10 CFR 50.73 PHILADELPHIA ELECTRIC COMPANY LIMERICK GENERATING STATION P. O. BOX 2300 SANATOGA, PA 19464-2300 (215) 327-1200 EXT. 2000 J. DOERING, JR. December 05, 1992 Docket No. 50-352 LIMERICK GENERATING STATION License No. NPF-39 U.S. Nuclear Regulatory Commission Attn: Document Control Desk Washington, DC 20555 SUBJECT: Licensee Event Report Limerick Generating Station - Unit 1 This LER concerns a Nuclear Steam Supply Shutoff System (NSSSS) Group III isolation of the Reactor Water Cleanup (RWCU) System due to high differential flow caused by a pressure transient while removing a RWCU filter dem neralizer from service. Reference: Docket No. 50-352 Report Number: 1-88-011 Revision Number: 01 Event Date: March 26, 1988 Report Date: December 05, 1992 Facility: Limerick Generating Station P.O. Box 2300, Sanatoga, PA 19464-2300 This revised LER is being submitted to clarify the actions taken to prevent recurrence. Changes to this LER are indicated by revision bar markers in the right hand margins. The original LER was submitted pursuant to the requirements of 10CFR.73(a)(2)(iv). Very truly yours, DMS: cah T. T. Martin, Administrator, Region I, USNRC T. J. Kenny, USNRC Senior Resident Inspector, LGS 140043 9212140168 921205 ADDCK 05000352

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SUPPLEMENTAL REPORT EXPECTED (14)

On March 26, 1988 at 0615 hours, a Reactor Water Cleanup (RWCU) isolation occurred on a Nuclear Steam Supply Shutoff System (NSSSS), an Engineered Safety Feature, Group III Channel A and D "high differential flow" isolation signal. Operations personnel, removing the 'A' RWCU filter demineralizer from service in order to restart the 'C' RWCU pump, opened the filter demineralizer bypass valve HV-44-1F044 in conjunction with closing the 'A' filter demineralizer flow control valve FV-C-45-1-66A. The filter demineralizer bypass valve HV-44-1F044 could not be adjusted to permit the minimum required system flow. This caused the 'A' RWCU pump to trip on low suction flow, resulting in a pressure transient, which caused a high differential flow initiating an NSSSS Group III, A and D Channel "high differential flow" isolation signal. The RWCU inboard and outboard isolation valves HV-044-1F001 and HV-044-1F004 closed isolating RWCU. The isolation was reset at 0640 hours and RWCU was returned to normal operation at 0905 hours. There were no adverse consequences associated with this event and there was no release of radioactive material. A RWCU system modification and revisions to the RWCU system operating procedures have been implemented and have prevented the recurrence of this event.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION APPROVED OMB NO. 3150-0104

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Unit Conditions Prior to the Event:

Operating Mode 1 (Power Operation)

Reactor Power 95%

Description of the Event:

On March 26, 1988 at 0615 hours, a Reactor Water Cleanup (RWCU) isolation occurred on a Nuclear Steam Supply Shutoff System (NSSSS) Group III Channel A and D "high differential flow" isolation signal. The isolation occurred when the 'A' RWCU filter demineralizer was being removed from service to restart the 'C' RWCU pump. The filter demineralizer bypass valve HV-44-1F044 was being open in conjunction with clasing the 'A' filter demineralizer flow control valve FV-C-45-1-66A in accordance with procedures. The required bypass flow was not achieved as the filter demineralizer flow control valve was closed and the filter demineralizer bypass valve was open (see attached sketch). The system flow fell below the minimum required 60 gpm flow rate causing the 'A' RWCU pump to trip on low suction flow. This resulted in a pressure transient causing a high differential flow condition, for greater than the 45 second time delay, initiating the Nuclear Steam Supply Shutoff System (NSSSS) isolation signal. The RWCU inboard and outboard isolation valves HV-044-1F001 and HV-044-1F004 closed, as designed, isolating RWCU.

The high differential flow isolation was not immediately reset because indicated RWCU inlet flow, sensed by flow element FE-44-1N035, continued to fluctuate between 60 to 80 gpm due to flow turbulence which was caused by the flow path that existed from the bottom head drain to RWCU and back to the recirculation suction line via the HV-044-1F015 valve (see attached sketch). Operations personnel closed the inlet valve, HV-044-1F105, leading from the reactor recirculation pump suction. Indicated RWCU inlet flow and bottom head drain flow dropped to zero and the NSSSS Group III isolation was reset at 0640 hours.

The duration of the isolation was 0 hours and 25 minutes.

Consequences of the Event:

The RWCU system isolated as designed on the high differential flow NSSSS Group III, A and D channel isolation signal. There was no release of radioactive material to the environment. RWCU was out of service for 3 hours and 30 minutes and reactor water purity remained within specified limits following the event. If the RWCU system remained out of service for greater than 4 hours reactor water chemistry grab samples would have been taken, in accordance with Technical Specifications, to determine reactor water purity. In the event that one of the NSSSS Group III isolation signals failed to isolate RWCU, the redundant channel isolation signal is designed to isolate the system.

Cause of the Event:

RWCU isolated on a pressure transient. The pressure transient was caused by an inability of the demineralizer bypass valve HV-44-1F044 to be adjusted to

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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properly control system flow. This valve is believed to be oversized for its application. As a result, Operations personnel experienced difficulty controlling RWCU flow while removing the 'A' filter demineralizer from service (see attached sketch). Operations personnel could not maintain the minimum required 60 gpm system flow because system flow is controlled by adjusting the filter demineralizer bypass valve (HV-44-1F044) in a very narrow range, less than 10% valve full open. This globe valve has a standard plug, or quick opening, type disc and the adjusting requirements are difficult to control. As a result, the 'A' RWCU pump tripped on low suction flow (pump protection). A pressure transient ensued causing a high differential flow condition of greater than 54.9 gpm. This condition lasted for greater than 45 seconds thereby initiating an NSSSS Group III, A and D Channel "high differential flow" isolation signal.

Corrective Actions:

The isolation was reset at 0640 hours and RWCU was returned to operation at 0905 hours.

Actions Taken to Prevent Recurrence:

A modification to replace valve HV-44-1F044 was planned, as stated in Revision O of this LER. Instead, a modification has been implemented which lengthened the time delay of the RWCU pump low suction flow trip. The time delay was increased from 5 seconds to 180 seconds to allow operations personnel additional time to adjust valve positions during RWCU system flow alterations, including the repositioning of valve HV-44-1F044. Notes and caution statements in the RWCU system operating procedures have been revised, and have aided Operations personnel in minimizing differential flow isolations during RWCU system evolutions. Therefore, the planned modification to replace valve HV-44-1F044 has been cancelled since these alternative measures have prevented the recurrence of this event.

EIIS Code:

NSSSS - JM RWCU - CE Isolation Valve - ISV Filter Demineralizer - FDM Pump - P

Previous Similar Occurrences:

Limerick LERs 84-031, 85-002, 85-003, 85-051, 85-082, and 86-033 reported RWCU isolations on high differential flow conditions.

Tracking Codes: (B) Design Deficiency.

NRC Form 366A (9.63) U.S. NUCLEAR REGULATORY COMMISSION LICENSEE EVENT REPORT (LER) TEXT CONTINUATION APPROVED DMB NO. 3150-0104 EXPIRES: 8/31/85 FACILITY NAME (1) DOCKET NUMBER (2) LER NUMBER IS PAGE (3) SEQUENTIAL YEAR Limerick Generating Station, Unit 1 0 111 0 | 5 | 0 | 0 | 0 | 3 | 5 | 2 8 8 014 OF -0 11 0/4 TEXT (If more space is required, use additional NRC Form 366A's) (17) 0 SKETCH FOR LER 88-011 V TO "A" FILTER DEMINERALIZER AND THE FV.C. 45-1-66A FLOW CONTROL VALVE DEMINERALIZER 6" - REC'N MECH HON-REGEN HEAT EXCHANGER HEAT EXCHANGER "B" FRIER 9 0 TO --> ----: HV-1-06A HV-44-1F044 HEAT EXCHANGER HEAT EXCHANGER REDEH TO FEEDWATER SYSTEM FROM FRIEN DEMINERALIZENS ----HEAT RWCU PUMP Q--MAHI CONDENSER FE) FE-14040 11032 X HV-044-1F003 HV-044-1F004 10 (FE-044-1H035) HV 1F038 HV-1F1DO -----> FIREM REACTOR RECINC. PUMP SUCTION FROM RX VESSEL BOTTOM HEAD DRAM HV 044-1F105 X411