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 to mitigate RCS pressure transient.

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May 30, 1990

May 30, 1990

Mr. Thomas T. Martin, Regional Administrator
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Subject: Thirty (30) Day Special Report
Use of the Overpressure Protection System
to Mitigate an RCS Pressure Transient
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Martin:

In accordance with Technical Specification 3.15.1.3, this thirty day special report on Use of the Overpressure Protection System to Mitigate an RCS Pressure Transient, is hereby submitted.

On April 30, 1990, at 0810 EDST, the Reactor Coolant System (RCS) was in a solid condition with pressure and temperature at 325 psig and 340°F respectively with the "B" Reactor Coolant Pump operating. Decay heat removal was via the steam generators with RHR still lined up to the RCS. The letdown pressure control valve, PCV-135, was in automatic controlling RCS pressure at 325 psig. Periodic test procedure PT-7 (Hydro Test of Reactor Coolant System) was in progress for the required RCS hydro subsequent to the annual refueling and maintenance outage. The reactor vessel overpressure protection system was in service as required until the RHR system is taken out of service and isolated from the RCS.

Isolation of the RHR system was being performed when the overpressure protection system activated at approximately 400 psig RCS pressure. The two pressurizer power operated relief valves (PORVs) operated as designed to mitigate the slow pressure transient and stabilized RCS pressure at approximately 360 psig. The pressurizer PORVs were open for approximately four seconds.

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The apparent causes of the event are as follows:


- o Excess letdown, which is normally used to control RCS pressure by varying charging flow with excess letdown flow during the performance of the RCS hydro, was ineffective at the lower pressures so the Control Room Operators were using normal letdown to supplement excess letdown for RCS pressure control. Also, with the RHR system still open to the RCS, some letdown was still being accomplished through its letdown path.
- o During the above evolution, RCS pressure was being controlled by the letdown pressure control valve, PCV-135, from the letdown orifices and RHR system. Excess letdown was in service, but ineffective in controlling RCS pressure. When the RHR system was isolated from the RCS, letdown from the RHR path was terminated and all normal letdown now to PCV-135 was through letdown orifices. With PCV-135 set in automatic, letdown pressure was being controlled at approximately 325 psig. With charging flow at a minimum, RCS pressure slowly increased to the overpressure protection actuation setpoint due to an approximate 80 psig system differential between letdown and the operating coolant pump discharge pressure, before Control Room Operators could intervene manually to control it.

Immediate corrective action was taken to ensure that the pressurizer PORVs opened to mitigate the RCS pressure transient and then closed. Subsequently, the Control Room Operators placed PCV-135 in manual and adjusted it to control RCS pressure at approximately 340 psig.

Corrective action to prevent recurrence will be as follows:

- o Continued evaluation of the events initiating the RCS pressure transient.
- o Checkout of the proper operation of the excess letdown system during these conditions.
- o Revision of operating procedures to alert operators on effective methods of pressure control under these conditions.

Very truly yours,


Robert C. Macredy
Division Manager
Nuclear Production

RCM/eeh

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Document Control Desk
Washington, DC 20555

Ginna USNRC Senior Resident Inspector