## WESTINGHOUSE CLASS 3

# RESIDUAL HEAT REMOVAL SYSTEM AUTOCLOSURE INTERLOCK REMOVAL REPORT FOR DIABLO CANYON NUCLEAR POWER PLANT 

Revision 2.0

## Pacific Gas and Electric Company Contract No. 212-5-238-85

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## WESTINGHOUSE CLASS 3

## ABSTRACT

A review and analysis has been performed which justifies the deletion of the autoclosure interlock of the Residual Heat Removal System suction isolation valves (MOV-8701, MOV-8702). The open permissive circuitry remains intact. An alarm is added to notify the operator of an incorrectly positionod valve (MOV-8701, MOV-8702). A probabilistic analysis was used to determine that deletion of the autoclosure interlock is acceptable from a safety standpoint.

### 1.0 INTRODUCTION

Recently, the Nuclear Regulatory Commission (NRC) has expressed interest in the acceptability of removing the autoclosure interlock (ACI) on the Residual Heat Removal System (RHRS) suction isolation valves. This interest arises from a concern about the loss of residual heat removal capability during cold shutdown and refueling operations due to inadvertent isolation of the RHRS caused by failure of the autoclosure interlock circuitry. Isolation of the RHRS while operating could result in a loss of decay heat removal capability, overpressurization of the Reactor Coolant System (RCS) with possible power-operated relief valve (PORV) challenge, and/or RHRS pump damage.

This report provides an evaluation of the removal of the Residual Heat Removal System autoclosure interlock at the Diablo Canyon Nuclear Power Pluit. The report reviews the basis for the interlock in terms of regulations and justifies removal of the auioclosure interlock based on a safety evaluation of the effect of autoclosure interlock removal on low temperature overpressure protection, RHRS availability and interfacing system LOCA potential.

### 1.1 Background

A U.S. Nuclear Regulatory Commission, Office for Analysis and Evaluation of Operational Data, report (Reference 1) analyzed U.S. pressurized water reactor (PWR) experiences involving loss of an operating Decay Heat Removal (DHR) system. This report indicated that 130 loss of decay heat removal events were reported between 1976 and 1983. The consequences of a total loss of DHR system under certain conditions could lead to core uncovery, and resultant fuel damage. In addition, analysis of operating data revealed that an underlying or root cause of most loss of DHR system events are human factors deficiencies involving procedural inadequacies and personnel error. Most errors were committed during maintenance, testing, repair operations and at a time when the DHR system (or RHRS) is operational.

Reference 1 lists summaries of loss of RHRS events that occurred during 1982 and 1983. A Nuclear Safety Analysis Center/Electric Power Research Institute report (Reference 2) identified loss of RHRS events for the period 1976 through 1981. Table 1-1 from Reference 1 is reproduced and provides a tabulation of these 130 DHR system losses for 33 plants during the period of 1976 through 1983. The leading category of loss of DHR system events ( 37 of 130) was an inadvertent automatic closure of the suction isolation valves in the RHRS. Most of these events were caused by human error. Table 1-2 is also reproduced from Reference 1 and tabulates the number of events for five categories of failure that cause a loss of RHRS operation and illustrates that $28.5 \%$ of the events were caused by inadvertent automatic closure of suction isolation valves.

The reader is directed to Reference $\angle$ appendices for summary information on RHRS losses that occurred from 1976 to 1981. For the period of 1982 through 1983, Reference 1, Appendix A providse additional summary information on RHRS losses.

As stated in Reference 1, plant "operating data has shown that for RHRS operation, removal of power or removal of the autoclosure interlocks to the RHRS suction isolation valve can be a safe, effective method for preventing spurious suction isolation".

Also, the Reference 1 case study report has stimulated much irterest in the subject of autoclosure interlocks. Based upon an earlier (1984) draft of this case study report, Sandia Laboratories performed a risk assessment as part of Task A-45 evaluating the competing risks associated with RHRS suction isolation valve closures and Event V. The Sandia report (Reference 3), "Potential Benefits Obtained by Requiring Safety-Grade Cold Shutdown Systems," was done for the Calvert Cliffs plants' configuration. Subsequent to their quantification of risks, Sandia concluded that:
> "The lowest core melt frequency due to the combination of loss of RHRS suction during cold shutdown and "-LOCAs is obtained when there are no autoclosure interlocks on the RHRS suction valves...removing the overpressure interlocks from the RHRS suction valves gives the best RHRS suction arrangement for PWRs based upon this analysis.

...when interlocks are present, loss of RHRS suction is the largest contributor to core melt frequency for all assumed values of probability of core melt given that RHRS suction is lost. However, when the interlocks are not present, the core melt frequency due to loss of RHRS suction is comparable to or less than the V -LOCA core melt frequency for the "best estimate" cases.

Finally, we believe that the "best" RHRS suction valve arrangement is to have a single suction line without primary system over-pressure interlocks on the valves."

In response to the earlier draft of this case study, NRR reviewed the issue of "RCS/RHRS Suction Line Interlocks on PWRs". NRR performed a prioritization evaluation (a simplified risk and cost assessment). As a result, on August 13, 1985, in Reference 4, the Director of NRR forwarded a copy of his staff's prioritization of this issue, assigned it a "HIGH" priority ranking, and directed the Director of the Division of Systens Integration to take the actions necessary to resolve this issue.

It is also important to note that Westinghouse has evaluated Kewaunee's proposal for removing the autoclosure interlocks on the RHRS suction valves. Reference 5 notes that Westinghouse's analysis concluded that for Kewaunee, the proposed modification would be a safety improvement. NRR has subsequently approved the modification. As noted in Reference 5, the effects of autoclosure interlock removal upon plant safety must be evaluated on a plant by plant basis because of numerous plant-specific differences.



### 2.0 SUMMARY OF RESULTS

The analysis presented in this report supports removal of the autoclosure interlock. Based on prior operating experience, the autoclosure interlock has been a dominant montributor to the loss of decay heat removal. Spurious closure of the KriRS isolation valves due to false signals, deenergization of power buses and various testing errors has occurred steadily since the implementation of the ACI in the 1970s. Recently the effects of the spurious closure of these valves are being realized. An NRC report has determined that spurious closure of the RHRS isolation valves account for approximately 29 percent of the total RHR system failures. This report has raised a concern that the autoclosure interlock has become detrimeitial to overall safety. Most recent reports on the subject favor removal of the autoclosure interlock or some tyoe of modification to the interlock.

However, before a change can be implemented, the NRC has requested that the effects of removal of the interlock be examined. Through examination of the interfacing systems LOCA frequency, the RHRS availability, and the effects on overpressurization transients, the results of this report show that there would be no net increase in risk consequences from removal of the interlock.

Two modifications to the autoclosure interlock were addressed in this report. The first modification considered was the addition of alarin which would actuate if the RCS pressure increased above a given setpoint and either of the RHRS isolation valves is open. The other modification, a single switch to close both valves (based on NRC suggestions), will not provide adequate assurance that the valves are closed. An alarm would have to be installed to alert the operator of a high RCS pressure and that the RHR suction valves are open. Based on the analyses presented in this report, a single switch and alarm configuration does not result in an appreciable change in safety as compared to the modification that includes an alarm only. Furthermore, during leak rate testing of the valves, the single switch would have to be overridden or bypassed in order to singularly test each isolation valve. Therefore, the design change that is recommended for Diablo Canyon is the deletion of the autoclosure interlock and the addition of an alarm.

### 3.0 LICENSING BASIS

### 3.1 History

During the 1960's, typical RHR systems for a pressurized water reactor plant consisted of twin (auxiliary) coolant trains connected to the RCS via a single suction line. Two closed valves in series isolated the RHRS from the RCS while the RCS was in operation. A "prevent-open" interlock was added to one of the valves to prevent its opening while RCS pressure was above RHRS design pressure. The second valve had its power disconnected via administrative procedures. As an additional design feature, the valve motor operator was sized with insufficient torque to move the disc with a pressure differential greater than 600 psi. Finally, a relief valve set at RHiRS design pressure was located just downstream of the suction valves.

The early 1970's saw the Atomic Energy Cormission (AEC) pressing for a pressure interlock on both valves. (Reference 6). As two suction lines were also starting to make their appearance, the AEC position was extended to four suction isolation valves. Other AEC positions that evolved at that time (1971) were 1) interlocks for automatic closure on pressure, 2) diverse principles fol 'nterlocks, and 3) commitment to IEEE-279. Table 3-1 provides a brief impac' 'these requirements and some of the plants affected.

The introduction of the autoclose interlock re-emphasized a previous concern, i.e. RCS pressure control during RHRS operation. Spurious closure of the suction valves isolates the suction line relief valves and the low pressure letdown line from the RHRS to the Chemical and Volume Control System (CVCS). Without the low pressure letdown line, plant operation in the water solid mode is difficult. Additionally, should a pressure transient occur, automatic closure of the suction valves prevents the relief valve from performing its function, subsequently aggravating the transient. (Reference 7 \& 8)

A joint meeting between industry ( $\underline{W}$, B\&W, and CE) and AEC in March 1974 attempted to clarify the AEC's requirement for the interlocks. (Reference 9)

This discussion brought about two acceptable methods of overpressure protection while the RHRS is in operation or when returning the RCS to operation (Reference 10):

- automatic closure interlocks, or
- sufficient capacity of the RHRS suction line relief valves, or
- a combination of the above

It was pointed out at the meeting that the AEC representative on the ANS Committee 32.4 (Overpressure Protection of Low Pressure Systems Connected to the RCPB) said he would not accept remioval of the autoclosure interlock. While the AEC replied that a committee member speaks only as an individual and not for the AEC, the AEC representative's position was later adopted as their official position. (Reference 11)

Over the next 1-1/2 years, Westinghouse performed several analyses in support of the RESAR-3 and RESAR-41 applications. These analyses demonstrated that adequately sized relief valves were sufficient by themselves in protecting the RHRS from overpressure, and that the autoclosure feature was not needed.

In parallel with the RESAR-41 application and NRC staff review, the NRC formalized their position and released it as a Branch Technical Position in the summer of 1975. (Reference 12)

Faced with the requirement for retaining the autoclosure interlock, discussion with the NRC centered on raising the setpoint such that the autoclosure feature did not prematurely isolate the RHRS. This was in conjunction with lowered setpoints for the RHRS suction line relief valves (to 450 from 500 fsig), to allow the relief valves to perform. The raised autoclosure setpoint, however, did not preclude transients initiated by a spurious closure of the valves. (Reference 13)

The Safety Evaluation Report (SER) for the RESAR-41 application provided the final NRC position on the issue (Reference 14). While Branch Technical Position ICSB-3 required that "the valve operators should receive a signal to close automatically whenever the primary system pressure exceeds the subsystem design pressure," the RESAR-41 SER stated:
> "In particular, the Residual Heat Removal System inlet isolation valves will be equipped with autoclosure and prevent-open interlocks to prevent possible exposure of the residual heat removal system to excessive pressures. The interlocks will be designed to prevent the occurrence of a situation where there is only a single barrier protection against a possible loss-of-coolant accident outside containment.

The autoclosure interlock will close the system isolation valves when the Reactor Coolant System pressure increases to 750 pounds per square inch. This pressure is greater than the Residual Heat Removal System relief valve set pressure plus accumulation, thus assuring that the relief valves will provide some overpressure protection to the reactor coolant system when in the cold shutdown condition.

Westinghouse has designed the relief valves for the residual heat removal system to prevent inadvertent overpressurization during plant cooldown or startup, considering normal operating conditions, infrequent transients, and abnormal occurrences. As part of our review of the final design for RESAR-41, we will require that Westinghouse provide a detailed analysis that demonstrates the adequacy of the capacity of the system relief valves to prevent overpressurization during plant cooldown or startup."

The situation of a possible loss-of-coolant accident would exist should an operator neglect to close one of the series isolation valves when the plant is returned to normal pressure. Passive failure of the closed valve disc would expose the RHRS to full RCS pressure, resulting in a possible rupture of the RHRS outside containment. Then the NRC recognized an autoclosure setpoint above the RHRS design pressure separated the autoclosur feature from pressure transient mitigation. The requirement, then, was to demonstrate the adequacy of the relief valves.

The industry experienced problem of loss of RHRS capability and possible pump damage following a failure of the autoclosure interlock was reviewed in conjunction with the RESAR-3S application (Reference 15). Actions taken by several utilities were to remove power from one or more of the suction valves during the timeframe when the RHRS pumps are most susceptible to damage due to loss of suction (i.e. refueling). Westinghouse recommended this via a technical bulletin in mid-1977 (Reference 16). Various other publications also dealt with the issue (References 17 \& 18).

Use of the pressurizer power-operated relief valves in conjunction with the RHRS relief valves was reviewed and found acceptable by the NRC. While the NRC did recognize the higher (above RHRS design pressure) setpoint, they stopped short of permitting the removal of the autoclosure feature from the plant (Reference 19).

In 1977, Working Group ANS-56.3 (previously ANS-32.4 and ANS-55.4) finished work on ANSI/ANS-56.3-1977 (Reference 20). This standard permitted the designer a choice between a suction valve automatic closure feature and relief valves having adequate relieving capacity. The standard also stated that:
"Control Room indication shall be provided to indicate when isolation is
necessary."

The issue remained quiet through the remainder of the 1970 's.

In 1982, a study was published by Oak Ridge National Laboratory detailing the review and evaluation of events placed in the NSIC file involving the removal of decay heat in US BWRs and PWRs from June 1979 through Juie 1981 (Reference 21). The Oak Ridge study reported that during the two-year period "the most frequent event involving a significant problem with DHR system was the cavitation of RHRS pumps". Five events were traced to spurious closure of the suction valves due to signals from their autnolosure interlocks.

Shortly thereafter, an EPRI report also detailed events where RHRS operation was curtailed due to inadvertant suction valve closure (Reference 2), Twenty-four events (occurring over five years) that involved inadvertent loss of RHRS cooling due to the autoclosure interlock failing were identified.

### 3.2 Current Regulations

The removal of the autoclosure feature has been reviewed against applicable regulatory and industry sufety standard criteria.

### 3.2.1 ANSI/ANS 56.3-1977

"Overpressure Protection of Low Pressure Systems Connected to the Reactor Coolant Pressure Boundary".

Section 3 of this standard describes several methods of protection that "shall be used" to prevent overpressurization of the RHRS. Specifically, Section 3.2.1 permits the designer a choice between the use of an autoclose feature or pressure relief sized on the basis of the most extreme pressure transient anticipated to occur during the plan operating condition when the two valves are open. Figure 1 of the standard depicts these methods.

Following removal, the method of overpressure protection provided is that depicted in Figure 1 as 1(b).

### 3.2.2 Standard Revieh Plan

"Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plant," NUREG-0800, July 1981.

The NRC position is stated in two branch technical position papers: RSB 5-1 and ICSB 3. ICSB 3, position B.2. states:
"For system interfaces where both valves are motor-operated, the valves should have independent and diverse interlocks to prevent both from opening unless the primary system pressure is below the subsystem desigr. pressure. Also, the valve operators should receive a signal to close automatically whenever the primary system pressure exceeds the subsystem design pressure."
"The following shall be provided in the suction side of the RHRS to isolate it from the RCS.
A. Isolation shall be provided by at least two power-operated valves in series. The valve positions shall be indicated in the control room.
B. The valves shall have independent diverse interlocks to prevent the valves from being opened unless the RCS pressure is below the RHRS design pressure. Failure of a power supply shall not cause any valve to change position.
C. The valves shall have independent diverse interlocks to protect against one or both valves being open during an RCS increase above the design pressure of the RHRS. "

The RSB position is clear in that an autoclosure interlock must be utilized and its setpoint must be tied to the RHRS design pressure. The ICSB position however does not emphatically require an autoclosure interlock.

While the ICSB position makes no mention of relief valves, position C. of RSB 5-1 states:
"The RHRS shall satisfy the pressure relief requirements listed below.

1. To protect the RHRS against accidental overpressurization when it is in operation (not isolated from the RCS), pressure relief in the RHRS shall be provided with relieving capacity in accordance with the ASME Boiler and Pressure Vessel Code. The most limiting pressure transient during the plant operating condition when the RHRS is not isolated from the RCS shall be considered when selecting the pressure relieving capacity of the RHRS. For example, during shutdown cooling in e PWR with no steam bubble in the pressurizer, inadvertent operation of an additional charging
pump or inadvertent opening of an ECCS accumulator valve should be considered in selection of the design bases.
2. Fluid discharged through the RHRS pressure relief valves must be collected and contained such that a stuck open relief valve will not:
(a) Result in flooding of any safety-related equipment.
(b) Reduce the capability of the ECCS below that needed to mitigate the consequences of a postulated LOCA.
(c) Result in a non-isolatable situation in which the water provided to the RCS to maintain the core in a safe condition is discharged outside of the containment.
3. If interlocks are provided to automatically close the isolation valves when the RCS pressure exceeds the RHRS design pressure, adequate relief capacity shall be provided during the time period while the valves are closing."

The RSB position goes on to state:
"D. Pump Protection Requirements

The design and operating procedures of any RHRS shall have provisions to prevent damage to the RHRS due to overheating, cavitation or loss of adequate pump suction fluid."

The inconsistency in branch positions (one requires the autoclosure interlock while the other regards it as optional) is compounded by the NRC's acceptance of the autoclosure setpoint above RHRS design pressure. As events from the past few years have shown loss of RHRS cooling to be a more serious and more frequent transient than overpressure transients, emphasis should be placed on the recognized pump protection requirements of RSB 5-1.

An April 17, 1984 NRC memorandum (Reference 22) discussed a clarification of the design basis of RHRS interlocks and a concern centered on the safety implications of the failure mode of interlocks due to a loss of an instrument bus. Reference 22 concludes that:
"In summary, the aspects of the RHRS interlocks which can result in automatic closure of the RHRS suction valves on a loss of an instrument bus make a negligible contribution to the design basis for which they are provided. However, the potential for a complete loss of decay heat removal capability by the RHRS is greatly increased by this design. Therefore, it is recommended that in the interest of plant safety, action should be taken to modify the design of RHRS interlocks for $W$ plants such that a loss of an instrument bus will not result in a loss of RHRS cooling. Also, it is recommended that action be taken to clarify the purpose of the RHRS interlocks for the Diablo Canyon record as well as any required changes."

A January 1985 RSB position states that (Reference 5):
"The issue of RHRS ACI reliability is being prioritized by SPEB. In the meantime, proposals to change the RHRS isolation valve controls should be carefully considered, especially in light of the many overlapping concerns."
"There is no reason, as yet, to allow or even encourage whole scale removal of the ACI . The request by each plant should be reviewed on a case-by-case basis. As a minimum, however, any proposal to remove the ACI should be substantiated by proof that the change is a net improvement in safety. For example, requests for removal of power or the ACI should assess as a minimum, the following:

1. The means available to minimize Event $V$ concerns.
2. The alarms to alert the operator of an improperly positioned RHRS MOV.
3. The RHRS relief valve capacity must be adequate.
4. Means other than the ACI to ensure both MOVs are closed (e.g., single switch actuating both valves).
5. Assurance that the function of the open permissive circuitry is not affected by the proposed change.
6. Assurance that MOV position indication will remain available in the control room, regardless of the proposed change.
7. An assessment of the proposed change's effect on RHRS reliability, as well as on LTOPs concerns."

## 3.2 .3 10CFR50.59

This section of the Code of Federal Regulations allows the utility to make a change in the facility as described in the FSAR without prior NRC approval if the change does not involve a change in the technical specifications or an unreviewed safety question.

The change "shall be deemed to involve an unreviewed safety question (i) if the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the safety analysis report may be increased; or (ii) if a possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report may be created; or (iii) if the margin of safety as defined in the basis for any technical specification is reduced."

The "Standard Technical Specifications for Westinghouse Pressurized Water Reactors", NUREG-0452, DRAFT Rev. 5, requires that verification of automatic isolation and interlock action of the RHRS from the RCS be conducted at least once per 18 months in accordance with surveillance requirement 4.5.2.d.1). The "Technical Specifications for the Diablo Canyon Nuclear Power Plant, Units 1 and $2^{\prime \prime}$, NUREG-1151 does noi contain a similar surveillance requirement.

Thus the impact of the removal of the ACI on 10CFR50.59 is 1 imited to determining if the removal constitutes an unreviewed safety question as discussed above.

The first question that needs to be addressed is (i) as defined above: is there an increase in the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the safety analysis report?

Section 6.6 of this report concludes that based on three areas of probabilistic analysis: 1) the frequency of an Event $\mathrm{V}, 2$ ) the availability of the RHRS, and 3) the effect on overpressure transients, there is an overall increase in safety due to removal of the autoclosure interlock. While it is true that the frequency of the overpressurization event does increase, the increase is from E-14 to E-12 and is considered to be insignificant and offset by the reduction in frequency of Event $V$ and the slight increase in RHRS avallability. The demonstrated improvement in RHRS availability will further reduce the probability of the accidents for which RHRS failure during shutdown cooling is an initiating event. Therefore, this change does not involve an increase in the probability or consequences of accidents previously evaluated.

Addressing the second question (ii) as defined above: is the possibility of an accident or malfunction of a different type than any evaluated previously in the safety analysis report created?

Chapter 15.0 of the Diablo Canyon Final Safety Analysis Report states that the analysis of an RHRS overpressurization accident, requested in Reg. Guide 1.70, rev. 1, is not necessary because the RHRS interlocks makes the overpressurization of the RHRS extremely unlikely.

The effect of an overpressure transient at cold shutdown conditions will not be altered by removal of the ACI. With or without removal of the ACI, the RHRS will be subject to overpressure for which the RHRS system relief valves must be relied upon to limit pressure to within RHRS design parameters. This follows from the fact that while it is true that the interlocks provide an automatic closure to the RHRS suction valves on high RCS pressure,
overpressure protection of the RHRS is provided by the RHRS relief valves and not by the slow acting suction valves that isolate the RHRS from the RCS. The purpose of the interlocks is to assure that there is a double barrier (two closed valves) between the RCS and the RHR system when the plant is at normal operating conditions. The interlock function is to preclude conditions that could lead to a LOCA outside of containment due to operator error. The interlock function is not to isolate the RHRS from the RCS when the RHRS is operating in the decay heat mode.

There are several levels of defense which would assure thide is a double barrier between the RCS and RHRS when the plant is at normal operating conditions. The first level would be the plant operating proceaures which instruct the operator to isolate the RHRS during plant heatup. The second level would be the installation of alarms that sound a "valve not full closed" signal in conjunction with a "RCS pressure - high" signal. The intent of these alarms is to alert the operator that either of the RCS-RHRS isolation valves is not fully closed, and the double isolation is not intact. The third level of defense would be revised alarm response guidelines and operator training. It should be noted that the open permissive interlock is not changed and it would still function to prevent opening of either RHRS suction/isolation valve when the RCS is at a higher pressure.

Thus, removal of the RHR ACI does not create the possibility of an accident different than that described in the DCPP FSAR Update. RHR overpressurization in shutdown modes is prevented because of the addition of alarms to warn the operator of "valve not full closed" and the relief capacity of the RHR safety valves. In operating modes, the open permissive interlocks function to prevent the opening of the RHRS suction/isolation valves when the RCS is at high pressure. The open permissive interlocks are not affected by the proposed ACI removal.

Item (iii) does not apply as the autoclosure interlock is not used as a basis for any technical specifications.

### 3.2.4 10CFR50, Appendix $R$

Appendix $R$ governs the Fire Protection Program to be applied to all nuclear power plants, and states that "when considering the effects of fire, those systems associated with achieving and maintaining safe shutdown conditions assume major importance to safety because damage to them can lead to core damage resulting from loss of coolant through boiloff." Given that the result of the PRA portion of this report justifies the deletion of the autoclose interlock based on a criterion of availability and reliability the RHR system is made in effect, more available, this change does not adversely impact the current Diablo Canyon Appendix R Fire Protection Safety Analysis Report. Of course, changes made as a part of the autoclose deletion must be reviewed by the customer and made in accord with Appendix $R$ requirements that apply to Diablo Canyon, such as train separation, fire barriers, fire hazards analyses, etc. as defined in section III.G. of Appendix $R$ to 10CFR50.
Plants Affected
2 Loop Plants
Kewaunee
Prairie Island 1 \＆ 2
3 Loop Plants
North Anna 1 \＆ 2
Beaver Valley 1
4 Loop Plants
Zion 1 \＆ 2
D．C．Cook 1 \＆ 2
Salem 1 \＆ 2
Diablo Canyon $1 \& 2$
Trojan
TABLE 3－1
9NIATVA NOIIJNS SצH甘 OI SNOII甘JIHIOOW O马yIdSNI כヨ甘
Group I

Original Design


Plants Affected
Sequoyah 1 \& 2
Watts Bar 1 \& 2
McGuire $1 \& 2$

TABLE 3-1 (continued)
contains two separate connections,
one for each pressure transmitter. (2) Added control circuitry to auto-

AEC INSPIRED MODIFICATIONS TO RHRS SUCTION VALVING
Required Modifications

## Original Design

pap!noud sem daff!msuext anssand auo 'q anten dof leub!s lox lqua ap!noud of 1.a (1) above. The pressure transmitter was taken off the reactor coolant loop which contained the RHR suction line. The pressure transmitter was connected into the suction line inside the containment.
 valves if they haven't been manuau!̣! uo!fons ч7oq asolว א!leว!̣еш -

2 Loop Plants
Future Plants
$\begin{aligned} & 3 \text { Loop Plants } \\ & \text { Farley } 1 \& 2 \\ & \text { Virgil Summer }\end{aligned}$ A control signal from one of the two
pressure channels is used to inter-
lock the opening of the two suction
line valves adjacent to the RCS and a
control signal from the other pressure
channel is used to interlock the
opening of the two suction line valves adjacent to the RHRS.

$$
\quad \begin{aligned}
& \text { Shearon Harris, } 1,2,3,4 \\
& \text { prevent its opening whenever } \\
& \text { the system pressure is greater } \\
& \text { than about } 425 \text { psig. }
\end{aligned} \quad \begin{array}{ll}
\text { b. Added control circuitry to automatically Future Plants }
\end{array}
$$

AEC INSPIRED MODIFICATIONS TO RHRS SUCTION VALVING

Plants Affected


Required Modifications

##  <br> 1070W uo! founf [8ว!7! for <br> Group III <br> I dnotg se awes <br> $$
\begin{aligned} & \text { 3. Group III } \\ & \text { Same as Group } \end{aligned}
$$ $\dot{m}$ <br> Operated Valves, E-EPS-737, May 10, 1972.

### 4.0 RESIDUAL HEAT REMOVAL SYSTEM

### 4.1 Function

The primary function of the Residual Heat Removal System (RHRS) is to remove decay heat from the Reactor Coolant System (RCS) during plant cooldown and refueling operations. To effect this, the RHRS transfers heat from the RCS to the Component Cooling Water System (CCWS) to reduce reactor coolant temperature to the cold shutdown temperature at a controlled rate dui 'ng the latter part of normal plant cooldown and maintains chis temperature until the plant is started up again.

As a secondary function, the RHRS also serves as part of the Emergency Core Cooling System (ECCS) during the injection and recirculation phases of a LOCA. The RHRS is also used to transfer refueling water between the refueling water storage tank and the refueling cavity before and after the refueling operations.

### 4.2 System Description

A schematic diagram of the RHRS is present in Figure $4-1$. The RHRS consists of two heat exchangers, two motor-driven pumps and the associated piping, valves and instrumentation necessary for operational control. The inlet line to the RHRS is connected to the hot leg of reactor coolant loop 4, while the return 1 ines .re connected to the cold legs of each of the reactor coolant loops.

The RHRS suction line is isolated frum the RCS by two motor-operated valves in series while the discharge lines are isolated by two check valves in each line. The RHRS isolation valves and the inlet line pressure relief valve are located inside containment while the remainder of the system is located outside containment.

During system uperation, reactor coolant flows from the RCS to the RHRS pumps, through the tube side of the RHRS exchangers and back to the RCS. The heat is transfarred in the RHRS exchangers to the component cooling water circulating through the shell side of the heat exchangers.

Coincident with RHRS operations, a portion of the reactor coolant flow may be diverted from downstream of the RHRS heat exchangers to the CVCS low-pressure letdown line for cleanup and/or pressure control. By regulating the diverted flowrate and the charging flow, the RCS pressure can be controlled. Pressure regulation is necessary to maintain the pressure range dictated by the fracture prevention criteria requirements of the reactor vessel and by the No. 1 seal differential pressure and NPSH requirements of the RCPs.

The RCS cooldown rate is manually controlled by regulating the reactor coolant flow through the tube side of the RHRS heat exchangers. Instrumentation is provided to monitor system pressure, temperature and total flow, and to activate an alarm on low flow.

### 4.3 System Operation

A discussion of RHRS operation during various reactor operating modes follows:

## Reactor Startup

Generally, during cold shutdown, residual heat from the reactor core is being removed by the RHRS. The number of pumps and heat exchangers in service depends on the RHRS load at the time.

At initiation of plant startup, the RCS is completely filled, and the pressurizer heaters are energized. The RHRS pumps are operating, but the discharge is directed to the CVCS via a line that is connected to the common header downstream of the RHRS heat exchanger. Indication of steam bubble formations is provided in the control room by the damping out of the RCS pressure fluctuations and by pressurizer level indication. The RHRS is then isolated from the RCS and the system pressure is controlled by normal letdown and the pressurizer spray and pressurizer heaters.

## Power Generation and Hot Standby Operation

During power generation and hot standby operation, the RHRS is not in service but is aligned for operation as part of the ECCS.

## Reactor Shutdown

The initial phase of reactor cooldown is accomplished by transferring heat from the RCS to the Steam and Power Conversion System (SPCS) through the use of the steam generators.

When the reactor coolant nominal temperature and pressure are reduced to < $350^{\circ} \mathrm{F}$ and less than 425 psig, respectively, approximately 4 hours after reactor shutdown, the second phase of cooldown starts with the RHRS being placed in operation.

The reactor cooldown rate is 1 imited by RCS equipment cooling rates based on allowable stress limits, as well as the operating temperature limits of the CCWS. As the reactor coolant temperature decreases, the reactor coolant flow through the RHRS heat exchangers is increased.

As cooldown continues, the pressurizer is filled with water and the RCS is operated in the water-solid condition. At this stage, pressure is controlled by regulating the charging flow rate and the letdown rate to the CVCS from the RHRS. After the reactor coolant pressure is reduced and the temperature is $140^{\circ} \mathrm{F}$ or lower, the RCS may be opened for refueling or maintenance.

Refueling
Both RHRS pumps are utilized during refueling to pump borated water from the refueling water storage tank to the refueling cavity. During this operation, the isolation valves in the inlet line of the RHRS are closed and the isolation valves from the refueling water storage tank are opened.

After the watar level reaches normal refueling level, the inlet isolation valves are opened, the Refueling Water Storage Tank (RWST) supply valves are closed, and RHRS operation resumes.

During refueling, the RHRS is maintained in service with the number of pumps and heat exchangers in operation as required by the heat load.

Following refueling, the RHRS pumps are used to drain the refueling cavity to the top of the reactor vessel flange by pumping water from the RCS to the Ku.fueling Water Storage Tank.

### 4.4 Component Description

This section describes the major components of the RHRS.

## RHRS Pumps

Two pumps are installed in the RHRS. The pumps are sized to deliver sufficient reactor coolant flow through the RHRS heat exchangers to meet the plant cooldown requirements. The use of two pumps ensures that cooling capacity is only partially lost should one pump become inoperative.

The RHRS pumps are protected from overheating and loss of suction flow by miniflow bypass lines that provide flow to the pump suction at all times. A control valve located in each miniflow line is regulated by a signal from the flow transmitters located in each pump discharge header. The control valves open when the RHRS pump discharge flow is less than 500 gpm and close when the flow exceeds 1000 gpm .

A pressure sensor in each pump discharge header provides a signal for an indicator in the control room. A high-pressure alarm is also actuated by the pressure sensor.

The two pumps are vertical, centrifugal units with mechanical shaft seals. All pump surfaces in contact with reactor coolant are austenitic stainless steel or equivalent corrosion resistant material.

## RHRS Heat Exchangers

Two heat exchangers are installed in the RHRS. The heat exchanger design is based on heat load and temperature differences between reactor coolant and component cooling water existing 20 hours after reactor shutdown when the temperature difference between the two systems is small.

The installation of two heat exchangers ensures that the heat removal capacity of the system is only partially lost if one heat exchanger becomes inoperative.

The heat exchangers are of the shell and $U$-tube type. Reactor coolant circulates through the tubes, while component cooling water circulates through the shell. The tubes are welded to the tubesheet to prevent leakage of reactor coolant.

RHRS Valves

8701, 8702, Inlet Isolation Valves
These valves are motor-operated gate valves which are normally closed except when the RHRS is in operation. Both valves are provided with a manual control (open/closed) on the main control board and will fail in the "as-is" position.

Valves 8701 and 8702 are interlocked with RCS pressure transmitters PT-405 and PT-403, respectively. These interlocks prevent the inadvertent opening of the valves, 8701 and 8702 , when the RCS pressure is above approximately 390 psig . Both valves also close automatically when the RCS pressure is higher than approximately 700 psig .

Also, valve 8702 is interlocked such that it cannot be opened if the temperature in the pressurizer vapor space ( $T-454$ ) is above a temperature corresponding to a saturation pressure which would cause overpressurization of the RHRS.

A more detailed description of the interlocks is provided in Section 5.0.

8700A, 8700 B , Pump Suction Isolation Valves
These valves are motor-operated gate valves which are normally open except when the RHRS is used as part of the Safety Injection System (SIS) during the recirculation phase. An interlock is provided between valve $8700 \mathrm{~A}(8700 \mathrm{~B})$ and valves $8982 \mathrm{~A}(8982 \mathrm{~B}), 9003 \mathrm{~A}$ (9003B) and 8804 A (8804B) to prevent the opening of the suction valve without closing the others.

HCV-637, HCV-638, Heat Exchanger Flow Control Valves
These valves are air-operated butterfly valves which may be positioned from the main control room. By manually adjusting these valves, the flow through the heat exchangers may be controlled.

## HCV-670, Bypass Flow Control Valves

This valve, located in the heat exchanger bypass line, is an air operated butterfly valve which may be positioned from the main control room. By adjusting the valve the bypass flow around the heat exchangers may be changed to regulate the residual return flow temperature, and in conjunction with HCV-637 and 638 the total return flow. The line containing the valve is isolated from the RHRS pumps and heat exchangers by two manual gate valves in the piping cross-tie between the RHRS pumps and heat exchangers. These valves are opened prior to initiation of residual heat removal operations.

FCV-641A, FCV-641B, Miniflow Stop Valves
These normally closed velves are motor-operated globe valves which are located in the residual heat removal pump miniflow line. The valves are controlled by flow transmitters FIC-641A and FIC-641B, respectively, which are located in the discharge line of the RHRS pump. These valves will open when their respective pumps are operating, and the flow is less than 500 gpm . When the pump flow exceeds 1000 gpm , or a residual heat removal pump stops, the corresponding valve will close.

## 8716A, 8716B, Crosstie Valves

These motor operated valves, located in the piping crosstie downstream of the residual heat exchangers, are normally open during normal plant operating and

RHRS operation. These valves are controlled from the main control board and fail "as ic". These valves are used to align the RHRS for the recirculation phases following a loss of coolant accident.

8948A, 8948B, 8948C, 8948D, RHRS Injection Line Check Valves
There is one check value in each branch of the cold leg injection line to prevent backflow from the RCS.

8818A, 8818B, 8818C, 88180, RHRS Return Line Check Valves
One check valve is located in each branch of the RHRS return line to serve as a backup in the event of leakage of the check valves on the cold leg injection line.

8809A, 8809B Gate Valve
There is an eight-inch normally open, motor-operated gate valve in each parallel discharge line from the residual heat removal pump, downstream of the heat exchanger and discharge crosstie header.

8726A, 8726 B Crosstie Valves
These two manual gate valves isclate the heat exchanger bypass line. During startup of the RHRS, these valves must be opened.



### 5.0 PROPOSED MODIFICATION

To effect the removal of the autoclosure interlock (ACI), certain modifications must be made to the Diablo Canyon Plant. These changes fall into two categories: modifications to the electrical design, and modifications to the operating procedures. The following text defines the functional requirements for these changes, and actual implementation of the changes will be by Pacific Gas \& Electric. The model used in the analysis for this report is based on an assumed mathod of implementation; this method was chosen based on inputs from both Pacific Gas \& Electric and Westinghouse. The final modifications made to Diablo Canyon, both electrically and procedurally, must meet the given functional requirements to ensure validity of this report.

### 5.0.1 Current Interlocks

There are two normally closed motor operated series isolation valves in the RHR pump suction line from the RCS loop 4 hot leg. Valve 8702 is the first value from the RCS and 8701 is second. The interlock feature provided for both valves is essentially identical in function. Each valve is interlocked against opening unless the RCS pressure as measured by appropriate channels is less than approximately 390 psig ; in addition, valve 8701 is also interlocked with RCS temperature and will not be permitted to open unless the RCS temperature is less than $475^{\circ} \mathrm{F}$. Each valve is also interlocked to automatically close on increasing RCS pressure greater than 700 psig ; for valve 8701, both RCS pressure and temperature are required for the valve to automatically close. These interlocks are shown functionally on Figures 5-6 and $5-7$, and also are shown on elementary wiring diagrams in Figures $5-8$ and 5-9. Currently, the velve control via the interlocks is shown in the center of the elementary diagrams as a single line circuit comprised of contacts that close when the appropriate conditions are met; i.e., auto-close for valve 8701 functionally receives inputs from PC-405BX and TC454, and valve 8702 receives inputs from PC403BX. The open permissive is similarly shown. As can aiso be seen on Figures 5-8 and 5-9, marked revisions which implement the deletion of the auto-close interlock are shown. These are encircled by clouds and are explained in section 5.1.1 through 5.1.3.

### 5.1 Functional Requirements

The items included in the functional requirements are discussed below.
5.1.1 Alarms are to be provided (for each valve in the RHRS suction line) that sound given a "valve not full closed" signal in conjunction with a "RCS pressure-high" signal. See Figures 5-1 and 5-2. The intent of these alarms is to alert the operator that either of the RCS-RHRS isolation valves in series is not fully closed, and the double valve isolation from the RCS to the RHRS is not intact. Valve position indication input to this alarm must be from the valve Stem Mounted Limit Switches (SMLS) and power to that SMLS must not be affected by power lockout to the valve. As with other power lockout valves, there is no requirement for opposite train power for the SMLS, only that power to the SMLS is not affected by power lockout. (See Figure 5-3) The elementary wiring diagrams also show the alarm circuits for the valves. These were added to the upper right position of the diagrams, and indicate a monitor light, an annunciator, a power source, a pressure input, and a valve position input. Also note 3 has been added which specifies that the valve position must be input whenever the valve is not fully closed. This alarm must be verified safety grade just as other safety-related alarms would be, such as those occurring for Refueling Water Storage Tank Level.
5.1.2 The autoclosure portion of the currant interlock will be removed, shown functionally on Figures $5-4$ and $5-5$. The only change is removing the autoclose portion, as the open permissive circuit will not be altered. The original interlocks are shown on Figures $5-6$ and $5-7$, for comparison. The elementary wiring diagrams also show the auto-closure portion deletion simply by disconnecting the autoclose input line from contact 5 on each valve. This will effect the minimal plant required changes, and will also provide positive invaliciation of the autoclose interlock. These changes are marked in the lower central portion of the diagram. Note that inputs will still be made to the interlock; however the contact(s) will never be closed by the autoclose signal, and thus the valve will never close from an "autoclose" signal.
5.1.3 The plant specific operating procedures for heatup from cold shutdown to hot standby must be modified to reflect the appropriate (new) alarm recognition and responses for the added alarins. These new procedure sections will verify that the operator takes steps to close the open valve, or if this is not possible, to return to the shutdown mode of operation.

Overall, the functional requirements reflect the deletion of the ACI, while retaining the open permissive portion of the interlock.

### 5.2 Alternative Modification

In the determination of the modification which would be proposed, considerations were given to many factors including regulatory requirements, systems design, and minimizing piant changes. The set of changes which best meet all of the considerations was chosen as the proposed modification as defined in Section 5.1. Other modifications were considered, but did not meet all the criteria as well as the proposed modification. For example, a single switch capable of closing both valves in series (instead of separate switches for each valve) was also considered. However, from a reliability standpoint, the single switch and alarm versus an alarm only, provides no significant advantage. Furthermore, in order to test the isolat'jn valves for leakage, pursuant to Technical Specification Surveillance Ru. ifement 4.4.6.2.2, the single switch circuitry would have to be bypassed or overridaen so that each valve could be "demonstrated operable by verifying leakage to be within its limit ..." (Reference 29). Thus, the alarm modification supports the "minimum-change" concept with respect to plant design changes and operations.


ELGURE 5-1
YAL.YE ALARM - MOY-8701


EIGURE 5-2


## ELGURE 5-3

POSITION INDICATION

SPRING RCTURN TO AUTIL
AUTL $=$ MAINTAIN POSITIDN


ELGuRE 5-4
PROPOSED INTERLOCK - MOV-8701


EIGURE 5-5
PROPOSED INTERLOCK - MOV-8702

SPRING RETURN YO AUTI

$$
\text { AUTD }=\text { MAINTAIN PASITION }
$$



EIGURE 5-6
CURRENT INTERLOCK - MOV-8701

SPRING RETURN TD AUTD
AUTQ = MAINTAIN PUSITIUN


EIGURE 5-7
CURRENT INTERLOCK - MOY-8702





### 6.0 PROBABILISTIC ANALYSIS

### 6.1 Introduction

This section describes the probabilistic analyses performed to justify removal of the autoclosure interlock. Three different areas were examined in this analysis: 1) the likelihood of an interfacing system LOCA; 2) the potential increase in RHRS availability and 3) low temperature overpressurization concerns. Each of the three areas were analyzed utilizing the current configuration and then the proposed modification. The NRC-proposed single switch to close both isolation valves was also analyzed. The net change in each area was determined and the overall net detriments and benefits were weighed to determine the acceptability of removal of the autoclosure interlock.

### 6.2 Data

The data used in this analysis was derived primarily from the Interim Reliability Evaluation Program (IREP). When data was unavailable for electrical components, other sources were chosen, particularly IEEE 500 and WASH-1400. The component failure data is presented in Table 6.2-1.

Testing information was obtained from the Technical Specifications while maintenance information was extracted from the Zion Probabilistic Safety Study (assumed to be representative of PWRs).

Human error probabilities were obtained from Swain and Guttman (Ref. 27) and are explained in the individual analyses.

### 6.3 Event V Analysis

An interfacing systems LOCA, referred to as an Event $V$ in WASH-1400, is a breach of the high pressure reactor coolant system boundary at an interface with the low pressure piping system. This breach has the potential to cause a LOCA in which the containment and containment safeguards radionuclide protective barriers are bypassed.

In this section, the frequency of an interfacing systems LOCA is calculated for the RHRS-RCS system interface for three cases: 1) with the present interlock configuration, 2) with the proposed modification logic, and 3) with the NRC pruposed modification.

## Analysis

Typically, RHRS suction paths are the dominant $V$-sequence source. Figure 6.3-1 depicts the RHRS suction valve arrangement. As shown in the figure, one suction line contains two series motor-operated valves. Failure of these normally closed valves would expose the low pressure piping upstream of the valves to the existing RCS pressure.

Failure combinations involving rupture of two series motor-operated valves are included in the analysis. Also included are the combinations of one valve failing open and subsequent rupture of the other valve. Failure of both valves to close during startup operations is not included because this condition would become apparent during startup testing and corrective action would be taken.

Based on the above information, the following expression is developed for the frequency of an Event $V$ via the RHRS suction path:

$$
F(\text { VSEQ })=\lambda_{2} Q\left(V_{1}\right)+\lambda_{1} Q\left(V_{2}\right)+\lambda_{2} Q\left(V_{1} R\right)
$$

where

| $\lambda_{1}$ | $=$ failure rate of MOV 8701 (rupture) |
| :--- | :--- |
| $\lambda_{2}$ | $=$ failure rate of MOV 8702 (rupture) |
| $Q\left(V_{1}\right)$ | $=$ probability that MOV 8701 is open |
| $Q\left(V_{2}\right)$ | $=$ probability that MOV 8702 is open |
| $Q\left(V_{1} R\right)$ | $=$ probability of rupture of MOV 8701. |

The following assumptions were applied in the development of this equation:

1) The frequency of valve rupture is that of catastrophic internal leakage. The failure rate $\lambda_{i}$ is the same for either valve given that the valve is exposed to RCS pressure.
2) Valve 8702 is at RCS pressure and valve 8701 is at RCS pressure only if valve 8702 fails open.
3) No common cause rupture of the two valves is considered. This is based on the fact that no common cause ruptures of valves have actually occurred.
4) The calculation is based on an occurrence when the plant is not in the shutdown mode.

Assuming that the total defined mission time is the time between refueling outages (i.e., every 18 months), the quantity $Q\left(V_{1} R\right)=6.57 E-4$. The valuss for $\lambda_{1}$, and $\lambda_{2}$ are equal and are taken to be $1 \mathrm{E}-7 / \mathrm{hr}$. The probabilities for $Q\left(V_{1}\right)$ and $Q\left(V_{2}\right)$ were quantified through the use of the detailed fault trees (see Appendix B). The probabilities were caiculaced to be:

| With Present | With | With NRC |
| :--- | :---: | :---: |
| Configuration | Modification | Modification |


| MOV $8701 Q\left(V_{1}\right)$ | $2.39 E-5$ | $1.27 E-8$ | $1.19 E-8$ |
| :--- | :--- | :--- | :--- |
| MOV $8702 Q\left(V_{2}\right)$ | $2.39 E-5$ | $1.27 E-8$ | $1.19 E-8$ |

Using these values and substituting in 0 the $V$-sequence equation yields the following results:

|  | With Present | With Proposed | With NRC |
| :---: | :---: | :---: | :---: |
|  | Configuration | Modification | Modification |
| $F\left(V_{\text {seq }}\right)$ | $6.17 \mathrm{E}-7 / \mathrm{yr}$ | $5.76 \mathrm{E}-7 / \mathrm{yr}$ | $5.76 \mathrm{E}-7 / \mathrm{yr}$ |

The frequency of an Event $V$ decreases by approximately seven percent with removal of the ACI. The main contributor to the frequencies in each case is a double rupture of MOV 8702 then 8701 . The deletion of the ACI has no impact on this contributor. The other contributor (the rupture of one valve while the other valve has failed open) decreases from 4.19E-8/year for the present configuration to $1.11 \mathrm{E}-11 /$ year for the modification case and to $1.04 \mathrm{E}-11 /$ year for the NRC modification case. This is a significant decrease in the occurrence of an Event $V$ by this failure mode. The deletion of the autoclosure interlock and the inclusion of an alarm is beneficial in reducing this contribution.

Furthermore, several factors were not considered in the analysis but are worth mentioning:

1) Both suction valves have $A C$ power removed from the operators during Modes 1, 2, and 3. This prevents opening of the valves during these modes.
2) Both suction valves have open permissive interlocks that prevent the valves from being opened whenever the RCS pressure is greater than approximately 390 psig. The second isolation valve also has an openpermissive interlock that prevents it from being opened if the pressurizer temparature exceeds $475^{\circ} \mathrm{F}$.
3) It is highly unlikely that the valve could move against the high $\Delta P$ across the valve when the plant is in Modes 1,2 , or 3 (i.e., valve motor size is inadequate to open the valve given the high $\Delta P$ ).
4) If a RHRS pump seal should fail during an Event V, water would spill onto the floor of the pump compartment. Each RHRS pump is in a separate, shielded compartment that dirains to a sump containing two 30 -gpm pumps that can pump the spillage to the waste disposal system. Gross leakage from the RHRS can be accommodated in the pump compartments, each of which has a capacity of 9450 gallons.
5) If an Event $V$ should occur, the RHRS relief valve would operate. This relief valve discharges inside containment to the pressurizer relief tank. This relief valve would decrease the consequences of an Event $V$.

Based on the analysis, a modification is beneficial in reducing the frequency of an interfacing system LOCA.

### 6.4 RHRS Availability

The availability of the RHRS during cold shutdown has been of increasing concern in the nuclear industry. Many events have occurred in which the ability to remove decay heat has been lost, either because a loss of flow in the RHRS or because of a loss of the heat sink. Abnormal events that occur shortly after initiation of the RHRS, while decay heat is high, can cause bulk boiling conditions if decay heat removal is lost and not restored by the operator in a time period as short as twenty minutes.

Removal of the autociosure interlock will reduce the number of spurious closure events and thus increase the availability of the RHRS system.

## Analysis

Three different scenarios were postulated to evaluate the unavailability of the RHRS: 1) failure during startup of the RHRS, 2) failure during the first 72 hours after initiation (in which two trains of RHRS are reguired), and 3) failure during long term cooling (a 6 week time period was assumed in which only one train of RHRS is required).

The models used for the analysis are fault trees. The major components in the RHR system were modeled including valves, heat exchangers and pumps. The two suction valves are modeled in detail to explicitly show the changes in the unavailability due to removal of the autoclosure interlock. Detailed descriptions of the analysis are shown in Appendix $C$.

The results of the analysis are shown in Table 6.4-1. As can be seen from the table, the unavailability of the RHRS slightly decreases with removal of the autoclosure interlock. A trend appears to be occurring in which the change in unavailability (with and without the interlock) decreases more rapidly as the time period required for RHRS operation increases. Thus, removal of the interlock increases the availability of the RHRS.

### 6.5 Overpressurization Transients

A number of occurrences in the past have happened in which the tenperature pressure limits have exceeded a plant's Technical Specifications. A majority of these events have occurred during startup or shutdown conditions. These pressure transients are of concern because the vessel material is more brittle at relatively low temperatures than at operating temperatures.

The effect of an overpressure transient at cold shutdown conditions will be altered by removal of the autoclosure interlock. With removal of the interlock, the RHRS will also bo subject to overpressure for which it may not be designed to handle. However, the RHRS relief valve will be available to help mitigate the transient. The tradeoffs between these two must be considered in the analysis of the RHRS autoclosure interlock.

The overpressurization analysis uses event trees to model the mitigating acticns (both automatic and manual) following the occurrence of low temperature overpressurization events. These mitigating actions affect the severity of the overpressurization events and reduce the possibility of damage to the plant. The analysis is divided into two parts: 1) determination of the frequency of cold overpressure events and 2) the effect of mitigation on the transients. Each part is discussed below.

## INITIATING EVENTS

Many past reports heve characterized the different types of transients possible at cold shutdown. These events have been grouped into two gener 11 categories: 1) events that affect the balance between mass addition and mass letdown; and 2) events that affect the heat input/heat removal balance. These
types of events have actually occurred and the NRC has expressed concern over the frequency of these events. This section describes each transient event and attempts to quantify the frequency of these events.

## Premature Opening of the RHRS

Overpressurization of the RHRS could occur if the RHRS is opened prior to reducing the RCS pressure below the RHRS design pressure. However, the RHRS isolation valves are equipped with "prevent-open" irterlocks. These interlocks prevent the opening of the suction valves before the RCS pressure is below a given setpoint. Furthermore, the valve motor operator is sized with insufficient torque to raise the stem with a pressure differential across the valve greater than 500 psi .

To date, this type of event has not occurred, although attempts to access the RHRS prior to reduction of the RCS pressure have resulted in valve motor failures. Because of the design features on the RHRS isolation valves, this type of event is not considered plausible and was not analyzed.

## Rod Withdrawal

Rod withdrawal during shutdown would have only a minor effect on the RCS. The neutron flux would increase to the source range trip setpoint prior to core generation.

A Westinghouse analysis of this event for the RESAR-3 and -41 designs utilized the following assumptions:

1) Reactor is subcritical by $1 \% \Delta k / k$.
2) One loop of the RHRS is isolated from service.
3) RCS temperature and pressure are $350^{\circ} \mathrm{F}$ and 425 psig prior to the event.

It was determined that the transient pressure would not exceed $110 \%$ of RHRS design pressure. The RHRS relief valve would also be available to help mitigate this transient. The removal of the autoclosure interlock has no effect on this transient. Thus, this event was not considered a critical event and was removed from the analysis.

## Failure to Isolate RHRS During Startup

During plant startup, the RCS is completely filled, and the pressurizer heaters are energized. The RHRS pumps are operating, but the discharge is directed to the CVCS. After the RCPs are started, pressure control via the RHRS and the low-pressure letdown line is continued until the pressurizer steam bubble is formed. Indication of steam bubble formation is provided in the control room by the damping out of the RCS pressure fluctuations and by pressurizer level indication. The RHRS is then isolated from the RCS.

If the RHRS is not isolated by the operator, RCS pressure would increase to that of the suction relief valve. Discharge through the relief valve would prevent the operator from increasing the pressure further.

If only one of the suction valves is closed, RCS pressure can be raised to operating pressure. Should the operator fail to close the remaining valve, a loss-of-coolant accident could occur if the closed valve opens or ruptures. This scenario is addressed in Section 6.3.

## Pressurizer Heaters Actuation

During startup, all of the pressurizer heaters are energized and letdown is initiated (or increased) in order to form a steam bubble in the pressurizer. If the pressurizer heaters are inadvertently actuated, the same scenario results. The expansion rate due to boiling in the pressurizer is greater than that due to merely heating the pressurizer water. If the RHRS is not isolated, the pressure increase is limited by the relief valve on the RHRS suction line. However, if the relief valve failed, the RCS pressure would
increase above the RHRS design pressure. The transient will continue until the decreasing pressurizer water level actuates an automatic heater cutoff (at approximately $10 \%$ of pressurizer volume).

## Startup of an Inactive Loop

The startup of an inactive reactor coolant pump is another heat input transient. This transient occurs when charging flow is continued for a period of time without having all of the reactor coolant pumps in operation. This cold water collects in the low areas of the loop piping. When the inactive reactor coolant pump is started, the cold water mixes in the warm steam generators, and the cold water expands as its density decreases. This expansion results in an increase in RCS pressure.

## Loss of RHRS Cooling Train

Loss of an RHRS cooling train may occur at any time during RHRS operation. However, such a loss would have its greatest impact if it were to occur immediately following RHRS initiation during plant cooldown. At this time, the heat generation rate exceeds the heat removal capability of the remaining cooling train. The RHRS relief walve will protect the RHRS from overpressurization as long as the RCS does not boil. A loss of cooling would cause a slow rise in the coolant temperature and pressure.

## Opening of Accumulator Discharge Isolation Valve

The opening of an accumulator discherge valve will input water into the RCS which is already water solid. The peak pressure reached during this event will be between the initial RCS pressure and the accumulator nitrogen pressure.

## Letdown Isolation

For this event, two scenarios are considered: isolation of letdown while the RHRS remains functional and isolation of the RHRS itself. Of these, the pressure transient associated with the second event is greater in that the
mass addition transient is coupled with a heatup transient. Additionally, isolation of the RHRS precludes the use of the RHRS relief valve in mitigating the pressure rise and places this action on the LTOP system.

## Charging/Safety Injection Pump Actuation

Under stable pressure conditions, the inadvertent actuation of a charging pump or safety injection pump that results in coolant addition without an increase in letdown will cause a pressure transient.

These transients were researched in order to determine the frequency of these events. Appendix $D$ details the events that have occurred and the quantification of the frequencies of these transients. Table 6.5-1 lists the transients and the frequencies calculated based on operating experience.

HEAT INPUT ANALYSIS

The investigation of reported cold overpressurization events showed these heat addition mechanisms.

1) inadvertent operation of all the pressurizer heaters.
2) heat addition from core decay heat at 12 hours following an extended period of operation,
3) inadvertent startup of a reactor coolant pump with temperature asymmetry between the reactor coolant system and the steam generator.

Past analyses assessed the effect of these transients in terms of the change in RCS pressure associated with each transient. Figure $6.5-1$ was generated from these analyses. Note that the above transients are applicable to Diablo Canyon Power Plant, see Reference 25.

This figure shows that heat input transients occur quickly in time. The figure also shows that given that RCS temperature and pressure are below $350^{\circ} \mathrm{F}$ and 450 psig, the RCS pressure change is less than approximately 200 psi for
the decay heat addition and pressurizer heaters actuation. For these cases, the RHRS suction valve autoclosure interlock would not be activated (the setpoint is 700 psig). Furthermore, the LTOP system and the RHRS suction relief valve are capable of mitigating these transients. The probability of the failure of the RHRS relief valve coupled with failure of two trains of the LTOP system is extremely small (on the order of $3 \mathrm{E}-09$ ). Given that the initiating event frequency for pressurizer heaters actuation is $6.32 \mathrm{E}-3 / \mathrm{yr}$, the frequency of RHRS damage from this event is roughly $1.9 E-11 / \mathrm{yr}$. For the decay heat addition case (loss of an RHRS cooling train) the initiator frequency ( $5.37 \mathrm{E}-1 / \mathrm{yr}$ ) coupled with failure of the RHRS relief valve and the LTOP system (3E-09) yields a frequency of RHRS damage of $1.6 \mathrm{E}-9 /$ year.

For the startup of an inactive reactor coolant pump with a temperature asymmetry between the RCS and the steam generator, the peak pressure change is approximately 1500 psi and occurs in roughly 90 seconds with no relief valve actuation. Because the RHRS motor-operated valves closing time is approximately two minutes, the RHRS would be subjected to the high pressure before the valve could close. This could lead to the possibility of an interfacing systems LOCA. However the probability of this event is small because the RHRS relief valve and the LTOP system must both fail in order for this event to occur. Given that the frequency for startup of an inactive loop transient is $6.95 \mathrm{E}-2 / \mathrm{yr}$, the frequency of an interfacing systems LOCA would be approximately $2.1 \mathrm{E}-10 / \mathrm{yr}$.

From this analysis, a modification to the autoclosure interlock will have no effect on heat input/removal transients that occur during cold shutdown.

## MASS INPUT ANALYSIS

In order to depict the slower mass input transients (relative to the heat input transients), event trees were utilized to model the mitigating actions that occur following the transients. Operator actions and mitigating systems are included in the event trees.

Event trees were constructed to determine the consequences of the mass input transients. The safety functions, i.e. the event tree top events, for the event trees are defined below:

1. Initiating Event (IE): The fiass input initiator that could lead to overpressurization and/or possible RHRS damage.
2. RHRS isolated (RI): The RHRS will be isolated during certain periods of shutdown. This dictates whether or not the RHRS relie valve is available to mitigate the transient and if the possibility exists for damage to the RHRS.
3. RHRS Suction Relief Valve Lifts at $P=450 \mathrm{psig}$ (RV): If the RHRS is not isolated, the spring loaded relief valve will open at a pressure of approximately 450 psig . The valve is sized to relieve the combined flow of both charging pumps into the RCS at cold conditions and this prevents exceeding the RHRS design pressure.
4. LTOP System Operates at $P=450 \mathrm{psig}$ (LTP): The low temperature overpressure protection system consists of two redundant and independent systems utilizing the pressurizar PORVs. When the system is enabled and reactor coolant temperature is below $330^{\circ} \mathrm{F}$, a high pressure signal (above 450 psig ) will trip the system automatically and open a PORV until the pressure drops below the reset value.

5a. RHRS Suction/1solation Valves Automatically Close at $P=700 \mathrm{psig}(R S)$ : When the pressure increases to 700 psig , the autoclosure interlock receives a pressure signal that actuates the circuitry and closes the motor-operated valve. This node is addressed in the present configuration case only.

5b. Operator Detects Overpressure Alarm and Isolates the RHRS (OD): For the modification case, an alarm would sound when the pressure reached approximately 700 psig . Through a revision in operating procedures,
it is assumed that the operator will detect the overpressure and isolate the RHRS before the pressure reaches $150 \%$ of the RHRS design pressure.
6. Operator Secures Running Pump (OA1): Given an alarm, either by actuation from the RHRS relief valve opening to the pressurizer relief tank (FRT), or from the operation of at least one train of LTOP, or from an RHRS pump low flow alarm (on autoclosure of the RHRS suction valves) or from the high pressure alarm on the RHRS suction valves (in the modification case only), the operator will stop the extra running pump (either an SI or charging pump). If the operator stops the running pump, the overpressure event is halted.
7. Operator Opens a PORV (OA2): Given an alarm, if no or one relief valve operates successfully and the pressure stili continues to rise, the operator may open a PORV in order to reduce the pressure. The operator may also open a PORV if he fails to stop the running pump in order to increase the time available to mitigate the transient.
8. Pressurizer Safety Relief Valve Opens at $P=2485$ psig (PZR): If the charging SI pump has sufficient suction head, the RCS pressure could be increased to the safety relief value setpoint ( $p=2485 \mathrm{psig})$. If the charging pump is not secured then the vaive will cycle open and closed.
9. RHRS Relief Valve Reseats (VR): Given that the RHRS relief valve successfully operated and the transient was terminated, the relief valve must reseat or coolant would be lost to the PRT. If the transient is not stopped, the relief valve will cycle open and closed and is assumed to eventually fail open.
10. Pressurizer PORVs Reseat (PRV): Given that one or more of the PORVs has opened and the transient has tsen stopped, the valve must close in order to avert a loss of coolant condition. If the transient is not stopped, the valve(s) will cycle until failure occurs.

Success criteria for each event tree top event were developed and sjstem/ component failure probabilities were calculated for each of the nodes. The calculation of these probabilities is detailed in Appendix $D$. The results of these calculations (i.e., the failure probabilities) for each of the nodes is shown in Table 6.5-2.

The event tree sequences were classified into discrete consequence categories. Each consequence category then represents a number of individual sequences that all have similar characteristics associated with them. The consequence categories were defined by the parameters listed in Table 6.5-3.

The event trees were quantified using system/component failure probabilities along with the initiating event frequencies to determine the frequency of the consequence categories for the present configuration and the modification case. Each initiating event is discussed below.

## Opening of Accumulator Discharge Isolation Valve

This event does not require an event tree analysis. The opening of an accumulator discharge isolation valve would produce a pressure peak between the initial RCS pressure and the accumulator nitrogen pressure. At cold shutdown conditions, the RCS pressure is below 450 psig. The accumulator design pressure is 700 psig and the normal operating pressure is 650 psig. Therefore, the maximum pressure possible would be less than 650 psig. This pressure would not damage the RHRS. The RHRS actoclosure interlock may close for this case but this would only occur if the RHRS relief valve and the LTOP system failed to operate. Therefore, the interlock has no effect on this transient.

## Letdown Isolation/RHRS Operable

The quantification of the event tree for this case is shown in Appendix D. The consequence frequencies for most of the categories decrease or do not change. However, the frequency of a high overpressure interfacing systems LOCA increases from $6.54 \mathrm{E}-15 / \mathrm{Yr}$ to $2.28 \mathrm{E}-12 / \mathrm{Yr}$. These frequencies are cor.servative because it was assumed that the operator must act within 10
minutes nf the onset of the event, and that if he fails no other operator action would take place. Furthermore, with a mismatch between the charging flowrate with no letdown (maximum flowrate of 550 gpm ) the pressure would not increase as quickly as some of the other transients. Another important assumption is matis that the RHRS could not withstand great pressure. This is also discussed in Section 6.3. The final assumption that is conservative is that the charging pump will continue to run at its maximum flowrate against the large $\Delta P$ that would exist.

## Letdown Isolation/RHRS Isolated

This event puts the transient's overpressure effects on the RCS and not on the RHRS. Thus, the removal of the RHRS autoclosure interlock does not affect the mitigating systems available to stop the transient.

However, the initiating event itself causes this transient. Spurious closure of the isolation valves initiates the overpressure transient. If the autoclosure interlock is removed, the initiator frequency would be reduced. Thus it was conservatively assumed that the frequency of this transient would be reduced by one half (from $2.34 \mathrm{E}-1 / \mathrm{Yr}$ to $1.17 \mathrm{E}-1 / \mathrm{Yr}$ ). (The removal of the interlock would essentially decrease the frequency by much more than one half. However, to account for some unknown spurious closure events, the frequency was conservatively to be reduced by one half. See additional explanation in Appendix D.) The result of the reduction in initiator frequency decreases the challeiges to the mitigating systems in the RHRS and reduces the frequencies of the consequences.

## Charging/Safety Injection Puinp Actuation

The analysis of this transient (assuming maximum flowrates from the pumps and no letdown) in regard to removal of the autoclosure interlock showed an increase in the frequency of high overpressure interfacing systems LOCA from $5.89 \mathrm{E}-15 / \mathrm{Yr}$ to $2.05 \mathrm{E}-12 / \mathrm{Yr}$. Most of the other consequence category frequencies decreased.

The conservative assumptions discussed in the letdown isolation - RHRS operable case also apply in this analysis. Specifically it is doubtful that both pumps will continue to run at maximum flowrate as the pressure increases. Thus more time would be available in which the operator can mitigate the transient because the pressure would increase more slowly.

A summary of the overpressurization analysis is shown in Table 6.5-4.

### 6.6 Conclusions

Based on the three areas of probabilistic analysis - the frequency of an Event $V$, the availability of the RHRS, and the effect on overpressure transients, the overall increase in safety due to removal of tha autoclosure interlock can be seen.

The frequency of an interfacing systems LOCA decreased from 6.17E-7/yr to $5.76 \mathrm{E}-7 / \mathrm{yr}$ at power while the frequency increased from approximately $1.24 \mathrm{E}-14 / \mathrm{yr}$ to $4.33 \mathrm{E}-12 / \mathrm{yr}$ in the overpressurization analysis. Compared to the "at-power" case, the overpressurization case frequency is not as significant as the decreased frequency at power conditions.

Furthermore, the availability of the RHRS increases slightly with removal of the autoclosure interlock (from $2.28 \mathrm{E}-2$ to $2.21 \mathrm{E}-2$ for the long term cooling analysis). The trend in this analysis shows that the longer the RHRS is required, the more of a detriment to decay heat removal is the autoclosure interlock. Also, the loss of one power bus (due to failure or testing) will cause closure of the RHRS suction valves and failure of an inverter supplying power will cause the suction valves to fail closed in the present configuration. With removal of the interlock, these types of concerns will not be as significant.

From a probabilistic point of view, the removal of the autoclosure interlock indicates an increase in safety.

## TAELE 6.2-1 <br> DATA

| CDMP OHEKT | FGILURE MODE FA | FAILURE RATE | WhTA baSE | REMARK.S |
| :---: | :---: | :---: | :---: | :---: |
| AIK DPEKKTED VALVE | FGILURE TO DPEEATE | 3E-03/D | 1REF |  |
| ALARK | FhILUPE TO OFERATE | $6 \mathrm{E}=07 / \mathrm{h}$ | 1EEE-500 |  |
| luSES | ALI MODES | 1.0E-06/ ${ }^{\text {ch }}$ | IREP |  |
| CHECK VALVE | FAILUEE TD DFEK | 1E-04/D | IREF |  |
| CIREUIT BREAKER5 | SPURIOJS DPEN | 1.0E-08/h | IEEE-500 |  |
| ClEEUTT BREAKERS | FAILURE TO OPEN | $2.0 \mathrm{E}=0 \mathrm{OB} / \mathrm{H}$ | IEEE-500 |  |
| CIECUIT BrEakers | FAILURE TO CLDEE | $3.05-08 / H$ | 1EEE-500 |  |
| CCEE SAFETY VALVES | FAILURE TO DFEN | 1E-05/D | IREP |  |
| CODE SAFETY VALVES | Fhllure To Close | 1E-02/D | 1REP |  |
| FUSES | PREKATURE OPEK | 3.0E-06/ h | IREP |  |
| LIATT SWITCH | COHTACTS SHORT | 2.70E-08/h | WASH 1400 |  |
| LIMIT SWITCH | FAILUKE TO DPERATE | 1.0E-04/D | IREF |  |
| MANUAL SEITEH | FAILURE TD TRANSFER | 3E-05/D | IREP |  |
| HANJAL VALVE | FAILURE TO OFERATE | 3E-07/H | IREP | 1 ACTUATIOK/MOK |
| WHKLAL VASEE | Fhilure To oferate | [E-04/D | IREP |  |
| RC*DE DRIVEN Pump | FAILUKE TD START | 35-03/0 | IREP |  |
| KDTOF DRIUEN PJMF | FAIL TO RUK, GIVEH START | 3E-05/h | IREP |  |
| MOTDR DPEEATED VALVE | Fature 10 ciose | 3E-03/D | 1REF |  |
| METOK DFETHTED VALVE | FAILURE TO DPEN | 3E-03/D | IREP |  |
| MDTDF DPERKTEL VELVE | FAIL TO REMEIT DFEM/CLDSE | - JE-07/ H | 13EF |  |
| NDTOK OFERATEE VGLVE | CATKSTPOFHIT | JE-07/h | IREF |  |
| OUERLOAD BREAIEK | PRERHTURE OFEK | $3.08-06 / \mathrm{H}$ | RATE FOR A FUSE |  |
| PhESSuRE TKAKSMITTER | LOW OUTPUT | 6.0E-08/ ${ }^{\text {S }}$ | 1EEE-500 |  |
| PRES5UAE TKANSMITTER | ALL MOEES | $1.73 \mathrm{E}-06 / \mathrm{H}$ | IEEE-500 |  |
| FRE5SURE TRAKSKITTEK | HIGH DUTPUT | 1.3E-07/h | 1EEE-500 |  |
| RELAYS | CONTACTS FAIL TO TRANSFER | R 1.0E-06/h | MREP |  |
| Relars | COKTEETS FAIL TO TRANSFER | h 3E-04/0 | IREP |  |
| RELAY5 | NDPM DPEN COWTACTS SHDFT | $2.75-08 / \mathrm{H}$ | WNT |  |
| RELAY5 | NDRK CLOSED COHTACTS OPEN | - $1.2 \mathrm{E}-07 / \mathrm{h}$ | WKTD |  |
| RELAT5 | COIL FAILURE | $3.05-06 / \mathrm{H}$ | MKEP |  |
| RELATS | CDIL FAILURE | 3E-06/H | IREF |  |
| RELIEF VALYES | FALLURE TD CLOSE | $3 \mathrm{E}-02 / \mathrm{D}$ | IREF |  |
| RELIEF VALVES | FAILUKE TO DPEK | 3E-04/D | IREF |  |
| RDTAEY MAhJAL SUITCH | COKTACTS FAIL DFEN | 1.70t-06/H | WNT |  |
| ROTARY MAKVAL SESTEH | SHDRT ACRDSS COKTACTS | 1.70E-06/H | UNTS |  |
| TEFFEKATURE TRANSH:TTEK | hloh dutput | 1.5E-07/H | 1EEE-500 |  |
| TEKPERKTURE TRANSKITTEK | ALL MODE5 | 1.71E-06/H | 1EEE-500 |  |
|  | LOW DUTFUT | 6. OE-08/ H | 1EEE-500 |  |
| TOROJE 561TL | FRILUKE ID DFERATE | 1.0E-04/D | IEEF |  |
| TEADUE SWITCH | CDKTALTS SH2Fi | $2.7 \mathrm{E}-0 \mathrm{~B} / \mathrm{H}$ | 6FEH 1400 |  |
| TKんK:F DEKEK 5 | ALL MEDE5 | 3.5E-07/ ${ }^{\text {H }}$ | 1EEE-500 |  |
| WKE | OFEN TIFCUTT | $3 \mathrm{E}-06 / \mathrm{H}$ | IREF |  |
| V1RES | SHOFT TO BREME | 3E-07/h | 1REF |  |
| N14! | SHOFT TO POKERED | $3 \mathrm{E}-68 / \mathrm{h}$ | Ifitif |  |

## RHRS UNAVAILABILITIES

## Present

Configuration

NRC
Modification Modification

| MOV 8701 Fails to Open | $5.02 \mathrm{E}-3$ | $5.02 \mathrm{E}-3$ | $5.02 \mathrm{E}-3$ |
| :--- | :--- | :--- | :--- |
| MOV 8702 Fails to Open | $5.02 \mathrm{E}-3$ | $5.02 \mathrm{E}-3$ | $5.02 \mathrm{E}-3$ |
| MûVs 8701 and 8702 |  |  |  |
| Spuriously Close (T=72 hrs) | $6.64 \mathrm{E}-5$ | $2.22 \mathrm{E}-5$ | $2.22 \mathrm{E}-5$ |
| MOVs 8701 and 8702 |  |  |  |
| Spuriously Close (T=1008 hrs) |  |  |  |

## Initiating Event

### 1.0 PREMATURE OPENING OF RHRS

### 2.0 ROD WITHDRAWAL

### 3.0 HEAT INPUT/REMOVAL

3.1 Failure to Isolate RHR Not Analyzed
During Startup3.2 Pressurizer Heaters Actuation6. $32 \mathrm{E}-3$
3.3 Startup of Inactive RCS Loop ..... 6.95E-2
3.4 Loss of RHRS Cooling Train ..... 5.37E-1
,
4.0 MASS INPUT/LETDOWN
4.1 Opening of Accumulator Discharge ..... $1.89 E-2$4.2 Letdown Isolation4.2.1 RHRS Operable1.01E-1
4.2.2 RHRS Isolated (Present) ..... 2.34E-1
(Modification)
4.3 Charging/Safety Injection Pump ..... 9.72E-3 Actuation
(Per Reactor Year)
Not Analyzed
Not Analyzed
,

TABLE 6.5-2
NODAL SYSTEM/COMPONENT FAILURE PROBABILITIES

| Node | Conditions | Failure Probability |
| :---: | :---: | :---: |
| RI | Charging Pump Tree | 0.9 |
|  | Letdown-RHRS Operable Tree | 1.0 |
|  | Letdown-RHRS Isolated Tree | 0.0 |
| RV |  | 3.0E-4 |
| LTP | One Train Fails | 7.71E-3 |
|  | Two Trains Fail | $1.50 \mathrm{E}-5$ |
| RS | Present Configuration Only | 1.44E-5 |
| OD | Modification Cases Only |  |
|  | 20 minutes action time | 5.25E-4 |
|  | 10 minutes action time | 5.02E-3 |
| OA1 |  | 0.217 |
| OA2 | Given Success of Previous Task | 0.21 |
|  | Given Failure of Previous Task | 0.36 |
| PZR |  | 1.0E-15 |
| $V R$ |  | 3.0E-2 |
| PRV | Given One PORV Opens | 3E-3 |
|  | Given Two PORVS Open | 6E-3 |

# TABLE 6.5-3 <br> DESCRIPTION OF CONSEQUIENCE CATEGORIES 

| Identifier | Description |
| :---: | :---: |
| H | High Pressure Transient ( $P>2485$ psig) |
| M | Medium Pressure Transient ( $450<P<2485$ ) |
| L | Low Pressure Trarisient ( $P<450 \mathrm{psig}$ ) |
| SF | Small finite lnss of coolant (<1000 gpm) |
| LF | Large finite loss of coolant ( $>1000 \mathrm{gpm}$ ) |
| SC | Smal? continuous loss of coolant ( $<1000 \mathrm{gpm}$ ) |
| LC | Large continuous loss of coolant ( $>1000 \mathrm{gpm}$ ) |
| OP | Overpressure |
| 1 | RHRS Isolated |
| 0 | RHRS Open |
| V | Interfacing Systems LOCA |

## SUMMARY OF OVERPRESSURIZATION ANALYSIS

| Initiating Event | Initiating Event Frequency (Per Yr) | Effect of Removal <br> of Autoc losure Inter lock |
| :---: | :---: | :---: |
| 1. Premature Opening of RHRS | (None to Date) | No effect. The prevent-open interlock is of importance in this case, not the autoclose interlock. |
| 2. Rod Withdrawal | (None to Date) | No effect. A small increase in temperature is expected but this increase would not affect the RHRS. |
| 3. Failure to Isolate RHRS During Startup | Not Analyzed | This transient is described in Section 6.3. However, the RHRS relief valve's operation would stop further increases in pressure. |
| 2. Pressurizer Heaters Actuation | 6.32E-3 | This transient causes a siow rise in pressure. The relief values are available to mitigate the transient. Pressurizer heaters would automatically shutoff. No effect. |
| 5. Startup of an Inactive Loop | 6.95E-2 | No effect. The rise in pressure is too quick for the slow closing isolation valves. |
| 6. Loss of RHR Cooling Train | $5.37 \mathrm{E}-1$ | No effect. The rise in pressure from decay heat is slow which would give the operator more time to react. |
| 7. Opening of Accumulator Discharge Isolation Valves | e $1.89 \mathrm{E}-2$ | No effect. Mass would be input from the accumulator until the RCS and accumulator pressure equal. Accumulator pressure would not exceed 700 psig. |

# TABLE 6.5-4 (Cont) <br> SUMMARY OF OVERPRESSURIZATION ANALYSIS 

| Initiating | Initiating Event | Effect of Removal |
| :---: | :---: | :---: |
| Event | Frequency (Per Yr) | of Autoclosure Interlock |

8. Letdown Isolation
RHRS Operable
9. Letdown Isolation RHRS Isolated

| 10. Charging/Safety | $1.01 \mathrm{E}-1$ |
| :--- | :--- | | Increases frequency of high overpressure |
| :--- |
| Injection Pump |



FIGURE 6.3-1
AHH Suction Valve Arrangement


Figure 6.5-1
Typical Heat Input Transients
No Relief Valve Actuation

### 7.0 CONCLUSIONS

This section outlines the conclusions reached from the analysis. The conclusions address the NRC concerns expressed in Reference 5.

## 1. MEANS AVAILABLE TO MInimize a loca outside the containment

The two motor operated valves serve as the primary Reactor Coolant System pressure boundary. They are remote operated, and are powered by separate electrical sources. Therefore, the capability of this set of valves to isolate the Residual Heat Removal System is very reliable. Plant operating procedures instruct the operator to isolate the RHRS during plant heatup, so the 1 ikelihood of these valves being left open is remote. Therefore, during normal heatup and cooldown operations, redundant valves and operator action are adequate to insure RHRS isolation.

Should a pressure peak occur in the RCS, the pressure would not be imparted to the low p esssure portion of the RHRS, since a relief valve ( $900 \mathrm{gpm} / 450 \mathrm{psig}$ ) protects the low pressure system. This relief valve discharges inside containment to the pressur izer relief tank (PRT). A discharge would be detected by high temperature, level, and pressure alarms in the PPT.

It would be noted that there are Technical Specification surveillance requirements applicable to these valves.

The frequency of an interfacing systems LOCA is reduced from $6.17 \mathrm{E}-7 / \mathrm{yr}$ for the case with the autoclosure interlock to $5.76 \mathrm{E}-7 / \mathrm{yr}$ for the case with removal of the ACI and addition of an alarm.

## 2. ALARMS TO ALERT THE OPERATOR OF AN IMPROPERLY POSITIONED RHRS ISOLATION VALVE

Each isolation val..- has its position indicated on the main control board at its control switch. In addition, should both valves not be closed when RCS pressure is above RHRS pressure, the relief valve would actuate, resulting in

PRT pressure, level and temperature alarms. Also the RHRS contains pressure alarms which actuate as the pressure approaches the RHRS design pressure. Additional alarms will be implemented to provide indication of an isolation valve being open when RCS pressure exceeds a pre-determined value. The proposed Westinghouse design change incorporates additional alarms in the control room to alert the operator of valve position when the RCS pressure reaches a given pressure.

## 3. VERIFICATION OF THE ADEQUACY OF RHRS RELIEF VALVE CAPACITY

In support of RESAR-3 and RESAR-41 applications, Westinghouse performed several analyses that demonstrated that the relief valve does protect the RHRS from overpressure. These analyses were reviewed, and their applicability to the Diablo Canyon Power Plant was verified as a part of this program.
4. MEANS OTHER THAN AUTO-CLOSE INTERLOCKS TO ENSURE BOTH ISOLATION VALVES ARE CLOSED (E.G. SINGLE SWITCH ACTUATING BOTH VALVES)

Operating instructions, along with redundant position indication and alarms, are sufficient to insure isolation.

Furthermore the alarm which would actuate given a high pressure signal and either isolation valve open would indicate the position of the valves along with the indicating lights.

A single switch to close both valves alone would not provide adequate assurance that the valves would be closed. An alarm would also have to be installed. However it is believed that the location of the hand switches (for both valves) near each other on the MCB is sufficient to ensure timely operator actions.

## 5. ASSURANCE THAT THE OPEN PERMISSIVE CIRCUITRY IS NEITHER REMOVED OR AFFECTED BY THE PROPOSED CHANGE

The Westinghouse design leaves the open permissive circuit intact.

## 6. ASSURANCE THAT ISOLATION VALVE POSITION INDICATION WILL REMAIN AVAILABLE IN THE CONTROL ROOM REGARDLESS OF THE PROPOSED CHANGE

The Westinghouse design leaves the valve position indication at the main control board intact. This indication will be by two means
(i) continuous valve position indication (MCB status lights)
(ii) absence of the alarms provided with the autoclose interlock removal.
7. ASSESSMENT OF THE EFFECT OF THE PROPOSED CHANGE ON RHRS AVAILABILITY, AS WELL AS LOW TEMPERATURE OVERPRESSURE PROTECTION

This change will increase the availability of the RHRS relief valve to mitigate low temperature overpressure occurrences, thereby reducing challenges to the power operated relief valves, and keeping RCS pressure at cold temperatures in an acceptable range with respect to Appendix 6 limits.

The probabilistic analysis of the reliability of the RHRS showed that the availability slightly increased with the deletion of the autoclosure interlock.

Several overpressure transients were modeled to show system and operator response to these transients. An increase in the frequency of a LOCA at shutdown conditions was found. However the relative magnitude of the resulting frequency is insignificant compared to the frequency at power conditions.

Based on the answers provided to the above concerns, removal of the autoclosure interlock along with implementation of the recommended modification results in a net improvement in safety.

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## APPENDIX A <br> OVERVIEW OF FAULT TREE AND EVENT TREE <br> QUANTIFICATION

APPENDIX A

## OVERVIEW OF FAULT TREE AND EVENT TREE QUANTIFICATION

This appendix provides an overview of how fault trees and event trees are quantified. The first section explains fault trees while the middle section describes event trees and the final section summarizes the computer codes used in the analysis.

## A. 1 Fault Trees

A fault tree analysis can be simply described as an analytical technique, whereby an undesired state of the system is specified (usually a state that is critical from a safety standpoint), and the systom is then analyzed in the context of its environment and operation to find all credible ways in which the undesired event can occur. The fault tree itself is a graphic model of the various parallel and sequential combinations of faults that will result in the occurrence of the predefined undesired event. The faults can be events that are associated with component hardware failures, human errors, or any other pertinent events that can lead to the undesired event. A fault tree thus depicts the logical interrelationships of basic events that lead to the undesired event--which is the top event of the fault tree.

It is important to understand that a fault tree is not a model of all possible system failures or all possible causes for system failure. A fault tree is tailored to its top event which corresponds to some particular system failure mode, and the fault tree thus includes only those faults that contribute to this top event. Moreover, these faults are not exhaustive--they cover only the most credibie faults as assessed by the analyst.

It is also important to point out that a fault tree is not in itself a quantitative model. It is a qualitative model that can be evaluated quantitetively and often is. This qualitative aspect, of course, is true of virtually all varieties of system models. The fact that a fault tree is a particularly convenient model to quantify does not change the qualitative nature of the model itself.

A fault tree is a complex of entities known as "gates" which serve to permit or inhibit the passage of fault logic up the tree. The gates show the relationships of events needed for the occurrence of a "higher" event. The "higher" event is the "output" of the gate; the "lower" events are the "inputs" to the gate. The gate symbol denotes the type of relationship of the input events required for the output event. Thus, gates are somewhat analogous to switches in an electrical circuit or two valves in a piping layout. Figure A-1 shows the type of gates commonly used in fault tree analyses.

The basic events identified in the fault trees are divided into four categories: 1) hardware failure unavailability 2) maintenance outage unavailability, 3) test outage contribution and 4) human error probability. The sections below describe these four categories.

## A.1.1 Hardware Failure Unavailability

In fault tree development two types of contribution to component average unavailability are considered:

- Hardware Failure
- Hardware Outages

The hardware failure contribution arises because the component may fail prior to or during its operation. The outage contribution arises when the component is removed from operation for testing, preventative maintenance, and/or repair.

Two important considerations are made when evaluating component failure contribution. The component may be operating or it may be in a standby mode. If the component is part of a standby system, the average unavailability is estimated using either a time-based failure rate or a demand failure probability for the component failure modes being assessed.

A time-based failure rate is applicable when the failure mechanism causing the failure mode is related to the time the component is in service between checks
of its operability. The time between tests is thus an important part of the unavailability calculations for such component failure modes. A demand failure probability is appropriate for component failure modes that do not depend on the test period length, but rather are related to the number of times that the component is "demanded" to operate. The length of test period is irrelevant for a component whose failure mode is truly demand dependent. The component average unavailability using a time-based failure is given by the expression:

$$
\begin{equation*}
a_{c}=1 / 2 \lambda s T_{T} \tag{1}
\end{equation*}
$$

where $q_{c}$ is the component average unavailability, $\lambda$ s is the standby failure rate (failures per hour), and $T_{T}$ is the length of time between tests (hours). An estimate obtained using this expression is adequate assuming an exponential failure distribution and if the product of $\lambda T_{T} \leq 0.1$.

The demand failure probability is given directly by the data base and thus:

$$
\begin{equation*}
q_{c}=a_{d} \tag{2}
\end{equation*}
$$

with $a_{c}$ defined as before and $a_{d}$ is the demand failure probability.
A more appropriate model for calculation of the unavailability of components in standby assumes that such components have both time-dependent and demand failure contributions given by:

$$
\begin{equation*}
q_{c}=q_{d}+1 / 2 \lambda s T_{T} \tag{3}
\end{equation*}
$$

with the parameters $q_{c}, q_{d}$, $\lambda$ s and $T_{T}$ are as previously defined. Data is usaally not available to estimate both the time-dependent and demand related portion of component unavailabilities.

When a component test period is relatively small(e.g., on the order of three months or less) either expression (1) or expression (2) may be used to estimate the unavailability of standby components without introducing sufficient error in the results obtained in fault tree quantification.

The calculation model to compute the unavailability (unreliability) of non-repairable components in operating system is given by the expression:

$$
\begin{equation*}
q_{c}=\lambda_{0} T_{M} \tag{4}
\end{equation*}
$$

with $q_{c}$ as previously defined, $\lambda_{0}$ is the operating failure rate (failures per hour) and $T_{M}$ is the total defined mission time. Again, the expression is adequate assuming an exponential failure distribution and if the product of $\lambda_{C} T_{M} \leq 0.1$

In standby safety related systems, components once actuated may fail to perform for the desired mission time (e.g., a pump fails to start and run for a desired time). The una ;ilability calculation model for such components is given as:

$$
\begin{equation*}
a_{c}=a_{d}+\lambda_{0} T_{M} \tag{5}
\end{equation*}
$$

or

$$
\begin{equation*}
a_{c}=1 / 2 \lambda s T_{T}+\lambda_{0} T_{M} \tag{6}
\end{equation*}
$$

with each parameter for both of the above expressions as previously defined. The selection of which expression to use for the quantification being performed is dependent on the type of data given by the selected data bank being used. Depending on a particular component's operating failure rate and total mission time used, the last term of expression (5) may be dropped from being considered as the calculated operating failure probability may be much less than the component's demand failure probability.

## A.1.2 Maintenance Outage Unavailability

As stated previously, component outages can occur when components are removed from service for test, preventative maintenance, and/or repair. These are generally classified as:

- Scheduled outages resulting from periodic tests and scheduled preventative maintenance.
- Unscheduled outages resulting from a need to repair a failed component.

Scheduled preventative maintenance may be performed by some utilities on major safeguards equipment during normal plant operation. When scheduled preventative maintenance removes a component from service, then a scheduled maintenance outage contribution to component unavailability occurs.

Unscheduled outage occurs when a component fails and is in need of repair to continue system operation. For standby component, this usually happens during a periodic test when a component is discovered to be in a failed state.

Often repair ensues when a component is found to be degraded but operable (i.e., leaky pump and valves seals, excessive back leakage through check valves, etc.) as well as when a catastrophic type failure occurs. Thus the frequency with which unscheduled repair occurs should be as least as large as the component's failure rate, which in many reported data banks, includes only catastrophic failures.

The unscheduled repair (maintenance) outage contribution to component unavailability due to failure detected during test is given by the expression:

$$
\begin{equation*}
a_{R M}=f_{R}\left(\tau_{R} / T_{T}\right) \tag{7}
\end{equation*}
$$

where $a_{R M}$ is the component unavailability due to unscheduled repair, $f_{R}$ is the frequency (per test period) with which repair is expected to occur, ${ }^{\tau} R$ is the mean component repair time (hours) and $T_{T}$ is the test period.

The scheduled preventative maintenance outage contribution to component unavailability for point value computation is estimated by:

$$
\begin{equation*}
a_{S M}=f_{M}\left(\tau_{M} / T_{T}\right) \tag{8}
\end{equation*}
$$

where $q_{S M}$ is the component unavailability due to scheduled maintenance, $f_{M}$ is the frequency (per test period) with which scheduled maintenance occurs, ${ }^{T} M$ is the mean component outage time for scheduled maintenance, and $T_{T}$ is the test period.

In both of the above expressions (i.e. 7 and 8 ) since $a_{R M}$ and $a_{S M}$ are probability values all of the parameters on the right hand side of the expressions must be compatible and cancel out so that respective " $q$ " values obtained are dimensionless. For instance, for monthly testing, if the test period $\left(T_{T}\right)$ is expressed in hours per month, the repair duration ( $\tau_{R}$ ) is in hours, and $f_{R}$ is the reciprocal of the number of months between repair acts, then $G_{R M}$ is dimensionless.

The mean component repair time $\left(\tau_{R}\right)$ is used to compute repair outage unavailabilities for failed components detected during scheduled tests. The mean value selected should be in accordance with a plant's technical specification outage limit.

The frequency $\left(f_{R}\right)$ per test period with which repair is expected to occur is abstracted from the Zion PRA Study and is assumed typical for PWR plants. Test period related with the data covers monthly and quarterly testing and the data presented is given as events per hour. Therefore $Q_{\text {RM }}$ can be directly calculated using the data by the expression:

$$
\begin{equation*}
a_{h_{1}} \quad(\text { Events } / H r)\left(\tau_{R}\right) \tag{9}
\end{equation*}
$$

## A.1.3 Test Outage Contribution

Most testing of safeguards equipment during normal plant operation will not prevent such equipment from carrying out its intended safety function if an accident happens while the equipment is undergoing testing in accordance with the plant's technical specification. If a test procedure results in a comps int being removed írom active service for all or a portion of a test, then a test outage occurs. The unavailability of a component due to testing is given by the expression:

$$
\begin{equation*}
a_{t}=T_{t} / T_{T} \tag{10}
\end{equation*}
$$

where $a_{t}$ is the average unavailability from the test outage, ${ }^{\tau} t$ is the average duration of test (hours) and $T_{T}$ is the interval between test in hours. This data can be extrected from the Technical Specifications.

## A.1.4 Human Error Probability

Both event tree and fault tree modeling presented consider operator error as an input parameter. Considerable work has been done by $\mathrm{Swain}, \mathrm{Bell}$, and Guttman to develop techniques and procedures for conducting human error reliability analysis. Their work along with examples is documented in NUREG/CR-1278, "Handbook of Human Reliability Analysis With Emphasis on Nuclear Power Plant Applications". This document will be used to establish the methodology for the quantification of human errors as required for event and fault tree quantification. Brief summaries of selected task of human reliability analysis are given in the paragraphs that follow.

A task analysis of each task operator contributing to an event tree sequence and/or system unavailability quantification using fault trees is to be performed. This forms the basis for the development of human reliability analysis probability trees. Tasks given by emergency operating procedures, test procedures, and maintenance procedures are formally broken down into smaller units (steps) of human behavior. These individual units of performance constitute elements of behavior for which potential errors can be identified. A task analysis table is prepared based on analysis of tasks. The format of the table is not important, however, the table should contain all information pertinent to required task (i.e. equipment on which action is performed, the required action by operator, limits of his performance, location of controls, etc.). The details in task analysis and the amount of information recorded are used to obtain human erron probability (HEP) estimates used at a later time in the analysis quantification of human errors.

Once the breakdown of tasks steps are completed, errors likely to be made by the operator are identified for each step. The steps are listed in chronologically order. Based on the actual performance situation, the analyst determines which types of error the operator is likely to make and which he is
not. Errors of commission and omission are to be considered. Extreme care should be exercised in deciding which errors, if any, are to be discounted. Rather than discounting a "questionable" error the analyst thinks unlikely, it should be included in the analysis.

Human reliability analysis (HRA) probability trees are then developed for each task identified by accident event trees and system fault trees. In the development of the HRA probability tree, each likely error defined in the task analysis is entered as the right limb in a binary tranch of the tree. Chronologically, in the order of their potential occurrence, the resultant branches of errors form the 1 imb . of the HRA tree, with the first potential error starting at the highest point of the tree.

Any given task appears as a two-1imb branch of a HRA probability tree, with each left limb representing the probatility of success and each right limb that of failure. Once a task is diagrammed as having been completed successfully (or unsuccessfully) another task is considered. The binary branch describing the probability of the success (or failure) of the second task extends from the left (or right) limb of the first branch. This process is repeated until all tasks are included in the development of the HRA tree. When completed, every limb of the tree following the initial branching will depict a conditional probability.

A HRA probability tree is quantified by assigning nominal human error probabilities to each task limb on the tree. Error probabilities assigned are obtained from Chapter 20 of NUREG/CR-1278. To use the values given by Chapter 20 , the analyst categorizes all tasks based upon the operator manipuiating valves, performing a check of another operator's work, using a written procedure, or attempting some other type of task. Values are then selected from Chapter 20 that most closely approximates the uescription of a task being consiciered. In some cases the description on Chapter 20 will detail a scenario only slightly different from the one in analysis, thus the analyst can use the Chapter 20 values for the scenario as is in knowing that the difference between the scenario being analyzed from that of Chapter 20 will not materially affect anal is results. In other cases, the actual situation
and the one described in Chapter 20 may reflect tasks that are basically the same but are performed under different circumstances (e.g., operator stress level, available operators etc.). For such cases the human error probability must then be modified to reflect the conditions under which the task is actually being performed. This is usually done during the assessment of the performance shaping factors acting on the task as detailed in NUREG/CR-1278.

Once human error probability values are assigned to each task limb of a HRA tree, the une silability of an operator to perform a particular procedure can be obtained by summing the conditioral failure probabilities of failed branches representing failed tasks associated with the procedure.

## A.1.5 Fault Tree Component Identification Codes

Table A.1-1 describes the coding system used in the fault tree analysis to identify components, trains and failure modes.

## A. 2 Overview of Event Tree Quantification

Event trees are inductive logic methods for identifying the various possible outcomes of a given initiating event. In risk analysis applications, the initiating event of an event tree is typically a system failure, and the subsequent evonts are determined by the system characteristics.

An event tree begins with a defines accident-initiating event. This event could arise from failure of a system component, or it could be initiated externally to the system. Different event trees must be constructed and evaluated to analyze a set of accidents,

Once an initiating event is defined, all the safety systems that can be utilized after the accident must be defined and identified. These safety systems are then structured in the form of headings for the event tree.

Once the systems for a given initiating event have been identified, the sat of possible failure and success states for each system must be defined and enumerated. Careful effort is required in defining success and failure states for the systems to ensure that potential failure states are not. included in the success definitions; much of this analysis is done using fault tree technique.

Once the system failure and success states have been properly defined the states are then combined through the decision-tree branching logic to obtain the various accident sequences that are associated with the given initiating event. The initiating event is depicted by the initial horizontal line and the system states are then connected in a stepwise, branching fashion; system success and failure states have been denoted by $\$$ and $F$, respectively. The format follows the standard tree structure characteristic of event tree methodology, although sometimes the fault states are located above the success states.

The accident sequences that results from the structure are shown in the last column. Each branch of the tree yields one particular accident sequence. The system states on a given branch of the event tree are conditional on the previous states having already occurred.

Once the final event tree has been constructed so that the results associated with each accident sequence have been defined, the final task is to compute the probabilities of system failure. Fault tree analyses are used to calculate the conditional probabilities needed for each branch of the event tree. Multiplication of the conditional probabilities for each branch in a sequence gives the probability of that sequence. (Reference: McCormick, Norman J., Reliability and Risk Analysis, Academic Press, New York, 1981.)

## A. 3 Computer Codes

This section describes the compt ${ }^{+-r}$ codes used in the analysis. The codes used in fault tree analysis (WESLLi, SIMON2 and GRAFTER2) are presented followed by the event tree codes (SUPER3).

## A.3.1 GRAFTER2

GRAFTER2 is a computer code written in FORTRAN and ASSEMBLER languages to construct fault trees interactivity on an IBM-XT or an IBM-AT computer. It is used in conjunction with the SIMON2 and WESCUT codes to carry out fault tree analysis from construction stage, to data base management, then to quantification.

The GRAFTER2 code can be used to construct, store, update and print fault trees interactively. The code can construct fault trees containing up to 2064 boxes (gate or basic event). A menu of commands is provided to construct the faults trees. Computer keyboard is used to move to different locations of the fault tree.

## A.3.2 WESCUT

WESCUT is a computer code written in FORTRAN77 to run on an IBM-PC model AT or $X T$. It identifies the minimal cutsets of a fault tree. It also quantifies the mean failure probability and variance of the top event and other specified lower level events.

For each gate specified in the input for cutset identification, the code identifies and prints out the cutsets. The cutsets are listed in order of decreasing probability. The mean probability and variance for the gate is also calculated and is printed.

## A. 3.3 SIMON 2

SIMON2 is a computer code written in FORTRAN to be run on :BM-XT or an IBM-AT computer to support the fault tree analysis done by the GRAFTER2 code. Three major objectives are defined for the implementation of the code:

1. To minimize hand calculations and data entry that go into fault tree analysis.
2. Provide tables for documentation.
3. Improve quality assurance by providing a master data file for all the fault trees needed for a given project.

SIMON2 calculates and tabulates basic event failure probabilities and variances. If requested, these probabilities and variances can also be placed in a GRAFTER2 fault tree (to be referred to as a "GRAFTER2 database") generated by GRAFTEn?.

## A.3.4 SUPER3

SUPER3 is a code for event tree analysis using an IBM-XT or AT computer. The code will draw an event tree or draw and quantify an event tree. In addition, the code will run a series of quantifications of a single event tree using alternate event probabilities if required for sensitivity or other studies.

The code can be used to construct and quantify an event tree with a maximum of 25 nodes and with up to 10 branches for each event node. The event tree is further 1 imited to a total of 650 branches. The event tree may be repeatedly recalculated with multiple set of probability values for the purpose of conducting sensitivity or other studies.

Output includes or may include the event tree picture, accident sequence number, number of failures, sequence pathname, sequence probability, sequence frequency and sequence category, consequence category, consequence probability and consequence frequency and, finally, the event tree frequency (sum of the consequence frequencies).

The code can present the output information in any of several formats selected to suit user needs.

## TABLE A.1-1 <br> FAULT TREE COMPONENT IDENTIFICATION CODES

Nine or ten character codes identify component failures in the fault trees. The format of component failures in the fault trees is STCCCXXXXF where:

* $S$ is the system identification code.
* $T$ is the identification of the train to which the component belongs.
* CCC is the component type identification code.
* $X X X X X$ is the number designating the single component in the P\&IDs.
* $F$ is the specific component failure.

The following lists the codes used in this evaluation.

COMPONENT IDENTIFICATION CODE

Code Letters Component Identification

System

R
Residual Heat Removal System

Train

1
2

> Train \#1

Train \#2

Mechanical Components

HE
Heat Exchanger
PV
Pressure Vessel
PM

# TABLE A.1-1 (Cont) <br> COMPONENT IDENTIFICATION CODE 

## Code Letters

Component Identification

CV
HV
AV
LS
LO
SW
SR
MO
MS
RE
RL
CN

CO
FU
CT
TP
TT
TE

Valve, Check
Valve, Hydraulic Operated
Valve, Air (Pneumatic) Operated
Limit Switch
Lockout Relay or Switch
Manual Switch (Pushbutton)
Manual Switch (Rotary)
Motor
Motor Starter
Relay
Relay (Latching Type)
Relay or Switch Contact
Switch, Torque
Thermal Overload Element
Valve, Manual
Valve, Motor Operated
Valve, Relief Pneumatic or Hydraulic Operated
Valve, Relief Solenoid Operated
Valve, Solenoid Operated

## Electrical Components

## Circuit Breaker

Control Switch
Coil
Fuse
Transformer, Current
Transmitter, Pressure
Transmitter, Temperature
RTD Temperature Element

# TABLE A.1-1 (Cont) <br> FAILURE MODE IDENTIFICATION CODE 

## Code Letters

A
B
C
D
F
I
J
K
M
N
0
P
Q
R
S
T
U
V
X

H
L
VS
ST
OE
TST
MAIN

Failure Mode

## Does Not Start

Open Circuit
Closed
Does Not Open
Loss of Function (Does not operate/start/run)
Interference
Degraded
Does Not Close
Maintenance
No Input
Open
Plugged
Short Circuit
Rupture
Short to Ground
Test
Spurious Opening
Spurious Closing
Does Not Run
Fails High
Fails Low
Visual Detection
Status Light
Operator Error
Test
Maintenance

noust strac:


Thustat ix atma:




TWUSYE DTH EyMES:-

Figure A-1


## APPENDIX B

## EVENT V ANALYSIS

> APPENDIX B
> EVENT $V$ ANALYSIS

The frequency of an interfacing systemi. LOCA is an important safety concern because a direct release of radionuclides to the atmosphere may occur. In this appendix, the frequency of an event via the RHR suction path is calculated for three cases: 1) with the present interlock configuration, 2) with the proposed modification, and 3) with the NRC proposed modification.

The failure combinations considered in the analysis involve: 1) rupture of two series motor-operated valves and 2) one valve failing open and subsequent rupture of the other valve.

The following conditions were applied in the analysis:

1. The frequency of valve rupture is that of catastrophic internal leakage. The failure rate $\lambda$ is the same for either valve given that the valve is exposed to RCS pressure.
2. Valve 8702 is at RCS pressure and valve 8701 is at RCS pressure only if valve 8702 fails open.
3. No common cause rupture of the valves is considered. This is based on the fact that no common cause ruptures of valves have actually occurred.
4. The calculation is based on an occurrence when the plant is at power, not in the shutdown mode.
5. All electrical power is assumed to be available with a probability 1.0 .

The frequency of an event $V$ is calculated using the following expression:

$$
F(V S E Q)=\lambda_{2} Q\left(V_{1}\right)+\lambda_{1} Q\left(V_{2}\right)+\lambda_{2} Q\left(V_{1} R\right)
$$

where
$\lambda_{2}=$ failure rate of MOV 8702 (rurture)
$\lambda_{1}=$ failure rate of MOV 8701 (rupture)
$Q\left(V_{1}\right)=$ probability that MOV 8701 is open
$Q\left(V_{2}\right)=$ probability that MOV 8702 is open
$Q\left(V_{1} R\right)=$ probability of rupture of MOV 8701.

The failure rate due to rupture of a motor-operated valve is $1.0 \mathrm{E}-7$ per hr $\left(\lambda_{1}\right.$ and $\left.\lambda_{2}\right)$. The quantity $Q\left(V_{1} R\right)$ is determined by assuming that the total defined mission time is the time between refueling outages (i.e., every 18 months). The rupture of motor-operated valve 8701 is assumed to occur randomly in the time interval $0-T_{M}$ where $T_{M}$ is the total defined mission time. Therefore the probability of MOV 8701 rupturing is:

$$
\begin{aligned}
& Q\left(V_{1} R\right)=\lambda \frac{T_{M}}{2}=\frac{1.0 E-7}{h r} \times \frac{13140 \mathrm{hrs}}{2} \\
& Q\left(V_{1} R\right)=6.57 E-4
\end{aligned}
$$

In order to determine the probabilities of motor-operated valves 8701 or 8702 being open while at power, detailed fault trees of these valves were used.

Figure B-1 and B-2 shows the elementary wiring diagrams for MOV 8702 and 8701 respectively for the present interlock configuration. Figures $B-3$ and $B-4$ show the NRC-proposed modification to these diagrams in which the autoclose portion is deleted and an alarm and a single switch to close both valves is added. The other modification considers the alara only.

The fault trees developed from these elementary wiring diagrams are shown in Figures $\mathrm{B}-5$ to $\mathrm{B}-10$.

The scenarios examined in the fault trees are: 1) the valve is not closed after previous use (either by operator error or failure of the autoclosure
interlock) 2) the valve fails to close when the operator turns a switch and 3) the valve spuriously opens. Each of these scenarios is described below.

For the present interlock configuration motor-operated valve 8701 or 8702 can be left open after previous use by the operator failing to close the valve during startup, an operator failing to detect the wrong valve position via the status light during mode transition and the autoclosure interlock failing to close the valve. For the modification case with the alarm only, another error is added in which the operator fails to detect the wrong position via the alarm and the autoclose portion is deleted.

With the modification of a single switch in place, if the operator fails to close a valve, neither valve would be closed. If the plant was beginning startup operations, the position of the valves would be detected and corrective action taken. Thus, with a single switch to close both valves, the operator failing to close one valve is not a credible event and not included in the analysis.

Spuriously opening of the valves for both cases involves an operator failing to rack power out to the valves in combination with a failure in the "OPEN" valve circuitry.

The valve failing to close when the operator turns the switch is aiother failure mode. In this scenario, the valve's circuitry or mechanical components cause the motor-operated valve to not close on demand. The operator must detect this failure either by the status light in the present configuration case or by the status light and alarm in the modification case.

Table B-1 show the failure probabilities used in the fault trees based on a 12 hour detection interval.

This interval is based on the fact that the valve's position will be detected within one shift. To calculate the basic event probabilities, the following formula was used:

$$
Q=\lambda \frac{T \text { detect }}{2}
$$

where:

```
Q = basic event probability
\lambda = failure rate for component
T detect = detection interval
```

Also presented in Table B-2 are the human error probabilities calculated in the analysis. The probabilities were obtained from Swain, et.al and the detailed calculations and the values used are documented for each human error scenario.

## Results

The probabilities obtained from the fault tree quantification for the isolation valves being open are:

Q(V1) MOV 8701 is open

| With Present Configuration | With <br> Modification | With NRC Modification |
| :---: | :---: | :---: |
| 2.39E-5 | 1.27E-8 | $1.19 \mathrm{E}-8$ |
| 2.39E-5 | 1.27E-8 | $1.19 \mathrm{E}-8$ |

The major cutsets (failure combinations) obtained from the quantification are shown in Tables B-3 and B-4 for the present configuration. The dominant cutsets for MOVs 8701 and 8702 are failure of the valve to close when the operator turns the switch in combination with the failure of the operator to detect that the valve is still open by use of the status light.

For the modification case, the dominant contributors are listed in tables B-5 and B-6. For the NRC modification case, Tables B-7 and B-8 show the cutsets obtained in the quantification. The dominant failure combination in both cases is the operator fails to detect that the valve is still open after he
turns the switch. However, now the valve position will be detected by the status light and the alarm. Both devices would have to fail or the operator would have to fail to recognize these two indicators in order for the possibility of an Event $V$ to occur.

The frequency of an Interfacing Systems LOCA is calculated for each scenario. The results are shown below:

With Present
Configuration
6.17E-7/yr
$5.76 \mathrm{E}-7 / \mathrm{yr}$
5.76E-7/yr

The frequency of an Event $V$ decreases by approximately seven percent with removal of the ACI. The main contributor to the frequencies in each case is a double rupture of MOV 8702 then 8701 . The deletion of the ACI has no impact on this conitributor. The other contributor (the rupture of one valve while the other valve has failed open) decreases from 4.19E-8/year for the present configuration to $1.11 \mathrm{E}-11$ year for the modification case and to $1.04 \mathrm{E}-11 /$ yer for the NRC modification case. This is a significant decrease in the occurrence of an Event $V$ by this failure mode. The deletion of the auto closure interlock and the inclusion of an alarm is beneficial in reducing this contribution.

From this analysis, it can be concluded that a modification is beneficial in reducing the frequency of an interfacing systems LOCA by reducing the frequency of contributions other than a double valve rupture event,
Analysis
Comments
Combined into
R1405ACTV $7.2 E-7$
Rate for a fuse
Combined into
R1405ACTF $7.2 E-7$

Fault Event
Probability



SYSTEM: MOV 8701 and 8702 - V-SEQJENCE


Fault Event




Probability






Modification Cases
Fault Event
Probability
 U

MOV 8701 and 8702 - V-SEQUENCE
Failure
Rate
$1 \mathrm{E}-4 / \mathrm{d}$
$1 \mathrm{E}-4 / \mathrm{d}$
$1.7 \mathrm{E}-6 / \mathrm{hr}$
$6.0 \mathrm{E}-8 / \mathrm{hr}$
$3 \mathrm{E}-6 / \mathrm{hr}$
$3 \mathrm{E}-4 / \mathrm{d}$
$3 \mathrm{E}-3 / \mathrm{d}$
$6 \mathrm{E}-7 / \mathrm{hr}$
$3 \mathrm{E}-5 / \mathrm{D}$
$1 \mathrm{E}-4 / \mathrm{D}$
$6.0 \mathrm{E}-8 / \mathrm{hr}$
$6 \mathrm{E}-7 / \mathrm{hr}$
$3 \mathrm{E}-5 / \mathrm{D}$
$6.0 \mathrm{E}-8 / \mathrm{hr}$
 Fault Tree
Identifier
R2LS33AOU
R2LS33ACU
R2SRCNU
R2TP403ACTF
R2MSCOF
R2CN42CAK
R2MV8702K
R1ALARM
R1SRCNK
R1ALLSK
R1TP405ACTF
R2ALARM
R2SRCNK
R2TP403ACTF

$$
\begin{aligned}
& \begin{array}{l}
\check{n} \\
\simeq
\end{array}
\end{aligned}
$$

$$
\begin{aligned}
& \begin{array}{c}
\frac{c}{o} \\
\frac{i}{n} \\
\frac{\pi}{2}
\end{array} \\
& \stackrel{\text { W }}{\underline{E}}
\end{aligned}
$$

## hUMAN ERROR CALCULATIONS

1. Operator prematurely racks power out by opening the breakers for MOV's 8701 and 8702 using operating procedure OP B-2:IV.

$$
\begin{aligned}
\text { 2. Omission error } & \text { operator fails to close MOV } \\
H E P=0.02 & \text { Table } 20-7 \text { no checkoff provisions, } \\
& \text { long list } \geq 10 \text { items }
\end{aligned}
$$

2. Commission error - operator selects wrong circuit breaker HEP $=0.003 \quad$ Table 20-12
3. Recovery error - checker fails to detect errors by others $H E P=0.1 \quad$ Table $20-22$


$$
\begin{aligned}
& P_{O E}=1 E-3+2.97 E-4 \\
&=1.297 E-3 \\
&=1.3 E-3 \\
& \text { Fault Tree Identifiers: R1CBOEB and R2CBOEB }
\end{aligned}
$$

## TABLE B-2 (Cont)

2. Operator fails to remove power from valve at circuit breaker for MOV's 8701 and 8702 using operating procedure OP B-2:IV
3. Omission error - operator fails to open circuit break HEP $=0.01 \quad$ Table 20-7 no checkoff provisions, long list, $\geq 10$ items
4. Commission error - operator selects wrong circuit breaker HEP $=0.003 \quad$ Table 20-12
5. Recovery error - checker fails to detect errors by others $H E F=0.1 \quad$ Table 20-22


$$
\begin{aligned}
& P_{O E}=1 E-3+2.97 E-4 \\
&=1.3 E-3 \\
& \text { Fault Tree Identifiers: R1CBREMOE and R2CBREMOE }
\end{aligned}
$$

3. Operator fails to close MOV after previous use using operating procedure OP B-2:IV
4. Omission error - operator fails to close MOV

$$
\begin{array}{ll}
\text { HEP }=0.01 \quad \begin{array}{l}
\text { Table 20-7 no checkoff provisions } \\
\\
\\
\text { long list, } \geq 10 \text { items }
\end{array}
\end{array}
$$

2. Commission error - operator turns rotary control in wrong direction HEP $=0.0005 \quad$ Table 20-12
3. Recovery error - checker fails to detect errors by others HEP $=0.05 \quad$ Table 20-22


$$
P=0.99(0.0005)(0.05)=2.48 E-5
$$

$$
\begin{aligned}
& P_{O E}=5 E-4+2.48 E-5 \\
&=5.25 E-4 \\
& \text { Fault Tree Identifiers: R187010t o end R287020E0 }
\end{aligned}
$$

4. Operator fails to detect wrong position via status light
5. Omission error - operator fails to detect

$$
\text { HEP }=0.01 \quad \text { Table } 20-27 \text { long list }>10 \text { items }
$$

2. Commission error - checker fails to detect HEP $=0.5 \quad$ Table 20-22 second checker


$$
P=0.01(0.5)=5.0 E-03
$$

$P_{\text {OE }}=5 E-3$
Fault Tree Identifiers: R187010EST and R287020EST

## TABLE B-2 (Cont)

5. Operator fails to detect wrong position via alarm

$$
\begin{aligned}
\text { 1. Omission error } & \text { operator fails to detect } \\
H E P=0.0001 & \text { Table } 20-23 \text { one annunciator }
\end{aligned}
$$

2. Recovery error - checker fails to detect HEP $=0.5 \quad$ Table 20-22 second checker


$$
\begin{aligned}
& P_{O E}=5 E-5 \\
& \text { FBult Tree Identifiers: R2B702ALOE, R182O1ALOE }
\end{aligned}
$$

TABLE B-3
MOV 8701 IS OPEN-PRESENT CONFIGURATION DOMINANT CONTRIBUTORS

| Cut Set Probability | Percent <br> Contribution <br> to Unavallability | Cut set | Description |
| :---: | :---: | :---: | :---: |
| 1. $1.50 \mathrm{E}-5$ | 62.8 | R1MV8701K, R187010EST | 8701 Fails to Close and Operator Fails to Detect via Status Light |
| 2. 6.50E-6 | 27.2 | R1CBOEB, R187010EST | Operator Prematurely Racks Power Out and Fails to Detect via Status Light |
| 3. $1,50 \mathrm{E}-6$ | 6.3 | R1CN42CAK, R187010EST | Contact 42(c)A Fails to Transfer and Operator Fails to Detect via Status Light |
| 4. 5.00E-7 | 2.1 | R1L533ACU, R187010EST | Limit Switch 33AC Fails Open and Operator Fails to Detect via Status Light |
| 5. $2.50 \mathrm{E}-7$ | 0.6 | R187010EST, R15RCNK | Close Contact on Switch Fails to <br> Transfer and Operator Fails to <br> Detect via Status Light |

Mean Unavailability $=2.39 E-5$

TABLE B-4
MOV 8702 IS OPEN-PRESENT CONFIGURATION DOMINANT CONTRIBUTORS

| Cut Set Probability | Percent Contribution to Unavailability | Cut set | Description |
| :---: | :---: | :---: | :---: |
| 1. 1.50E-5 | 62.8 | R2MV8702K, R287020EST | 8702 Fails to Close and Operator Fails to Detect via Status Light |
| 2. $6.50 \mathrm{E}-6$ | 27.2 | R2CBOEB, R287020EST | Operator Prematurely Racks Power Out and Fails to Detect via Status Light |
| 3. $1.50 \mathrm{E}-6$ | 6.3 | R2CN42CAK, R287020EST | Contact 42 (c)A Fails to transfer and Operator Fails to Detect via Status Light |
| 4. 5.00E-7 | 2.1 | R2LS33ACU, R287020EST | Limit Switch 33AC Fails Open and Operator Fails to Detect via Status Light |
| 5. $2.50 \mathrm{E}-7$ | 0.6 | R287020EST, R25RCNK | Close Contact on Switch Fails to Transfer and Operator Fails to Detect via Status Light |

Mean Unavailability $=2.39 E-5$

TABLE B-5
MOV 8701 IS OPEN-MODIFICATION DOMINANT CONTRIBUTORS

Percent

| Cut Set Probability | Percent <br> Contribution <br> to Unavailability | Cut set | Description |
| :---: | :---: | :---: | :---: |
| 1. $4.50 \mathrm{E}-9$ | 35.4 | R18701EST, R1TP405CNK, R18701K | Alarm Pressure Transmitter Relay Contact Fails to Transfer, Valve Fails to Close, Operator Fails to Detect via Status Light |
| 2. $1.95 \mathrm{E}-9$ | 15.4 | R18701EST, R1TP405CNK, R1CBOEB | Alarm Pressure Relay Contact Fails to Transfer, Operator Prematurely Racks Power Out and Fails to Detect via Status Light. |
| 3. $2.50 \mathrm{E}-9$ | 11.8 | R18701EST, R1ALLSK, R18701K | Alarm Limit Switch Fails to Operate, Valve Fails to Close and Operator Fails to Detect |
| 4. 7.87E-10 | 6.2 | R187010E, R18701EST, R1TP405CNK | Operator Fails to Close Valve, Fails to Detect via Status Light and Alarm Pressure Relay Contact Fails |
| 5. $7.50 \mathrm{E}-10$ | 5.9 | R18701EST, R18701ALO, R18701K | Operator Fails to Detect via Status Light and Alarm, Valve Fails to Close |

Mean Unavailability $=1.27 \mathrm{E}-8$

TABLE B-6
MOV 8702 IS OPEN-MODIFICATION
DOMINANT CONTRIBUTORS

| Cut Set Probability | Percent <br> Contribution <br> to Unavailability | Cut set | Description |
| :---: | :---: | :---: | :---: |
| 1. $4.50 \mathrm{E}-5$ | 35.4 | R28702EST, R2TP403CNK, R28702K | Alarm Pressure Transmitter Relay Contact Fails to Transfer, Valve Fails to Close, Operator Fails to Detect via Status Light |
| 2. $1.95 \mathrm{E}-9$ | 15.4 | R28702EST, R2TP403CNK, R2CBOEB | Alarm Pressure Relay Contact Fails to Transfer, Operator Prematurely Racks Power Out and Fails to Detect via Status Light. |
| 3. 1.50E-9 | 11.8 | R28702EST, R2ALLSK, R28702K | Alarm Limit Switch Fails to Operate, Valve Fails to Close and Operator Fails to Detect |
| 4. $7.87 \mathrm{E}-10$ | 6.2 | R287020E, R28702EST, R2TP403CNK | Operator Fails to Close Valve, Fails to Detect via Status Light and Alarm Pressure Relay Contact Fails |
| 5. 7.50E-9 | 5.9 | R28702EST, R28702ALO, R28702K | Operator Fails to Detect via Status Light and Alarm, Valve Faile to Close |

Mean Unevailability $=1.27 \mathrm{E}-8$

TABLE B-7
MOV 8701 IS OPEN-NRC MODIFICATION DOMINANT CONTRIBUTORS

Percent


Mean Unavailability $=1.19 E-8$

TABLE B-8
MOV 8702 IS OPEN-NRC Modification
DOMINANT CONTRIBUTORS

| Cut Set Probability | Percent <br> Contribution to Unavailability | Cut set | Description |
| :---: | :---: | :---: | :---: |
| 1. $4.50 \mathrm{E}-9$ | 37.8 | R28702K, R28702EST, R2TP403CNK | Valve Fails to Close, Alarm <br> Pressure Relay Contact Fails to <br> Transfer and Operator Fails to Detect |
| 2. $1.95 \mathrm{E}-9$ | 16.4 | R2CBOEB, R28702EST, R2TP403CNK | Alarm Pressure Relay Contact Fails to Transfer, Operator Prematurely Racks Power Out, Fails to Detect via Status Light |
| 3. 1.50E-9 | 12.6 | R28702K, R28702EST, R2ALLSK | Valve Fails to Close, Alarm Limit Switch Fails to Transfer, Operator Fails to Detect |
| 4. $7.50 \mathrm{E}-10$ | 6.3 | R28702K, R28702EST, R28702ALOE | Valve Fails to Close, Operator Fails to Detect via Alarm and Status Light |
| 5. $6.50 \mathrm{E}-10$ | 5.5 | R2CBOEB, R28702EST, R2ALLSK | Operator Prematurely Racks Power Out, Fails to Detect and Alarm Limit Switch Fails to Transfer |

Mean Unavailability $=1.19 E-8$


MO 2-M2-2





Also Available $\mathrm{Or}_{4}$ Aperture Card






APERTURE CARD

Also Available $\mathrm{On}_{n}$ Aperture Card



TI APERTURE CARD<br>Also Available On Aperture Card

## $8708110183-09$






## TI APERTURE CARD <br> Aiso Avallable On A perture Card

## $8708110183-11$




## TI APERTURE CARD <br> Also Available $\mathrm{On}_{\mathrm{n}}$ Aperture Card

$8708110183-12$


# TI APERTURE CARD 



Also Available On Aperiure Card

# APPENDIX C <br> RESIDUAL HEAT REMOVAL SYSTEM (RHRS) 

## AVAILABILITY ANALYSIS

The residual heat removal system shown in Figure 4.1 was analyzed to determine the unavailability of the system to remove decay heat. Fault trees were used to determine unavailability for startup of the RHR system, for short term cooling ( 72 hours) and long term cooling ( 6 weeks).

## C. 1 Fault Tree Development

Guidelines were used in the construction of the fault trees to simplify and reduce the overall size of the fault trees since certain events are often not included owing to their low probability of occurrence relative to other events.

The following guidelines are described and the system components affected by the guidelines is discussed.

## Random Fault Postulation and Consideration

Guideline a. The "local faults of piping" in a fluid system segment are not to be included in the fault tree model construction, since their contribution to the probability of system failure, compared to the contribution from the other components, is insignificant. Pipe faults such as pipe plugging, orifice plugging and plugging from chemical crystallization due to loss of pipe heat tracing system are to be considered as credible faults.

AFFECTED COMPONENTS: Piping faults will not be considered.

Guideline b. Random mechanical failure of locally locked open manual valves are not to be included in fault tree development since the probability of failure is not significant relative to other valve faults. The only credible random valve failure that might occur is plugging of an open valve, but this is only
significant if the source of water or other fluid is untreated (e.g., service water, etc.) and if the likelihood is comparable or greater than other system faults. Failures of unlocked mariual valves will be included in fault tree development along with locked open active valves (which are rare) that are locked at the control board. Misposition of locked open manual valves due to human error is considered unlikely due to locking mechanisms employed (e.g., chained locked or other mechanical devices) on most valves.

AFFECTED COMPONENTS: Valves 8728A, 8728B, 8720A and 8720B are sealed open and thus closure of these valves is not considered a credible fault.

Guideline c. Normally open manual, air and motor-operated valves that are not required to change state during operation will be treated as if they are locally locked open. However, misposition of the valve prior to operation due to human error and/or a spurious control signal will be considered as a credible event if applicable (see treatment of test and maintenance faults to follow).

AFFECTED COMPONENTS: MOV's 8809A, 8809B, 8700A, 8700B, 8716A and 8716 B are normally open valves that do not change state during RHR operation. Spurious closure of these valves during long term cooling with be considered.

Guideline d. Potential flow diversion paths of fluid system that are isolated from the main flow path by one or more locally locked closed valves will not be considered as faults of the system.

AFFECTED COMPONENTS: Manual Valve 8741 is a normally locked closed value on the return line to the refueling water storage tank and thus is not a credible event.

Guideline e. Potential flow diversion paths isolated from the main flow path by normally closed manual, air, and motor-operated, and check valves will not be treated as faults of the system. However, valve misposition prior to operation due to human error and/or spurious control signal will be considered a system fault, if credible.

AFFECTED COMPONENTS: Motor-operated valves 8804 A and 8804 B are normally closed valves in the lines loading from the discharge side of the RHR heat exchanger to the suction side of the centrifugal charging pumps and safety injection pumps respectively. Motor operated valves 9003A and 9003B are normally closed valves in the lines from the RHR heat exchanger to the containment spray system. These valves are not considered.

Guideline f. Check valves failing closed to flow in the forward direction and failing open to flow in the reverse direction will be included as credible events. An exception is made for the case of two check valves in series being used as isolation valves to block flow. These need not be included in fault tree development since their combined probability of failure to isolate flow would be of low probability relative to other system faults.

AFFECTED COMPONENTS: The check valves on the cold leg injection lines are two check valves in series and are not considered to fail open in the reverse direction.

Guideline g. Tank failures are to be included in fault tree development, but failure of heat exchangers (coolers) to transfer heat due to plugging of the tube side and leakage (primary to secondary) are not. An exception is made for the case of heat exchangers plugging when the tube side flow of coolant transfer medium is untreated. Plugging is to be considered as a credible event for such cases if the coolant medium is untreated.

AFFECTED COMPONENTS: Failure of the heat exchangers due to plugging or leakage is not considered a credible fault.

## C. 2 Quantification

The availability of the residual heat removal system to remove decay heat is considered in three phases in this analysis. First, the RHR system must be placed into service and go through a warmup period in order to minimize the thermal shock to the system. Secondly, during the initial phase of cooldown, the decay heat load is high. For this phase, two trains of RHR are required for 72 hours. (Note: some plants can operate with only one train during this phase but the cooldown time is increased). The final phase of cooldown is long term decay heat removal. Six weeks was the time period assumed for this phase (based on the average refueling outage time period).

The fault trees developed for these scenarios are shown in Figures C-1 to $\mathrm{C}-3$. Figure $\mathrm{C}-1$ shows the fault tree for the startup of the RHR system. The fault tree in Figure $\mathrm{C}-2$ depicts the initial phase of cooldown in which both trains of RHR are required. The long term cooling fault tree is shown in Figure $\mathrm{C}-3$ (only one train of RHR is required).

Figure $C-4$ to $C-8$ show the detailed fault trees for motor-operated isolation valves 8701 and 8702 . These trees are developed using the present interlock configuration and the two modification configurations. The unavailabilities calculated from these trees are input into the cooling and startup trees to calculate the system unavailability.

## Assumptions

The assumptions used to develop the fault trees are presented below.

1. Injection into two cold legs by iwo pump trains is required for success for the startup and short term couling scenarios. Injection into two cold legs by one pump train is required for long term cooling.
2. The startup fault tree was derived using the operating procedures $O P B-2: V$.
3. The initial phases of startup and initial cooldown fault tree require two trains of operation. Therefore, no testing or maintenance operations are assumed to occur during these phases.
4. In the long term cooling fault tree, test and maintenance can occur. Therefore, spurious closure of valves and operator error in mispositioning of valves is considered credible.
5. During the warmup period, it is assumed that pump No. 1 is started first and must run for 2 hours. Pump No. 2 is started after 1 hour of warmup and must run for 1 hour.
6. For long term cooling, it is assumed that pump No. 1 is operating and pump No. 2 is on standby and thus must start and run.
7. All electrical power ( $A C$ and $D C$ ) is assumed to be available.

## C. 2 Data

Table C.2-1 shows the basic event probabilities used to calculate the unavailability of the RHR system. The formula used to calculate the basic event probability is:

$$
Q=\lambda \mathrm{Tm}
$$

where
$Q=$ basic event probability
$\lambda=$ failure rate for component

Tm $=$ total defined mission time in which the component must operate

Tile unavailability of RHR pump 2 due to test is based on the technical specifications which allow for a two hour unavailability limit. Maintenance unavailabilities were extracted from the Zion PSS for standby systems tested monthly or quarterly assuming a 72 hour component inoperability time limit.

The human error probabilities (HEPs) are calculated for each operator action required during RHR operation and are presented in Table C.2-2. The HEPs are extracted from Swain, et.al.

## C. 3 Results

The results from the quantification of the fault trees is shown in Table C.3-1. The dominant cutsets for each case shown in Table C.3-2.
for short term
for short term
for startup
for startup

| Fault Event |
| :--- |
| Probability |

$$
\begin{aligned}
& 1 E-4 \\
& 1 E-4 \\
& 1 E-4 \\
& 1 E-4 \\
& 1 E-4 \\
& 1 E-4 \\
& 1 E-4 \\
& 1 E-4 \\
& 1 E-4 \\
& 1 E-4 \\
& 1 E-4 \\
& 1 E-4 \\
& 2.16 E-3 \\
& 2.16 E-3 \\
& 6 E-5 \\
& 3 E-5
\end{aligned}
$$

| TABLE C.2-1 |
| :--- |
| COMPONENT RANOOM FAILURE UNAVAILABILITIES |

TABLE C.2-1
COMPONENT RANDOM FAILURE UNAVAILABILITIES


$$
\begin{array}{cc}
E & E \\
\hline & \frac{1}{4} \\
\hline
\end{array}
$$


SYSTEM: RESIDUAL HEAT REMOVAL

| Fault Event |
| :--- |
| Probability |





$n$
上
0
0


$$
\begin{aligned}
& \text { Failure } \\
& \text { Rate } \\
& 3 \mathrm{E}-3 / \mathrm{d} \\
& 3 \mathrm{E}-3 / \mathrm{d} \\
& 3 \mathrm{E}-3 / \mathrm{d} \\
& 3 \mathrm{E}-3 / \mathrm{d} \\
& 3 \mathrm{E}-5 / \mathrm{hr} \\
& 3 \mathrm{E}-5 / \mathrm{hr} \\
& 3 \mathrm{E}-3 / \mathrm{d} \\
& 3 \mathrm{E}-3 / \mathrm{d} \\
& 3 \mathrm{E}-3 / \mathrm{d} \\
& 3 \mathrm{E}-3 / \mathrm{d} \\
& 1 \mathrm{E}-4 / \mathrm{d} \\
& 3 \mathrm{E}-3 / \mathrm{d} \\
& 3 \mathrm{E}-3 / \mathrm{d} \\
& 1 \mathrm{E}-4 / \mathrm{d} \\
& 3 \mathrm{E}-3 / \mathrm{d} \\
& 1 \mathrm{E}-7 / \mathrm{hr}
\end{aligned}
$$


Fault Tree
Identifier
R1AV6380
R2AV6337D
R2HXCCW364
R1HXCCW365
R1PMiX
R2PM2X
R1MV641AD
R2MV641BD
R1AV6700
R2AV670D
R1XV8726AD
R2AV638K
R1AV638K
R2XV8726BD
R1AV670K
R1MV8809AV

$$
\begin{aligned}
& \begin{array}{l}
\text { Fault Event } \\
\text { Probability } \\
\hline \\
1.01 \mathrm{E}-4 \\
1.01 \mathrm{E}-4 \\
1.01 \mathrm{E}-4 \\
1.01 \mathrm{E}-4 \\
1.01 \mathrm{E}-4
\end{array} \\
& \text { RESIDUAL HEAT REMOVAL } \\
& \text { COMPONENT RANDOM FAILURE BNAVAILABILITIES } \\
& \text { Spuriously Closes } \\
& \text { Spuriousiy Closes } \\
& \text { Spuriously Closes } \\
& \text { Spuriously Closes } \\
& \begin{array}{l}
\text { u } \\
0 \\
\vdots \\
\vdots \\
\text { n } \\
0 \\
0 \\
0 \\
0
\end{array} \\
& \begin{array}{l}
\frac{0}{\circ} \\
\frac{0}{2}
\end{array}
\end{aligned}
$$

$$
\begin{aligned}
& 0 \\
& \frac{w}{3} \\
& 4 \\
& 0 \\
& \frac{1}{0} \\
& 4 \\
& \frac{y}{20} \\
& \underset{\sim}{0}
\end{aligned}
$$

SYSTEM: RESIDUAL HEAT REMOVAL - MOV 8701 - FAIL TO OPEN SPURIOUSLY CLOSE

$$
\begin{aligned}
& \text { Fault } \\
& \text { Detection } \\
& \text { Interval }
\end{aligned}
$$

$$
\begin{aligned}
& \text { TABLE C.2-1 (Cont) } \\
& \text { COMPONENT RANDOM FAILURE UNAVAILABILITIES }
\end{aligned}
$$

$$
\begin{aligned}
& 1 \text { demand } \\
& 1 \text { demand } \\
& 1 \text { demand } \\
& 1 \text { demand } \\
& 1 \text { demand } \\
& \text { - } \\
& 1 \text { demand } \\
& 72 \text { hrs } \\
& 1008 \text { hrs } \\
& 72 \text { hrs } \\
& 1008 \text { hrs }
\end{aligned}
$$



SYSTEM: RESIDUAL HEAT REMOVAL - MOV 8701 - FAIL TO OPEN SPURIOUSLY CLOSE

$$
\begin{aligned}
& \dot{L} \\
& \underset{\sim}{n} \underset{\sim}{n} \\
& \sim
\end{aligned}
$$

$$
E_{i}
$$

$$
1,1 \sum_{n}^{n}, \frac{\infty}{n}
$$



$$
\begin{aligned}
& \text { Fault Tree } \\
& \text { Identifier } \\
& \hline
\end{aligned}
$$

-R2ACBU
R2CTF
R2FUU
R20L49U
R2LS33BCK
R2QS33TOK
R2LS33B0K
R2SRCNK
R2MSCOF
R2CN420AK
R2TP405AXH
R2MV87020
R2MV8702V
R2MV8702V
R2TP4058XV
R2SRCNQ
R2CN42ACQ

$$
\begin{aligned}
& \text { Spuriously Opens } \\
& \text { Fails }
\end{aligned}
$$

$$
\begin{aligned}
& \text { Fails } \\
& \text { Premature Open }
\end{aligned}
$$

Spuriously Opens
Fails to Transfer
Fails to Transfer
Fails to Transfer
Fails to Close
Coil Failure
Fail to Transfer
Fails High
Fail to Open
Fails to Remain Open
Fails High

$$
\begin{aligned}
& \text { Shorts } \\
& \text { Shorts }
\end{aligned}
$$

COMPONENT RANDOM FAILURE UNAVAILABILITIES

$$
\begin{aligned}
& \text { Failure } \\
& \text { Rate } \\
& 1.0 \mathrm{E}-8 / \mathrm{hr} \\
& 3.5 \mathrm{E}-7 / \mathrm{hr} \\
& 3.0 \mathrm{E}-6 / \mathrm{hr} \\
& 3.0 \mathrm{E}-6 / \mathrm{hr} \\
& 1 \mathrm{E}-4 / \mathrm{d} \\
& 1 \mathrm{E}-4 / \mathrm{d} \\
& 1 \mathrm{E}-4 / \mathrm{d} \\
& 3 \mathrm{E}-5 / \mathrm{d} \\
& 3 \mathrm{E}-6 / \mathrm{hr} \\
& 3 \mathrm{E}-4 / \mathrm{d} \\
& 1.3 \mathrm{E}-7 / \mathrm{hr} \\
& 3 \mathrm{E}-3 / \mathrm{d} \\
& 1 \mathrm{E}-7 / \mathrm{hr} \\
& 1.3 \mathrm{E}-7 / \mathrm{hr} \\
& 2.7 \mathrm{E}-8 / \mathrm{hr} \\
& 2.7 \mathrm{E}-8 / \mathrm{hr}
\end{aligned}
$$

$$
\begin{aligned}
& \text { Fault } \\
& \text { Detection } \\
& \text { Intervai } \\
& \hline
\end{aligned}
$$

$$
\begin{aligned}
& 1 \text { demand } \\
& 1 \text { demand } \\
& 1 \text { demand } \\
& 1 \text { demand } \\
& 1 \text { demand }
\end{aligned}
$$

$$
1008 \mathrm{hrs}
$$

$$
\begin{aligned}
& 1 \text { demand } \\
& 72 \mathrm{hrs} \\
& 1008 \mathrm{hrs}
\end{aligned}
$$

$$
\begin{aligned}
& 72 \mathrm{hrs} \\
& 1008 \mathrm{hrs}
\end{aligned}
$$

$$
72 \text { hrs }
$$

$$
1008 \mathrm{hrs}
$$

$$
\begin{aligned}
& 72 \mathrm{hrs} \\
& 1008 \mathrm{hrs}
\end{aligned}
$$

Analysis
Comments
Rate for a fuse

$$
\begin{aligned}
& \text { Mission } \\
& \text { Time }
\end{aligned}
$$

RESIDUAL HEAT REMOVAL

$$
\begin{aligned}
& \text { TABLE C.2-1 (Cont) } \\
& \text { COMPONENT MAINTENANCE UNAVAILABILITIES }
\end{aligned}
$$

$$
\begin{aligned}
& \text { Mean } \\
& \text { Maintenance } \\
& \text { Acts Per Hour } \\
& \text { 8.42E-Events/hour }
\end{aligned}
$$

$$
\begin{aligned}
& \text { Unavailability } \\
& \text { Due to Maintenance } \\
& 1.57 \mathrm{E}-3
\end{aligned}
$$

$$
\begin{aligned}
& \text { Analysis } \\
& \text { Comments } \\
& \text { From Zion PSS Prior } \\
& \text { Distribution Standby } \\
& \text { Systems tested } \\
& \text { monthly or quarterly } \\
& 72 \text { hour component } \\
& \text { inoperability time } \\
& \text { limit }
\end{aligned}
$$

$$
\begin{aligned}
& \text { Analysis } \\
& \text { Coments } \\
& 2 \text { hour test duration } \\
& \text { per Tech Spec } 3.4 .1 .4 .1 \\
& 92 \text { day (Quarterly) } \\
& \text { functional test for pumps }
\end{aligned}
$$

## TABLE C.2-2 <br> HUMAN ERROR CALCULATIONS

1. Operator fails to close air operated value 638 or 637 or 670 .
2. Omission error - operator fails to close MOV

$$
\begin{array}{ll}
\text { HEP }=0.01 \quad & \text { Table 20-7 no checkoff provisions }, \\
& \text { long } 1 \text { is, }>10 \text { items }
\end{array}
$$

5. Commission error - turn switch in wrong direction HEP $=\frac{0.002}{5}=0.0002$ Table 20-12
6. Recovery error - checker fails to detect errors by others

$P=0.99(0.0002)(0.05)=9.9 E-6$
$P_{O E}=9.9 E-6+5 E-4$
$=5.10 E-4$
Fault Tree Identifiers: R2AV6370E R1AV6380E R1AV670K0E

## TABLE C.2-2 (Cont) <br> HUMAN ERROR CALCULATIONS

2. Operator fails to open air sperated valve $637,638,670, \mathrm{CCW}$ valves
```
1. Omission error - operator fails to open MOV
    HEP = 0.01 Table 20-7 no checkoff provisions,
                                long list, > }10\mathrm{ items
```

2. Conmission error - turn switch in wrong direction HEP $=0.001 / 5=0.0002$ Table $20-12$
3. Recovery error - checker fails to detect errors by others HEP $=0.05 \quad$ Table 20-22 special short term

$\mathrm{P}=0.01(0.05)=5 \mathrm{E}-4$

$$
P=0.99(0.0002)(0.05)=9.9 E-6
$$

$$
\begin{array}{rll}
P_{\text {OE }}= & 9.9 E-6+5 E-4 & \\
=5.20 E-4 & & \\
\text { Foult Tree ldentifiers: } & \text { R1AV638DOE } & \text { R2AV637OOE } \\
& \text { R1AV6700E } & \text { R2ASVG700E } \\
& \text { R2HXCCWOE } & \text { R1HXCCWOE }
\end{array}
$$

## TABLE C.2-2 (Cont) <br> HUMAN ERROR CALCULATIONS

2. Operator fails to open air operated valve $637,638,670$, CCW valves
3. Omission error - operator fails to open MOV

$$
\begin{array}{ll}
\text { HEP }=0.01 \quad \text { Table } 20-7 \text { no checkoff provisions }, \\
& \text { long list },>10 \text { items }
\end{array}
$$

2. Commission error - turn switch in wrong direction HEP $=0.001 / 5=0.0002$ Table 20-12
3. Recovery error ~ checker fails to detect errors by others HEP $=0.05 \quad$ Table 20-22 special short term


$$
P=0.99(0.0002)(0.05)=9.9 \mathrm{E}-6
$$

$$
\begin{array}{rlr}
P_{O E} & =9.9 E-6+5 E-4 & \\
& =5.10 E-4 & \\
\text { Fault Tree Identifiers: } & \text { R1AV638DOE } & \text { R2AV63700E } \\
& \text { R1AV6700E } & \text { R2ASV6700E } \\
& \text { R2HXCCWOE } & \text { R1HXCCWOE }
\end{array}
$$

TABLE C.2-2
HUMAN ERROR CALCULATIONS

1. Operator fails to close air operated valve 638 or 637 or 670.
2. Omission error - operator fails to close MOV HEP $=0.01 \quad$ Table 20-7 no checkoff provisions, long list, > 10 items
3. Commission error - turn switch in wrong direction

$$
\text { HEP }=\frac{0.001}{5}=0.0002 \text { Table 20-12 }
$$

3. Recovery error - checker fails to detect errors by others


$$
\begin{aligned}
& P=0.99(0.0002)(0.05)=9.9 E-6 \\
P_{O E} & =9.9 E-6+5 E-4 \\
& =5.10 E-4
\end{aligned}
$$

Fault Tree Identifiers: R2AV6370E R1AV6380E R1AV670K0E

> TABLE C.2-2 (Cont) HUMAN ERROR CALCULATIONS
3. Operator fails to open manual valve $8726 \mathrm{~A}, 8726 \mathrm{~B}$

1. Omission error - operator fails to open XV

$$
\begin{array}{ll}
H E P=0.01 \quad & \text { Table 20-7 no checkoff provisions } \\
& \text { long list },>10 \text { items }
\end{array}
$$

2. Commission error - making an error of selection HEP $=0.008 \quad$ Table 20-13 ambiguously labeled part of a group of valves
3. Recovery error - detecting locally operated valves HEP $=0.005 \quad$ Table 20-14 rising stem only


$$
\mathrm{P}=0.99(0.008)(0.005)=3.96 \mathrm{E}-5
$$

$$
\begin{aligned}
P_{O E} & =3.96 E-5+5 E-5 \\
& =8.96 E-5
\end{aligned}
$$

Fault Tree Identifiers: R1XV8726AO R2XV8726B0

```
    TABLE C.2-2 (Cont)
HUMAN ERRDR CALCULATIONS
```

4. Operator inadvertently closes valve (motor-operated or air operated)
5. Commission error - select wrong control

$$
\text { HEP }=0.001 \quad \text { Table 20-12 well-del ineated }
$$

2. Recovery error - detect closed valve $H E P=0.2 \quad$ Tabir $20-22$ routine tasks
3. Recovery error - basic walk around detection $H E P=0.52 \quad$ Table 20-27 daily walk around


$$
\begin{aligned}
P_{O E} & =4.26 E-4+1.04 E-4 \\
& =5.2 E-4
\end{aligned}
$$

Fault Tree ldentifiers: R1HCV6380E, R2HCV6370E

# TABLE C.2-2 (Cont) <br> HUMAN ERROR CALCULATIONS 

5. Operator fails to open MOV 8701 or 8702
6. Omission error - operator fails to open MOV

$$
\begin{array}{ll}
\text { HEP }=0.01 \quad & \text { Table } 20-7 \text { no checkoff provisions, } \\
& \text { long } 1 \text { ist }>10 \text { items }
\end{array}
$$

2. Cominission error - turn switch in wrong direction HEP $=0.0005 \quad$ Table 20-12
3. Recovery error - checker fails to detect

$$
\text { HEP }=0.05 \quad \text { Table 20-22 speciel short term }
$$



$$
\begin{aligned}
& P_{O E}=5 E-4+2.48 E-5 \\
&=5.25 E-4 \\
& \text { Foult Tree Identifiers: R1MV87010E, R2MVB7020E }
\end{aligned}
$$

# TABLE C.2-2 (Cont) <br> HUMAN ERROR CALCULATIONS 

6. Operator fails to close breakers for MOV's 8701 or 8702
7. Omission error - operator fails to close breakers HEP $=0.01 \quad$ Table 20-7 no checkoff provisions, long list, > 10 items
8. Commission error - select wrong circuit breaker HEP $=0.005 \quad$ Table 20-12 densely grouped
9. Recovery error - checker fails to detect error $H E P=0.05 \quad$ Table 20-22


$$
\begin{aligned}
P_{O E} & =5 E-4+2.47 E-4 \\
& =7.47 E-4
\end{aligned}
$$

Fault Tree Identifiers: R1ACBVOE, R2ACBVOE

| With Present | With | With NRC |
| :---: | :---: | :---: |
| Configuration | Andification | Modification |


| MOV 8701 fails to open | $5.02 E-3$ | $5.02 E-3$ | $5.02 E-3$ |
| :--- | :--- | :--- | :--- |
| MOV 8702 fails to open | $5.02 E-3$ | $5.02 E-3$ | $5.02 E-3$ |
| MOV 8701 or 8702 Spuriously |  |  |  |
| over $T=72$ hours | $6.64 E-5$ | $2.22 E-5$ | $2.22 E-5$ |
| MOV 8701 or 8702 Spuriously |  |  |  |
| Close over $T=1008$ hours | $9.29 E-4$ | $3.11 E-4$ | $3.11 E-4$ |
| RHRS fails during warmup | $2.07 E-2$ | $2.07 E-2$ | $2.07 E-2$ |
| RHRS fails over short term | $7.11 E-5$ | $2.69 E-5$ | $2.59 E-5$ |
| RHRS fails over long term | $2.01 E-3$ | $1.39 E-3$ | $1.39 E-3$ |
| Total RHRS Unavailability <br> over short term | $2.08 E-2$ | $2.07 E-2$ | $2.07 E-2$ |



$$
\begin{aligned}
& \text { Cutset } \\
& \text { Probability } \\
& \text { 1. } 3.00 \mathrm{E}-3 \\
& \text { 2. } 7.47 \mathrm{E}-4 \\
& \text { 3. } 5.25 \mathrm{E}-4 \\
& \text { 4. } 3.00 \mathrm{E}-4 \\
& \text { 5. } 3.00 \mathrm{E}-4 \\
& \text { 6. } 1.00 \mathrm{E}-4 \\
& \text { 7. } 3.00 \mathrm{E}-5
\end{aligned}
$$

## TABLE C．3－2 <br> MOV 8701 Fails to Open

$$
\varepsilon-320^{\circ} G=\Lambda 117 I Q \forall 7 I \forall \wedge \forall N \cap N \forall J W
$$

TABLE C. 3-2 (Cont)
MOV 8702 Fails to Open
DOMINANT CONTRIBUTORS

Pressure Relay Contact Fails to Transfer

## Limit Switch Fails to Close <br> Rotary Switch Contact Fails to Close

$\varepsilon-320^{\circ} \mathrm{S}=A 11718 \forall 7 I \forall A \forall N \cap$ N $Z 3 W$
ercent
ribution to
vailability
14.8
10.5
6.0
6.0
2.0
0.6
Present Configuration
TABLE C． $3-2$（Cont）
MOV 8701 or 8702 Spuriously Close（ $\mathrm{T}=72 \mathrm{hrs}$ ）
DOMINANT CONTRIBUTORS
TABLE C． $3-2$（Cont）
MOV 8701 or 8702 Spuriously Close（ $\mathrm{T}=72 \mathrm{hrs}$ ）
DOMINANT CONTRIBUTORS
Pressure Transmitter 403 Actuation Fails
Pressure Transmitter 405 Actuation Fails
Valve Spuriously Closes
Valve Spuriously Closes
Relay Contact 42AC Shorts in MOV 8702
Rotary Switch Contact Shorts in MOV 8702
Rotary Switch Contact Shorts in MOV 8702
Relay Contact 42 AC Shorts in MOV 8701
Rotary Switch Contact Shorts in MOV 8702
TABLE C． $3-2$（Cont）
MOV 8701 or 8702 Spuriously Close（ $\mathrm{T}=72 \mathrm{hrs}$ ）
DOMINANT CONTRIBUTORS

| Contribution to |
| :--- |
| Unaveilability |


Cutset
R2403ACT
R1405ACT

R1MV8701V
R2CN42ACO

R1CN42ACO


| Cutset |
| :--- |
| Probability |

1． $2.02 \mathrm{E}-5$

3． $7.20 \mathrm{E}-6$
4．7．20E－6
5． $1.94 \mathrm{E}-6$
6． $1.94 \mathrm{E}-6$
7． 1.94 E .6
8． $1.94 \mathrm{E}-6$
§－369＊9＝ALITIQ甘าIVAVNก N甘ZW
Present Configuration
Contribution to
㐫
30.4
10.9
10.9
2.9





## (7น०ว) $2-\varepsilon \cdot ว ~ \exists า 9 \vee 1$

DOMINANT CONTRIBUTORS
Pressure Transmitter 403 Actuation Fails
Actuation Fails
Vaive Spuriously Closes
Relay Contact 42AC Shorts in MOV 8702
Rotary Switch Contact Shorts in MOV 8702
Relay Contact 42AC Shorts in MOV 8701
Rotary Switch Contact Shorts in MOV 8701
(s.44 800I=1) sasoty $K_{1}$ snotands $20 L 8$ to $10 L 8$ NOW
Description
Valve Spuriously Closes
NRC Modification and Modification
TABLE C. 3-2 (Cont)
MOV 8701 or 8702 Spuriously Close ( $\mathrm{T}=72 \mathrm{hrs}$ )
DOMINANT CONTRIBUTORS
Description
Rotary Switch Contact Shorts in MOV 8701
Rotary Switch Contact Shorts in MOV 8702
Relay Contact 42AC Shorts in MOV 8701 R1CN42ACQ

## Cutset

R2MV8702V
R1MV8701V
R1SRCNQ
REEN42ACO
R2SRCNQ

| Contribution to |
| :--- |
| Unavailability |

$\stackrel{\sim}{\sim}$
8.7
8.7
8.7
8.7
Cutset
Probability

1. $7.20 E-6$
2. $7.20 \mathrm{E}-6$
3. $1.94 \mathrm{E}-6$
4. $1.94 E-6$
5. $1.94 \mathrm{E}-6$
TABLE C.3-2 (Cont)
DOMINANT CONTRIBUTORS
Description
Valve Spuriously closes
Rotary Switch Contact Shorts in MOV 8701 Relay Circuit 42 AC Shorts in MOV 8702
Rotary Switch Contart Shorts in MOV 8702 Rotary Switch Contact Shorts in MOV 8702
Relay Contact $42 A C$ Shorts in MOV 8701

$$
\text { Relay Contact 42AC Shorts in MOV } 8701
$$

R2MV8702V
R1MV8701V





OJษZゅNכTצ NRC Modification and Modification 8702 Spuriously Close ( $T=1008 \mathrm{hrs}$ ) MOV 8701 or
Cutset $p-311 I^{\circ} \varepsilon=$ A11718V804d NV3W

TABLE C．3－2（Cont）

dominant contributors
Description

| R1MV1SOL | MOV 8701 or 8702 Spuriously Close |
| :--- | :--- |
| R1PMIXS R2PMZXS | RHR Pumps Fail to Continue Running |

Present Configuration

MEAN PROBABILITY $=7.11 \mathrm{E}-5$

98ャてい1／のt：A8S00
TABLE C.3-2 (Cont)
Modification and NRC Modification Short Term Cooling


TABLE C.3-2 (Cont)
Long Term Cooling
DOMINANT CONTRIBUTORS
Description
MOV 8701 or 8702 Spuriously Close
RHR Pumps Fail to Continue Running
Pump \#1 Fails to Run and Pump
\#2 Fails to Start
aวueuąu!ew of añ alqeiteneun $\mathrm{Z} \mathrm{\#}$
Pump \#1 Fails to Run and Pump \#2
Unavailability Due to Test
Pump \#1 Fails to Run and MOV 8700B
Spuriously Closes
Pump \#2 Fails to Run and MOV 8700A
Spuriously Closes
Pump \#1 Fails to Run and CV8730B
Fails to Open QROELBAJZZ XIWdIX
XZWdZY AVOOLBAWIZ
1SIZWdZy
R1PM1X
R2MV8700BV
R1PM1X
Riphix e2w
NIVWZWdZZ
$\forall Z W d Z Y$
XIWdIV
hoszanty
R2PM2X R1PM1

TPMI
 Contribution to
Unavailability
uo!feanbituol fuasand

2. $9.12 \mathrm{E}-\frac{4}{4}$
3. $9.06 E-5$
4. $4.74 \mathrm{E}-5$
5. $2.74 \mathrm{E}-5$
6. $3.05 \mathrm{E}-6$
0.2
8.

$$
0.2
$$

R1PM1X
XIWdIX

$$
0.2
$$

$\varepsilon-310^{\circ} 2=$ A1I 71 g\%q0idd $N \forall 3 W$
TABLE C. 3-2 (Cont)
Modification and NRC Modification Long Term Cooling
DOMINANT CONTRIBUTORS
Description
RHR Punizs Fails to Continue Running
MOV 8701 or 8702 Spurious?y Close
RHE Pame 1 Fails to Run and Pump \#2 Fails to
Start
Pump \#1 Fails to Run and Pump \#2 Unavailabie
due to Maintenance
7. \#1 Fails :o Run and Pimp \#2 Unavailable
Due to Test
Pump \#1 Fails to Run and MOV 8700B Spuriously Pump \#2 Fails to Run and MOV 8700A Spuriously Closes Closes
Pump \#1 Fails to Run and CV 8730B Fail to Open Q80EL8AJZY XIWdIY
XZWdZY AVOOLBAWIX
A800LBAWZY XIWdIY

[^0]
22.4
S.9

0.2
O
0.2 R1PM1X R2PM2TST
R1PM1X R2MV8700BV
NIVWZWAZヌ XIWdİ
R1PM1X R2PM2X
R1Mvisor
$\forall$ ZWdZy XIWdId
RIPMIX RZPMZMAIN


$870811 / 183-14$







| 4 | 3 | 2 |  |
| :--- | :--- | :--- | :--- |



TI APERTURE CARD

| Also Available On |
| :---: |
| Aperiture Card |
| WESTI NGHOUSE   <br> MOV 8702 FAILS TO OPEN  <br> FICURE C-5 $15: 41$ |






Also Available $O n$
Aperture Card
C-40

## APPENDIX D

OVERPRESSURIZATION

ANALYSIS

## D. 1 INTRODUCTION

This appendix details the calculations and qualitative analyses involved in the determination of the effect of removal of the RHR autoclosure interlock. The first section categorizes the types of initiating events and using operating experience determines the frequency of these events. The remaining section discusses the mass input transients and the consequences from these transients.

## D. 2 INITIATING EVENTS

This section provides the data and calculations used to determine the frequencies of the transient events identified in Section 6.5. Table D.2-1 lists the transients that have actually occurred at U.S. PWRs by the type of transient.

In order to determine the frequency of these events, a compilation of operating years of experience was performed. This data is provided in Table D.2-2. This table shows, for each plant, a rough estimate of the total number of shutdown hours (in which the RHRS wouid be required to operate) along with the total report period hours. This data shows that roughly 31 percent of the time that a plant has been operating, it is in the shutdown modes.

Therefore to quantify the frequency of overpressurization transients the following formula was used:

$$
\begin{aligned}
F(\text { Transient })= & \frac{\# \text { of transients }}{\text { \#of shutdown years }} \\
& \frac{\# \text { of transients }}{\text { Total report period years } \times \% \text { in shutdown }} \\
& \frac{\text { \# of transients }}{510.30 \text { years } \times 31 \%}
\end{aligned}
$$

Table D.2-3 lists the frequencies for each transient using the above formula.

For the loss of RHR cooling train initiating event and for the letdown isolation/RHRS isolated event, an estimate of the number of events was made utilizing the AEOD Case Study Report "Decay Heat Removal Problems at U.S. Pressurized Water Reactors." The Letdown isolation, RHk's isolated event was assumed to be synonymous with the automatic closure of Suction/Isolation valves events reported in Table 1-2 ( 37 events). The number of loss of RHR cooling train events was determined by subtracting the number of autoclosure events and the number of inability to open suction/isolation valve events from the total number of events ( $130-37-8=85$ events).

For the modification case in which the autoclosure interlock is removed, the number of letdown isolation events due to isolation of the RHRS via autoclosure of the suction valves would essentially decrease to zero. However to account for some unknown causes of closure of the suction valves, the number of events was conservatively assumed to only decrease by one-half.

If the failure rate for a motor-operated valve to spuriously close is taken from Table $6.2-1$ as $1 E-7 / \mathrm{hr}$, the frequency for a letdown isolation event due to spurious closure of one of the motor operated suction valves would be:

Frequency $=2$ valves $\times \frac{1 E-7}{\mathrm{hr}} \times \frac{8760 \mathrm{hrs}}{\text { year }} \times 31 \%$
$=5.43 E-4 /$ year

Thus the reduction of the frequency by one-half is a conservative assumption.

## D. 3 MASS INPUT ANALYSIS

The following section describes the assumptions and the calculations involved in the analysis of mass input initiated overpressurization events. The effect of these transients on the RHR system and on the RCS are categorized in order to determine the differences between the events that lead to high overpressure, medium or low overpressure conditions.

This analysis utilized event trees to depict the various mitigating actions that take place after a mass input initiated transient.

The following assumptions and conditions were used in the development of the event trees:

1. The plant is in the cold shutdown mode (mode 5) with a temperature below $160^{\circ} \mathrm{F}$ and a pressure below 390 psig.
2. One charging pump is in operation and pumping at its maximum flowrate of 550 gpm .
3. Letdown via the RHRS is in operation and the flowrate is 120 gpm .
4. No RCPs are in operation.
5. An alarm must actuate before the operator can intervene and stop the transient. This alarm can come from:
a) RHR relief valve discharge to PRT (pressurizer relief tank),
b) PORV discharge to PRT,
c) LTOP system operation,
or d) RHR pump low flow alarm due to closure of the RHR suction valves.
6. If the flowrate due to the transient is greater than the relief capacity of the operacing mitigation systems, another system must operate or the pressure will continue to increase with a rate proportionate to the difference in input/removal rates.
7. When a pump spuriously starts, it runs at its maximum flowrate (charging pump flowrate $=550 \mathrm{gpm}$ and safety injection pump flowrate $=$ $650 \mathrm{gpm})$. Furthermore, these pumps are assumed to have an infinite water source.

The event trees derived in this analysis are shown in Figure D.3-1, D.3-2, and D.3-3. Figure D.3-1 depicts the mitigating actions given the initiator Charging/Safety Injection Pump Actuation, while letdown isolation with the RHR operable and inoperable are shown in Figure D.3-2 and D.3-3 respectively.

The node that is affected by removal of the autoclosure interlock is the RS node (RHRS Suction Valve Close). This node changes from an automatic system (the autoclosure interlock) to an operator action (given an alarm). No distinction between the modification and the NRC proposed modification is made for this node.

The probability calculations for each node are shown in Table D.3-1. The success criteria for each node is also shown on the tables.

The results of the quantification of the event trees is shown in Tables D.3-2 to D.3-4. These tables also detail the change in frequencies of the consequence categories due to the removal of the autoclosure interlock.

| dolf $33 I M 1$ Q3 2xa nald $305 \mathrm{NI} 3 n 7 \mathrm{En} 1317 \mathrm{Za}$ |
| :---: |
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| 915d OS2 01 |
| 915d 0011 01 |
| $13173 d$ ard 915d 08\% 01 |
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| 9ISd GZG 01 gzt HOdd |
| 915d 001101021 wody |
| 915d 0t9 01 00\% H0dd |
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| 915d O\%E 01 c6k wodj |
| 915d 06¢ 01 OGy WOdd |
| Sxabin3a |

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OPENING OF RCCUMULATOR ISOLATION DISCHRPGE UPE VES
 STRRTUP OF INACTIUE LOOP

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\text { MRRCH B, } 1972
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PRESSURE SURGE FILLING AND VENTING PRESSURE SURGE PCS FILL AND VENT
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BROKEN MIRES ON RELAY
FLECTRICRE BUS TRANSFER BUS DEENERGIZED SI SIGNPL RPS TESTING

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ISOLRTION OF LETDOWN WHILE CHPIRGING CONTINUES INDIRN POINT 2 PRAIRIE ISLAND INOIRN POINT ST. LUCIE 1 $\begin{array}{ll}\text { FRRLEY } 2 & \text { COT } 1983 \\ \text { TURKEY POINT A } & \text { NOV } 28,1981 \\ \text { TURKEY POINT } 4 & \text { NOU } 29,1981 \\ \text { NORTH ANNR } 2 & \text { MRY 24, 1982 }\end{array}$ $\begin{array}{ll}\text { FRRLEY } 2 & \text { COT } 1983 \\ \text { TURKEY POINT A } & \text { NOV } 28,1981 \\ \text { TURKEY POINT } 4 & \text { NOU } 29,1981 \\ \text { NORTH ANNR } 2 & \text { MRY 24, 1982 }\end{array}$ MRY 24,1982
MAY 18,1982 MRRCCH 1985
MRY 1985 ISOLRTION OF LETDOWN WHILE CHPRGI

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INOIRN POINT 2
INDIRN POINT 2
INOIRN POINT 2
INOIRN PROIRIE ISLAND 2
ST. LUCIE 1
BERUER UPLLEY 1
BERUER UPLLEY 1
O.C. COOK 1

INDIRN POINT 2
MORTH ANNA 1
NIRTH RNNA 1
FARLEY 2
SRN ONOFRE
SUIRRY 1

\[

\]

TABLE D．2－i（CONT．）

$$
\begin{aligned}
& \text { TO } 670 \text { PSIG } \\
& \text { TO } 650 \text { PSIG } \\
& \text { FFRM } 50 \text { TO BOO PSIG } \\
& \text { FROM } 100 \text { TO } 1100 \text { PSSGG } \\
& \text { FFROM } 400 \text { TO } 3326 \text { PSIG } \\
& \text { FRYTM } 95 \text { TO } 1300 \text { PSIG } \\
& \text { FSOM } 400 \text { TO B30 PSIG } \\
& \text { FPOH } 50 \text { TO } 2250 \text { PSIG } \\
& \text { TEMP FROM BO TO } 170
\end{aligned}
$$



CHRRGING／SAFETY INJECTION PUMP RETUATION

## IMDIAN POINT 2



DEC 3， 1974 JULY こ2， 1975

SEPT 18， 1975
FEB 28， 1976
SEPT 30， 1976
RPRIL 19， 19 日0
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ISOLRTION OF LETDOWN WHILE CHREGING CONTINEES RHR ISOLATEG
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loss of bus

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## N．SAFETY

JUNE $19 H 5$
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N．SAFETY
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SI SIGURL
SI SIGMAL INROVEDTENT SI SIGNRL

INADVERTENT CHRRGING
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PERSONNEL ERPOR
PERSONNEL ERPOR
PERSINTNEL ERROR
PLACE CHRPGING IN SERUICE

BRTTEPY TESTING

> SOURCES REACTOR-VESSEL TRANSIENTS, NUCLEAR SAFETY (ABSTRACTED FROM NUREG-O13B) IE INFORMATION NOT ICE B2-17 CASE STUDY REPORT - LOW TEMPERATURE OVERPRESSURE EVENTS AT TURKEY POINT UNIT 4 NUCLEAR POWER EXPERIENCE WESTINGHOUSE SEARCH OF LERS AEOD CASE STUDY REPORT- DECAY HEAT REMOVAL PROBLEMS AT U.S. FWRS

FROM 110 TO 1290 PSIG
FROM 345 TO 1400 PSIG FROM 360 TO 560 PSIG RCS PNRUS LIFTED OPFS DFERATED

WIL \＆nadod SISd 18801 TRE POLV OFENEU PORU OPENED

PORU ACTUATED
BOTH PORUS ACT
BOTH PORUS ACTUFTED
POPU CYCLED FPTM 350 TO



#    

QRRQQR


TABLE D.2-3
OVERPRESSURIZATION FREQUENCIES

## Number of <br> Transient

1. Premature Opening of the RHR System
2. Rod Withdrawal
3. Heat Input/Removal
3.1 Failure to Isclate RHR Not Analyzed Not Analyzed
during Startup
3.2 Pressurizer Heaters Actuation

1
6.32E-3/yr
6.95E-2/yr
3.4 Loss of RHR Cooling Train

85*
5.37E-1/yr
4. Mass Input/Letdown
4.1 Opening of Accumulator
Discharge Isolation Valve
4.2 Letdown Isolation
4.2.1 RHRS Operable

16
1.01E-1/yr
4.2.2 RHRS Isolated (Present)

37*
2.34E-1/yr (Modification) 19**
1.17E-1/yr
4.3 Charging/Safety Injection 16
$1.01 \mathrm{E}-1 / \mathrm{yr}$ Pump Actuation

* From AEOD Decay Heat Removal Case Study Report.
**Assumed to be one half of present configuration case.


## TABLE D.3-1 <br> NODAL PROBABILITY CALCULATIONS

## 1. RHR Isolated (RI)

Description: For the charging/safety injection pump initiating event, it was assumed that the RHR is not isolated approximately $90 \%$ of the time during cold shutdown. For the letdown isolation RHR operable, the RHR is not isolated while for the letdown isolation, RHR isolated the transient has no effect on the RHRS.

| Case | RI Failure |
| :---: | :---: |
| Charging/Safety Injection Pump | 0.9 |
| Leidown Isolation - RHR Operable | 1.0 |
| Letdown Isolation - RHR Isolated | 0.0 |

# TABLE D.3-1 (Cont) <br> NODAL PROBABILITY CALCULATIONS 

2. RHR Relief Valve Operates (RV)

Success: RHR Relief Valve Opens at $P=450$ psig

Failure: Relief Valve Fails to Open

Description: The RHR relief valve is a spring-loaded relief valve set to actuate at a pressure of 450 psig . It can relieve 900 gpm at 450 psig .

Probability (RV Fails to Open) $=3 E-4$

# TABLE D.3-1 (Cont) <br> NODAL PROBABILITY CALCULATIONS 

## 3. LTOP System Operates at $P=450 \mathrm{psig}$ (LTP)

Success: One or Two Trains of LTOP operate

Failure: Both trains fail to operate

Description: The LTOP system consists of two trains that utilize the PORV. The operator must enable the system at $P=475 \mathrm{psig}$ or an alarm sounds. The LTOP system is set at $P=450 \mathrm{psig}$ and $T=323^{\circ} \mathrm{F}$. A PORV can relieve 700 gpm at $P=450$ psig.

Failure Probabilities: The failure probabilities were calculated through the use of fault trecs. Figure D.3-4 shows the fault tree developed for two trains of LTOP while the failure of one train of LTOP is shown in Figure D.3-5.

LTP Feilure Probabilities
Two Trains Fail 1.50E-5
One Train Fails $\quad 7.71 \mathrm{E}-3$

# TABLE D.3-1 (Cont) <br> NODAL PROBABILITY CALCULATIONS 

4a) RHR Suction Valves Close at $P=700$ psig (RS)

Success: Autoclose Feature Closes
One of Two RHR Isolation
Valves at $P=700$ psig

Failure: Both isoletion valves do not close.

Description: The autoclose feature utilizes a pressure signal to actuate the valve operator which closes the valve.

Failure Probabilities: The failure probability was calculated using a fault tree. Figure D.3-6 depicts the autoclose failing to close one of two isolation valves (MOV 8701 or 8702).

RS Failure Probability $=1.44 \mathrm{E}-5$

## TABLE D.3-1 (Cont) <br> NODAL PROBABILITY CALCULATIONS

4b) Operator Isolates RHR System Given Overpressure Alarm (OD)

Success: Operator closes one of two isolation valves when alarm sounds at $P=700 \mathrm{psig}$.

Failure: Operator fails to close either isolation valve.

Description: The modification cases assume an alarm operates when the pressure exceeds 700 psig and an isolation valve is in the open position. Given this alarm, the operator (through traiting and operating procedures) will close one of the isolation valves.

Failure Probability: The probability of failure is conditional on a time factor. If an mitigating system operates successfully, it is assumed that the operator has 20 minutes in which to act. If no mitigating system operates, the operator has approximately 10 minutes in which to act. The calculations are shown below:

## HUMAN ERROR CALCULATIONS

1. Diagnosis within time $T$ by control room personnel of abnormal event
```
HEP =0.01 within 20 minutes Table 20-3
HEP=0.1 within }10\mathrm{ minutes
```

2. Estimated HEP in operating manual controls

$$
\begin{array}{ll}
\text { HEP }=0.0005 & \text { Turn rotary control in wrong direction } \\
& \text { (Table 20-12) }
\end{array}
$$

```
            TABLE D.3-1 (Cont)
NODAL PROBABILITY CALCULDITIONS
```

4b) (Continued)
3. Recovery factor - special short term one of a kind checking

$$
H E P=0.05 \quad \text { Table 20-22 }
$$



$$
P(20 \text { minutes })=5.25 E-4
$$

$$
P(10 \text { minutes })=5.02 E-3
$$

```
    TABLE D.3-1 (Cont)
NODAL PROBABILITY CALCULATIONS
```

5. Operator Secures Running Pump (OA1)

Success: Operator Stops Pump

Failure: Pump Continues to Run

Description: For any operator action to occur, an alarm must sound. The probability that the operator secures the pump also considers that the operator neglects the alarm.

Failure Probability: The human error probability is calculated below:

1. Initial screening model for diagnosis in time $T$

$$
\text { HEP }=0.1 \quad \text { within } 20 \text { minutes } \quad \text { Table 20-1 }
$$

.. Conditional probability of failure for task $N$ given success of precedting task ( $\mathrm{N}-1$ )

$P$ (operator fails to secure pump) $=0.217$

## TABLE D.3-1 (Cont) <br> NODAL PROBABILITY CALCULATIONS

6. Operator Opens PORV (OA2)

Success: Operator opens a PORV to reduce pressure

Failure: Operator fails to open PORV

Description: If the mass input is greater than the relieving capacity or if no relief valve operates, the operator can open a PORV to reduce the pressure. If the operator fails to secure the pump, he can open a PORV in crder to increase the time he has available in which to act.

Failure Probabilities:

Given failure of previous task

$$
C P=0.36 \quad \text { Table 20-18 Medium dependence }
$$

Given success of previous task

$$
C P=0.21 \quad \text { Table 20-19 Medium dependence }
$$

## TABLE D.3-1 (Cont) <br> NODAL PROBABILITY CALCULATIONS

7. Pressurizer Safety Vaive Lifts at $P=2485 \mathrm{psig}$ (PZR)

Success: One of three safety valve operate.

Failure: All three safety valves fail.

Description: The safety valves can relieve approximately 875 gpm at $P=2485 \mathrm{psig}$ and $T=100^{\circ} \mathrm{F}$.

Failure Probability: The failure of one valve to open is $1 \mathrm{E}-5 / \mathrm{D}$. Thus the failure oi all three values is:

$$
P \text { (values fail to open })=(1 E-5)(1 E-5)(1 E-5)=1 E=15
$$

TABLE D.3-1 (Cont)
NODAL PROBABILITY CALCULATIONS
8. RHR Relief Valve Reseats (VR)

Success: Relief Valve Cluses

Failure: Relief Valve Fails to Close

Description: Given that the transient is successfully mitigated, the RHR relief valve musi close in order to prevent a loss of coolant.

Failure Probability: The probability that the relief valve will not reseat is $3 \mathrm{E}-2$.

## TABLE D.3-1 (Cont) <br> NODAL PROBABILITY CALCULATIONS

9. PORVs Reseat (PRV)

Success: The PORVS that opened close.

Failure: None of the actuated PORVs close.

Description: Given that the transient is mitigated, the PORVs must close in order to prevent a loss of coolant.

Failure Probability: The failure to reseat for a PORV is $3 E-3$.

If two PORVs operated, two must close $P(2$ PORVs fail to close $)=\varepsilon E-3$

TABLE D.3-2
CONSEQUENCE CATEGORY FREQUENCIES (PER YEAR) FOR LETDOWN ISOLATION RHR OPERABLE TREE (INITIATING EVERIT FREQUENCY $=1.01 E-1$ )

| Consequerce <br> Cateogry | Frequency <br> Present <br> Configuration |  |  | Frequency <br> Modification <br> Case |
| :--- | :--- | :--- | :--- | :--- |

TABLE D.3-3
CONSEQUENCE CATEGORY FREQUENCIES (PER YEAR) FOR LETDOWN ISOLATION RHR ISOLATED TREE
(INITIATING EVENT FREQUENCY
PRESENT CASE: $2.34 \mathrm{E}-1 / \mathrm{yr}$ MODIFICATION CASE: $1.17 \mathrm{E}-1 / \mathrm{yr}$ )

|  | Frequency | Frequency |  |
| :---: | :---: | :---: | :---: |
| Consequence | Present | Modification | Change |
| Cateogry | Configuration | Case | (+ or -) |
| SUCCESS | 1.8212E-1 | 9.1062E-2 | -9.1058E-2 |
| LLFI | $1.0908 \mathrm{E}-3$ | $5.4542 \mathrm{E}-4$ | -5.4538E-4 |
| LLCI | $5.0386 \mathrm{E}-2$ | 2.5193E-2 | -2.5193E-2 |
| LSFI | 4.2379E-6 | 2.1190E-6 | -2.1189E-6 |
| LSCI | $3.915 \mathrm{E}-4$ | 1.9575E-4 | $-1.9575 \mathrm{E}-4$ |
| HLCI | 3.510E-6 | $1.7550 \mathrm{E}-6$ | $-1.7550 \mathrm{E}-6$ |
| HOPI | 3.510E-21 | $1.7550 \mathrm{E}-21$ | $\underline{-1.735 E-21}$ |
|  |  | Total Change | $-1.17 \mathrm{E}-1$ |

> TABLE D. $3-4$
> CONSEQUENCE CATEGORY FREQUENCIES (PER YEAR)
> FOR CHARGING/SI PUMP TREE (INITIATING EVENT FREQUENCY $=1.01 E-1 / \mathrm{yr}$ )

|  | Frequency | Frequency |  |
| :---: | :---: | :---: | :---: |
| Consequence | Present | Modification | Change |
| Cateogry | Configuration | Case | (+ or -) |
| SUCCESS | $7.6488 \mathrm{E}-2$ | 7.6488E-2 | 0 |
| LSFI | 4.7269E-5 | 4.7269E-5 | 0 |
| LLCI | 2.1748E-3 | $2.1748 \mathrm{E}-3$ | 0 |
| MSCI | $1.7133 E-5$ | $1.7133 \mathrm{E}-5$ | 0 |
| HLCl | $2.5802 \mathrm{E}-7$ | 2.5976E-7 | $-6 E-11$ |
| HOPI | $2.5802 \mathrm{E}-22$ | $2.5796 \mathrm{E}-22$ | $-6 E-26$ |
| LSFO | $2.5343 E-3$ | 2.5343E-3 | 0 |
| LLFO | 1.2885E-5 | $1.2885 \mathrm{E}-5$ | 0 |
| LLCO | $1.9725 \mathrm{E}-2$ | $1.9725 \mathrm{E}-2$ | 0 |
| MOPI | 2.2420E-7 | 2.2408E-7 | $-1.20 \mathrm{E}-10$ |
| MSFO | 4.6819E-13 | $1.7069 \mathrm{E}-11$ | 1.66E-11 |
| MSCO | 4.4959E-12 | $1.6391 \mathrm{E}-10$ | $1.594 \mathrm{E}-10$ |
| MSF I | 4.9463E-10 | 4.9438E-10 | $-2.50 \mathrm{E}-13$ |
| HOPOV | 5.8903E-15 | $2.0534 E-12$ | 2.048E-12 |
|  |  | Total Chan | 0 |



Figure D.3-1
Charging/Safety Injection Pump Rctuation


Figure D.3-2
Letdown Isolation - RHR Operable


Figure D.3-3
Letdown Isolation - RHR Inoperable (Isolated)




D-28


[^0]:    | Contribution to |
    | :--- |
    | Unavailability |

