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U.S. NUCLEAR REGULATORY COMMISSION NRC Form 368A LICENSEE EVENT REPORT (LER) TEXT CONTINUATION APPROVED OMB NO 3150-6104 EXPIRES 8/31 88 DOCKET NUMBER (2) FACILITY NAME (1) LER NUMBER IS PAGE (3) SEQUENTIAL YEAR NUMBER Fort St. Vrain, Uni. No. 1 818 01112 011 012 OF 018 0 15 10 10 10 12 16 17 TEXT (# more spars is required, use artiRtional NRC Form 3654's) (17)

### BACKGROUND:

In accordance with the requirements of 10CFR 50.49, Public Service Company of Colorado (PSC) developed and implemented an Environmental Qualification (E.Q.) program in 1986 and 1987. The purpose of environmental qualification is to assure the ability of certain safety related and safe shutdown equipment to withstand the effects of accidents resulting in harsh environments. The Fow E.Q. program is based upon the existence of a Steam Line Rupture Detection Isolation System (SLRDIS) which automatically detects and isolates high energy steam line breaks. A major aspect of the FSV E.Q. program was the development of reactor and turbine building temperature profiles that would result from various postulated high energy line breaks (HELBs). These individual temperature profiles were utilized in the development of composite temperature profiles to which equipment at FSV was qualified.

PSC contracted General Atomics (GA) to develop the building temperature profiles used for equipment qualification. GA developed these profiles using two computer programs, FLASH/GA and CONTEMPT-G. The FLASH/GA program was used to obtain pipe break blowdown rates and the CONTEMPT-G program was used to develop building temperature profiles. GA developed numerous scenarios to consider breaks in all high energy lines from full offset ruptures to partial breaks. Scenarios were analyzed with 100%, 75%, 50%, 25%, 10%, 3%, 2%, 1% and smaller sized breaks. By analyzing this large spectrum of breaks, the final temperature profiles that represent the most limiting environmental conditions were established.

## EVENT:

In support of the research and development of the FSV E.Q. program, GA was contracted to determine building temperature responses in the event of various HELB scenarios. GA utilized the CONTEMPT-G computer program for determining these building temperature responses. This computer program was initially developed by the Phillips Petroleum company in 1967 for water reactors and was oriented towards small compartmentalized building volumes. Therefore, in order to utilize the CONTEMPT-G program in determining building temperature responses at FSV, it was necessary that GA modify the CONTEMPT-G program for an open building application. Following program modification, GA pursued the development of the building temperature profiles that would be used as the basis for equipment qualification. These temperature profiles were submitted to the NRC as part of the overall E.Q. program review.

NRC Form 368A (9-83)	LICENSEE EVENT REP	EVENT REPORT (LER) TEXT CONTINUATION APPROVED OMB NO. 3150-0104 EVENTRES: 8-31-08						
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The NRC review included an independent verification of two scenarios (i.e., large and medium breaks) from each building. This independent review was performed by Pacific Northwest Laboratories (PNL) using the COBRA computer program. As a result of the initial review, discrepancies were identified between the peak temperatures determined by COBRA vs. CONTEMPT-G. Discussions with the NRC in November, 1986 led to the conclusion that use of different heat transfer coefficients by GA and PNL caused these discrepancies. It was decided that PSC would reanalyze six selected scenarios using the heat transfer value used by PNL in addition to reducing conservatisms of the prior analysis. Following completion of this reanalysis, the NRC again had PNL perform an independent check of the new temperature profiles. The results of PNL's analysis were in acceptable agreement with GA's and the FSV temperature profiles were approved by the NRC (Ref. 1).

Subsequent to the reanalysis process identified above, GA identified an error in the open building CONTEMPT-G program. This error caused instability in program output when size changes were made to the computational time steps. The temperature profiles approved by the NRC (Ref. 1) were generated while this error in the open building CONTEMPT-G program was in place. GA corrected the error and under its own direction, performed additional analysis to study the impact of this program error on the building temperature profiles. GA notified PSC via GP-3118 dated May 10, 1988, that after correcting the program error and analyzing the various steam line rupture scenarios, several resultant temperature profiles exceeded the composite envelope profiles utilized for equipment qualification. PSC was unfamiliar with GA's basis and rationale for the CONTEMPT-G program change (Ref. 3) and contracted Numerical Analysis Inc. (NAI) to independently verify the new temperature profiles generated by the mod'fied CONTEMPT-G program. NAI's analysis results concluded that the old GA profiles were non-conservative and informed PSC of this finding. PSC reviewed NAI's results and agreed with NAI's conclusion. On August 16, 1988 following PSC's review, NRC notification was made per the requirements of 50.72(b)(2)(111)(D).

## CAUSE:

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Due to the long period of time (over 10 years) that the program error had existed in the open building CONTEMPT-G program, it is difficult to specifically identify and correct all the various factors that contributed to this issue. The "root cause" for this event was that inappropriate assumptions were made in the open building CONTEMPT-G program that were not identified in the verification process.

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It should be noted that in the early stages of the E.Q. issue, emphasic was placed on large steam line breaks with considerable mass and energy discharges. Although small partial breaks were certainly recognized as plausible events, the open building CONTEMPT-G program was primarily validated against large line break scenarios. The results of these validation efforts, even with the program error in place, agreed closely with other industry computer codes. Even during the NRC independent verification of the GA profiles, PNL analyzed only the large and medium line break scenario data provided them by PSC. No comparative analysis was performed by PNL on the small line break scenarios. Additionally, it was discovered as a part of this current evaluation that an apparent error was made in the modelling assumptions utilized for the analyses. This apparent error produced results which closely paralleled GA's errant CONTEMPT-G code results.

## SAFETY ANALYSIS:

Since the computer code utilized to develop the FSV E.O. temperature profiles contained an error, it is possible that certain FSV equipment could have been qualified to less limiting criteria than what would have actually existed during an HELB. In such an event, equipment items exposed to harsh environments in excess of their qualification rating could fail to perform their safety functions. Therefore, this event alone could have prevented the safety function of equipment needed to mitigate the consequences of an HELB accident and is being reported herein pursuant to 10CFR = 50./3(a)(2)(v)(D).

PSC is utilizing NAI to generate new temperature profiles to which equipment will be qualified. NAI is performing this task using the COBRA computer code. The new composite profile generated by this code has a substantially lower peak building temperature than the old GA CONTEMPT-G profiles, but sustains a higher temperature for a longer period of time (see Figure 1). Analyses of numerous postulated smaller HELBs have established that a SLRDIS fixed high temperature trip setpoint of equal to or less than 180 degrees F will limit the magnitude of the delayed building temperature peaks. This trip setpoint ensures that postulated smaller HELBs are detected and automatically isolated to limit the building elevated temperature for environmental qualification, and to allow for building access.

PSC is in the process of reviewing all FSV E.Q. Binders to determine whether any equipment items are not qualified to the new NAI temperature profile. At this time, over 90% of the binders have been reviewed and verified acceptable. Although PSC has not completed this analysis, it appears that all FSV E.Q. equipment originally qualified to the GA CONTEMPT-G composite profile will also be qualified to the NAI COBRA temperature profile. The remaining binders are being reviewed. The results of this review will be included in a supplemental report.

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# CORRECTIVE ACTIONS:

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GA corrected the error in the open building version of the CONTEMPT-G code.

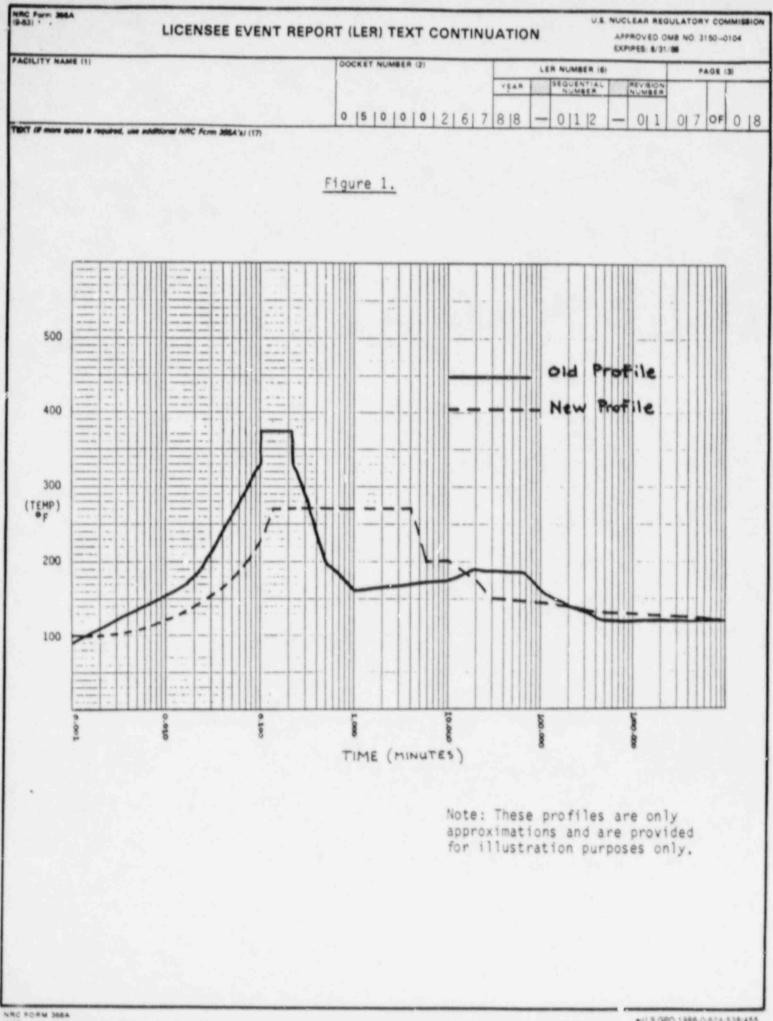
Numerical Analysis Incorporated (NAI) will develop PSC's building temperature profiles using the COBRA computer code. These profiles will be the basis for FSV equipment qualification.

PSC will modify SLRDIS to add an additional actuation at a fixed setpoint (approximately 180 degrees F). This modification will be performed by CN-2842, and will be completed prior to reactor operation greater than 2% power following the current outage.

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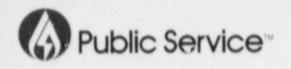
REFERENCES:

- K. L. Heitner to R. O. Williams, "Approval of Fort St. Vrain Temperature Pressure Profiles" NRC letter dated March 13, 1987 (G-87071).
- D. W. Warembourg to D. Alberstein, "Reactor and Turbine Building Temperature Profiles" PSC letter number PG-1738, June 9, 1988.



<sup>+</sup>U S GPO 1988-0-624-538/455

1 8 NRC Form 366A U.S. NUCLEAR REGULATORY COMMISSION LICENSEE EVENT REPORT (LER) TEXT CONTINUATION APPROVED OM8 NO 3150-0104 EXPIRES: 8/31/88 FACILITY NAME (1) DOCKET NUMBER (2) LER NUMBER IS PAGE (3) SEQUENTIAL NUMBER NUMBER YEAR Fort St. Vrain, Unit No. 1 -011 018 OF 018 0 15 10 10 10 2 16 7 818 - 0112 TEXT (If more apace is requires, use additional NRC Form 3864's) (17) Jim Hil Nuclear Licensing Engineer J. M. Granding rvisor Nuclear Licensing-Compliance Supervisor Acting Fuller Manager, Nuclear Production and Station Manager NAC FORM 3884



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Public Service Company of Colorado

16805 WCR 19 1/2, Platteville, Colorado 80651

September 21, 1988 Fort St. Vrain Unit No. 1 P-88345

U. S. Nuclear Regulatory Commission ATTN: Document Control Desk Washington, D.C. 20555

Docket No. 50-267

SUBJECT: Licensee Event Report 88-012-01, Revised Preliminary Report

REFERENCE: Facility Operating License No. DPR-34

Gentlemen:

Enclosed, please find a copy of Licensee Event Report No. 50-267/88-012-01, Revised Preliminary Report, submitted per the requirements of 10 CFR 50.73(a)(2)(v)(D). This revised report includes the expected submission date for the supplemental report.

If you have any questions, please contact Mr. M. H. Holmes at (303) 480-6960.

Sincerely,

Talk

C. H. Fuller Manager. Nuclear Production and Station Manager

Enclosure

cc: Regional Administrator, Region IV ATTN: Mr. T. F. Westerman, Chief Projects Section B

> Mr. R. E. Farrell Senior Resident Inspector, FSV

CHF/1mb