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September 20, 1995 ND3MNO:3716

Beaver Valley Power Station, Unit No. 1 Docket No. 50-334, Licensee No. DPR-66 LER 95-007-00

United States Nuclear Regulatory Commission Document Control Desk Washington, DC 20555

In accordance with Appendix A, Beaver Valley Technical Specifications, the following Licensee Event Report is submitted:

LER 95-007-00, 10 CFR 50.73.a.2.ii.B, "Residual Heat Removal System Overpressure Protection Deficiency".

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General Manager Nuclear Operations

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Attachment

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PDR

The Nuclear Professionals

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cc: Mr. T. T. Martin, Regional Administrator
United States Nuclear Regulatory Commission
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FORM 366 (5-92) U.S. NUCLEAR REGULATORY COMMISSION LICENSEE EVENT REPORT (LER) (See reverse for required number of digits/characters for each block)							ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.									
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ABSTRACT (Limited to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

On 8/21/95, a review of a vendor advisory letter identified a potential weakness in overpressure protection involving the residual heat removal (RHR) system. The RHR system design pressure is 600 psig. Overpressurization analysis allows up to 110 percent of design pressure for design basis overpressure transient events. The RHR system relief valve is located downstream of the RHR pumps and heat exchangers with a nominal setpoint of 600 psig. An overpressure condition can potentially occur if the RHR system pressure is raised to its design maximum at the inlet to the RHR pumps. The relief valve is assumed to be relieving at 110 percent of design pressure (660 psig, which corresponds to 600 psig setpoint and 10 percent accumulation). This corresponds to an inlet heat exchanger pressure of 690 psig, if it is conservatively assumed that a pressure restriction of approximately 30 psig is provided by the RHR heat exchangers. This potential pressure will exceed the design rating of the heat exchanger. The cause for this event is a design error. Administrative controls have been established governing the RHR and Overpressure Protection systems (OPPS). Safety implications were limited. During RCS heatup and cooldowns, there was a 21 degree range during which RHR may have been in service without OPPS, however the RHR relief valve was not challenged during these evolutions.

NRC FORM 366 (5-92)

NRC FORM 366 (5-92) • LICENSEE EVENT REPOR TEXT CONTINUATION	ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MINBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET WASHINGTON DC 20403					
FACILITY NAME (1)	DOCKET NUMBER (2)		PAGE (3)			
Beaver Valley Power Station	05000334	YEAR 95	SEQUENTIAL NUMBER	REVISION NUMBER 00	2 OF 3	
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TEXT (If more space is required, use additional copies of NRC Form 3664) (17)

DESCRIPTION OF EVENT

On 8/21/95, a review of a vendor advisory letter, NSAL-95-003 "Potential to Exceed 110% of RHRS Design Pressure", identified an overpressure protection deficiency involving the residual heat removal (RHR) system and relief valve located on the discharge side of the RHR pumps. The BVPS RHR system design pressure is 600 psig. Overpressurization analysis allows up to 110 percent of design pressure for design basis overpressure transient events. The BVPS RHR system relief valve is located downstream of the RHR pumps and heat exchangers with a nominal setpoint of 600 psig. An overpressure condition can potentially occur if a design basis transient raises pressure at the inlet to the RHR relief valve to its setpoint. The relief valve is assumed to be passing design flowrate due to the design basis transient occurring. The relief valve is designed to reach rated relief capacity with 10% accumulation (i.e. 660 psig, which corresponds to 600 psig setpoint and 10 percent accumulation). Accounting for a conservative estimate of a pressure restriction of approximately 30 psig provided across the RHR heat exchangers by the operating RHR pump, the inlet heat exchanger pressure would be 690 psig. This potential pressure will exceed the design pressure allowance of the heat exchanger during the design basis event. Refer to Figure 1.



NRC FORM 366 (5-92) LICENSEE EVENT REPORT TEXT CONTINUATION	ESTIMATED BURD. SHOWS TO COMPLY WITH THIS INFORMATION COLLECT, JN REQUEST 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0164), OFFICE OF MANAGEMENT AND BUIDES' WASHINGTON, DC 20503					
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TEXT (If more space is required, use additional copies of NRC Form 3664) (17)

CAUSE OF THE EVENT

The cause of the event is inadequate consideration of operating conditions during the initial design and analysis of the RHR overpressure protection system. The design basis pressure for the RHR system, including piping and all components downstream of the RHR pumps, is 600 psig. The RHR overpressure protection system is required by ASME to prevent pressure from exceeding 660 psig (110 percent of design). It appears that the initial design completed during the construction of the station may not have recognized that RHR flow-induced pressure drop across the RHR heat exchanger, which is generated during normal RHR system operation, needed to be considered in the relief valve setpoint calculation.

CORRECTIVE ACTIONS

- The station shutdown and startup procedures have been revised to require the RCS overpressure protection system (OPPS) to be placed into service whenever the RHR system in service. OPPS will provide adequate overpressure protection for the RHR system.
- The Unit 2 RHR system design was reviewed for applicability. This review determined that this potential condition does not apply for Beaver Valley Power Station Unit 2, which has the relief valve located on the suction side of the RHR pump.
- 3. An operating experience entry describing this event will be issued on the Nuclear NETWORK system.

REPORTABILITY

This event is being reported in accordance with 10CFR50.a.2.ii.B, as a event or condition that resulted in the nuclear power plant being in a condition that was outside the design basis of the plant.

SAFETY IMPLICATIONS

There were minimal safety implications as a result of this event. During previous RCS heatups and cooldowns at BVPS, there was a 21 degree range during which RHR could have been in service without OPPS being in service. It was in this 21 degree range where RHR system overpressure protection had not been previously assured. RHR pressure never challenged the RHR relief valve during these heatup and cooldown periods.

PREVIOUS SIMILAR EVENTS

There are no previously reported events involving the design of the residual heat removal system.