

# Nebraska Public Power District

LQA8300132

April 21, 1983

U.S. Nuclear Regulatory Commission Operating Reactors Branch No. 2 Division of Licensing Washington, D.C. 20555

Attention: Mr. Domenic B. Vassallo, Chief

Dear Mr. Vassalio:

Subject: NUREG-0737, Item II.K.3.13, "RCIC Automatic Restart"

Cooper Nuclear Station

NRC Docket No. 50-298, DPR-46

Reference: 1) Letter from D. B. Vassallo to J. M. Pilant, dated March 16, 1983, same subject

Reference 1 requested either a verification that the acceptance criteria contained in Enclosure 3 therein had been (or will be) satisfied for the subject NUREG item, or that a description be provided of how the CNS design satisfies the intent of the criteria. Furthermore, Reference 1 requested either a confirmation that the modification had already been made or a schedule for its implementation. This letter provides the requested information.

Responses to the acceptance criteria of Enclosure 3 to Reference 1 are presented below:

#### Criterion 1:

The RCIC system shall be modified to relocate the existing logic for the high reactor vessel water level trip from the RCIC turbine trip valve to the steam supply valve to permit subsequent auto restart of the RCIC system on low water level. This change will be consistent with actions identified in the BWR Owners' Group proposed modification, noted above, for RCIC automatic restart, including plant specific considerations.

### Response to Criterion 1:

The automatic restart feature for the RCIC system has been implemented per the BWR Owners' Group Evaluation, except for:

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1. General Notes, number 1 recommended modifying the turbine trip valve by replacing the oil dash pot system with an electrical trip solenoid. The stated reason for the change is that the valve will ultimately close after any turbine shutdown, due to loss of oil pressure. This note applies to seven earlier BWR's, of which Cooper Nuclear Station is one, and reflects systems as originally designed by the General Electric Company.

The RCIC turbine trip valve was modified in 1977, by adding a motor operator. The motor operator originally allowed remote manual resetting of the trip valve from the Control Room, to its normal standby open position. As part of the automatic restart design change, an automatic reset was added which will reopen the trip valve if the trip and steam supply valves are both shut. Therefore, after the steam supply valve closes on high water level, and the trip valve closes on loss of oil pressure, the motor operator will automatically drive the stem down, latch and then reopen the trip valve, returning the RCIC system to a standby condition. This modification therefore meets the intent of Criterion 1.

2. Item number 4 of the Implementation section dealt with adding an annunciator alarm to alert the operator when the RCIC turbine trips on high water level, specifically. The addition was not made because the trip valve shut limit switch will initiate an alarm anytime the valve shuts, thus providing the operator with adequate indication of a RCIC turbine trip.

### Criterion 2:

The modifications to the RCIC system shall be designed and implemented to standards consistent with the original system design.

# Response to Criterion 2:

The modification was designed and implemented per the original system design. Wiring not internal to the control panels was installed in conduit. The cable used external to control panels was qualified to IEEE-383-1974 standards and all cable used is consistent with wiring currently in use in the RCIC system for similar applications. The only component added, a G.E. type HFA relay, was a spare previously in service in the RCIC system.

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#### Criterion 3:

For those plants for which the RCIC system is classified as a safety-related system, the quality assurance requirements of Appendix B to 10CFR Part 50 apply. In order to provide assurance that the modifications of the RCIC system are implemented to standards commensurate with the system's importance to safety for those plants for which the RCIC system is not classified as a safety-related system, the following requirements are applicable . . .

### Response to Criterion 3:

The RCIC system is considered safety-related, and therefore is covered by the requirements of Appendix B to 10CFR Part 50.

If you have any questions, please contact me.

Sincerely,

Jay M. Pilant

Division Manager of Licensing &

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Quality Assurance

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