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Mr. Robert E. Link, Vice President
Nuclear Power Department
Wisconsin Electric Power Company
231 West Michigan Street, Room P379
Milwaukee, Wisconsin 53201

Dear Mr. Link:

SUBJECT: RISK-BASED INSPECTION GUIDE

The U.S. Nuclear Regulation Commission is developing a risk-based inspection guide (RIG) to be published as a NUREG report under our Technical Assistance Program with National Laboratories. The RIG is intended to provide guidance for USNRC inspection activities.

To obtain information for the guide, we would like to send a representative of our contractor Battelle Pacific Northwest Laboratories, to the Point Beach Nuclear Plant on September 9, 1992 to accompany the resident inspector in a system walkdown. While on site, the contractor will be available to meet with your staff to receive comments regarding the RIG in order to reflect your plant status accurately. However, I would like to clarify that your participation during the visit is not essential and would be strictly voluntary.

I am enclosing a draft copy of the RIG. Please let me know if you would like to participate during the visit.

Your cooperation in this matter is appreciated.

Sincerely,

original signed by

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

Enclosure:

1. Draft RIG

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WASHINGTON, D.C. 20555

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Sincerely,

A handwritten signature in cursive script that reads "Robert B. Samworth".

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

Enclosure:

1. Draft RIG

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Mr. Robert E. Link
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AUXILIARY FEEDWATER SYSTEM RISK-BASED INSPECTION GUIDE
FOR THE POINT BEACH NUCLEAR POWER PLANT

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Richland, Washington 99352

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 Point Beach plant. This information is presented to provide inspectors with increased resources for inspection planning at Point Beach.

The risk importance of various component failure modes was identified by analysis of the results of probabilistic risk assessments (PRAs) for many pressurized water reactor (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 individual failures having a variety of root causes. In order to help inspectors 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 Point Beach 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 importance.

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1.0 INTRODUCTION

This document is one 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 the causes that are significant enough to warrant consideration in inspection planning at Point Beach.

This inspection guidance is presented in Section 3.0, following a description of the Point Beach AFW system in Section 2.0. Section 3.0 identifies the risk important system components by Point Beach 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 Point Beach 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 (LERs) and Nuclear Plant Reliability Data System (NPRDS) event descriptions were also reviewed. 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.

2.0 POINT BEACH AFW SYSTEM

This section presents an overview of the Point Beach 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 provides feedwater to the steam generators (SG) to allow secondary-side heat removal from the primary system when main feedwater is unavailable. The system is capable of functioning for extended periods, which allows time to restore main feedwater flow or to proceed with an orderly cooldown of the plant to where the residual heat removal (RHR) system can remove decay heat. A simplified schematic diagram of the Point Beach AFW system is shown in figure 2.1.

The AFW System consists of two motor-driven (MDAFW) pumps, two turbine-driven (TDAFW) pumps, two Condensate Storage Tanks (CSTs) and associated piping and controls for operation. It is designed utilizing two pumping systems and two different sources of water supply to the pumps, thus providing redundancy to ensure that a single fault will not obstruct the system function. The AFW pumps normally take suction from two 45,000 gallon capacity CSTs via a common header. The CSTs supply water to the suction of each AFW pump through a ten inch suction line containing manual gate valves and a check valve. The CSTs must contain a total minimum volume of 10,000 gallons per operating unit for use by the AFW System to ensure a sufficient quantity of water is available to maintain the RCS at hot shutdown for 90 minutes with steam discharge to atmosphere. A backup water supply for the AFW pumps is available from the Service Water (SW) System. It can be manually aligned to the suction of the AFW pumps via normally closed MOVs. All four pumps can take suction from either or both of the North and South service water headers, however one MDAFW and one TDAFW pump are normally aligned to take suction from each header.

The system is designed to start up and establish full rated flow within 30 seconds of an automatic start signal. The motor driven MDAFW pumps start on the following conditions: low-low SG level in any SG, a trip of both main feedwater pumps in either unit, or a safety injection signal. The TDAFW pump starts on low-low SG level in both associated SGs or on loss of both 4.16 kv buses that supply the main feedwater pumps.

The steam-driven auxiliary feedwater pumps provide feedwater only to the steam generator of the associated unit. Each pump discharges through a check valve into a common 4 inch header from which auxiliary feed water is delivered through individual 3 inch lines, each containing a normally open motor-operated valve, to the main feedwater line inside the containment near each steam generator. Two check valves, one at the connection to the main feedwater line and one just downstream of the motor-operated valve, prevent backflow from the main feed line when the pump is not in service. Manual valves are also provided for isolation of the individual feed lines.

The motor-driven auxiliary feedwater pumps are common to both units with the discharge of each pump lined up to provide feed to one steam generator in each unit (P38A is normally aligned to supply the "A" SG in each unit and P38B is normally aligned to supply the "B" SG in each unit). Each pump discharges through a check valve and an air-operated pressure control valve into a common 3 inch header. The auxiliary feedwater is then directed to the associated steam generator in each unit through individual 3 inch lines, each containing a normally open motor-operated valve and a check valve. The individual lines join the discharge from the steam-driven pump downstream of the respective motor-operated valves outside of the containment structures such that only one auxiliary feed line penetration is required per steam generator. As with the steam-driven pumps, the double check valve arrangement prevents backflow when the pumps are not in service. Manual valves are also provided for isolation of the individual feed lines.

The common discharge headers from each motor-driven auxiliary feedwater pump can be cross-connected downstream of the air-operated control valves. Normal system alignment, however, requires that both valves in the cross-connection be locked in the shut position. To protect the auxiliary feedwater pumps from excessive temperature rise during low flow conditions, each pump is equipped with an orificed recirculation line which provides the required minimum flow through the pumps by returning feedwater to the condenser storage tanks. An air-operated valve in the recirculation line interrupts flow when adequate discharge flow is sensed.

Steam for the TDAFW pumps is provided from one or both of the associated steam generators from points upstream of the main steam isolation valves.

2.2 Success Criterion

System success requires the operation of at least one pump supplying rated flow to at least one steam generator.

2.3 System Dependencies

The AFW system depends on AC power for motor-driven pumps, SW and MS motor operated valves, DC power for control power to valves, and instrument air for control valves. In addition, the turbine-driven pump also requires steam availability.

2.4 Operational Constraints

When the reactor coolant is heated above 350 degrees F, the Point Beach Technical Specifications require that the reactor shall not be taken critical unless the following conditions are satisfied:

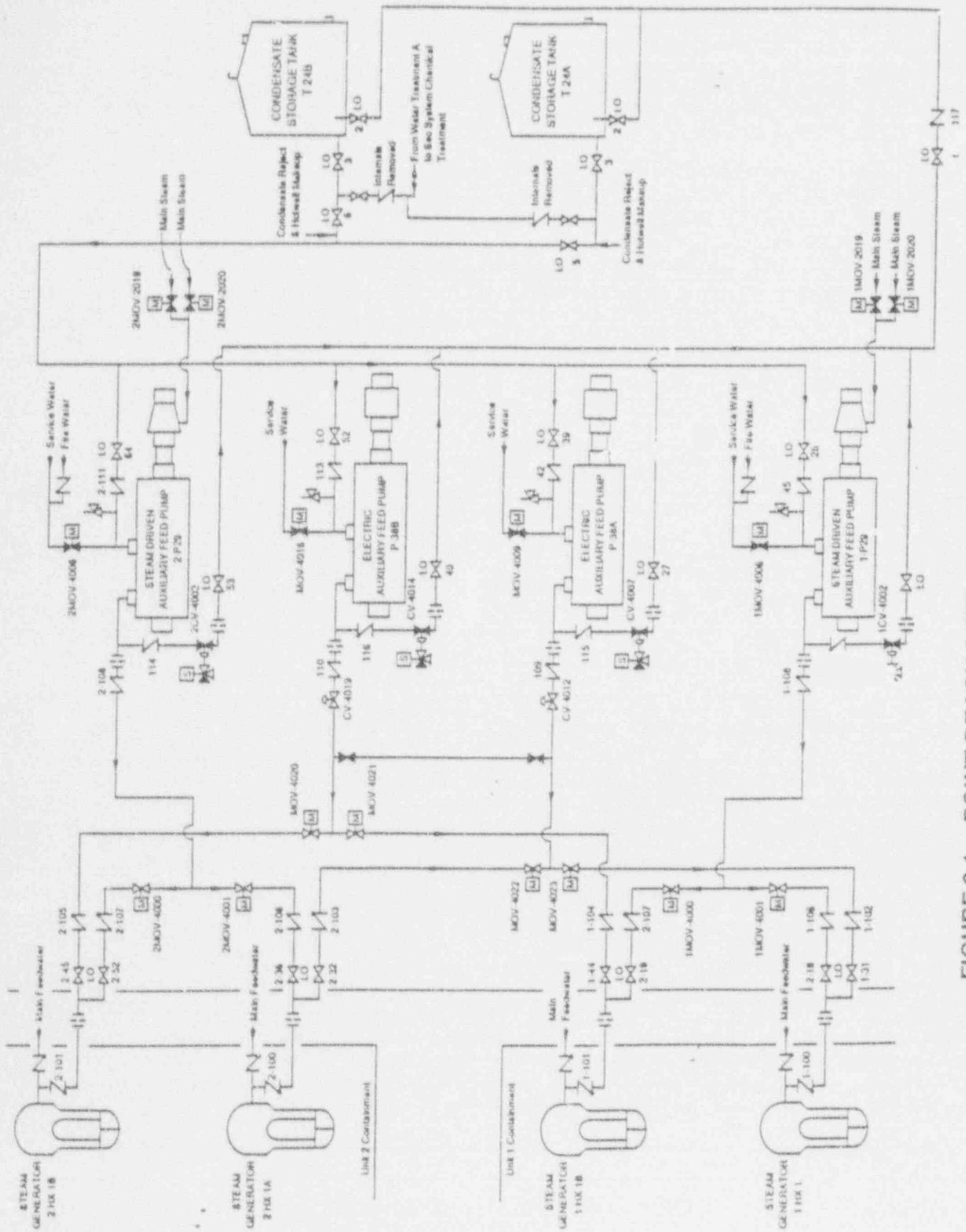


FIGURE 2.1 POINT BEACH AUXILIARY FEEDWATER SYSTEM

1. For two-unit operation, all four auxiliary feedwater pumps, together with their associated flow paths and essential instrumentation, shall be operable.
2. For single-unit operation, both motor-driven auxiliary feedwater pumps and the turbine-driven auxiliary feedwater pump associated with that unit, together with their associated flow paths and essential instrumentation, shall be operable.
3. A minimum of 10,000 gallons of water per operating unit in the condensate storage tanks and an unlimited supply from the lake via either leg of the plant service water system.

During two unit power operation, one of the four auxiliary feedwater pumps may be out-of-service as follows:

1. A turbine-driven auxiliary feedwater pump may be out-of-service for up to 72 hours. If not restored to service within the 72 hour time period, the associated reactor shall be shut down and in hot shutdown within the next 12 hours.
2. A motor-driven auxiliary feed pump may be out-of-service for up to 7 days. If not restored to service within the 7-day period, both reactors shall be shut down and in hot shutdown within the next 12 hours.

During single-unit operation, the turbine-driven auxiliary feedwater pump may be out-of-service for up to 72 hours. If not restored to service within the 72 hour time period, the reactor shall be shut down and in hot shutdown within the next 12 hours.

During single-unit operation, either one of the motor-driven auxiliary feedwater pumps may be out-of-service for up to 7 days. If not restored to service within the 7-day time period, the operating unit shall be shutdown and in hot shutdown within the next 12 hours

3.0 INSPECTION GUIDANCE FOR THE POINT BEACH AFW SYSTEM

In this section the risk important components of the Point Beach 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 types of components, both at Point Beach 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 the system or component design, operation, maintenance, or testing for inspection activities. These activities include 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. 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 and motor control valves into a common discharge header. 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 1P-29 or 2P-29 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. Governor malfunction and control, bearing wear and oil supply problems have occurred at Point Beach.
- 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.
- Turbines with Woodward Model PG-PL governors have tripped on overspeed when restarted shortly after shutdown, unless an operator 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.
- 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.

3.1.3 Motor Driven Pump P-38A or P-38B 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. Control circuit and electric power failures have prevented automatic pump starts at Point Beach.
- 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 1P-29, 2P-29, P-38A, P-38B 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 Motor Operated Isolation Valves Fail Closed

MD Pump Service Water Suction Valves: 4009, 4016
TD Pump Service Water Suction Valves: 1-4006, 2-4006
TD Pump to "A" SG isolation Valve: 1-4001, 2-4001
TD Pump to "B" SG isolation Valve: 1-4000, 2-4001
Steam Supply TD Pumps: 1-2019, 1-2020, 2-2019, 2-2020
MD Pump Discharge to SG "A": 4022, 4023
MD Pump Discharge to SG "B": 4020, 4021

The MDAFW pump discharge valves are normally open MOVs. Steam supply lines to the turbine driven AFW pumps contain normally closed motor operated steam isolation valves. The service water suction isolation MOVs are normally closed. All these MOVs fail as-is on loss of power.

Common cause failure of MOVs has resulted 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. Torque switch adjustment and dirty contacts has prevented proper MOV operation at Point Beach.

- 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. Overload and valve operator adjustment have caused failure of MOVs at Point Beach.

- 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 Limitorque SMB motor operators 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. DE8.

3.1.6 Air Operated Flow Valves Fail Closed

MD Pump Flow Control: 4012, 4019
MD Pump Recirculation Control: 4007, 4014
TD Pump Recirculation Control: 1-4002, 2-4002

These air operated valves (AOVs) control flow to the steam generators and recirculation flow back to the CST. The flow control valves fail open and the recirculation valves fail closed on loss of instrument air.

- Control circuit problems have been a primary cause of failures, both at Point Beach and elsewhere. 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 air regulator failure or leaking air lines.
- Out-of-adjustment electric flow controllers have caused improper valve operation, affecting multiple trains of AFW. CC12.
- Leakage of hot feedwater through check valves has caused thermal binding of flow control MOVs. AOVs may be similarly susceptible. CF2.
- Multiple flow control valves have been plugged by clams when suction switched automatically to an alternate, untreated source. CC9.

3.1.7 Manual Suction or Discharge Valves Fail Closed

MD Pump Suction Valves: 39, 40
MD Pump Discharge Valves: 2, 44, 45
TD Pump Suction Valves: 64
TD Pump Discharge Valves: 18, 19, 56, 57
CSTs Main Supply Valves: 3, 5, 6, 8
Recirculation Valves: 1, 27, 40, 53

These manual valves are normally locked open. Manual valves that could reduce flow in any AFW drain are normally locked in the proper position for emergency use.

Valve mispositioning has resulted in failures 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

SG Check Valves: 1-100,1-101,1-102,1-104,1-106,1-107,2-100,2-101,2-103,2-105,2-106,2-107

AFW Pump Discharge Check Valves: 1-108,2-108,109,110

AFW Pump Suction Check Valves: 111,112,113,115

- 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. CC10.
- Slow leakage past the final check valve of a series may not force the check valve closed. Other check valves in series may leak similarly. 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, but which are absent from this table because of high reliability or

redundancy, must also be addressed to ensure that their risk importances are not increased. Examples include the (open) steam lead isolation valves (235 and 237) upstream of 2019 and 2020, and an adequate water level in the CSTs.

TABLE 3.1. Risk Important AFW System Walkdown Table

<u>Component #</u>	<u>Component Name</u>	<u>Required Position</u>	<u>Actual Position</u>
<u>Electrical</u>			
P-38A	Motor-Driven Pump	Racked In/ Closed	_____
P-38B	Motor-Driven Pump	Racked In/ Closed	_____
<u>Valves</u>			
AF 3	CST "A" Isolation Valve	Locked Open	_____
AF 5	CST "A" Isolation Valve	Locked Open	_____
AF 6	CST "B" Isolation Valve	Locked Open	_____
AF 8	CST "B" Isolation Valve	Locked Open	_____
AF 52	P-38B MDP Suction Valve	Locked Open	_____
AF 39	P-38A MDP Suction Valve	Locked Open	_____
AF 64	2-P29 TDP Suction Valve	Locked Open	_____
AF 26	1-P29 TDP Suction Valve	Locked Open	_____
1AF 4006	1P-29 TDP Service Water Supply	Closed	_____
2AF 4006	2P-29 TDP Service Water Supply	Closed	_____
AF 4016	P-38B MDP Service Water Supply	Closed	_____
AF 4009	P-38A MDP Service Water Supply	Closed	_____
AF 4014	P-38B MDP Recirculation Valve	Closed	_____
AF 4007	P-38A MDP Recirculation Valve	Closed	_____
2AF 4002	2-P29 TDP Recirculation Valve	Closed	_____
1AF 4002	1-P29 TDP Recirculation Valve	Closed	_____
AF 4019	P-38B MDP to SG "B" Flow Control	Open	_____
AF 4012	P-38A MDP to SG "A" Flow Control	Open	_____

TABLE 3.1. Risk Important AFW System Walkdown Table
(Continued)

AF 4020	P-38B MDP to SG 2-1B Discharge Iso	Open	_____
AF 4021	P-38B MDP to SG 1-1B Discharge Iso	Open	_____
AF 4022	P-38A MDP to SG 2-1A Discharge Iso	Open	_____
AF 4023	P-38A MDP to SG 1-1A Discharge Iso	Open	_____
2AF 4000	2P-29 TDP to SG 2-1B Discharge Iso	Open	_____
2AF 4001	2P-29 TDP to SG 2-1A Discharge Iso	Open	_____
1AF 4000	1P-29 TDP to SG 1-1B Discharge Iso	Open	_____
1AF 4001	1P-29 TDP to SG 1-1A Discharge Iso	Open	_____
2AF 2019	SG-2 M Steam Supply to TDP 2-P29	Closed	_____
2AF 2020	SG-2 M Steam Supply to TDP 2-P29	Closed	_____
1AF 2019	SG-1 M Steam Supply to TDP 1-P29	Closed	_____
1AF 2020	SG-1 M Steam Supply to TDP 1-P29	Closed	_____
AF 1-100	Piping Upstream of Check Valve	Cool	_____
AF 1-101	Piping Upstream of Check Valve	Cool	_____
AF 2-100	Piping Upstream of Check Valve	Cool	_____
AF 2-101	Piping Upstream of Check Valve	Cool	_____
AF 1-102	Piping Upstream of Check Valve	Cool	_____
AF 2-103	Piping Upstream of Check Valve	Cool	_____
AF 1-104	Piping Upstream of Check Valve	Cool	_____
AF 2-105	Piping Upstream of Check Valve	Cool	_____
AF 1-106	Piping Upstream of Check Valve	Cool	_____
AF 2-106	Piping Upstream of Check Valve	Cool	_____
AF 1-107	Piping Upstream of Check Valve	Cool	_____
AF 2-107	Piping Upstream of Check Valve	Cool	_____

TABLE 3.1. Risk Important AFW System Walkdown Table
(Continued)

AF 1-108	Piping Upstream of Check Valve	Cool	_____
AF 2-108	Piping Upstream of Check Valve	Cool	_____
AF 109	Piping Upstream of Check Valve	Cool	_____
AF 110	Piping Upstream of Check Valve	Cool	_____

4.0 GENERIC RISK INSIGHTS FROM PRAs

PRA's for 13 PWRs were analyzed to identify risk-important accident sequences involving loss of AFW, and 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 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 power conversion system (PCS) 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 (STGR)

A SGTR is followed by failure of AFW. Coolant is lost from the primary until the refueling water storage tank (RWST) 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. TDP or MDP Unavailable due to Test or Maintenance.
4. AFW System Valve Failures
 - steam admission valves
 - trip and throttle valve
 - 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 causes of AFW system component failures, as determined from a review of operating histories at Point Beach and at other PWRs throughout the nuclear industry. Section 5.1 describes experience at Point Beach from 1974-1991. Section 5.2 summarizes information compiled from a variety of NRC sources, including AECOD 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. Finally, information was included from reports of NRC-sponsored studies of the effects of plant aging, which include quantitative analyses 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 Point Beach Experience

The AFW system at Point Beach has experienced failures of the AFW pumps, pump discharge flow control valves, the turbine steam supply valves, pump suction and recirculation valves and system check valves. Failure modes include electrical, instrumentation, hardware failures, and human errors.

5.1.1 Motor Driven Pump Failures

There have been five events from 1974-1991 which involved failure of the motor-driven pumps. Failure modes involved instrument and control circuit failure, human error during maintenance activities and circuit breaker failure.

5.1.2 Turbine Driven Pump Failures

There have been ten events from 1974-1991 that have resulted in failures of the turbine driven pump. Failure modes involved failures in instrumentation and control circuits, system hardware failures, and human errors. The turbine driven pump has tripped or failed to reach proper speed or output as a result of governor control problems, worn o-rings, and worn bearings and oil supply problems.

5.1.3 Flow Control and Isolation Valve Failures

More than twenty events from 1974-1991 have resulted in failures of the motor operated isolation valves, steam control valves and air operated flow control valves. Principal failure causes were equipment wear, instrumentation and control circuit failures, valve hardware failures, and human errors. Valves have failed to operate properly due to failure of control components, broken or dirty contacts, misaligned or broken limit switches, control power loss, and valve operator calibration problems.

5.1.4 Check Valve Failures

There have been two cases of check valve failure at Point Beach from 1974-1991. The failure modes cited were normal wear and aging.

5.1.5 Human Errors

Human errors have caused several problems affecting the AFW system from 1974-1991. Personnel have inadvertently actuated the AFW pumps during testing, failed to calibrate equipment or improperly adjusted valves. Personnel error, inadequate training, 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 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 inverter, 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 leakage 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. Leakage 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.

CU12. 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 those 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.

DE6. 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).

DE7. 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.

DE8. At each of the units of the South Texas Project, space heaters provided by the vendor for use in preinstallation 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 Component Failures

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.

CF1. 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 (AEOD/C404, 1984). At Robinson, the pump shutdown procedure was changed to delay closing the MOVs until after the check valves were seated. At Farley, check valves were changed from swing type to lift type. Check valve rework has been done at a number of plants. Different valve designs and manufacturers are involved in this problem, and recurring leakage has been experienced, even after repair and replacement.

CF2. 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 ADVs, operability requires the availability of Instrument Air (IA), 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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