SEP 1 4 1983

MEMORANDUM FOR: George W. Knighton, Chief, Licensing Branch #3 Division of Licensing

FROM: Faust Rosa, Chief, Instrumentation & Control Systems Branch Division of Systems Integration

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File

18-412

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION AND AGENDA ITEMS FOR MEETING WITH BEAVER VALLEY 2 APPLICANTS

Plant Name: Beaver Valley 2 Docket No.: 50-412 Licensing Status: OL Responsible Branch: LB #3 Project Manager: L. Lazo Review Branch: ICSB Review Status: Incomplete

In our memorandum to you dated July 19, 1983 we stated that the ICSB review for Beaver Valley 2 will use meeting discussions to resolve our concerns. Attachment 1 is a list of items which the ICSB would like to discuss with the applicant. The applicant should be prepared to use detailed instrument, control and fluid system schematic drawings in explaining system designs and to provide verification that design bases and regulatory criteria are met. Attachment 2 is a list of formal questions that relate to IE Bulletin concerns. We request that a written response be provided for these questions. Additional written response may be required for some items in Attachment 1 after meeting discussions.

We request that the Project Manager arrange the review meetings to resolve these concerns on a schedule as outlined in our memorandum dated July 19, 1983.

ining) Signed By:

			Faust Rosa"		
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ATTACHMENT 1

QUESTIONS FOR MEETING(S) WITH APPLICANT ON BEAVER VALLEY UNIT 2 INSTRUMENTATION AND CONTROLS

Following is a list of items for discussion at meetings with the applicant to provide the NRC staff with information required to understand the design bases and design implementation for the instrumentation and control systems for Beaver Valley Unit 2. The applicant should be prepared to use detailed instrument, control, and fluid system drawings at the meetings in explaining system designs and to provide verification that design bases and regulatory criteria are met. DESIGNATED ORIGINAL

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Identify any plant safety related system or portion thereof, for which
 (7.1) the design is incomplete at this time.

- 2. As called for in Section 7.1 of the Standard Review Plan, provide
- (7.1) information as to how your design conforms with the following TMI Action Plan Items as described in NUREG-0737:
 - (a) II.D.3 Relief and safety valve position indication
 - (b) II.F.1 Accident monitoring instrumentation (Subparts 4, 5, and 6)
- Provide a brief overview of the plant electrical distribution system,
 (7.1) with emphasis on vital buses and separation divisions, as background for addressing various Chapter 7 concerns.

Describe design criteria and tests performed on the isolation devices
 (7.1) in the Balance of Plant Systems. Address results of analysis or tests

performed to demonstrate proper isolation between separation groups and between safety and non-safety systems.

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5. Describe features of the Beaver Valley 2 environmental control sys-(7.1) tem which insure that instrumentation sensing and sampling lines for systems important to safety are protected from freezing during extremely cold weather. Discuss the use of environmental monitoring and alarm systems to prevent loss of, or damage to systems important to safety upon failure of the environmental control system. Discuss electrical independence of the environmental control and monitoring system circuits.

Provide a list of any non-Class IE control signals that provide input
 (7.1) to class IE control circuits.

- 7. Identify where microprocessors, multiplexers, or computer systems
- (7.1) are used in or interface with safety-related systems. Also identify any "first-of-a-kind" instruments used for safety-related systems.
- 8. We request that the setpoint methodology for each Reactor Protection
- (7.1) System (RPS) and Engineered Safeguards Features (ESF) trip setpoint values be provided for both NSSS and BOP scope of supply at the time the Technical Specifications are submitted for review.

- 9. Identify any Balance of Plant scope safety related equipment (other (7.1) than those listed in Section 7.1.2.4 of the FSAR) that cannot be tested during reactor operation. Include auxiliary relays or other components in the safety-related systems.
- 10. In Section 7.1.2.6 of the FSAR compliance with R.G. 1.53 addresses
- (7.1) only protection systems. Provide the equivalent information for other systems important to plant safety.
- 11. Discuss the following:
- (7.1) (a) Response time testing of BOP and NSSS protection systems using the design criteria described in position C.5 of R.G. 1.118 and Section 6.3.4 of IEEE 338.
 - (b) Identify any temporary jumper wires or test instrumentation which will be used. Provide further discussion to describe how the test procedures for the protection systems conform to R.G. 1.118 position C.6.
 - (c) Typical response time test methods for pressure and temperature sensors.
 - (d) Compliance with Standard Technical Specifications for Westinghouse Pressurized Water Reactors (NUREG-0452, Rev. 4) as related to the third paragraph of the discussion under R.G. 1.118 on page 52 of FSAR Table 1.8-1.

Using detailed plant design drawings, discuss the reactor trip
 breaker and undervoltage relay testing procedures, and the capability of independent verification of the operability of reactor trip breaker shunt and undervoltage coils.

Using detailed plant design drawings, discuss the reactor coolant
 (7.2) loop isolation design and valve interlocks.
 (7.6)

- 14. Table 7.2-4 provides reactor trip correlation for reactor trip
 (7.2) signal, accident analysis, and technical specifications. Please
 (7.3) provide a similar table for safety interlocks and bypasses.
- 15. Describe the steam generator level instrumentation. Identify the (7.2) instrument channel used for protection functions and the control (7.3) functions. Address the control and protection interaction conformance to Section 4.7 of IEEE Std. 279-1971.
- 16. Using detailed schematics, describe the design of pressurizer PORV (7.2) control and the block valves control, and verify that no single (7.6) failure will preclude the automatic actuation logic for all modes of operation.
- 17. The information in Section 7.2.1.1.2 for "Reactor Trip on a Turbine
 (7.2) Trip," is insufficient. Please provide further design bases discussion on this subject, per BTP ICSB 26 requirements. As a minimum you should:

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- Using detailed drawings, describe the routing and separation for this trip circuitry from the sensor in the turbine building to the final actuation in the reactor trip system (RTS).
- (2) Discuss how the routing within the non-seismic Category 1 turbine building is such that the effects of credible faults or failures in this area on these circuits will not challenge the reactor trip system and thus degrade the RTS performance. This should include a discussion of isolation devices.
- (3) Describe the power supply arrangement for the reactor trip on turbine trip circuitry.
- (4) Discuss the testing planned for the reactor trip on turbine trip circuitry.
- (5) Discuss qualification of the sensors.

Identify other sensors or circuits used to provide input signals to the other protection systems which are located or routed through non-seismically qualified structures. This should include sensors or circuits providing input for reactor trip, emergency safeguards equipment such as the auxiliary feedwater system, and safety grade interlocks. Verification should be provided that the sensors and circuits meet IEEE-279 and are seismically and environmentally qualified. Testing or analyses performed to insure that failures of non-seismic structures, mountings, etc. will not cause failures which could interfere with the operation of any other portion of the protection system should be discussed.

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18. Identify where instrument sensors or transmitters supplying in-(7.2) formation to more than one protection channel are located in a (7.3) common instrument line or connected to a common instrument tap. The intent of this item is to verify that a single failure in a common instrument line or tap (such as break or blockage) cannot defeat required protection system redundancy.

Discuss the method of redundantly tripping the turbine following
 (7.2) receipt of reactor protection signals requiring turbine trip.

20. As discussed in Section 7.2.2.3.1 of the FSAR, an isolated output

- (7.2) signal from protection system channels is provided for automatic rod control. Discuss how this signal is derived. Discuss what steps, if any, are taken to prevent unnecessary control action during testing of protection system channels with a test source.
- 21. Discuss surveillance of the RTD bypass loop flow indications.
- (7.2) Confirm that technical specifications will include surveillance requirements for these indications.
- 22. Recent review of Waterford revealed heaters were used to control (7.2) temperature and humidity within insulated cabinets housing electrical transmitters that provide inputs to the RPS. These heaters were unqualified and concern was raised that heater failure could cause transmitter degradation. Please address any similar installations at Beaver Valley 2. If heaters are used, describe design criteria.

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23. Using detailed plant design drawings, discuss the control room(7.3) isolation and pressurization systems.

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- 24. Using detailed plant design drawings, discuss the containment auto-(7.3) matic isolation system. No radiation signal was shown on the logic diagram. Please address the diversity requirement stated in Standard Review Plan Section 6.2.4. Also discuss which valves are preselected for manual operation as stated in 1tem 14 of FSAR Section 6.2.4.1.
- 25. Using detailed system schematics, describe the sequence for auto-(7.3) matic initiation, operation, reset, and control of the auxiliary (7.4) feedwater system. The following should be included in the discussion:
 - a) the effects of all switch positions on system operation,
 - b) the effects of single power supply failures including the effect of a power supply failure on auxiliary feedwater control after automatic initiation circuits have been reset in a post accident sequence.
 - c) any bypasses within the system including the means by which it is insured that the bypasses are removed.
 - d) initiation and annunciation of any interlocks or automatic isolations that could degrade system capability.

- e) the safety classification and design criteria for any air systems required by the auxiliary feedwater system. This should include the design bases for the capacity of air reservoirs required for system operation.
- f) design features provided to ter inate auxiliary feedwater flow to a steam generator affected by either a steam line or feed line break.
- g) system features associated with shutdown from outside the control room.
- 26. Using detailed plant design drawings, illustrate that the com-(7.3) ponents in the auxiliary feedwater turbine-driven pump fluid (7.4) paths are totally independent from AC power sources. Discuss the capability to control or terminate auxiliary feedwater flow under a loss of AC power event.
- 27. Discuss the water sources of the auxiliary feedwater system and (7.3) the capability to transfer one source to the other. (7.4)
- 28. For main steam and feedwater line valve actuation, describe control (7.3) circuits for isolation valves and include automatic, manual and test features. Indicate whether any valve can be manually operated and indicate specific interfaces with the safety system electrical circuits.

Using detailed schematics, describe the operation of the containment
 (7.3) depressurization system initiating circuits, bypasses, interlocks
 and functional testing.

- 30. Using logic and schematic diagrams, describe the safety injection
 (7.3) system initiating circuits, bypasses, interlocks and functional testing.
- 31. Using logic and schematic diagrams, describe the AC emergency power
- (7.3) system (diesel generators and sequencer), initiating circuits, bypasses, interlocks and functional testing.
- 32. As discussed in Section 5.4.15.2 of the FSAR, the reactor vesse' head (7.3) test system consists of two parallel flow paths with redundant isolation valves in each flow path. Discuss operation of this system from the control room. Since the redundant valves are powered from the same vital power supply, discuss what measures (separation, grounded shield leads, etc.) are used to satisfy item A(8) of II.B.1 of NUREG-0737.
- 33. Using detailed drawings, describe the ventilation systems used to (7.3) support engineered safety features areas including areas containing systems required for safe shutdown. Discuss the design bases for these systems including redundancy, testability, etc.

34. Using detailed electrical schematics and piping diagrams, discuss(7.3) the automatic and manual operation and control of the station service water system and the component cooling water system. Discuss the interlocks, automatic switchover, testability, single failure, channel independence, indication of operability, and the isolation functions.

35. Identify any pneumatically operated valves in the ESF system. Us-

(7.3) ing detailed schematics, describe their operation on loss of instrument air system.

36. Discuss the testing provision in the engineered safety feature (7.3) P-4 interlocks.

- 37. On May 21, 1981, Westinghouse notified the Commission of a po-(7.3) tentially adverse control and protection system interaction whereby a single random failure in the volume control tank (VCT) level control system could lead to a loss of redundarily in the safety injection system for certain Westinghouse plants. Discuss the VCT level control system in Beaver Valley 2 design.
- 38. Discuss the fault tree analysis (FTA) technique and the interface (7.3) with WCAP-8760, "Failure Mode and Effects Analysis of the Engineered Safety Features Actuation System." Confirm that the interface requirements specified in WCAP-8760 have been met and include a statement in the FSAR to that effect.

On August 6, 1982, Westinghouse notified the staff of a potential 39. undetectable failure in online test circuitry for the master relays (7.3)in the engineered safeguards systems. The undetectable failure involves the output (slave) relay continuity proving lamps and their associated shunts provided by test pushbuttons. If after testing, a shunt is not provided for any proving lamp because of a switch contact failure, any subsequent safeguards actuation could cause the lamp to burn open before its associated slave relay is energized. This would then prevent actuation of any associated safeguards devices on that slave relay. Until an acceptable circuit modification is designed, Westinghouse has provided test procedures that ensure that the slave relay circuits operate normally when testing of the master relays is completed. Discuss this issue as applied to Beaver Valley 2.

40. Verify whether the systems required for safe shutdown can be
 (7.4) periodically tested during normal operation. Provide a cross reference to Technical Specification sections for those components that will be tested during normal operation.

41. Use plant design drawings to discuss the main steam power operated(7.4) relief valve control scheme. Is this a safety grade system?

42. FSAR Section 7.4.1.2.2 states, "Loss of instrument air does not pre-(7.4) vent the operation of the minimum systems necessary for hot standby."

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Provide further discussion for valves operation in auxiliary feedwater system, steam generator PORV, RHR system, and other pneumatic operators used in the safe shutdown systems.

- Provide a table showing safe shutdown display information and 43. identify safety grade items.
- Describe the capability of achieving hot and cold shutdown from 44. (7.4)outside the control room. As a minimum, provide the following information:
 - a) Location of transfer switches and remote control stations (ESP and ASP) (include layout drawings, etc.)
 - Design criteria for the remote control station equipment. b) including transfer switches.
 - c) Description of distinct control features to both restrict and to assure access, when necessary, to the displays and controls located outside the control room.
 - d) Discuss the testing to be performed during plant operation to verify the capability of maintaining the plant in a safe shutdown condition from outside the control room.
 - Description of isolation, separation and transfer/override e) provisions. This should include the design basis for preventing electrical interaction between the control room and remote shutdown equipment.

- f) Description of any communication systems required to coordinate operator actions, including redundancy and separation.
- g) Description of control room annunciation of remote control or overridden status of devices under local control.
- h) Means for ensuring that cold shutdown can be accomplished.
- Discuss the separation arrangement between safety related and non-safety related instrumentation on the auxiliary shutdown panel.
- 45. Use detailed schematics to describe the control circuits of the
- (7.4) pressurizer pressure control (PORV & heater control), including. the interlock and bypass provision from the remote control panel.
- 46. Discuss the plant tests to verify the capability of maintaining (7.4) the plant in a safe shutdown condition from outside the control room. Describe design compliance with Regulatory Guide 1.68.2.
- 47. Using detailed plant design drawings (schematics), discuss the
 (7.5) design pertaining to bypassed and inoperable status indication.
 As a minimum, provide the information to describe:
 - Compliance with the recommendations of R.G. 1.47. Include a discussion of your comments in Section 7.1.2.5 of the FSAR.

- The design philosophy used in the selection of equipment/ systems to be monitored. Include a discussion of the logic diagrams in Section 7.5 of the FSAR.
- 3) How the design of the bypass and inoperable status indication systems comply with positions B1 through B6 of ICSB Branch Technical Position No. 21.

The design philosophy should describe as a minimum the criteria to be employed in the display of inter-relationships and dependencies on equipment/systems and should insure that bypassing or deliberately induced inoperability of any auxiliary or support system will automatically indicate all safety systems affected.

48. Use schematic and layout drawings to discuss the physical separa (7.5) tion and wiring for redundant safety related instruments on the main control board.

49. Provide a discussion (using detailed drawings) on the residual (7.6) heat removal (RHR) system as it pertains to Branch Technical Positions ICSB 3 and RSB 5-1 requirements. Specifically, address the following as a minimum:

- a) The last statement under Section 7.6.2.1 of the FSAR.
- b) Testing of the RHR isolation valves as required by Branch Position E. of BTP RSB 5-1.

- by Position A.3 of BTP RSB 5-1. This should include a discussion of how the RHR system can perform its function assuming a single failure.
- d) Describe any operator action required outside the control room after a single failure has occurred and justify.

In addition, identify all other points of interface between the Reactor Coolant System (RCS) and other systems whose design pressure is less than that of the RCS. For each such interface, discuss the degree of conformance to the requirements of Branch Technical Position ICSB No. 3. Also discuss how the associated interlock circuitry conforms to the requirements of IEEE Standard 279. The discussion should include illustrations from applicable drawings.

50. Using detailed system schematics, describe the power distribution (7.6) for the accumulator valves and associated interlocks and controls including position indication in the control room and bypass indicator light arrangement.

51. Discuss interlocks for RCS pressure control during low temperature (7.6) operation.

52. Describe the automatic and manual design features permitting switch (7.6) over from the injection to the recirculation mode of emergency core cooling, including protection logic, component bypasses and overrides, parameter monitored and controlled, and test capabilities.

ATTACHMENT 2

ICSB QUESTIONS ON BEAVER VALLEY 2

- 420.2 Provide response to IE Bulletin 79-27 concerns.
- (7.5) (An event requiring operator action concurrent with failure of important instrumentation upon which these operator actions should be based.)
- 420.3 Provide response to IE Bulletin 80-06 concerns.
- (7.3) (Potential design deficiencies in bypass, override, and reset circuits of engineered safety features.)
- 420.4 Provide response to IE Information Notice 79-22 concerns.
- (7.7) (Control system malfunction due to a high energy line break inside or c tside of containment.)

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- 420.5 Provide response to IE Bulletin 79-21 concerns.
- (7.3) (Level measurement errors due to environmental temperatures effects on level instrument reference legs.)
- 420.6 Control System Failure concerns.
- (7.7) The analyses reported in Chapter 15 of the FSAR are intended to demonstrate the adequacy of safety systems in mitigating anticipated operational occurrences and accidents.

Based on the conservative assumptions made in defining these designbasis events and the detailed review of the analyses by the staff, it is likely that they adequately bound the consequences of single control system failures. To provide assurance that the design basis event analyses adequately bound other more fundamental credible failures, you are requested to provide the following information:

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- (a) Identify those control systems whose failure or malfunction could seriously impact plant safety.
- (b) Indicate which, if any, of the control systems identified in (a) receive power from common power sources. The power sources considered should include all power sources whose failure or malfunction could lead to failure or malfunction of more than one control system and should extend to the effects of cascading power losses due to the failure of higher level distribution panels and load centers.
- (c) Indicate which, if any, of the control systems identified in (a) receive input signals from common sensors. The sensors considered should include, but should not necessarily be limited to, common hydraulic headers or impulse lines feeding pressure, temperature, level or other signals to two or more control systems.
- (d) Provide justification that any simultaneous malfunctions of the control systems identified in (b) and (c) resulting from failures or malfunctions of the applicable common power source or sensor are bounded by the analyses in Chapter 15 and would not require action or response beyond the capability of operators or safety systems.