

December 5, 1990

NOTE TO: D. F. Ross, Deputy Director
Office of Analysis and Evaluation
and Operational Data

FROM: W. D. Beckner, Chief /s/
Risk Applications Branch, NRR

SUBJECT: ISLOCA ANALYSIS REPORT FOR DAVIS BESSE

The attached report on the assessment of ISLOCA risks for Davis Besse is in draft form. It contains preliminary information, some of which currently is being revised by INEL. Also, portions of the report are being contested by the licensee. In view of this, RES has denied its release to a recent FOIA request on the basis that the information is predecisional. The attached copy is for your personal use and should not be distributed in any way outside NRC. If you have any questions regarding this, please contact me.

cc w/o enclosure:
S. Diab, NRR
G. Burdick, RES

DISTRIBUTION

WBeckner
KCampe
RAB r/f
RAB Chron

OFC	: SC.RAB:DREP:NRR	:	:	:	:
NAME	: K.Campe: <i>[Signature]</i>	:	:	:	:
DATE	: 12/5/90	:	:	:	:

OFFICIAL RECORD COPY
Document Name: NOTE TO D. ROSS

B-78

B-79

AN APPROACH TO
IDENTIFYING AND QUANTIFYING

HUMAN ERROR IN
SUPPORT OF ISLOCA

HAROLD S. BLACKMAN
DAVID I. GERTMAN

DECEMBER 11TH AND 12TH, 1990



*Idaho
National
Engineering
Laboratory*

 *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

AN INTEGRATED APPROACH TO HRA WAS USED

- 0 ENSURE ALL TYPES OF ACTIONS WERE CONSIDERED FOR PRELIMINARY EVENT TREES
- 0 IDENTIFY AND SCREEN HUMAN INTERACTIONS WHICH MAY BE RISK SIGNIFICANT
- 0 DEVELOP A DETAILED DESCRIPTION OF IMPORTANT HUMAN ACTIONS
- 0 SELECT AND APPLY APPROPRIATE MODELING TECHNIQUES
- 0 DEVELOP NEW MODELS WHERE EXISTING TECHNIQUES DO NOT ADEQUATELY REPRESENT HUMAN ACTIONS
- 0 QUANTIFY THE PROBABILITIES FOR THE VARIOUS HUMAN ACTIONS
- 0 DOCUMENT THE INFORMATION FOR TRACEABILITY

**ERRORS OF COMMISSION ARE NOT USUALLY MODELED IN
CONTEMPORARY PRA EFFORTS**

- 0 METHODS FOR IDENTIFYING AND QUANTIFYING ERRORS OF
OMISSION FOR USE IN CONTEMPORARY PRA ARE WELL
DEVELOPED**

- 0 METHODS FOR IDENTIFYING AND QUANTIFYING ERRORS OF
COMMISSION ARE LESS WELL DEVELOPED**

- 0 PRESENT STUDY SOUGHT METHODS TO IDENTIFY, MODEL, AND
QUANTIFY ERRORS OF COMMISSION**

ERROR IDENTIFICATION BROADENED TO INCLUDE PROBABLE ERRORS OF COMMISSION

- 0 ERRORS ARE NORMALLY IDENTIFIED THROUGH TASK ANALYSIS
- 0 DATA COLLECTION IS KEYED TO HRA QUANTIFICATION TECHNIQUES
- 0 STUDY APPLIED A VARIATION OF SNEAK ANALYSIS TO IDENTIFY POTENTIAL ERRORS

EXAMPLE FINDING FROM SNEAK ANALYSIS:
THE POTENTIAL FOR EARLY ENTRY INTO DHR COOLDOWN

- o WE FOUND
 - ADMINISTRATIVE BARRIERS NOT IDENTIFIED
 - OPERATORS ROUTINELY BYPASS PHYSICAL BARRIERS BY JUMPERING INTERLOCKS
 - PROCEDURALLY SANCTIONED TO JUMPER ONE PIV

- o THIS SUGGESTED A SNEAK PATH FOR THE ERROR OF COMMISSION RELATED TO PREMATURELY OPENING VALVES

QUANTIFICATION OF INTENTIONAL ERRORS OF COMMISSION

- 0 INSUFFICIENT OPERATIONAL DATA EXISTS TO SUPPORT THE QUANTIFICATION OF ERRORS OF COMMISSION RELATED TO ERRONEOUS INTENT
- 0 ERRORS OF INTENT ARE NOT TIME DRIVEN BUT ARE CONSCIOUS DECISIONS ON THE PART OF THE OPERATOR
- 0 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
- 0 ERRORS OCCUR IN THE THINKING AS MUCH AS IN THE DOING
- 0 THEREFORE THE ANALYST MUST USE EXPERT JUDGEMENT TECHNIQUES FOR QUANTIFICATION

A SENSITIVITY ANALYSIS WAS CONDUCTED WHICH EVALUATED THE EFFECTS OF THE FOLLOWING POTENTIAL MODIFICATIONS:

0 PROCEDURES

- CAUTIONS, NOTES, AND WARNINGS ADDED
- HYPOTHEZIZE A PROCEDURE FOR ISLOCA
- PRECLUDE JUMPERING OF INTERLOCKS

0 INSTRUMENTATION

- ADDITION OF VALVE STATUS BOARD
- PRESENTATION OF INFORMATION ON PRESSURES, TEMPERATURES, LEVEL, AND FLOW

0 TRAINING

- FORMAL TRAINING ON ISLOCA, ASSOCIATED ALARMS, NEW PROCEDURES

0 RECOVERY

- ALL TASKS COVERED BY PROCEDURES, CHECKOFFS, AND INDEPENDENT VERIFICATION

B-80

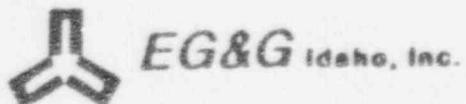


**Idaho
National
Engineering
Laboratory**

RUPTURE PROBABILITY CALCULATIONS

W. J. GALYEAN

DECEMBER 12, 1990



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).

- 0 PROBABILISTIC RUPTURE ANALYSES INCLUDES CONSIDERATION OF UNCERTAINTIES (EVEN WHEN POINT ESTIMATES ARE USED).

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
- 0 PUMPS

ESTIMATING REALISTIC FAILURE PRESSURES WAS A PRIME CONSIDERATION

0 PRESSURE CAPACITIES BASED ON ACTUAL (RATHER THAN CODE OR DESIGN) MATERIAL PROPERTIES OR ACTUAL TEST DATA.

System 20

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

to check failures and to produce

on basis of observed experience.

*Pressure and temperature
with this.*

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 MODEL 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:

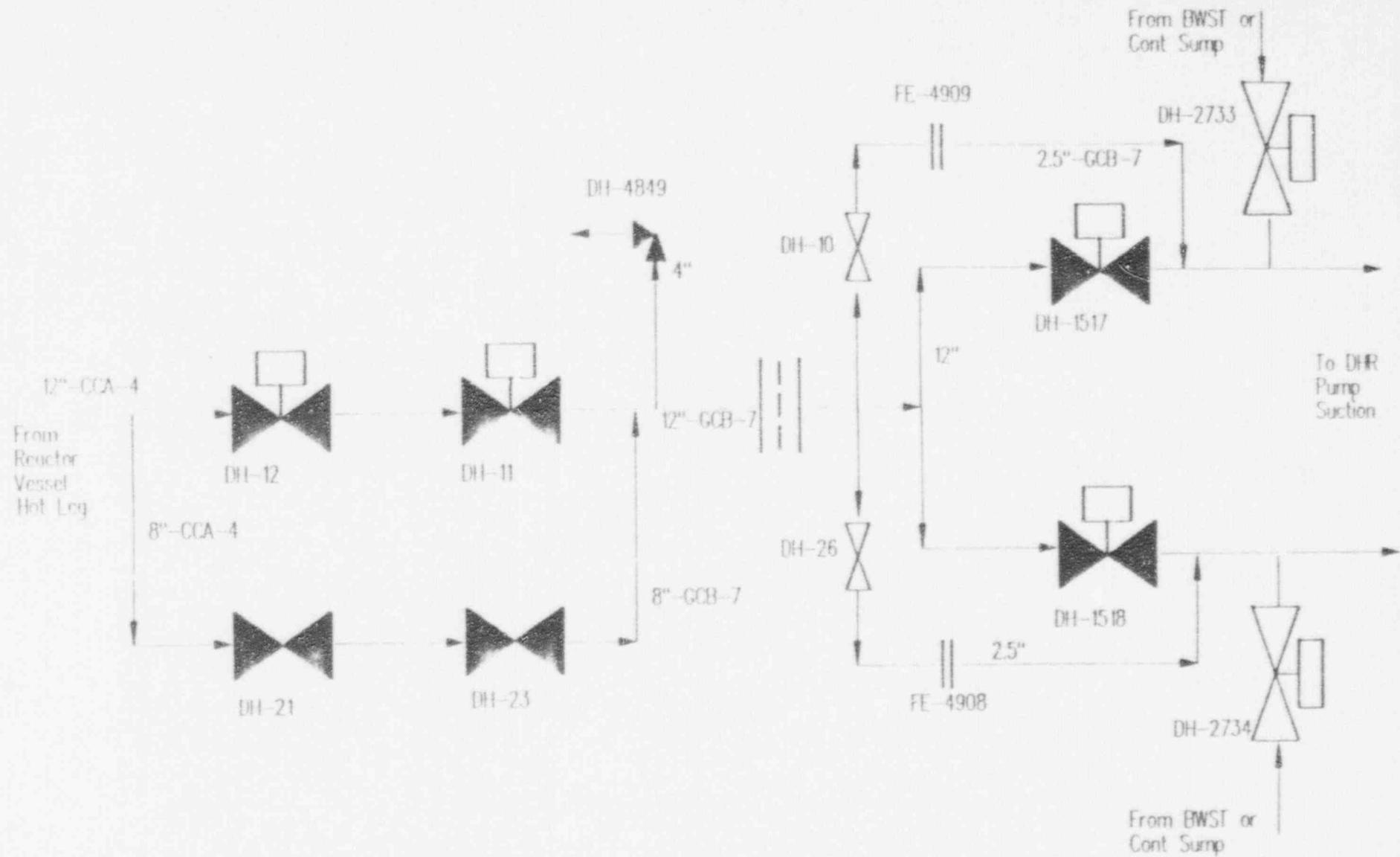
- 0 $P_L > P_F$, THEN COMPONENT RUPTURES,
- 0 $P_L < P_F$, THEN COMPONENT DOES NOT RUPTURE.
- 0 RUPTURE PROBABILITY IS FRACTION OF MONTE CARLO OBSERVATIONS RESULTING IN RUPTURES.

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)

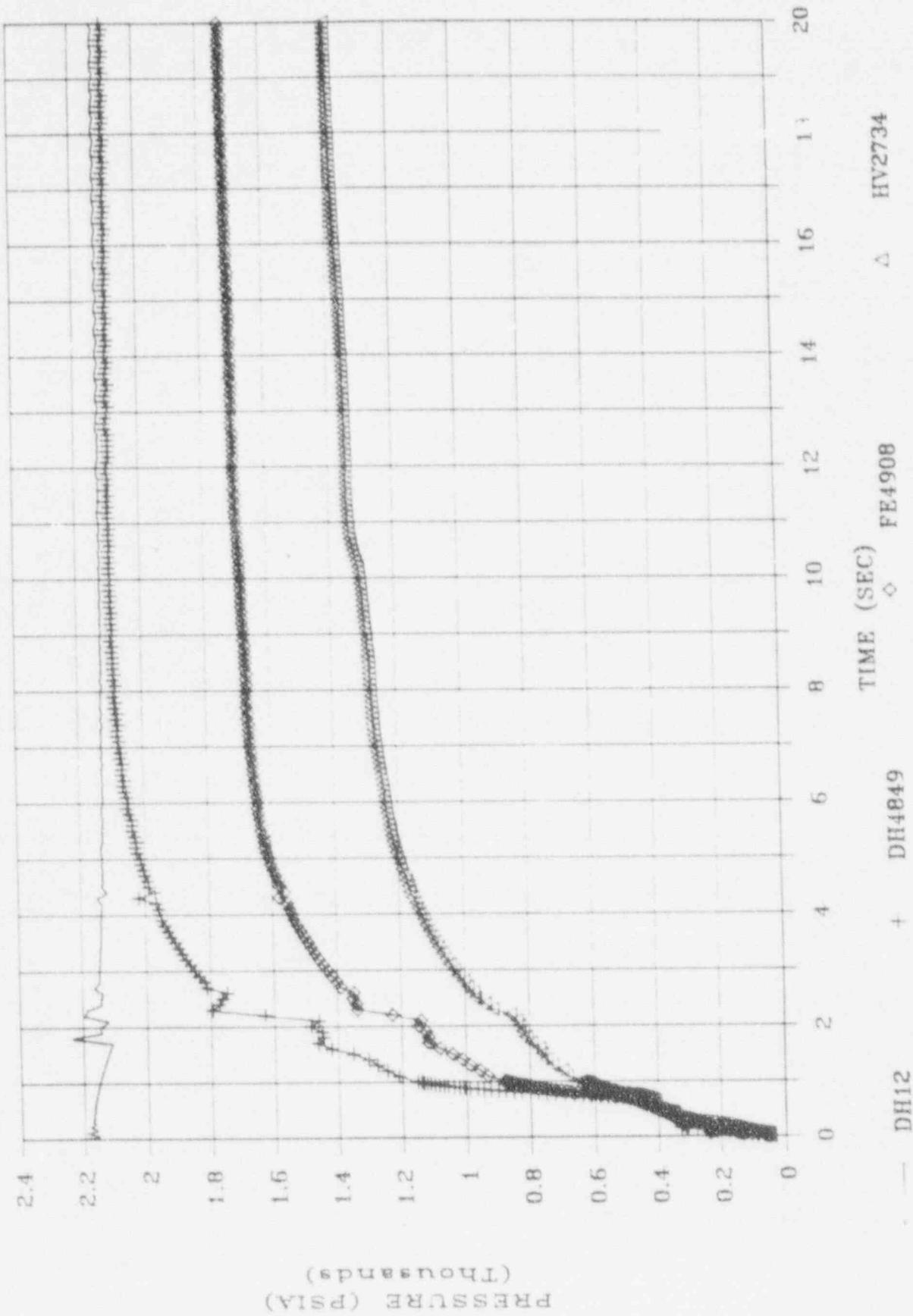
$$\begin{aligned}\text{PROB}(\text{FAIL PRESS} < 2100 \text{ PSIG}) &= \text{PHI}((\text{LN}(2100) - \text{LN}(1660)) / 0.36) \\ &= \text{PHI}(0.65) \\ \text{PROBABILITY OF RUPTURE} &= 0.742\end{aligned}$$

- 0 (REF: R. P. KENNEDY ET AL, NUCLEAR ENGINEERING AND
DESIGN, VOL.59, NO.2, AUGUST 1980.)



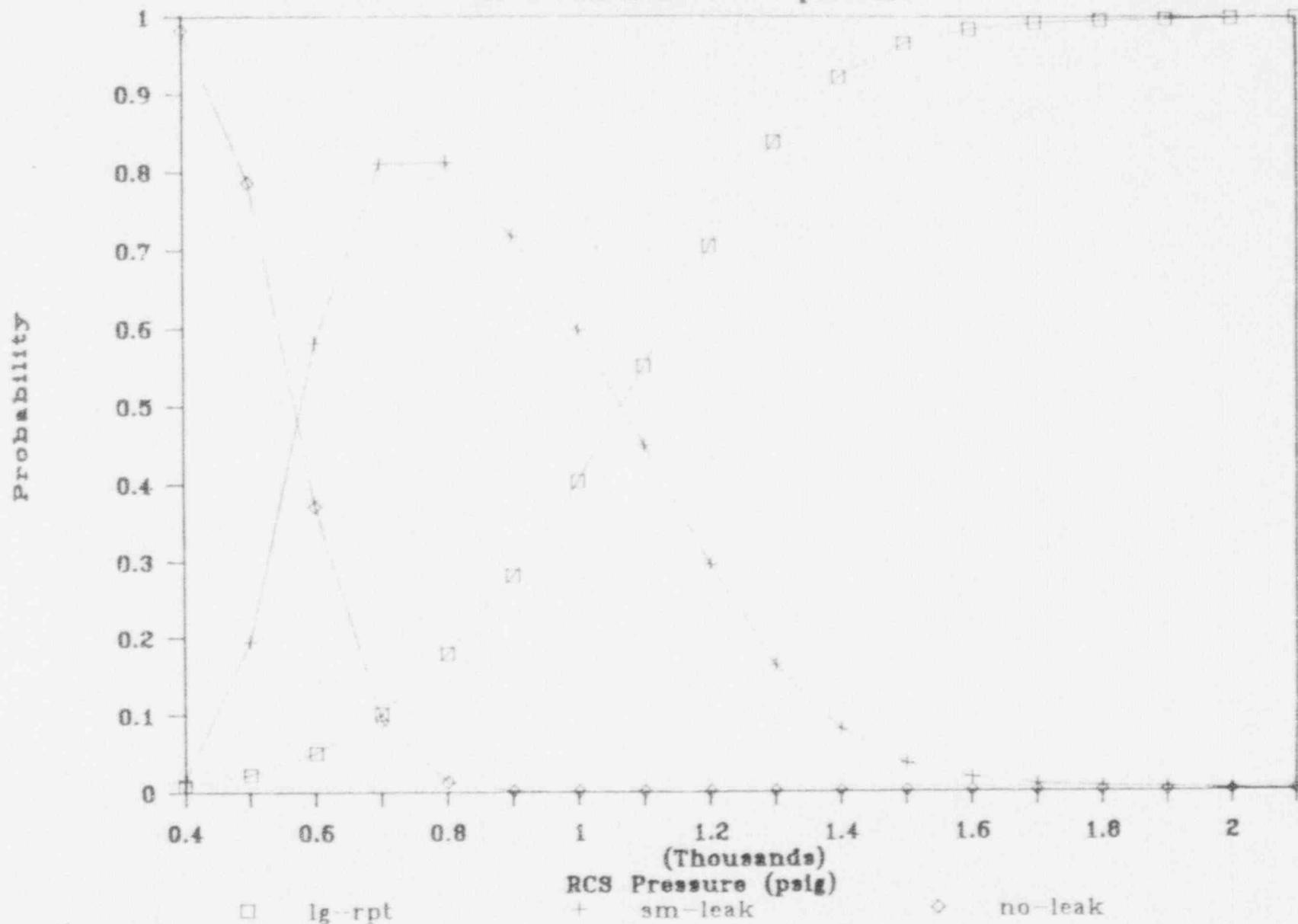
DIIR SHUTDOWN

2200 PSIA, 500 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

INEL

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

- O INTERFACING SYSTEMS WILL REACH MAXIMUM PRESSURE WITHIN
5 TO 7 SECONDS
 - THIS WILL NEGATE MOST BENEFIT EXPECTED FROM RCS
DEPRESSURIZATION
- O FLANGE AND SEAL LEAKS ARE POSSIBLE BUT ARE NOT EXPECTED
TO BE LARGE ENOUGH TO PROTECT OTHER EQUIPMENT
- O PIPE RUPTURES AND FAILURES OF HEAT EXCHANGERS ARE MOST
LIKELY

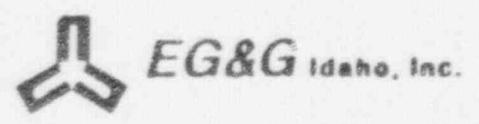
B-81

BACKGROUND AND APPROACH
FOR ISLOCA EVALUATIONS

DUANE J. HANSON
DECEMBER 11, 12 1990



*Idaho
National
Engineering
Laboratory*



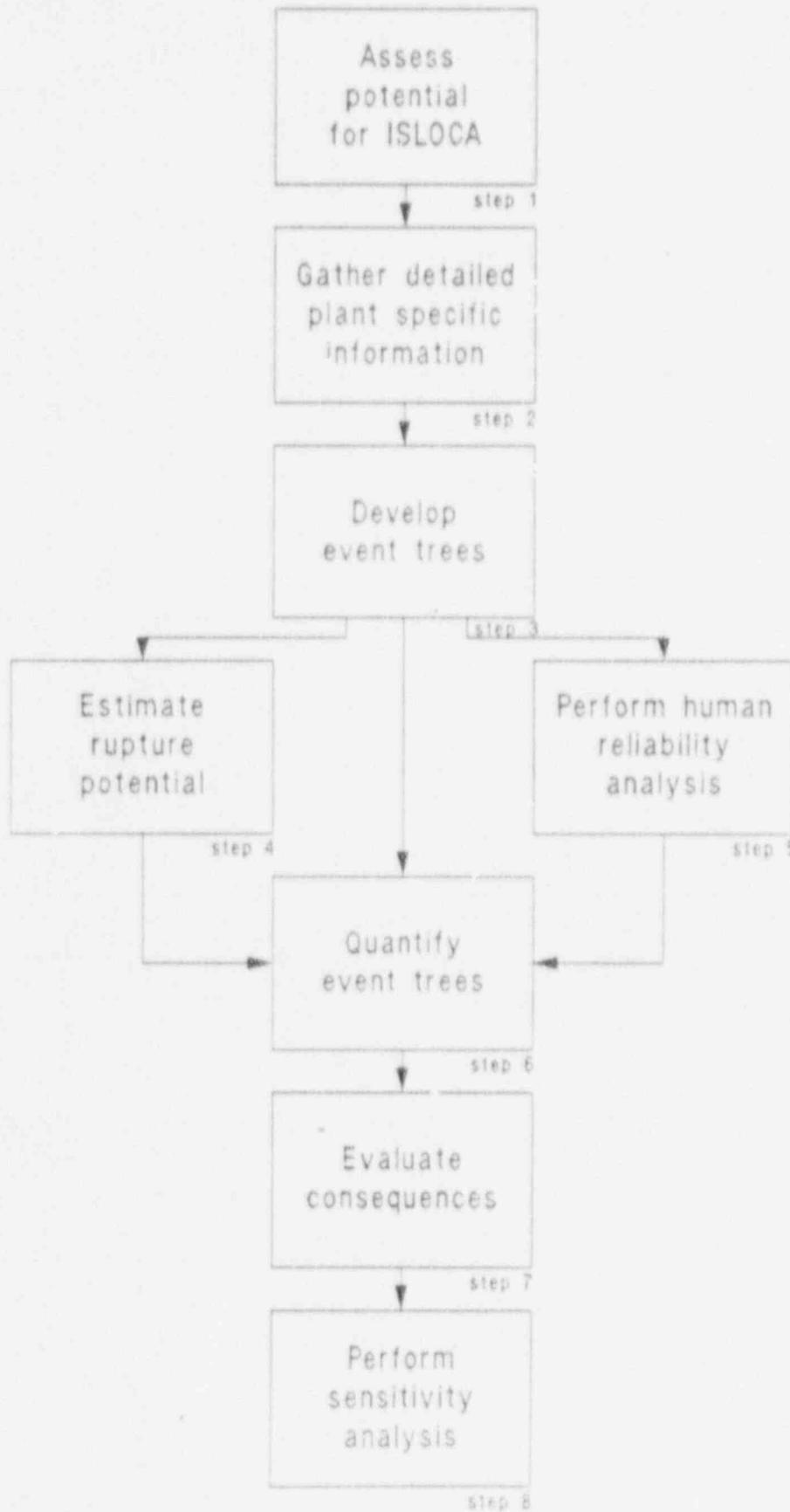
SKIP

ISLOCA PROGRAM OBJECTIVES (CONT.)

- IDENTIFY AND DESCRIBE POTENTIAL ISLOCA SEQUENCES
 - TIMING
 - ACCIDENT MANAGEMENT STRATEGIES
 - EFFECT ON OTHER EQUIPMENT

- ESTIMATE CONSEQUENCES OF POTENTIAL ISLOCA SEQUENCES
 - CORE MELT FREQUENCY
 - OFFSITE CONSEQUENCES
 - RECOMMEND CONSEQUENCE REDUCTION ACTIONS

Approach for Evaluation of ISLOCA



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 EFFECT ISLOCA
- INFORMATION ON MAINTENANCE AND IN-SERVICE TEST PRACTICES
- INFORMATION ON FACTORS THAT COULD INFLUENCE HUMAN PERFORMANCE FOR DETECTION, PREVENTION, AND MITIGATION

STEP 4 - ESTIMATE RUPTURE POTENTIAL

- ESTIMATE THE MEDIAN FAILURE PRESSURE, ITS EXPECTED DISTRIBUTION AND VARIANCE, AND THE POTENTIAL LEAK RATE FOR EACH COMPONENT (IMPEL RESULTS)
- 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 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 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 PROPOSED CHANGES TO PLANT HARDWARE AND OPERATIONS
- EXAMINE ALTERNATIVE METHODS OF ESTABLISHING PROBABILITIES

IMPORTANT RESULTS TO CONSIDER DURING
THE FOLLOWING PRESENTATIONS

- EFFECT OF HUMAN ACTIONS AS INITIATORS FOR ISLOCA
- RELATIVE CONTRIBUTION OF HUMAN ERRORS AND HARDWARE FAILURES TO ISLOCA CDF AND RISK
- COMPONENTS THAT WOULD FAIL WHEN EXPOSED TO OVERPRESSURE
- IMPORTANCE OF DETECTION, DIAGNOSIS, ISOLATION, AND MITIGATION IN REDUCING RISK
- CAPABILITY OF VALVES TO INITIATE AND TERMINATE AN ISLOCA
- INFLUENCE OF PROCEDURES, INSTRUMENTATION, AND TRAINING ON THE CAPABILITIES OF PLANT PERSONNEL TO REDUCE ISLOCA RISK

QUICKCHECK™

Data Collection

- A. Portable, Data Acquisition Box, consisting of the following components:
- TEAC RD101T Digital Audio Tape Recorder
 - Sophisticated digital signal processing circuitry
 - Rugged field carrying case
- B. QUICKCHECK™ Dual Sensors
- Combined accelerometer and Hall Effect sensor
 - Permanent-mounting option
 - Hermetically-sealed in stainless steel housing
 - Can be utilized in high radiation / high temperature environments
 - Standard (-40°F / -40°C to 300°F / 149°C) and high temperature (to 550°F / 288°C) designs
- C. Internal Magnets
- High strength, high temperature Samarium Cobalt magnet
 - Magnet housing either welded or ^{braced} bonded to the check valve hinge arm or disk

B-86

QUICKCHECK™

Advanced Digital Signal Processing

- A. Pre-conditioning circuitry for: power supply, zeroing, gain, and filtering
- B. Post-conditioning circuitry which allows:
- Striking diagnostics due to the detailed display of data sampled at 20 KHz
 - Detection of metal-to-metal contact (such as hinge pin / arm wear) through a ~~4~~^{1.5} KHz filter
 - Qualification of flow and low frequency flutter through a ~~200~~² Hz filter
- C. Four primary data acquisition channels:
- 2 dedicated acoustic channels displayed in raw, high pass filtered, and low pass filtered formats
 - 2 universal channels available for magnetic, acoustic, or alternative transducers (pressure, temperature, or flow)

QUICKCHECK™

Analysis Hardware and Software

A. Hardware

- COMPAQ 386 desktop computer with such features as: 1 MB RAM, 100 MB hard disk, VGA color graphics, 44 MB Berrioulli drive, 80387 math coprocessor, *A/D Card, ...*
- HP Paintjet color inkjet printer

B. Advanced menu-driven software

- Zoom, vertical expansion, and scrolling
- Pull-down menus with pop-up windows
- Displays any 2 channels of data at one time
- FFT and RMS calculation capability
- Event labeling
- Display of 20 seconds of data (sampled at 20KHz)
- Data transfer to Lotus 1-2-3 or DBASE
- Automated report generation

QUICKCHECK™

BENEFITS

- I. Fast, accurate, and reliable
- II. Minimizes disassemblies and inspections
- III. Works on all common check valve sizes, types, and materials
- IV. Reduces radiation exposure levels for check valve diagnostics
- V. Satisfies SOER 86-03 and GL 89-04 concerns