August 11, 1992

Docket No. 50-346

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PDIII-3 Reading
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Region III, DRP

Mr. Donald C. Shelton
Vice President, Nuclear - Davis-Besse
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c/o Toledo Edison Company
300 Madison Avenue
Toledo, Ohio 43652

Dear Mr. Shelton:

SUBJECT: RISK-BASED INSPECTION GUIDE (RIG)

This is in reference to the development of Risk-Based Inspection Guides (RIGs) to be published as NUREGs under a USNRC Technical Assistance Program with National Laboratories. The RIGs are intended to provide useful guidance for USNRC inspection activities.

The purpose of this letter is to inform you that we are planning to send our contractor, Tom Vehec of Pacific Northwest Laboratories, to visit your plant, Davis-Besse, on August 25, 1992. The visiting contractor will accompany the resident inspector in a system walkdown and verify the accuracy of the information. During this visit, they will be available to meet your staff and receive comments from you regarding the RIG in order to ensure that your plant status is accurately reflected. However, we would like to clarify that your participation during the visit will be strictly voluntary. We are enclosing a draft copy of the RIG, and if you choose to participate during the visit, please inform me and the RIG project coordinator, Dr. Jin Chung (301) 504-1071.

Your cooperation with us in this matter is appreciated.

Sincerely,

/S/

Jon B. Hopkins, Sr. Project Manager
Project Directorate III-3
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

Enclosure:
1. Draft RIG

cc:
See next page

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PKreutzer	JHopkins/bj	JHannon
8/11/92	8/11/92	8/11/92

DOCUMENT NAME: A:\RISKBS.RIG

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ENCLOSURE

NUREG/CR-
PNL-

AUXILIARY FEEDWATER SYSTEM RISK-BASED INSPECTION GUIDANCE FOR THE DAVIS-BESSE NUCLEAR POWER PLANT

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July 1991

Prepared for
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SUMMARY

This document presents a compilation of auxiliary feedwater (AFW) system failure information which has been screened for risk significance in terms of failure frequency and degradation of system performance. It is a risk-prioritized listing of failure events and their causes that are significant enough to warrant consideration in inspection planning at the Davis-Besse plant. This information is presented to provide inspectors with increased resources for inspection planning at Davis-Besse.

The risk importance of various component failure modes was identified by analysis of the results of probabilistic risk assessments (PRAs) for many pressurized water reactors (PWRs). However, the component failure categories identified in PRAs are rather broad, because the failure data used in the PRAs is an aggregate of many individuals failures having a variety of root causes. In order to help inspectors to focus on specific aspects of component operation, maintenance and design which might cause these failures, an extensive review of component failure information was performed to identify and rank the root causes of these component failures. Both Davis-Besse and industry-wide failure information was analyzed. Failure causes were sorted on the basis of frequency of occurrence and seriousness of consequence, and categorized as common cause failures, human errors, design problems, or component failures.

This information is presented in the body of this document. Section 3.0 provides brief descriptions of these risk-important failure causes, and Section 5.0 presents more extensive discussions, with specific examples and references. The entries in the two sections are cross-referenced.

An abbreviated system walkdown table is presented in Section 3.2 which includes only components identified as risk important. This table lists the system lineup for normal, standby system operation.

This information permits an inspector to concentrate on components important to the prevention of core damage. However, it is important to note that inspections should not focus exclusively on these components. Other components which perform essential functions, but which are not included because of high reliability or redundancy, must also be addressed to ensure that degradation does not increase their failure probabilities, and hence their risk importances.

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1.0 INTRODUCTION

This document is the eighteenth of a series providing plant-specific inspection guidance for auxiliary feedwater (AFW) systems at pressurized water reactors (PWRs). This guidance is based on information from probabilistic risk assessments (PRAs) for similar PWRs, industry-wide operating experience with AFW systems, plant-specific AFW system descriptions, and plant-specific operating experience. It is not a detailed inspection plan, but rather a compilation of AFW system failure information which has been screened for risk significance in terms of failure frequency and degradation of system performance. The result is a risk-prioritized listing of failure events and their causes that are significant enough to warrant consideration in inspection planning at Davis-Besse.

This inspection guidance is presented in Section 3.0, following a description of the Davis-Besse AFW system in Section 2.0. Section 3.0 identifies the risk important system components by Davis-Besse identification number, followed by brief descriptions of each of the various failure causes of that component. These include specific human errors, design deficiencies, and hardware failures. The discussions also identify where common cause failures have affected multiple, redundant components. These brief discussions identify specific aspects of system or component design, operation, maintenance, or testing for inspection by observation, records review, training observation, procedures review, or by observation of the implementation of procedures. An AFW system walkdown table identifying risk important components and their lineup for normal, standby system operation is also provided.

The remainder of the document describes and discusses the information used in compiling this inspection guidance. Section 4.0 describes the risk importance information which has been derived from PRAs and its sources. As review of that section will show, the failure events identified in PRAs are rather broad (e.g., pump fails to start or run, valve fails closed). Section 5.0 addresses the specific failure causes which have been combined under these broad events.

AFW system operating history was studied to identify the various specific failures which have been aggregated into the PRA failure events. Section 5.1 presents a summary of Davis-Besse failure information, and Section 5.2 presents a review of industry-wide failure information. The industry-wide information was compiled from a variety of NRC sources, including AEOD analyses and reports, information notices, inspection and enforcement bulletins, and generic letters, and from a variety of INPO reports as well. Some Licensee Event Reports and NPRDS event descriptions were also reviewed individually. Finally, information was included from reports of NRC-sponsored studies of the effects of plant aging, which include quantitative analyses of reported AFW system failures. This industry-wide information was then combined with the plant-specific failure information to identify the various root causes of the broad failure events used in PRAs, which are identified in Section 3.0.

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2.0 DAVIS-BESSE AFW SYSTEM

This section presents an overview of the Davis-Besse AFW system, including a simplified schematic system diagram. In addition, the system success criterion, system dependencies, and administrative operational constraints are also presented.

2.1 System Description

The AFW system consists of two turbine (TDAFW) and one motor driven (MDFW) pump which is used in the event that both TDAFW pumps are not available. The AFW system provides feedwater to the steam generators (SG) to allow secondary-side heat removal when main feedwater is not available and to promote natural circulation of the Reactor Coolant System (RCS) in the event of a loss of all four reactor coolant pumps. The system is capable of functioning for extended periods during a total loss of offsite power or a loss of the main feedwater system. This allows time to restore offsite power or main feedwater flow or to proceed with an orderly cooldown of the plant to the point where the decay heat removal system (DHR) can remove decay heat. A simplified schematic of the Davis-Besse AFW system is shown in Figure 2.1.

The AFW system consists of two turbine-driven pumps (TDAFW), a motor-driven feed pump (MDFP) that provides feedwater to the steam generators if both turbine driven pumps are unavailable, two Condensate Storage Tanks (CSTs), and associated piping, valves and instrumentation. Feedwater is supplied to the TDAFW and MDFW pumps from the CSTs through a common suction header. The TDAFW and MDFW pumps are capable of supplying either steam generator. Steam is supplied to both TDAFW turbines from either SG or the auxiliary steam system, through automatically controlled motor operated valves (MS 106, 106A, 107, and 107A) located upstream of the main steam isolation valves. The TDAFW and MDFW pumps are equipped with a continuous recirculation flow system, which prevents pump deadheading.

The system is designed to start up, establish, and control SG level automatically. Both TDAFW pumps will start upon any of the following conditions and initiate auxiliary feedwater flow:

- Either SG level less than 23.5" as indicated on startup range instrumentation.
- Loss of all four RCPs.
- Either SG pressure 177 psig greater than main feedwater pressure.
- Either SG pressure less than 612 psig.
- High SG level of 225"/215" (#1/#2 respectively) on startup range instrumentation.

Each TDAFW pump discharges through check valves to one or both SGs. The TDAFW pumps are normally aligned to supply their respective SG, however, depending upon plant conditions, cross connect valves (AF 3869, AF 3870, AF 3871, and AF 3872) can be realigned to feed both SGs with either TDAFW pump or to feed each SG with the opposite TDAFW pump. The AFW line for both SGs is equipped with a flow element, flow transmitter, and a flow control valve that controls AFW flow to a predetermined SG level.

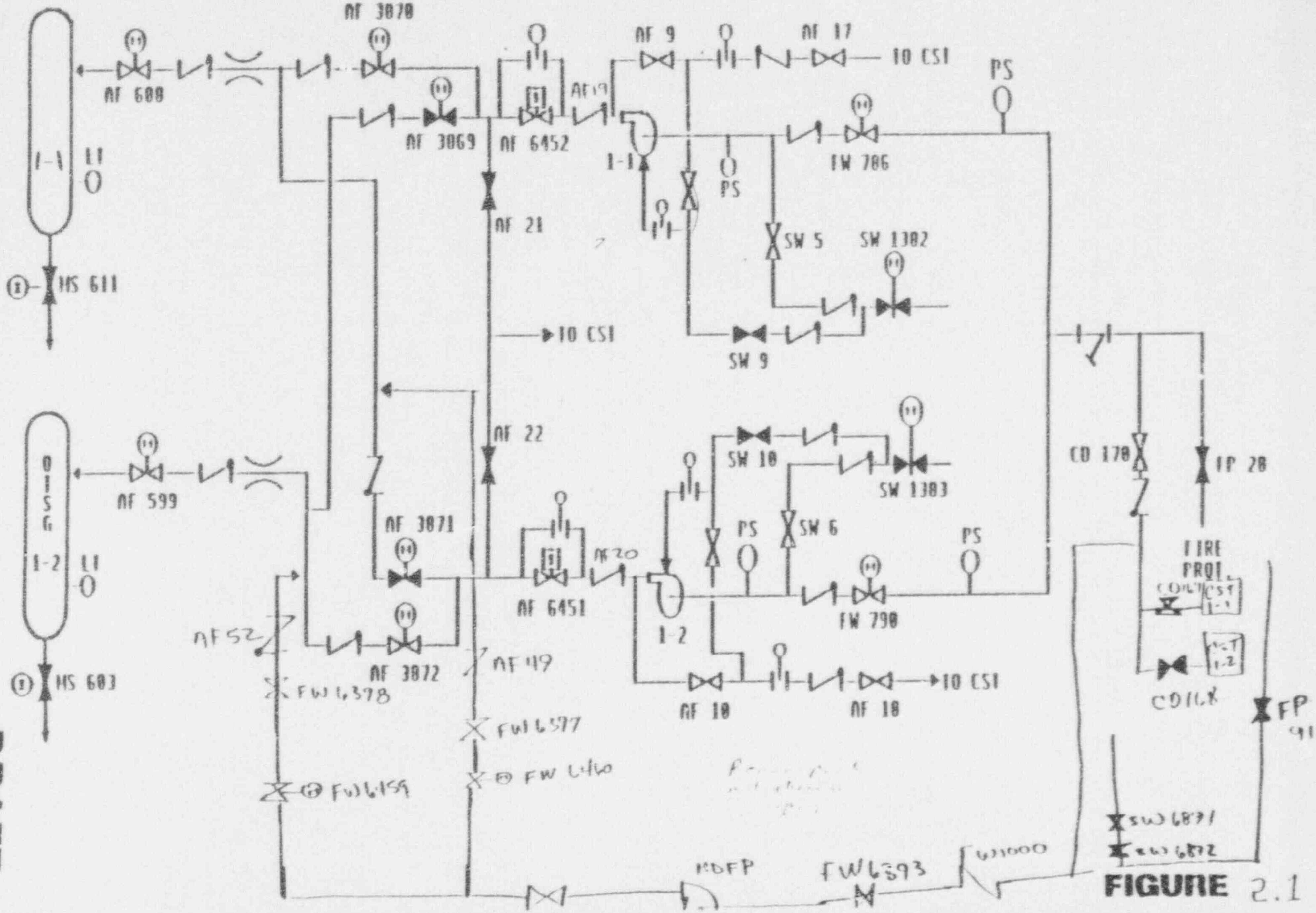

FIGURE 2.1

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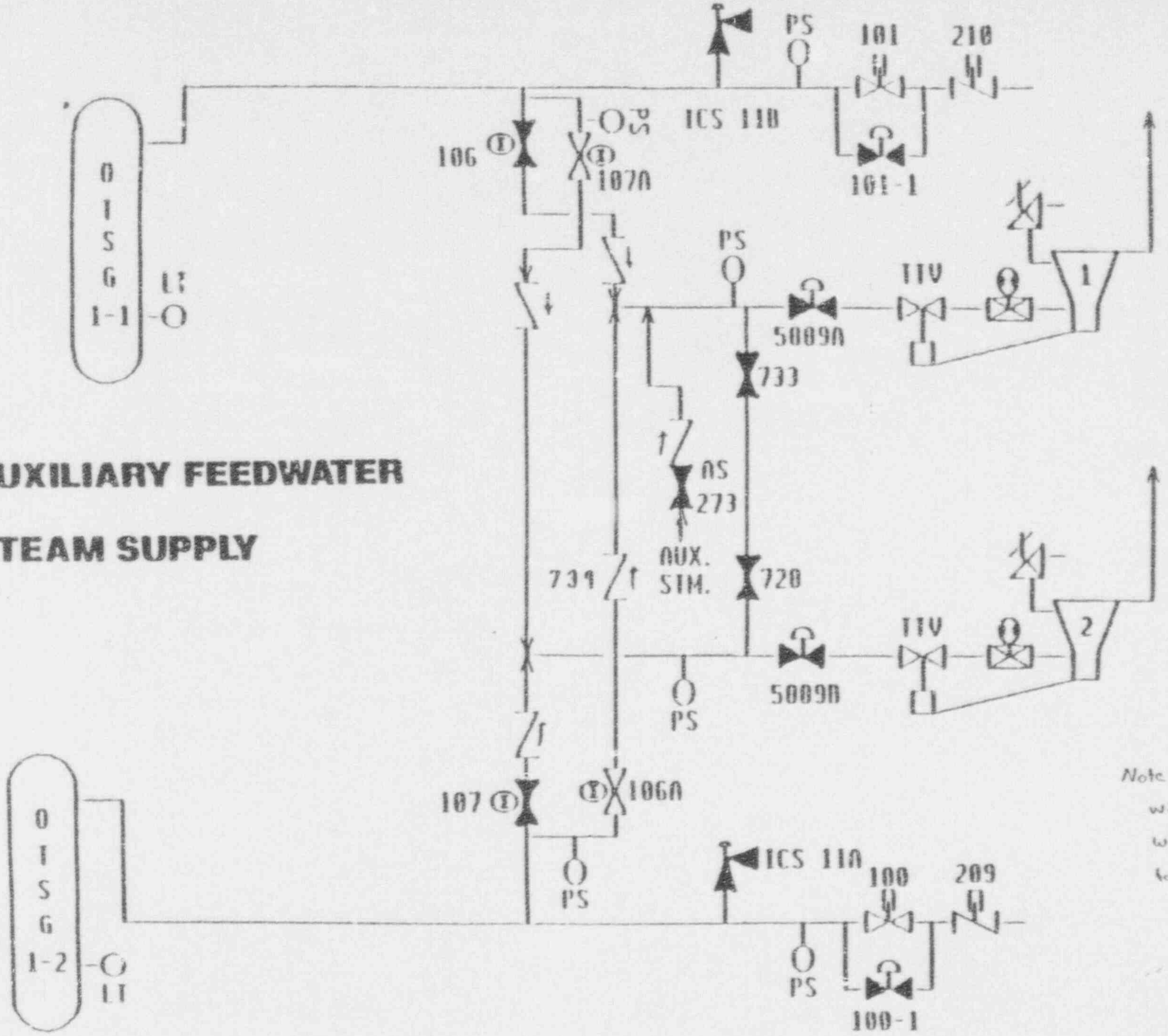
AUXILIARY FEEDWATER STEAM SUPPLY



Note: This figure
will be combined
with figure 2.1
for the final rep

FIGURE 2.2

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The #1 Main Steam line supplies both the #1/#2 TDAFW pumps via MS 106/107A. The #2 MS Line supplies both the #2/#1 TDAFW pumps via MS 107/106A. Normally MS 106A and MS 107A are open and MS 106 and MS 107 are closed. Depending on which Steam Feed and Rupture Control System (SFRCS) trip occurs, both TDAFW pumps can be supplied from both MS lines simultaneously (MS 106, 106A, 107, 107A all open) or both TDAFW pumps can be supplied from either MS line (MS106/107A open and MS 107/106A closed or MS 106/107A closed and MS 107/106A open).

In addition to dual, redundant steam supply and discharge headers, power, control, and instrumentation associated with the two AFW system trains are independent from each other.

The two condensate storage tanks are the normal source of water for the AFW system. The tanks are required to store a sufficient quantity of demineralized water (250,00 gallons) to maintain the reactor coolant system (RCS) at hot standby conditions for 13 hours and then to cool the RCS to 280 degrees F, at which point the DHR system is put in service. The administratively controlled, locked open and locked closed valve configuration requires that one CST discharge valve (CD 167 or CD 168) be locked open to supply the AFW system. Backup AFW supply is provided by the Service Water system. Additionally, the Fire Protection system can be aligned to provide backup supply to the AFW system.

2.2 Success Criterion

System success requires the operation of at least one TDAFW pump supplying a minimum of 600 gpm to at least one of the two steam generators within 40 seconds after a loss of all main feedwater.

2.3 System Dependencies

The AFW system depends on AC and DC power at various voltage levels for TDAFW turbine governors, motor operated valve control circuits, solenoid valves, and monitor and alarm circuits. Instrument Air is required for the Main Steam Admission valves (MS 5889A/5889B). Steam availability is required for the TDAFW pumps.

2.4 Operational Constraints

When the reactor is in MODEs 1, 2, or 3 (Hot Standby through Power Operation), Davis-Besse Technical Specifications require two independent TDAFW pumps and associated flow paths (steam and water) and the MDFW pump and associated flow path to the AFW system to be OPERABLE. If one train of AFW or the MDFW pump or flow path becomes inoperable, it must be restored to operable status within 72 hours or the unit must be placed in hot shutdown within the next 12 hours. With any TDAFW Inlet Steam Pressure Interlocks inoperable, the interlocks must be returned to OPERABLE status within 7 days or the unit must be in hot shutdown within the next 12 hours.

Davis-Besse Technical Specifications require the condensate storage facilities (CST and deaerator storage tank) to be operable with a minimum contained water volume of at least 250,000 gallons.

With the condensate storage facilities inoperable, within 4 hours either the condensate storage facilities are to be returned to OPERABLE status or the service water system is to be demonstrated to be OPERABLE as a backup supply to the AFW system and the condensate storage facilities are to be returned to OPERABLE status within 7 days or place the unit in hot shutdown within 12 hours.

3.0 INSPECTION GUIDANCE FOR THE DAVIS-BESSE AFW SYSTEM

In this section the risk important components of the Davis-Besse AFW system are identified, and the important failure modes for these components are briefly described. These failure modes include specific human errors, design deficiencies, and types of hardware failures which have been observed to occur for these components, both at Davis-Besse and at PWRs throughout the nuclear industry. The discussions also identify where common cause failures have affected multiple, redundant components. These brief discussions identify specific aspects of system or component design, operation, maintenance, or testing for observation, records review, training observation. procedures review, or by observation of the implementation of procedures.

Table 3.1 is an abbreviated AFW system walkdown table which identifies risk- important components. This table lists the system lineup for normal (standby) system operation. Inspection of the identified components addresses essentially all of the risk associated with AFW system operation.

3.1 Risk Important AFW Components and Failure Modes

Common cause failures of multiple pumps are the most risk-important failure modes of AFW system components. These are followed in importance by single pump failures, level control valve failures, and individual check valve leakage failures.

The following sections address each of these failure modes, in decreasing order of risk-importance. They present the important root causes of these component failure modes which have been distilled from historical records. Each item is keyed to discussions in Section 5.2 where additional information on historical events is presented.

3.1.1 Multiple Pump Failures due to Common Cause

The following listing summarizes the most important multiple-pump failure modes identified in Section 5.2.1, Common Cause Failures, and each item is keyed to entries in that section.

- Incorrect operator intervention into automatic system functioning, including improper manual starting and securing of pumps, has caused failure of all pumps, including overspeed trip on startup, and inability to restart prematurely secured pumps. At Davis-Besse, control switch mispositioning has caused both of the TDAFW pumps to trip on overspeed. CC1.

- Valve mispositioning has caused failure of all pumps. Pump suction, steam supply, and instrument isolation valves have been involved. CC2.

- Steam binding has caused failure of multiple pumps. This resulted from leakage of hot feedwater past check valves into a common

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discharge header, with several valves involved including a motor-operated discharge valve. (See item 3.1.8 below.) CC10. Multiple-pump steam binding has also resulted from improper valve lineups, and from running a pump deadheaded. CC3.

- Pump control circuit deficiencies or design modification errors have caused failures of multiple pumps to auto start, spurious pump trips during operation, and failures to restart after pump shutdown. CC4. Incorrect setpoints and control circuit calibrations have also prevented proper operation of multiple pumps. CC5.
- Loss of a vital power bus has failed both the turbine-driven and one motor-driven pump due to loss of control power to steam admission valves or to turbine controls, and to motor controls powered from the same bus. CC6.
- Simultaneous startup of multiple pumps has caused oscillations of pump suction pressure causing multiple-pump trips on low suction pressure, despite the existence of adequate static net positive suction head (NPSH). CC7. Design reviews have identified inadequately sized suction piping which could have yielded insufficient NPSH to support operation of more than one pump. CC8.

3.1.2 Turbine Driven Pump Fails to Start or Run

- Improperly adjusted and inadequately maintained turbine governors have caused pump failures. HE2. Problems include worn or loosened nuts, set screws, linkages or cable connections, oil leaks and/or contamination, and electrical failures of resistors, transistors, diodes and circuit cards, and erroneous grounds and connections. CF5. Improperly adjusted governors have occurred at Davis-Besse.
- Terry turbines with Woodward Model EG governors have been found to overspeed trip if full steam flow is allowed on startup. Sensitivity can be reduced if a startup steam bypass valve is sequenced to open first. DE1.
- Condensate slugs in steam lines have caused turbine overspeed trip on startup. Tests repeated right after such a trip may fail to indicate the problem due to warming and clearing of the steam lines. Surveillance should exercise all steam supply connections. DE2.
- Trip and throttle valve (TTV) problems which have failed the turbine driven pump include physically bumping it, failure to reset it following testing, and failures to verify control room indication of reset. HE2. Whether either the overspeed trip or TTV trip can be reset without resetting the other, indication in the control room of TTV position, and unambiguous local indication of an overspeed trip affect the likelihood of these errors. DE3.
- Turbines with Woodward Model PG-PL governors have tripped on overspeed when restarted shortly after shutdown, unless an operator

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has locally exercised the speed setting knob to drain oil from the governor speed setting cylinder (per procedure). Automatic oil dump valves are now available through Terry. DE4.

- Stress corrosion cracking caused failure of the turbine-driven pump, allowing the final stage shaft sleeve to rub and eventually become friction welded to the stationary final stage piece of the pump.

3.1.3 Motor Driven Pump Fails to Start or Run

- Control circuits used for automatic and manual pump starting are an important cause of motor driven pump failures, as are circuit breaker failures. CF7.

- Mispositioning of handswitches and procedural deficiencies have prevented automatic pump start. HE3.

- Low lubrication oil pressure resulting from heatup due to previous operation has prevented pump restart due to failure to satisfy the protective interlock. DE5.

3.1.4 Pump Unavailable Due to Maintenance or Surveillance

- Both scheduled and unscheduled maintenance remove pumps from operability. Surveillance requires operation with an altered line-up, although a pump train may not be declared inoperable during testing. Prompt scheduling and performance of maintenance and surveillance minimize this unavailability.

3.1.5 Air Operated Valves Fail Closed

TDAFW Steam Admission valves: MS 5889A, 5889B

These normally closed air operated valves (AOVs) Admit steam to the TDAFW turbine. They fail open on loss of Instrument Air.

- Control circuit problems have been a primary cause of failures. CF9. Valve failures have resulted from blown fuses, failure of control components (such as current/pneumatic convertors), broken or dirty contacts, misaligned or broken limit switches, control power loss, and calibration problems. Degraded operation has also resulted from improper air pressure due to the wrong type of air regulator being installed or leaking air lines.

- Inadequate air pressure regulation has resulted in control valve failure to operate.

3.1.6 Motor Operated Valves Fail Closed

TDAFW Flow Control valves: AF 6451, 6452

TDAFW Pump Discharge Isolation: AF 599, 608
TDAFW Cross-connect valves: AF 3869, 3870, 3871, 3872
Service Water Suction Isolation: SW 1382, 1383
CFT Suction Isolation: FW 786, 790
Steam Supply Isolation Valves: MS 106, 106A, 107, 107A

The TDAFW Flow Control valves control SG level. They are normally open and fail open. The TDAFW pump discharge isolation valves are normally open with control power removed and are used to isolate AFW to the SGs. Two TDAFW Cross-connect valves (AF 3870, 3872) are locked open and aligned to feed their respective SG. The remaining two TDAFW cross-connect valves are closed and realign with a faulted SG. The Service Water Isolation valves are normally closed valves. The CST Suction Isolation valves are locked open valves with control power and the handwheels removed. Two of the Steam Supply Isolation valves (MS106, 107) are normally closed, MS 106A and 107A are normally open.

- Common cause failure of MOVs has occurred at Davis-Besse and elsewhere, from failure to use electrical signature tracing equipment to determine proper settings of torque switch and torque switch bypass switches. Failure to calibrate switch settings for high torques necessary under design basis accident conditions has also been involved. CC11.

- Valve motors have been failed due to lack of, or improper sizing or use, of thermal overload protective devices. Bypassing and oversizing should be based on proper engineering for design basis conditions. CF4.

- Out-of-adjustment electrical flow controllers have caused improper discharge valve operation, affecting multiple trains of AFW. CC12.

- Grease trapped in the torque switch spring pack of the operators of MOVs has caused motor burnout or thermal overload trip by preventing torque switch actuation. CF8.

- Manually reversing the direction of motion of operating MOVs has overloaded the motor circuit. Operating procedures should provide cautions, and circuit designs may prevent reversal before each stroke is finished. DE7.

- Space heaters designed for preoperation storage have been found wired in parallel with valve motors which had not been environmentally qualified with them present. DE7.

- Multiple flow control valves have been plugged by clams when suction switched automatically to an alternate, untreated source. CC9.

- Leakage of hot feedwater through check valves has caused thermal binding of normally closed flow control MOVs. AOVs may be similarly susceptible. CF2

3.1.7 Manual Suction or Discharge Valves Fail Closed

TDAFW Pump Train 1 & 2: CD 170, 167, 168; none
MDFW Pump: FW 6393, CD 167, 168; FW 1008, 6397, 6398

These manual valves are normally locked open. For each train, closure of the first valves would block pump suction and closure of the second valves would block pump discharge.

- Valve mispositioning has resulted in failure of multiple trains of AFW. CC2. It has also been the dominant cause of problems identified during operational readiness inspections. HE1. Events have occurred most often during maintenance, calibration, or system modifications. Important causes of mispositioning include:
  - Failure to provide complete, clear, and specific procedures for tasks and system restoration
  - Failure to promptly revise and validate procedures, training, and diagrams following system modifications
  - Failure to complete all steps in a procedure
  - Failure to adequately review uncompleted procedural steps after task completion
  - Failure to verify support functions after restoration
  - Failure to adhere scrupulously to administrative procedures regarding tagging, control and tracking of valve operations
  - Failure to log the manipulation of sealed valves
  - Failure to follow good practices of written task assignment and feedback of task completion information
  - Failure to provide easily read system drawings, legible valve labels corresponding to drawings and procedures, and labeled indications of local valve position

3.1.8 Leakage of Hot Feedwater through Check Valves:

MDFW Pump Trains: AF 49, 52, 43, 39
TDAFW Pump Train 1: AF 19, 72, 39, 73
TDAFW Pump Train 2: AF 20, 75, 43, 74

- Leakage of hot feedwater through several check valves in series has caused steam binding of multiple pumps. Leakage through a closed level control valve in series with check valves has also occurred, as would be required for leakage to reach the motor driven or turbine driven pumps. CC10

- Slow leakage past the final check valve of a series may not force upstream check valves closed, allowing leakage past each of them in turn. Piping orientation and valve design are important factors in achieving true series protection. CF1.

3.2 Risk Important AFW System Walkdown Table

Table 3.1 presents an AFW system walkdown table including only components identified as risk important. This information allows inspectors to concentrate their efforts on components important to prevention of core damage. However, it is essential to note that inspections should not focus exclusively on these components. Other components which perform essential functions, must also be addressed to ensure that their risk importances are not increased. Examples include verifing the handheels for steam admission valves to the turbine driven pumps (MS 5889 A and B) are in the neutral position to ensure proper automatic operation and an adequate water level in the CST.

TABLE 3.1. Risk Importance AFW System Walkdown Table for Davis-Besse AFW System Components

Component #	Component Name	Required Position	Actual Position
	Electrical		
	Motor Driven Pump	Racked In/ Closed	
	Valves		
AF 6451	TDAFW 2 Level Control	Auto	
AF 6452	TDAFW 1 Level Control	Auto	
AF 3869	TDAFW 1 Disch to SG 2 Stop Valve	Closed	
AF 3870	TDAFW 1 Disch to SG 1 Stop Valve	Open	
AF 3871	TDAFW 2 Disch to SG 1 Stop Valve	Closed	
AF 3872	TDAFW 2 Disch to SG 2 Stop Valve	Open	
MS 106	MS line 1 to TDAFW 1 Isolation	Closed	
MS 106A	MS line 2 to TDAFW 1 Isolation	Open	
MS 107	MS line 2 to TDAFW 2 Isolation	Closed	
MS 107A	MS line 1 to TDAFW 2 Isolation	Open	
MS 5889A	Stm Admission to TDAFW 1	Closed	
MS 5889B	Stm Admission to TDAFW 2	Closed	
SW 1382	SW to TDAFW 1	Closed	
SW 1383	SW to TDAFW 2	Closed	
AF 608	AFW to SG 1 Line Stop Valve	Locked Open	
AF 599	AFW to SG 2 Line Stop Valve	Locked Open	
CD 163	CST 1 Outlet Isolation	Locked Open	
CD 164	CST 2 Outlet Isolation	Locked Open	

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CD 167	CST 1 to AFW and Startup Feed Pumps	Locked Open [1]	______
CD 168	CST 2 to AFW and Start Feed Pumps	Locked Open [1]	______
AF 51	TDAFW Recirc to CST 2	Closed	______
AF 50	TDAFW Recirc to CST 1	Closed	______
AF 59	TDAFW Recirc to CST Overflow	Locked Open	______
CD 170	CSTs to Aux and Startup Feed Pumps Isolation	Locked Open	______
FW 88	MDFP Mini Recirc to CST Throttle	Locked Open	______
MS 728	TDAFW 2 Steam Inlet Header Cross Connect Isolation Valve	Locked Closed	______
AF 3872	TDAFW 2 disch to SG 2 Stop Valve	Open	______
FP 28	Fire Water Supply to Aux Pump Suct	Closed	______
FP 91	Startup Feed Pump 1 Fire Suction	Closed	______
AF 10	TDAFW 2 Min Flow RO Inlet Isolation Valve	Locked Open	______
FW 790	TDAFW 2 suction Isolation	Locked Open	______
AF 18	TDAFW 2 Mini Flow RO Outlet Isolation Valve	Locked Open	______
AF 14	TDAFW 2 Normal Bearing Cooling Water Isolation	Locked Open	______
AF 67	TDAFW 2 Cooling Water Supply	Locked Open	______
SW 6	TDAFW 2 Service Water Supply Iso	Locked Open	______
AF 4	TDAFW 2 Cooling Water Return Line Valve	Locked Open	______
AF 8	TDAFW 2 Cooling Water	Locked One Turn Open	______

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[1] Only one of these valves (CD 167 or CD 168) Shall be locked at any one time

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AF 66	TDAFW 2 Gov. Cooling Water Supply	Locked Open	________
MS 5889B	Steam Admission Valve to TDAFW 2	Locked Neutral	________
IA 234	Air Bleedoff Valve for MS 5889B, Steam Admission Valve to TDAFW 2	Locked Open	________
AF 9	TDAFW 1 Min Flow RO Inlet Isolation Valve	Locked Open	________
AF 13	TDAFW 1 Normal Bearing Cooling water Isolation	Locked Open	________
AF 64	TDAFW 1 Cooling Water Supply	Locked Open	________
AF 17	TDAFW 1 Min Flow RO Outlet Iso	Locked Open	________
AF 3870	TDAFW 1 Disch to SG 1 Stop Valve	Closed	________
SW 5	TDAFW 1 Service Water Supply Line Isolation Valve	Locked Open	________
FW 786	Auxiliary Feed Pump 1 Suction	Locked Open	________
AF 21	TDAFW 1 Recirc Stop Valve	Locked Closed	________
AF 7	TDAFW 1 Cooling Water Supply	Locked One Turn Open	________
AF 3	TDAFW 1 Cooling Water Return	Locked Open	________
AF 65	TDAFW 1 Gov Cooling Supply	Locked Open	________
MS 733	TDAFW 1 Steam Inlet Header Cross Connect Isolation Valve	Locked Closed	________
MS 5889A	Steam Admission to TDAFW 1	Locked Neutral	________
IA 233	Air Bleedoff Valve for MS 5889A, Steam Admission to TDAFW 1	Locked Open	________
FW 6393	MDAFW pump CST suction isolation	Locked Open	________
FW 1008	MDAFW pump discharge isolation	Locked Open	________
FW 6460	SG 2 MDAFW Level Control	Open	________
FW 6459	SG 1 MDAFW Level Control	Open	________

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FW 6397	MDAFW pump discharge isolation	Locked Open	________
FW 6398	MDAFW pump discharge isolation	Locked Open	________
AF 19	AFP 1 discharge check valve	Cool (<100 deg)	________
AF 20	AFP 2 discharge check valve	Cool (<100 deg)	________
AF 39	SG 1 check valve	Cool (<100 deg)	________
AF 43	SG 2 check valve	Cool (<100 deg)	________
AF 49	MDFP to SG 1 check valve	Cool (<100 deg)	________
A 52	MDFP to SG 2 check valve	Cool (<100 deg)	________
AF 72	AFP 1 to SG 1 check valve	Cool (<100 deg)	________
AF 73	AFP 1 to SG 2 check valve	Cool (<100 deg)	________
AF 74	AFP 2 to SG 1 check valve	Cool (<100 deg)	________
AF 75	AFP 2 to SG 2 check valve	Cool (<100 deg)	________

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4.0 GENERIC RISK INSIGHTS FROM PRAs

PRAs for 13 PWRs were analyzed to identify risk-important accident sequences involving loss of AFW, to identify and risk-prioritize the component failure modes involved. The results of this analysis are described in this section. They are consistent with results reported by INEL and BNL (Gregg et al 1988, and Travis et al, 1988).

4.1 Risk Important Accident Sequences Involving AFW System Failure

Loss of Power System

- A loss of offsite power and main feedwater is followed by failure of AFW. Due to lack of actuating power, the power operated relief valves (PORVs) cannot be opened preventing adequate feed-and-bleed cooling, and resulting in core damage.

- A station blackout fails all AC power except Vital AC from DC invertors, and all decay heat removal systems except the turbine-driven AFW pump. AFW subsequently fails due to battery depletion or hardware failures, resulting in core damage.

- A DC bus fails, causing a trip and failure of the power conversion system. One AFW motor-driven pump is failed by the bus loss, and the turbine-driven pump fails due to loss of turbine or valve control power. AFW is subsequently lost completely due to other failures. Feed-and-bleed cooling fails because PORV control is lost, resulting in core damage.

Transient-Caused Reactor or Turbine Trip

- A transient-caused trip is followed by a loss of the power conversion system (PCS), main feedwater, and AFW. Feed-and-bleed cooling fails either due to failure of the operator to initiate it, or due to hardware failures, resulting in core damage.

Loss of Main Feedwater

- A feedwater line break drains the common water source for MFW and AFW. The operators fail to provide feedwater from other sources, and fail to initiate feed-and-bleed cooling, resulting in core damage.

- A loss of main feedwater trips the plant, and AFW fails due to operator error and hardware failures. The operators fail to initiate feed-and-bleed cooling, resulting in core damage.

Steam Generator Tube Rupture (SGTR)

- A SGTR is followed by failure of AFW. Coolant is lost from the primary until the borated water storage tank (BWST) is depleted.

High pressure injection (HPI) fails since recirculation cannot be established from the empty sump, and core damage results.

4.2 Risk Important Component Failure Modes

The generic component failure modes identified from PRA analyses as important to AFW system failure are listed below in decreasing order of risk importance.

1. Turbine-Driven Pump Failure to Start or Run.
2. Motor-Driven Pump Failure to Start or Run.
3. TDAFW pump or MDFW pump Unavailable due to Test or Maintenance.
4. AFW System Valve Failures
    - steam admission valves
    - trip and throttle valves
    - flow control valves
    - pump discharge valves
    - pump suction valves
    - valves in testing or maintenance.
5. Supply/Suction Sources
    - condensate storage tank stop valve
    - hot well inventory
    - suction valves.

In addition to individual hardware, circuit, or instrument failures, each of these failure modes may result from common causes and human errors. Common cause failures of AFW pumps are particularly risk important. Valve failures are somewhat less important due to the multiplicity of steam generators and connection paths. Human errors of greatest risk importance involve: failures to initiate or control system operation when required; failure to restore proper system lineup after maintenance or testing; and failure to switch to alternate sources when required.

5.0 FAILURE MODES DETERMINED FROM OPERATING EXPERIENCE

This section describes the primary root cause of AFW system component failures, as determined from a review of operating histories at Davis-Besse and at other PWRs throughout the nuclear industry. Section 5.1 describes experience at Davis-Besse. Section 5.2 summarizes information compiled from a variety of NRC sources, including AEOD analyses and reports, information notices, inspection and enforcement bulletins, and generic letters, and from a variety of INPO reports as well. Some Licensee Event Reports and NPRDS event descriptions were also reviewed individually. Finally, information was included from reports of NRC-sponsored studies of the effects of plant aging, which include quantitative analysis of AFW system failure reports. This information was used to identify the various root causes expected for the broad PRA-based failure events identified in Section 4.0, resulting in the inspection guidelines presented in Section 3.0.

5.1 Davis-Besse Experience

The AFW system at Davis-Besse has experienced failures of the AFW pumps and pump governors, pump discharge isolation valves, turbine trip and throttle valves, and system check valves. Failure modes include electrical, instrumentation and control, hardware failures, and human errors.

5.1.1 Multiple Pump Failures

There has been an incidence of an operator actuating SFRCS on low steam pressure instead of low SG level after a loss of all main feedwater, this caused both TDAFW pumps to trip on overspeed.

5.1.2 Motor Driven Pump Failures

There have been two events of motor-driven pump failure since 1987. One resulted in tripping the MDFW pump breaker. The failure was caused by dirty contacts. The other event required the MDFW pump to be rebuilt after it had run without a suction source due to a procedural inadequacy.

5.1.3 Turbine Driven Pump Failures

More than forty events have occurred since 1977 that have resulted in decreased operational readiness of the AFW system. Failure modes involved failures in power fuses, instrumentation and control circuits, pump hardware failures, turbine hardware failures, mechanical wear, design deficiencies, procedural deficiencies, and human failures during maintenance activities. Improper or inadequate maintenance has resulted in improper adjustment of a governor slip clutch, and high outboard bearing temperatures which have required pump shutdown and repair.

5.1.4 Flow Control and Isolation Valve Failures

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Approximately sixty-three events since 1977 have resulted in impaired operational readiness of the air operated and motor operated isolation valves. Principal failure causes were equipment wear, corrosion, instrumentation and control circuit failures, manufacturer defects, valve hardware failures, inadequate test procedures which did not account for differential pressure across valves, and human errors. Valves have failed to operate properly due to failure of control components, broken or dirty contacts, limit switch bypass contacts opening, misaligned or broken limit switches, dirty and improperly lubricated valve stems, torque switch settings, and calibration problems. Human errors have resulted in improper control circuit repairs, limit switch adjustment, and installation of the wrong type of air pressure regulator.

5.1.5 Check Valve Failures

Two events of check valve failure have occurred since 1977. The failure mode cited was normal wear and aging, dirty components, and improper or inadequate maintenance.

5.1.6 Human Errors

There have been approximately seven events affecting the AFW system since 1977. The most serious of these caused multiple pump failures as discussed in Section 5.1.1. Personnel have overpressurized a SG while in a wet layup condition, mispositioned locked valves, reversed electrical leads, inadvertently tripped a pump during maintenance, tripped power supplies to flow transmitters, and mispositioned control switches during operation. Both personnel errors and inadequate procedures have been involved.

5.2 Industry Wide Experience

Human errors, design/engineering problems and errors, and component failures are the primary root causes of AFW System failures identified in a review of industry wide system operating history. Common cause failures, which disable more than one train of this operationally redundant system, are highly risk significant, and can result from all of these causes.

This section identifies important common cause failure modes, and then provides a broader discussion of the single failure effects of human errors, design/engineering problems and errors, and component failures. Paragraphs presenting details of these failure modes are coded (e.g., CC1) and cross-referenced by inspection items in Section 3.

5.2.1 Common Cause Failures

The dominant cause of AFW system multiple-train failures has been human error. Design/engineering errors and component failures have been less frequent, but nevertheless significant, causes of multiple train failures.

CC1. Human error in the form of incorrect operator intervention into automatic AFW system functioning during transients resulted in the temporary

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loss of all safety-grade AFW pumps during events at Davis Besse (NUREG-1154, 1985) and Trojan (AEOD/T416, 1983). In the Davis Besse event, improper manual initiation of the steam and feedwater rupture control system (SFRCS) led to overspeed tripping of both turbine-driven AFW pumps, probably due to the introduction of condensate into the AFW turbines from the long, unheated steam supply lines. (The system had never been tested with the abnormal, cross-connected steam supply lineup which resulted.) In the Trojan event the operator incorrectly stopped both AFW pumps due to misinterpretation of MFW pump speed indication. The diesel driven pump would not restart due to a protective feature requiring complete shutdown, and the turbine-driven pump tripped on overspeed, requiring local reset of the trip and throttle valve. In cases where manual intervention is required during the early stages of a transient, training should emphasize that actions should be performed methodically and deliberately to guard against such errors.

CC2. Valve mispositioning has accounted for a significant fraction of the human errors failing multiple trains of AFW. This includes closure of normally open suction valves or steam supply valves, and of isolation valves to sensors having control functions. Incorrect handswitch positioning and inadequate temporary wiring changes have also prevented automatic starts of multiple pumps. Factors identified in studies of mispositioning errors include failure to add newly installed valves to valve checklists, weak administrative control of tagging, restoration, independent verification, and locked valve logging, and inadequate adherence to procedures. Illegible or confusing local valve labeling, and insufficient training in the determination of valve position may cause or mask mispositioning, and surveillance which does not exercise complete system functioning may not reveal mispositionings.

CC3. At ANO-2, both AFW pumps lost suction due to steam binding when they were lined up to both the CST and the hot startup/blowdown demineralizer effluent (AEOD/C404, 1984). At Zion-1 steam created by running the turbine-driven pump deadheaded for one minute caused trip of a motor-driven pump sharing the same inlet header, as well as damage to the turbine-driven pump (Region 3 Morning Report, 1/17/90). Both events were caused by procedural inadequacies.

CC4. Design/engineering errors have accounted for a smaller, but significant fraction of common cause failures. Problems with control circuit design modifications at Farley defeated AFW pump auto-start on loss of main feedwater. At Zion-2, restart of both motor driven pumps was blocked by circuit failure to deenergize when the pumps had been tripped with an automatic start signal present (IN 82-01, 1982). In addition, AFW control circuit design reviews at Salem and Indian Point have identified designs where failures of a single component could have failed all or multiple pumps (IN 87-34, 1987).

CC5. Incorrect setpoints and control circuit settings resulting from analysis errors and failures to update procedures have also prevented pump start and caused pumps to trip spuriously. Errors of this type may remain undetected despite surveillance testing, unless surveillance tests model all types of system initiation and operating conditions. A greater fraction of instrumentation and control circuit problems has been identified during actual system operation (as opposed to surveillance testing) than for other types of failures.

CC6. On two occasions at a foreign plant, failure of a balance-of-plant inverter caused failure of two AFW pumps. In addition to loss of the motor driven pump whose auxiliary start relay was powered by the invertor, the turbine driven pump tripped on overspeed because the governor valve opened, allowing full steam flow to the turbine. This illustrates the importance of assessing the effects of failures of balance of plant equipment which supports the operation of critical components. The instrument air system is another example of such a system.

CC7. Multiple AFW pump trips have occurred at Millstone-3, Cook-1, Trojan and Zion-2 (IN 87-53, 1987) caused by brief, low pressure oscillations of suction pressure during pump startup . These oscillations occurred despite the availability of adequate static NPSH. Corrective actions taken include: extending the time delay associated with the low pressure trip, removing the trip, and replacing the trip with an alarm and operator action.

CC8. Design errors discovered during AFW system reanalysis at the Robinson plant (IN 89-30, 1989) and at Millstone-1 resulted in the supply header from the CST being too small to provide adequate NPSH to the pumps if more than one of the three pumps were operating at rated flow conditions. This could lead to multiple pump failure due to cavitation. Subsequent reviews at Robinson identified a loss of feedwater transient in which inadequate NPSH and flows less than design values had occurred, but which were not recognized at the time. Event analysis and equipment trending, as well as surveillance testing which duplicates service conditions as much as is practical, can help identify such design errors.

CC9. Asiatic clams caused failure of two AFW flow control valves at Catawba-2 when low suction pressure caused by starting of a motor-driven pump caused suction source realignment to the Nuclear Service Water system. Pipes had not been routinely treated to inhibit clam growth, nor regularly monitored to detect their presence, and no strainers were installed. The need for surveillance which exercises alternative system operational modes, as well as complete system functioning, is emphasized by this event. Spurious suction switchover has also occurred at Callaway and at McGuire, although no failures resulted.

CC10. Common cause failures have also been caused by component failures (AEOD/C404, 1984). At Surry-2, both the turbine driven pump and one motor driven pump were declared inoperable due to steam binding caused by backleakage of hot water through multiple check valves. At Robinson-2 both motor driven pumps were found to be hot, and both motor and steam driven pumps were found to be inoperable at different times. Backleakage at Robinson-2 passed through closed motor-operated isolation valves in addition to multiple check valves. At Farley, both motor and turbine driven pump casings were found hot, although the pumps were not declared inoperable. In addition to multi-train failures, numerous incidents of single train failures have occurred, resulting in the designation of "Steam Binding of Auxiliary Feedwater Pumps" as Generic Issue 93. This generic issue was resolved by

Generic Letter 88-03 (Miraglia, 1988), which required licensees to monitor AFW piping temperatures each shift, and to maintain procedures for recognizing steam binding and for restoring system operability.

CC11. Common cause failures have also failed motor operated valves. During the total loss of feedwater event at Davis Besse, the normally-open AFW isolation valves failed to open after they were inadvertently closed. The failure was due to improper setting of the torque switch bypass switch, which prevents motor trip on the high torque required to unseat a closed valve. Previous problems with these valves had been addressed by increasing the torque switch trip setpoint - a fix which failed during the event due to the higher torque required due to high differential pressure across the valve. Similar common mode failures of MOVs have also occurred in other systems, resulting in issuance of Generic Letter 89-10, "Safety Related Motor-Operated Valve Testing and Surveillance (Partlow, 1989)." This generic letter requires licensees to develop and implement a program to provide for the testing, inspection and maintenance of all safety-related MOVs to provide assurance that they will function when subjected to design basis conditions.

CC12. Other component failures have also resulted in AFW multi-train failures. These include out-of-adjustment electrical flow controllers resulting in improper discharge valve operation, and a failure of oil cooler cooling water supply valves to open due to silt accumulation.

5.2.2 Human Errors

HE1. The overwhelmingly dominant cause of problems identified during a series of operational readiness evaluations of AFW systems was human performance. The majority of these human performance problems resulted from incomplete and incorrect procedures, particularly with respect to valve lineup information. A study of valve mispositioning events involving human error identified failures in administrative control of tagging and logging, procedural compliance and completion of steps, verification of support systems, and inadequate procedures as important. Another study found that valve mispositioning events occurred most often during maintenance, calibration, or modification activities. Insufficient training in determining valve position, and in administrative requirements for controlling valve positioning were important causes, as was oral task assignment without task completion feedback.

HE2. Turbine driven pump failures have been caused by human errors in calibrating or adjusting governor speed control, poor governor maintenance, incorrect adjustment of governor valve and overspeed trip linkages, and errors associated with the trip and throttle valve. TTV-associated errors include physically bumping it, failure to restore it to the correct position after testing, and failures to verify control room indication of TTV position following actuation.

HE3. Motor driven pumps have been failed by human errors in mispositioning handswitches, and by procedure deficiencies.

5.2.3 Design/Engineering Problems and Errors

DE1. As noted above, the majority of AFW subsystem failures, and the greatest relative system degradation, has been found to result from turbine-driven pump failures. Overspeed trips of Terry turbines controlled by Woodward governors have been a significant source of these failures (AEOD/C602, 1986). In many cases these overspeed trips have been caused by slow response of a Woodward Model EG governor on startup, at plants where full steam flow is allowed immediately. This oversensitivity has been removed by installing a startup steam bypass valve which opens first, allowing a controlled turbine acceleration and buildup of oil pressure to control the governor valve when full steam flow is admitted.

DE2. Overspeed trips of Terry turbines have been caused by condensate in the steam supply lines. Condensate slows down the turbine, causing the governor valve to open farther, and overspeed results before the governor valve can respond, after the water slug clears. This was determined to be the cause of the loss-of-all-AFW event at Davis Besse (AEOD/602, 1986), with condensation enhanced due to the long length of the cross-connected steam lines. Repeated tests following a cold-start trip may be successful due to system heat up.

DE3. Turbine trip and throttle valve (TTV) problems are a significant cause of turbine driven pump failures (IN 84-66). In some cases lack of TTV position indication in the control room prevented recognition of a tripped TTV. In other cases it was possible to reset either the overspeed trip or the TTV without resetting the other. This problem is compounded by the fact that the position of the overspeed trip linkage can be misleading, and the mechanism may lack labels indicating when it is in the tripped position (AEOD/C602, 1986).

DE4. Startup of turbines with Woodward Model PG-PL governors within 30 minutes of shutdown has resulted in overspeed trips when the speed setting knob was not exercised locally to drain oil from the speed setting cylinder. Speed control is based on startup with an empty cylinder. Problems have involved turbine rotation due to both procedure violations and leaking steam. Terry has marketed two types of dump valves for automatically draining the oil after shutdown (AEOD/C602, 1986).

At Calvert Cliffs, a 1987 loss-of-offsite-power event required a quick, cold startup that resulted in turbine trip due to PG-PL governor stability problems. The short-term corrective action was installation of stiffer buffer springs (IN 88-09, 1988). Surveillance had always been preceded by turbine warmup, which illustrates the importance of testing which duplicates service conditions as much as is practical.

DE5. Reduced viscosity of gear box oil heated by prior operation caused failure of a motor driven pump to start due to insufficient lube oil pressure. Lowering the pressure switch setpoint solved the problem, which had not been detected during testing.

<u>DE6.</u> Waterhammer at Palisades resulted in AFW line and hanger damage at both steam generators. The AFW spargers are located at the normal steam generator level, and are frequently covered and uncovered during level fluctuations. Waterhammers in top-feed-ring steam generators resulted in main feedline rupture at Maine Yankee and feedwater pipe cracking at Indian Point-2 (IN 84-32, 1984).

<u>DE7.</u> Manually reversing the direction of motion of an operating valve has resulted in MOV failures where such loading was not considered in the design (AEOD/C603, 1986). Control circuit design may prevent this, requiring stroke completion before reversal.

<u>DE8.</u> At each of the units of the South Texas Project, space heaters provided by the vendor for use in pre-installation storage of MOVs were found to be wired in parallel to the Class 1E 125 V DC motors for several AFW valves (IR 50-489/89-11; 50-499/89-11, 1989). The valves had been environmentally qualified, but not with the non-safety-related heaters energized.

5.2.4 <u>Component Failures</u>

Generic Issue II.E.6.1, "In Situ Testing Of Valves" was divided into four sub-issues (Beckjord, 1989), three of which relate directly to prevention of AFW system component failure. At the request of the NRC, in-situ testing of check valves was addressed by the nuclear industry, resulting in the EPRI report, "Application Guidelines for Check Valves in Nuclear Power Plants (Brooks, 1988)." This extensive report provides information on check valve applications, limitations, and inspection techniques. In-situ testing of MOVs was addressed by Generic Letter 89-10, "Safety Related Motor-Operated Valve Testing and Surveillance" (Partlow, 1989) which requires licensees to develop and implement a program for testing, inspection and maintenance of all safety-related MOVs. "Thermal Overload Protection for Electric Motors on Safety-Related Motor-Operated Valves - Generic Issue II.E.6.1 (Rothberg, 1988)" concludes that valve motors should be thermally protected, yet in a way which emphasizes system function over protection of the operator.

<u>CF1.</u> The common-cause steam binding effects of check valve leakage were identified in Section 5.2.1, entry CC10. Numerous single-train events provide additional insights into this problem. In some cases leakage of hot MFW past multiple check valves in series has occurred because adequate valve-seating pressure was limited to the valves closest to the steam generators. Different valve designs and manufacturers are involved in this problem, and recurring leakage has been experienced, even after repair and replacement.

<u>CF2.</u> At Robinson, heating of motor operated valves by check valve leakage has caused thermal binding and failure of AFW discharge valves to open on demand. At Davis Besse, high differential pressure across AFW injection valves resulting from check valve leakage has prevented MOV operation (AEOD/C603, 1986).

CF3. Gross check valve leakage at McGuire and Robinson caused overpressurization of the AFW suction piping. At a foreign PWR it resulted in a severe waterhammer event. At Palo Verde-2 the MFW suction piping was overpressurized by check valve leakage from the AFW system (AEOD/C404, 1984). Gross check valve leakage through idle pumps represents a potential diversion of AFW pump flow.

CF4. Roughly one third of AFW system failures have been due to valve operator failures, with about equal failures for MOVs and AOVs. Almost half of the MOV failures were due to motor or switch failures (Casada, 1989). An extensive study of MOV events (AEOD/C603, 1986) indicates continuing inoperability problems caused by: torque switch/limit switch settings, adjustments, or failures; motor burnout; improper sizing or use of thermal overload devices; premature degradation related to inadequate use of protective devices; damage due to misuse (valve throttling, valve operator hammering); mechanical problems (loosened parts, improper assembly); or the torque switch bypass circuit improperly installed or adjusted. The study concluded that current methods and procedures at many plants are not adequate to assure that MOVs will operate when needed under credible accident conditions. Specifically, a surveillance test which the valve passed might result in undetected valve inoperability due to component failure (motor burnout, operator parts failure, stem disc separation) or improper positioning of protective devices (thermal overload, torque switch, limit switch). Generic Letter 89-10 (Partlow, 1989) has subsequently required licensees to implement a program ensuring that MOV switch settings are maintained so that the valves will operate under design basis conditions for the life of the plant.

CF5. Component problems have caused a significant number of turbine driven pump trips (AEOD/C602, 1986). One group of events involved worn tappet nut faces, loose cable connections, loosened set screws, improperly latched TTVs, and improper assembly. Another involved oil leaks due to component or seal failures, and oil contamination due to poor maintenance activities. Governor oil may not be shared with turbine lubrication oil, resulting in the need for separate oil changes. Electrical component failures included transistor or resistor failures due to moisture intrusion, erroneous grounds and connections, diode failures, and a faulty circuit card.

CF6. Electrohydraulic-operated discharge valves have performed very poorly, and three of the five units using them have removed them due to recurrent failures. Failures included oil leaks, contaminated oil, and hydraulic pump failures.

CF7. Control circuit failures were the dominant source of motor driven AFW pump failures (Casada, 1989). This includes the controls used for automatic and manual starting of the pumps, as opposed to the instrumentation inputs. Most of the remaining problems were due to circuit breaker failures.

CF8. "Hydraulic lockup" of Limitorque SMB spring packs has prevented proper spring compression to actuate the MOV torque switch, due to grease trapped in the spring pack. During a surveillance at Trojan, failure of the torque switch to trip the TTV motor resulted in tripping of the thermal overload device, leaving the turbine driven pump inoperable for 40 days until the next surveillance (AEOD/E702, 1987). Problems result from grease changes to EXXON NEBULA EP-0 grease, one of only two greases considered environmentally qualified by Limitorque. Due to lower viscosity, it slowly migrates from the gear case into the spring pack. Grease changeover at Vermont Yankee affected 40 of the older MOVs of which 32 were safety related. Grease relief kits are needed for MOV operators manufactured before 1975. At Limerick, additional grease relief was required for MOVs manufactured since 1975. MOV refurbishment programs may yield other changeovers to EP-0 grease.

CF9. For AFW systems using air operated valves, almost half of the system degradation has resulted from failures of the valve controller circuit and its instrument inputs (Casada, 1989). Failures occurred predominantly at a few units using automatic electronic controllers for the flow control valves, with the majority of failures due to electrical hardware. At Turkey Point-3, controller malfunction resulted from water in the Instrument Air system due to maintenance inoperability of the air dryers.

CF10. For systems using diesel driven pumps, most of the failures were due to start control and governor speed control circuitry. Half of these occurred on demand, as opposed to during testing (Casada, 1989).

CF11. For systems using AOVs, operability requires the availability of Instrument Air, backup air, or backup nitrogen. However, NRC Maintenance Team Inspections have identified inadequate testing of check valves isolating the safety-related portion of the IA system at several utilities (Letter, Roe to Richardson). Generic Letter 88-14 (Miraglia, 1988), requires licensees to verify by test that air-operated safety-related components will perform as expected in accordance with all design-basis events, including a loss of normal IA.

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