

G-PU 455

Koy

8307120747 780608  
PDR ADOCK 05000289  
P HOL

THE BABCOCK & WILCOX COMPANY  
POWER GENERATION GROUP

To DISTRIBUTION

From D. H. ROY, MANAGER, PLANT DESIGN (2315)

Cust.

805 4.

File No.  
or Ref.

Subj. SITE PROBLEM REVIEW FOR SAFETY ANALYSIS IMPACT

Date JUNE 8, 1978

This letter to cover one customer and one subject only.

DISTRIBUTION

- J. H. Taylor\*
- J. D. Phinney\*
- W. H. Spangler
- T. F. Scott\*
- D. W. LaBelle (Part Time)
- R. O. Vosburgh\*
- R. L. Pittman\*

\*Attendees

Reference: Memo, R. O. Vosburgh to D. W. LaBelle, "Site Problems Review", dated April 11, 1978

A meeting was held on Monday, June 5, at 10:00 a.m. to discuss means to assure adequate involvement of Safety Analysis Unit personnel at the front-end of site and operational upset problem resolution. In the Reference Memo, Safety Analysis identified recent incidents where- in more timely involvement of Safety Analysis engineers would have lead to more efficient and, perhaps, less costly disposition of a problem. Early involvement of these engineers will help to assure that Safety Analysis is adequately prepared when called upon to address safety implications and that the lowest risk and lowest cost solution is negotiated with the customer and/or the NRC.

R. L. Pittman reviewed the procedures for resolution of SPR's (NPG-0503-04, Revision). He stated that preparation of required paper work may lag the incident by a few days or as much as two weeks. The problem surfaced by Safety Analysis is not believed to be a procedure or paper work problem. It was the concensus of those in attendance that encouraging Service Managers, Licensing engineers and Plant Integration personnel to obtain the advice and consultation of Safety Analysis personnel at the front-end of any significant site problem would do much to help alleviate the problem. Mr. Taylor suggested that provisions be made on the SPR Form to signify whether or not the item described does nor does not have potential safety (Safety Analysis) impact.

CONFIDENTIAL

The following action items were generated during the discussion:

1. Assure that Plant Integration is reviewing SPR Forms for potential safety impact and refer to Safety Analysis as appropriate.....D. H. ROY.
2. Initiate a procedure modification request to include provision on SPR Form to indicate that a determination of safety impact has been made.....J. H. TAYLOR
3. Formally encourage Licensing personnel to solicit early involvement of Safety Analysis personnel when notified of site problems or operational upsets with potential safety analysis impact.....J. H. TAYLOR
4. Encourage Service Managers and other appropriate Nuclear Service personnel to obtain the earliest possible involvement of Safety Analysis personnel in the resolution of site problems and operational upsets with potential safety analysis impact.....J. D. PHINNEY

DHR/dww



CONFIDENTIAL

D.W. LABELLE

THE BABCOCK & WILCOX COMPANY  
POWER GENERATION GROUP

To	D.W. LABELLE, MANAGER, SAFETY ANALYSIS	
From	R.O. VOSBURGH, SAFETY ANALYSIS (2176)	BOS 643.3
Cust.	ALL OPERATING PLANTS	File No. or Ref.
Subj.	SITE PROBLEMS REVIEW	Date APRIL 11, 1978

This letter is for the customer and the subject only.

A situation has been developing that I believe needs escalation by you to Department Manager level for a policy decision. Several recent site operational problems have occurred, e.g., FPC - LBP Rod Problem, SMLD - Loss of Site Power to the NNI, TMI-2, Failure of Anti-Rotational Device on Idle Pump and EMOV Opening on Loss of X-Cabinet Power. The approach, as I perceive it, has been to evaluate what went wrong, fix it and return to operation. There has been no formal Safety Analysis involvement in any of these evaluations. The lack of our involvement can have at least three detrimental consequences best illustrated by the following examples:

1. Impact on Contracts Presently Under NRC Review

By the time SA was asked to be involved in the TMI-2 pump incident, the NRC had done its homework. Without adequate time to prepare a position on three-pump Safety Analysis evaluation, the indications are that the NRC will require much more partial pump analysis on CPCO - Midland Docket. This may be cost-recoverable for us on Midland, but what about TVA?

2. Impact on Other Operational Plants

The NRC also intimated, in the example given above, that no B&W plant would be allowed 3-pump operation without extensive analysis. Further it appears that at least two Tech Spec Sections (3.2.2 and 3.2.3 in Std. Format) will need revisions for all B&W plants.

Items 1 and 2 may not have been averted by early SA involvement, but some mitigation of consequences could have been accomplished if prior knowledge and planning had been done.

3. Impact on Plant Safety and Current SA-NRC Licensing Philosophy

At the risk of sounding egotistic, no other Unit has the knowledge to assess whether or not a site problem constitutes a safety issue and/or violation of the Safety Analysis assumptions under which the plant is licensed. Examples of this are:

- a) Opening of EMOV on loss of X-cabinet power at TMI-2. If all operating plants' ICS are wired with this logic as was TMI-2, then any transient done with loss of offsite power is invalid.

CONFIDENTIAL

318 0846

E15 8868

D.W. LaBella  
Site Problems Review  
page 2  
April 11, 1978

THE  
POWE

To

From

Cust

Sub

b) Loss of NNI Power at SREED— Has a transient scenario been uncovered that creates a worse overcooling transient of moderate frequency than is currently evaluated? Can the results be correlated with our transient modes? There are many questions that need SSA attention.

c) Failure of Anti-Rotational Device on TMI-2— In addition to items 1 and 2, what were our could be the consequences of this on fuel integrity if it was not corrected prior to power escalation? Can this mode of operation be used for thermal mix code verification?

The purpose of the examples given in Item 3 are to indicate that neither Licensing, Nuclear Services, Fuels, Control Analysis, etc. are qualified to make safety evaluation judgments. Therefore, there must be an automatic mechanism in-place where Safety Analysis, through its Contracts Group, is brought on board at the initial stages of any site problem. Also, its (SA) involvement in the Task Force should be an automatic function.

I would appreciate your and D.H. Roy's comments on the above.

RDV:lw

cc: D.H. Roy

CONFIDENTIAL