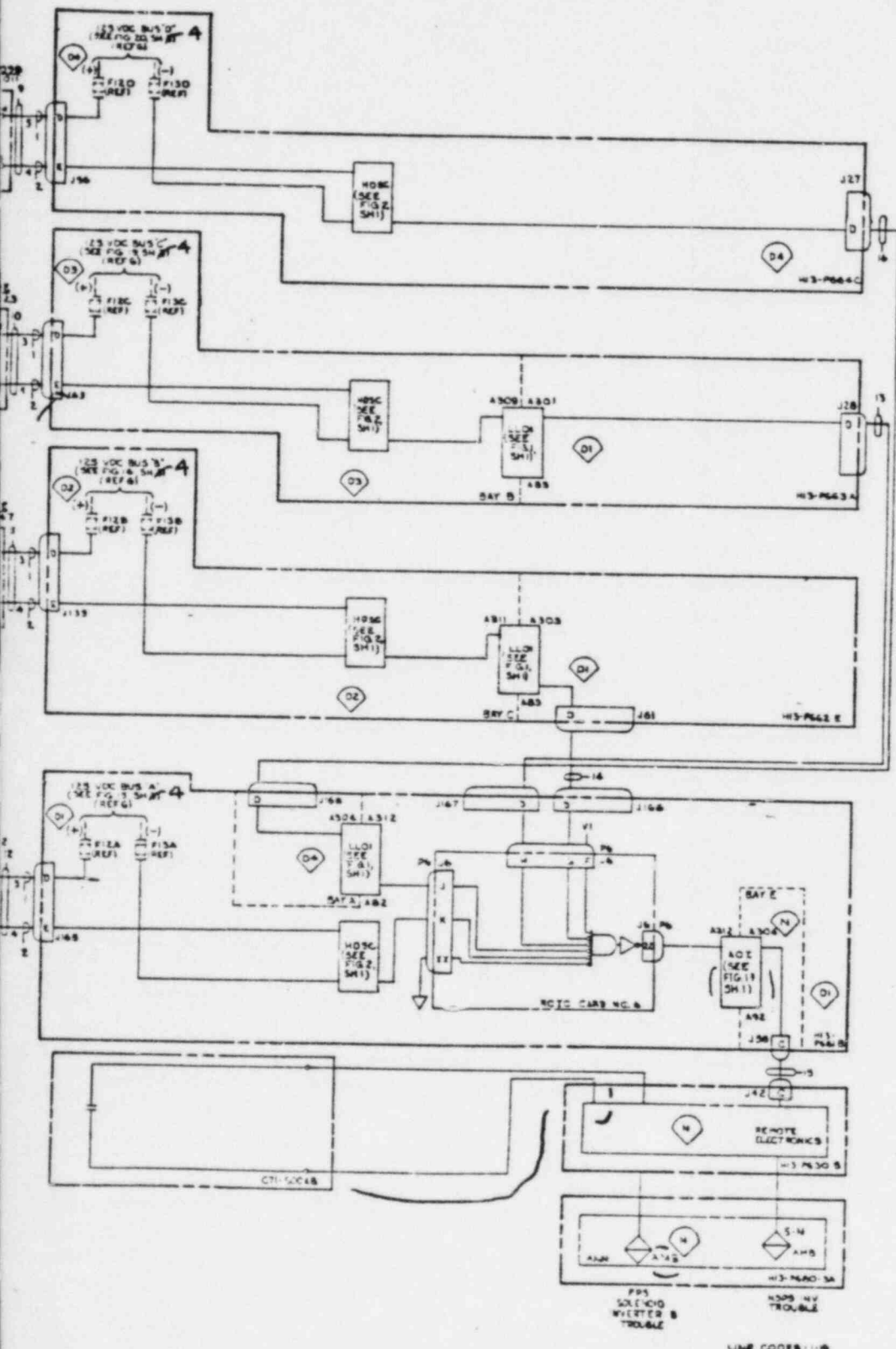
TABLE I
 ISOLATOR POWER CABLE TABULATION

ISOLATOR TYPE	FROM					TO					ELEM. SWITCH	SERVICE	
	DIV	PANEL	CONN	PIN	LINE CODE	PANEL	CONN	PIN	FILE	CARD			
LLO1	1	HIS-P66C	J166	F	14	HIS-P66E	J061	F	A83	A303	3	F5	H2VDC
LLO1	1	HIS-P66C	J166	G	14	HIS-P66E	J061	G	A83	A303	3	F5	H2VDC
LLO1	1	HIS-P66C	J167	F	15	HIS-P66E	J028	F	A83	A301	3	D9	H2VDC
LLO1	1	HIS-P66C	J167	G	15	HIS-P66E	J028	G	A83	A301	3	D9	H2VDC
LLO1	4	HIS-P66E	J027	F	16	HIS-P66E	J168	F	A82	A304	3	J6	H2VDC
LLO1	4	HIS-P66E	J027	G	16	HIS-P66E	J168	G	A82	A304	3	J6	H2VDC
AOZ	N	HIS-P650B	J042	D	15	HIS-P66E	J056	D	A92	A306	3	J7	H15VDC
AO1	M	HIS-P650B	J042	E	15	HIS-P66E	J056	E	A92	A304	3	J7	H25VDC

LINE CODES THIS SHEET NONE

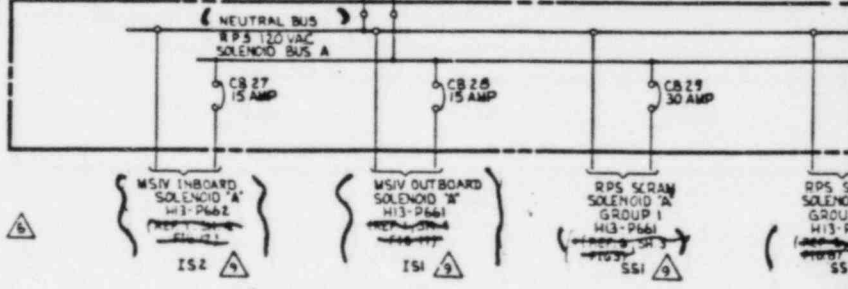
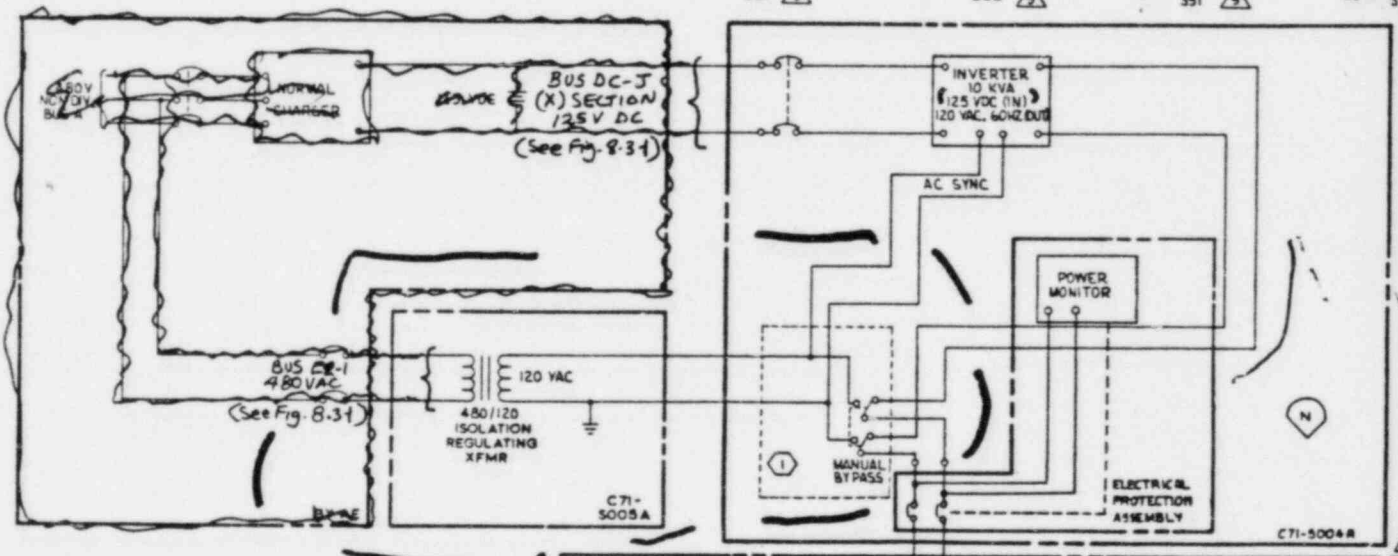
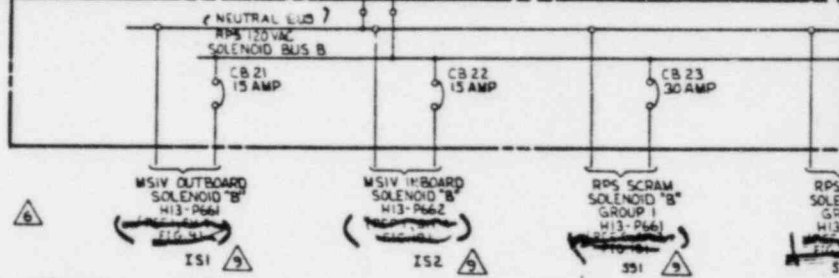
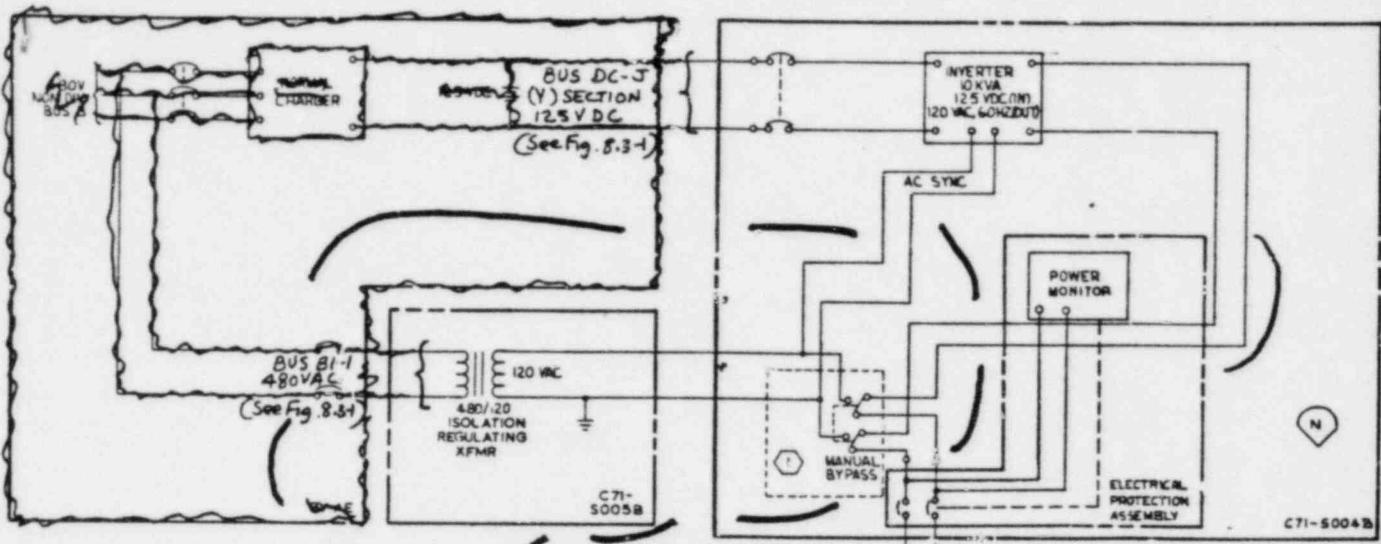
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7	NJ23288	5	CHANGED BY	DATE	REASON	APPROVED BY	DATE	REVISION
8	NJ40606	5	CHANGED BY	DATE	REASON	APPROVED BY	DATE	REVISION



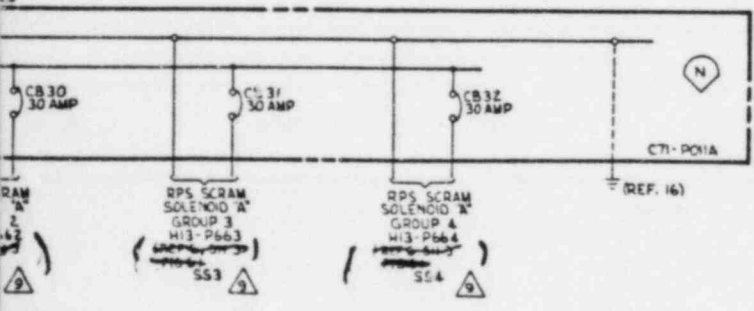
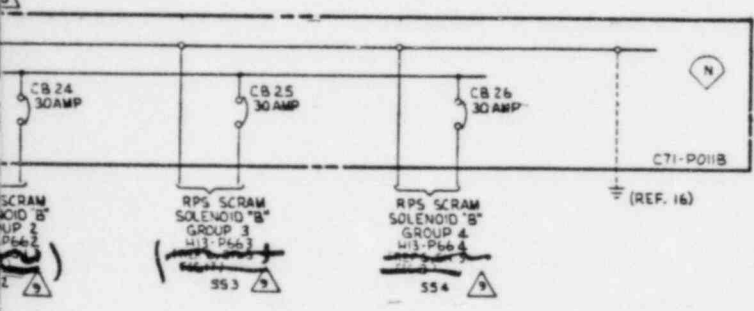


UPDATE GESSAR II FIG. 8-3-20C AS PER THIS DWG.

NO.	DESCRIPTION	DATE	BY	CHECKED
1	REVISION			
2	REVISION			
3	REVISION			
4	REVISION			
5	REVISION			



(1) THE MANUAL BYPASS SWITCH IS A SYNCHRONIZED MAKE-BEFORE BREAK SWITCH



B2BE 546

ADD THIS Dwg AS FIG. 8.3.20d (WITH MARKING INCORPORATED) TO GESSAR II

REV.	DESCRIPTION	DATE
8	NJ22547	
7	NJ28127	
6	NJ40226	
5	NJ41277	

ATTACHMENT NO. 2

DRAFT RESPONSES TO
REACTOR SYSTEMS BRANCH
QUESTIONS

440.13
(6.3)

Identify the relief valve discharge lines in the ECCS which penetrate primary containment and have outlets below the surface of the suppression pool. Since these lines form part of the primary containment, our concern is that excessive dynamic loads resulting from waterhammer during relief valve actuation may cause cracking or rupture of these lines. Provide additional information concerning measures you have taken to prevent this type of damage to these lines.

Response

All ECCS relief valves, except RHR relief valve number E12-F055, that discharge to the suppression pool, discharge subcooled water. Actuation of these relief valves are caused by small quantities of water that either leak back from the reactor and/or result from thermal expansion of water in the ECCS lines. Since these actuation conditions are characterized by pressure slowly approaching the relief valve set point and discharge of small quantities of water, significant water hammer and dynamic loads do not occur.

RHR relief valve number E12-F055 is provided to prevent overpressurization of the RHR heat exchanger during the steam condensing mode (SCM). Actuation of this relief valve would occur if the steam pressure reducing valve number E12-F051 failed open during the SCM and steam would be discharged to the suppression pool. The dynamic loading associated with actuation of E12-F055 during the SCM will be ~~submitted March 31, 1993 when the response to similar containment questions are submitted.~~ provided by the Applicant.

This loading depends on the specific characteristics of equipment-vendor dependent valves E12-F051 and E12-F055 as well as the fouling factor for the RHR heat exchanger.

440.20 We state in the SRP (e.g., in Section 15.1) that for anticipated transients, the most limiting plant systems single failure shall be identified and assumed in the analysis. Accordingly, describe the worst single failure for each events analyzed in Chapter 15 of your FSAR. Provide analyses including these postulated failures for the five most limiting events identified in your FSAR.

Response

Chapter 15 contains evaluations of postulated single failures associated with anticipated transients. Plant nuclear safety operational analysis (NOSA), the system-level qualitative-type failure modes and effects analysis of essential protective sequences in Appendix 15A, show compliance with the single active component failure or the single operator error criteria.

The five most limiting analyzed Chapter 15 transients are:

1. Loss of Feedwater Heater-Manual Flow Control
(Subsection 15.1.1)
2. Feedwater Control Failure-Maximum Demand
(Subsection 15.1.2)
3. Pressure Regulation Downscale Failure
(Subsection 15.2.1)
4. Generator Load Rejection with Failure of Bypass
(Subsection 15.2.2)
5. Turbine Trip with Failure of Bypass
(Subsection 15.2.3)

In reviewing the expected sequence of events utilized in simulating the plant performance for each of these transients, it was determined that postulating a single active safety-related component failure does not alter the transients. For the feedwater control failure - maximum demand transient in which credit is taken for full turbine bypass capacity, a single active component failure would result in the loss of one of the turbine bypass paths. However, the consequence of loosing one bypass path is not expected to result in fuel failure.