

Auxiliary Feedwater System Risk-Based Inspection Guide for the Turkey Point Nuclear Power Plant

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Prepared by
N. E. Moffitt, B. F. Gore, T. V. Vo

Pacific Northwest Laboratory
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Prepared by
N. E. Moffitt, B. F. Gore, T. V. Vo

Pacific Northwest Laboratory
Richland, WA 99352

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Division of Radiation Protection and Emergency Preparedness
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
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Summary

This document presents a compilation of auxiliary feedwater (AFW) system failure information which has been screened for risk significance in terms of failure frequency and degradation of system performance. It is a risk-prioritized listing of failure events and their causes that are significant enough to warrant consideration in inspection planning at the Turkey Point plant. This information is presented to provide inspectors with increased resources for inspection planning at Turkey Point.

The risk importance of various component failure modes was identified by analysis of the results of probabilistic risk assessments (PRAs) for many pressurized water reactors (PWRs). However, the component failure categories identified in PRAs are rather broad, because the failure data used in the PRAs is an aggregate of many individual failures having a variety of root causes. In order to help inspectors focus on specific aspects of component operation, maintenance and design which might cause these failures, an extensive review of component failure information was performed to identify and rank the root causes of these component failures. Both Turkey Point and industry-wide failure information was analyzed. Failure causes were sorted on the basis of frequency of occurrence and seriousness of consequence, and categorized as common cause failures, human errors, design problems, or component failures.

This information is presented in the body of this document. Section 3.0 provide brief descriptions of these risk-important failure causes, and Section 5.0 presents more extensive discussions, with specific examples and references. The entries in the two sections are cross-referenced.

An abbreviated system walkdown table is presented in Section 3.2 which includes only components identified as risk important. This table lists the system lineup for normal, standby system operation.

This information permits an inspector to concentrate on components important to the prevention of core damage. However, it is important to note that inspections should not focus exclusively on these components. Other components which perform essential functions, but which are not included because of high reliability or redundancy, must also be addressed to ensure that degradation does not increase their failure probabilities, and hence their risk importance.

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1 Introduction

This document is one of a series providing plant-specific inspection guidance for auxiliary feedwater (AFW) systems at pressurized water reactors (PWRs). This guidance is based on information from probabilistic risk assessments (PRAs) for similar PWRs, industry-wide operating experience with AFW systems, plant-specific AFW system descriptions, and plant-specific operating experience. It is not a detailed inspection plan, but rather a compilation of AFW system failure information which has been screened for risk significance in terms of failure frequency and degradation of system performance. The result is a risk-prioritized listing of failure events and their causes that are significant enough to warrant consideration in inspection planning at Turkey Point.

This inspection guidance is presented in Section 3.0, following a description of the Turkey Point AFW system in Section 2.0. Section 3.0 identifies the risk important system components by Turkey Point identification number, followed by brief descriptions of each of the various failure causes of that component. These include specific human errors, design deficiencies, and hardware failures. The discussions also identify where common cause failures have affected multiple, redundant components. These brief discussions identify specific aspects of system or component design, operation, maintenance, or testing for inspection by observation, records review, training observation, procedures review, or by observation of the implementation of procedures. An AFW system walkdown table identifying risk important components and their lineup for normal, standby system operation is also provided.

The remainder of the document describes and discusses the information used in compiling this inspection guidance. Section 4.0 describes the risk importance information which has been derived from PRAs and its sources. As review of that section will show, the failure events identified in PRAs are rather broad (e.g., pump fails to start or run, valve fails closed). Section 5.0 addresses the specific failure causes which have been combined under these broad events.

AFW system operating history was studied to identify the various specific failures which have been aggregated into the PRA failure events. Section 5.1 presents a summary of Turkey Point failure information, and Section 5.2 presents a review of industry-wide failure information. The industry-wide information was compiled from a variety of NRC sources, including AEOD analyses and reports, information notices, inspection and enforcement bulletins, and generic letters, and from a variety of INPO reports as well. Some Licensee Event Reports and NPRDS event descriptions were also reviewed. Finally, information was included from reports of NRC-sponsored studies of the effects of plant aging, which include quantitative analyses of reported AFW system failures. This industry-wide information was then combined with the plant-specific failure information to identify the various root causes of the broad failure events used in PRAs, which are identified in Section 3.0.

2 Turkey Point AFW System

This section presents an overview of the Turkey Point AFW system (Westinghouse 3 loop plant), including a simplified schematic system diagram. In addition, the system success criterion, system dependencies, and administrative operational constraints are also presented.

2.1 System Description

The AFW system consists of three turbine driven pumps shared between the two units. It provides feedwater to the steam generators (SG) to allow secondary-side heat removal from either unit when main feedwater is unavailable. The system is capable of functioning for extended periods, which allows time to restore main feedwater flow or to proceed with an orderly cooldown of the plant to the point where the residual heat removal (RHR) system can remove decay heat. Simplified schematics of the Turkey Point AFW system is shown in Figure 2.1.

The system is designed to start up and establish flow automatically. All three AFW pumps will start upon any of the following conditions: Safety injection, bus stripping on one or both 4160V busses, low-low level in any steam generator, trip of one main feedwater pump at less than 60% power or both main feedwater pumps under normal operating conditions; and initiate auxiliary feedwater flow to the unit causing the initiating signal. If offsite power is not available, the two motor-driven standby steam generator feedwater pumps can be placed in service. These pumps are powered by separate cranking diesels which supply the 4KV "C" busses.

Feedwater is supplied to each of the three AFW pumps from either Unit 3 or 4 Condensate Storage Tanks (CST) through check valves and normally locked open gate valves. All of the AFW pumps are turbine driven (TDAFW) and are capable of supplying the steam generators of either unit. Steam is supplied to all three AFW pump turbines from either unit, through automatically controlled motor operated valves

(3-1403,1404,1405; 4-1403,1404,1405), located upstream of the main steam isolation valves. Each AFW pump is equipped with a continuous recirculation flow system, which prevents pump deadheading.

Each AFW pump discharges through a check valve to one of two redundant discharge headers which are referred to as Train 1 and Train 2. Each of these trains feeds all three S/Gs for both units. Each S/G auxiliary feedwater line for both headers is equipped with a flow element, flow transmitter, and flow control valve that controls AFW flow to a predetermined flow rate of 130 gpm. The administratively controlled, locked open and locked closed valve configuration, illustrated in Figure 2.1, aligns the pumps so that pump A receives steam from S/G "C" of both units and discharges to the Train 1 feedwater header. Pumps B and C receive steam from S/G "A" and "B" of both units and discharge to the Train 2 feedwater header. In addition to dual, redundant steam supply and discharge headers, power, control, and instrumentation associated with the two AFW system trains are independent from each other.

The two condensate storage tanks are the normal source of water for the AFW system. Each tank is required to store a sufficient quantity of demineralized water to maintain one reactor coolant system (RCS) at hot standby conditions for 15 hours and then to cool it to 350°F, at which point the RHR system is put in service. All tank connections are located such that a continuous reserve of 185,000 gallons is maintained for the AFW system. When CST level drops by 10%, the water treatment plant begins makeup to the CST. Makeup rate is 400 gpm with both trains in operation. Backup AFW suction supply is provided by refilling the CST from the Demineralized Water Tank or the Primary Water Storage Tank. In addition, feedwater from the coal fired Units (1 & 2) can be supplied to Units 3 and 4 through a common header. The non-nuclear feedwater connects to the main feedwater regulating valve bypass line for each steam generator, just upstream of the bypass regulating valve.

2.2 Success Criterion

System success requires the operation of at least one TDAFW pump supplying rated flow to at least one of the three steam generators within three minutes on a loss of normal feedwater.

2.3 System Dependencies

The AFW system depends on AC and DC power at various voltage levels for motor operated valve control circuits, solenoid valves, and monitor and alarm circuits. Instrument Air is required for several pneumatic control valves. Instrument Air is backed up by a Nitrogen Supply System via several banks of accumulators. Steam availability is required for the turbine driven AFW pumps.

2.4 Operational Constraints

When both units are operating above 350°F, Turkey Point Technical Specifications require two independent auxiliary feedwater trains including three (3) AFW

pumps and their associated flowpaths (steam and water) be operable. If one train of AFW becomes inoperable, it must be restored to operable status within 72 hours or the affected unit must be placed in hot standby within the next 6 hours. If both trains of AFW are inoperable for 2 hours the availability of both standby feedwater pumps must be verified and the affected unit(s) must be placed in hot standby within the next 6 hours.

When both units are operating, Turkey Point Technical Specifications require an indicated CST water volume of at least 370,000 gallons. If one unit is operating and the other unit is in MODES 4, 5, or 6, then Technical Specifications require an indicated water volume of 185,000 gallons in either or both CSTs. If one CST becomes inoperable, it must be restored to an operable status within 4 hours or one unit has to be placed in hot standby within the next 6 hours.

With only one unit operating, Turkey Point Technical Specifications require either CST to be operable with a contained volume of at least 185,000 gallons. With both water supplies from the CSTs inoperable for 4 hours, a water supply from either CST must be restored to operable status or the unit must be placed in hot standby within the next 6 hours.

3 Inspection Guidance For The Turkey Point AFW System

In this section the risk important components of the Turkey Point AFW system are identified, and the important failure modes for these components are briefly described. These failure modes include specific human errors, design deficiencies, and types of hardware failures which have been observed to occur for these components, both at Turkey Point and at PWRs throughout the nuclear industry. The discussions also identify where common cause failures have affected multiple, redundant components. These brief discussions identify specific aspects of system or component design, operation, maintenance, or testing for inspection activities. These activities include: observation, records review, training observation, procedures review or by observation of the implementation of procedures.

Table 3.1 is an abbreviated AFW system walkdown table which identifies risk important components. This table lists the system lineup for normal (standby) system operation. Inspection of the components identified in the AFW walkdown table addresses essentially all of the risk associated with AFW system operation.

3.1 Risk Important AFW Components and Failure Modes

Common cause failures of multiple pumps are the most risk-important failure modes of AFW system components. These are followed in importance by single pump failures, level control valve failures, and individual check valve leakage failures.

The following sections address each of these failure modes, in decreasing order of risk importance. They present important root causes of these component failure modes which have been distilled from historical records. Each item is keyed to discussions in Section 5.2 where additional information on historical events is presented.

3.1.1 Multiple Pump Failures Due to Common Cause

The following listing summarizes the most important multiple-pump failure modes identified in Section 5.2.1, Common Cause Failures, and each item is keyed to entries in that section.

- Incorrect operator intervention into automatic system functioning, including improper manual starting and securing of pumps, has caused failure of all pumps, including overspeed trip on startup, and inability to restart prematurely secured pumps. CC1.
- Valve mispositioning has caused failure of all pumps. Pump suction, steam supply, and instrument isolation valves have been involved. CC2.
- Steam binding has caused failure of multiple pumps. This resulted from leakage of hot feedwater past check valves and a motor-operated valve into a common discharge header. CC10. Multiple-pump steam binding has also resulted from improper valve lineups, and from running a pump deadheaded. CC3.
- Pump control circuit deficiencies or design modification errors have caused failures of multiple pumps to auto start, spurious pump trips during operation, and failures to restart after pump shutdown. CC4. Incorrect setpoints and control circuit calibrations have also prevented proper operation of multiple pumps. CC5.
- Loss of a vital power bus has failed multiple pumps due to loss of control power to steam admission valves or to turbine controls. CC6.

- Simultaneous startup of multiple pumps has caused oscillations of pump suction pressure causing multiple-pump trips on low suction pressure, despite the existence of adequate static net positive suction head (NPSH). CC7. Design reviews have identified inadequately sized suction piping which could have yielded insufficient NPSH to support operation of more than one pump. CC8.

3.1.2 Turbine Driven Pump A, B or C Fails to Start or Run

- Improperly adjusted and inadequately maintained turbine governors have caused pump failures. HE2. Problems include worn or loosened nuts, set screws, linkages or cable connections, oil leaks and/or contamination, and electrical failures of resistors, transistors, diodes and circuit cards, and erroneous grounds and connections. CF5. Similar failures have occurred at Turkey Point.
- Terry turbines with Woodward Model EG governors have been found to overspeed trip if full steam flow is allowed on startup. Sensitivity can be reduced if a startup steam bypass valve is sequenced to open first. DE1.
- Turbines with Woodward Model PG-PL governors have tripped on overspeed when restarted shortly after shutdown, unless an operator has locally exercised the speed setting knob to drain oil from the governor speed setting cylinder (per procedure). Automatic oil dump valves are now available through Terry. DE4.
- Condensate slugs in steam lines have caused turbine overspeed trip on startup. Tests repeated right after such a trip may fail to indicate the problem due to warming and clearing of the steam lines. Surveillance should exercise all steam supply connections. DE2.
- Trip and throttle valve (TTV) problems (MOV-6459A,B,C) which have failed the turbine driven pump include physically bumping it, failure to reset it following testing, and failures to verify control room indication of reset. HE2. Whether either the overspeed trip or TTV trip can be reset without

resetting the other, indication in the control room of TTV position, and unambiguous local indication of an overspeed trip affect the likelihood of these errors. DE3.

3.1.3 Pump Unavailable Due to Maintenance or Surveillance

- Both scheduled and unscheduled maintenance remove pumps from operability. Surveillance requires operation with an altered line-up, although a pump train may not be declared inoperable during testing. Prompt scheduling and performance of maintenance and surveillance minimize this unavailability.

3.1.4 Air Operated Flow Control Valves Fail Closed

Train 1: 3-2816, 2817, 2818; 4-2816, 2817, 2818

Train 2: 3-2831, 2832, 2833; 4-2831, 2832, 2833

These normally closed air operated valves (AOVs) control flow to the steam generators. They fail closed on loss of Instrument Air.

- Control circuit problems have been a primary cause of failures, both at Turkey Point and elsewhere. CF9. Valve failures have resulted from blown fuses, failure of control components (such as current/pneumatic converters), broken or dirty contacts, misaligned or broken limit switches, control power loss, and calibration problems. Degraded operation has also resulted from improper air pressure due to air regulator failure or leaking air lines.
- Out-of-adjustment electrical flow controllers have caused improper discharge valve operation, affecting multiple trains of AFW. CC12. Turkey Point has experienced calibration problems with flow controllers.
- Leakage of hot feedwater through check valves has caused thermal binding of normally closed flow control MOVs. AOVs may be similarly susceptible. CF2.

- Turkey Point has experienced numerous air operated controller malfunctions which resulted from water in the instrument air system due to maintenance inoperability of the air dryers. CF9.

3.1.5 Motor Operated Valves Fail Closed

TD Pump Steam Stop: 3-1403, 1404, 1405; 4-1403, 1404, 1405
T & T Valves: MOV-6459 A, B, C

These normally closed MOVs isolate steam flow to the TD AFW pumps. They fail closed on loss of power.

- Common cause failure of MOVs has resulted from failure to use electrical signature tracing equipment to determine proper settings of torque switch and torque switch bypass switches. Failure to calibrate switch settings for high torques necessary under design basis accident conditions has also been involved. CC11.
- Valve motors have been failed due to lack of, or improper sizing or use of thermal overload protective devices. Bypassing and oversizing should be based on proper engineering for design basis conditions. CF4.
- Grease trapped in the torque switch spring pack of Limitorque SMB motor operators has caused motor burnout or thermal overload trip by preventing torque switch actuation. CF8.
- Manually reversing the direction of motion of operating MOVs has overloaded the motor circuit. Operating procedures should provide cautions, and circuit designs may prevent reversal before each stroke is finished. DE7.
- Space heaters designed for preoperation storage have been found wired in parallel with valve motors which had not been environmentally qualified with them present. DE7.

3.1.6 Manual Suction or Discharge Valves Fail Closed

CST Discharge Valves: 3-400, 144, 244, 344; 4-400, 144, 244, 344
Train 1 (TD Pump A): 3-142, 141, 241, 341; 4-142, 141, 241, 341
Train 2 (TD Pumps B & C): 002, 003; 3-006, 007, 008; 4-006, 007, 008
Isolation Valves: 3-139, 239, 339; 4-139, 239, 339
TD Pump Recirculation Valves: 177, 277, 377

Both pairs of CST discharge valves are normally locked open and they supply suction to all three TD AFW pumps. Pump A is normally aligned to supply train 1 of both units and pumps B and C are normally aligned to supply train 2 of both units. The capability exists to valve any of the three TD pumps to either train of either unit.

- Valve mispositioning has resulted in failures of multiple trains of AFW. CC2. It has also been the dominant cause of problems identified during operational readiness inspections. HE1. Events have occurred most often during maintenance, calibration, or system modifications. Similar events have occurred at Turkey Point. Important causes of mispositioning include:
 - Failure to provide complete, clear, and specific procedures for tasks and system restoration
 - Failure to promptly revise and validate procedures, training, and diagrams following system modifications
 - Failure to complete all steps in a procedure
 - Failure to adequately review uncompleted procedural steps after task completion
 - Failure to verify support functions after restoration

- Failure to adhere scrupulously to administrative procedures regarding tagging, control and tracking of valve operations
- Failure to log the manipulation of sealed valves
- Failure to follow good practices of written task assignment and feedback of task completion information
- Failure to provide easily read system drawings, legible valve labels corresponding to drawings and procedures, and labeled indications of local valve position

3.1.7 Leakage of Hot Feedwater through Check Valves:

Train 1: 3-140, 240, 340; 4-140, 240, 340

Train 2: 3-010, 012, 014; 4-009, 011, 013

Discharge TD Pumps: V-143, 243, 343

- Leakage of hot feedwater through several check valves in series has caused steam binding of multiple pumps. Leakage through a closed level control valve in series with check valves has also occurred, as would be required for leakage to reach any of the pumps. CC10.

- Slow leakage past the final check valve of a series may not force check valves closed. Other check valves in series may leak similarly. Piping orientation and valve design are important factors in achieving true series protection. CF1.

3.2 Risk Important AFW System Walkdown Table

Table 3.1 presents an AFW system walkdown table including only components identified as risk important. This information allows inspectors to concentrate their efforts on components important to prevention of core damage. However, it is essential to note that inspections should not focus exclusively on these components. Other components which perform essential functions, but which are absent from this table because of high reliability or redundancy, must also be addressed to ensure that their risk importances are not increased. Examples include the (locked-open) steam isolation valves upstream of the steam supply headers and an adequate water level in the CST.

Table 3.1 Risk Important Walkdown Table for Turkey Point AFW System Components

Component #	Component Name	Required Position	Actual Position
<u>Electrical</u>			
MOV 1403	S/G A Steam Supply Valve Motor	Racked In/Closed	_____
MOV 1404	S/G B Steam Supply Valve Motor	Racked In/Closed	_____
MOV 1405	S/G C Steam Supply Valve Motor	Racked In/Closed	_____
MOV 6459A	TD Pump A T&T Valve Motor	Racked In/Closed	_____
MOV 6459B	TD Pump B T&T Valve Motor	Racked In/Closed	_____
MOV 6459C	TD Pump C T&T Valve Motor	Racked In/Closed	_____
<u>Valves</u>			
3-400	Unit 3 CST Outlet Valve	Locked Open	_____
4-400	Unit 4 CST Outlet Valve	Locked Open	_____
3-144	Unit 3 TD Pump A Suction Isolation Valve	Locked Open	_____
3-244	Unit 3 TD Pump B Suction Isolation Valve	Locked Open	_____
3-344	Unit 3 TD Pump C Suction Isolation Valve	Locked Open	_____
4-144	Unit 4 TD Pump A Suction Isolation Valve	Locked Open	_____
4-244	Unit 4 TD Pump B Suction Isolation Valve	Locked Open	_____
4-344	Unit 4 TD Pump C Suction Isolation Valve	Locked Open	_____
3-141	Unit 3 Train 1 TD Pump Discharge Valve	Locked Open	_____

Table 3.1 (Continued)

Component #	Component Name	Required Position	Actual Position
3-142	Unit 3 Train 1 TD Pump Discharge Valve	Locked Open	_____
3-241	Unit 3 Train 1 TD Pump Discharge Valve	Locked Open	_____
3-341	Unit 3 Train 1 TD Pump Discharge Valve	Locked Open	_____
3-139	Unit 3 Train 1 TD Pump Discharge Valve	Locked Open	_____
3-239	Unit 3 Train 1 TD Pump Discharge Valve	Locked Open	_____
3-339	Unit 3 Train 1 TD Pump Discharge Valve	Locked Open	_____
AFPD-002	Unit 3 and 4 Train 2 TD Pump Discharge Valve	Locked Open	_____
AFPD-003	Unit 3 and 4 Train 2 TD Pump Discharge Valve	Locked Open	_____
3-006	Unit 3 Train 2 TD Pump Discharge Valve	Locked Open	_____
3-007	Unit 3 Train 2 TD Pump Discharge Valve	Locked Open	_____
3-008	Unit 3 Train 2 TD Pump Discharge Valve	Locked Open	_____
4-142	Unit 4 Train 1 TD Pump Discharge Valve	Locked Open	_____
4-141	Unit 4 Train 1 TD Pump Discharge Valve	Locked Open	_____
4-241	Unit 4 Train 1 TD Pump Discharge Valve	Locked Open	_____

Table 3.1 (Continued)

Component #	Component Name	Required Position	Actual Position
4-341	Unit 4 Train 1 TD Pump Discharge Valve	Locked Open	_____
4-139	Unit 4 Train 1 TD Pump Discharge Valve	Locked Open	_____
4-239	Unit 4 Train 1 TD Pump Discharge Valve	Locked Open	_____
4-339	Unit 4 Train 1 TD Pump Discharge Valve	Locked Open	_____
4-006	Unit 4 Train 2 TD Pump Discharge Valve	Locked Open	_____
4-007	Unit 4 Train 2 TD Pump Discharge Valve	Locked Open	_____
4-008	Unit 4 Train 2 TD Pump Discharge Valve	Locked Open	_____
3-2816	Train 1 Flow Control Valve	Closed	_____
3-2817	Train 1 Flow Control Valve	Closed	_____
3-2818	Train 1 Flow Control Valve	Closed	_____
4-2816	Train 1 Flow Control Valve	Closed	_____
4-2817	Train 1 Flow Control Valve	Closed	_____
4-2818	Train 1 Flow Control Valve	Closed	_____
3-2831	Train 2 Flow Control Valve	Closed	_____
3-2832	Train 2 Flow Control Valve	Closed	_____
3-2833	Train 2 Flow Control Valve	Closed	_____
4-2831	Train 2 Flow Control Valve	Closed	_____
4-2832	Train 2 Flow Control Valve	Closed	_____

Table 3.1 (Continued)

Component #	Component Name	Required Position	Actual Position
4-2833	Train 2 Flow Control Valve	Closed	_____
177	TDP A Recirculation Valve	Locked Open	_____
277	TDP B Recirculation Valve	Locked Open	_____
377	TDP C Recirculation Valve	Locked Open	_____
	<u>TDP Steam Supply Valves</u>		
3-319	Unit 3, Train 1	Locked Open	_____
3-082A	Unit 3, Train 1	Locked Open	_____
3-082B	Unit 3, Train 1	Locked Open	_____
3-119	Unit 3, Train 2	Locked Open	_____
3-219	Unit 3, Train 2	Locked Open	_____
3-004	Unit 3, Train 2	Locked Open	_____
3-006	Unit 3, Train 2	Locked Open	_____
3-007	Unit 3, Train 1 & 2 Cross-tie	Locked Closed	_____
001B	Unit 3 or 4, Train 2	Locked Open	_____
002B	Unit 3 or 4, Train 2	Locked Open	_____
001C	Unit 3 or 4, Train 2	Locked Open	_____
002C	Unit 3 or 4, Train 2	Locked Open	_____
4-319	Unit 4, Train 1	Locked Open	_____
4-082A	Unit 4, Train 1	Locked Open	_____
4-082B	Unit 4, Train 1	Locked Open	_____
4-119	Unit 4, Train 2	Locked Open	_____

Table 3.1 (Continued)

Component #	Component Name	Required Position	Actual Position
4-219	Unit 4, Train 2	Locked Open	_____
4-004	Unit 4, Train 2	Locked Open	_____
4-006	Unit 4, Train 2	Locked Open	_____
4-007	Unit 4, Train 1 & 2 Cross-tie	Locked Closed	_____
<u>TDP Steam Admission Valves</u>			
MOV 3-1405	Unit 3, Train 1	Closed	_____
MOV 3-1403	Unit 3, Train 2	Closed	_____
<u>TDP Steam Admission Valves</u>			
MOV 3-1404	Unit 3, Train 2	Closed	_____
MOV 4-1405	Unit 4, Train 1	Closed	_____
MOV 4-1403	Unit 4, Train 2	Closed	_____
MOV 4-1404	Unit 4, Train 2	Closed	_____
MOV-6459A	TDP A Throttle Trip Valve	Open	_____
MOV-6459B	TDP B Throttle Trip Valve	Open	_____
MOV-6459C	TDP C Throttle Trip Valve	Open	_____
<u>Piping Upstream of Check Valves</u>			
3-140	Train 1, 3A S/G	Cool	_____
3-240	Train 1, 3B S/G	Cool	_____
3-340	Train 1, 3C S/G	Cool	_____
4-140	Train 1, 4A S/G	Cool	_____
4-240	Train 1, 4B S/G	Cool	_____

Table 3.1 (Continued)

Component #	Component Name	Required Position	Actual Position
4-340	Train 1, 4C S/G	Cool	_____
3-010	Train 2, 3A S/G	Cool	_____
3-012	Train 2, 3B S/G	Cool	_____
3-014	Train 2, 3C S/G	Cool	_____
4-009	Train 2, 4A S/G	Cool	_____
4-011	Train 2, 4B S/G	Cool	_____
4-013	Train 2, 4C S/G	Cool	_____
143	TDP A Discharge	Cool	_____
243	TDP B Discharge	Cool	_____
343	TDP C Discharge	Cool	_____

4 Generic Risk Insights From PRAs

PRAs for 13 PWRs were analyzed to identify risk-important accident sequences involving loss of AFW, and to identify and risk-prioritize the component failure modes involved. The results of this analysis are described in this section. They are consistent with results reported by INEL and BNL (Gregg et al. 1988, and Travis et al. 1988).

4.1 Risk Important Accident Sequences Involving AFW System Failure

Loss of Power System

- A loss of offsite power is followed by failure of AFW. Due to lack of actuating power, the power operated relief valves (PORVs) cannot be opened preventing adequate feed-and-bleed cooling, resulting in core damage.
- A station blackout fails all AC power except Vital AC from DC invertors, and all decay heat removal systems except the turbine-driven AFW pump. AFW subsequently fails due to battery depletion or hardware failures, resulting in core damage.
- A DC bus fails, causing a trip and failure of the power conversion system. One AFW motor-driven pump is failed by the bus loss, and the turbine-driven pump fails due to loss of turbine or valve control power. AFW is subsequently lost completely due to other failures. Feed-and-bleed cooling fails because PORV control is lost, resulting in core damage.

Transient-Caused Reactor or Turbine Trip

- A transient-caused trip is followed by a loss of the power conversion system (PCS) and AFW. Feed-and-bleed cooling fails either due to failure of the operator to initiate it, or due to hardware failures, resulting in core damage.

Loss of Main Feedwater

- A feedwater line break drains the common water source for MFW and AFW. The operators fail to provide feedwater from other sources, and fail to initiate feed-and-bleed cooling, resulting in core damage.
- A loss of main feedwater trips the plant, and AFW fails due to operator error and hardware failures. The operators fail to initiate feed-and-bleed cooling, resulting in core damage.

Steam Generator Tube Rupture (SGTR)

- A SGTR is followed by failure of AFW. Coolant is lost from the primary until the refueling water storage tank (RWST) is depleted. High pressure injection (HPI) fails since recirculation cannot be established from the empty sump, and core damage results.

4.2 Risk Important Component Failure Modes

The generic component failure modes identified from PRA analyses as important to AFW system failure are listed below in decreasing order of risk importance.

1. Turbine-Driven Pump Failure to Start or Run.
2. Motor-Driven Pump Failure to Start or Run.
3. TDP or MDP Unavailable due to Test or Maintenance.
4. AFW System Valve Failures
 - steam admission valves
 - trip and throttle valve
 - flow control valves
 - pump discharge valves
 - pump suction valves
 - valves in testing or maintenance.

Generic Risk Insights

5. Supply/Suction Sources

- condensate storage tank stop valve
- hot well inventory
- suction valves.

In addition to individual hardware, circuit, or instrument failures, each of these failure modes may result from common causes and human errors.

Common cause failures of AFW pumps are particularly risk important. Valve failures are somewhat less important due to the multiplicity of steam generators and connection paths. Human errors of greatest risk importance involve: failures to initiate or control system operation when required; failure to restore proper system lineup after maintenance or testing; and failure to switch to alternate sources when required.

5 Failure Modes Determined From Operating Experience

This section describes the primary root causes of AFW system component failures, as determined from a review of operating histories at Turkey Point and at other PWRs throughout the nuclear industry. Section 5.1 describes experience at Turkey Point from 1972 to 1990. Section 5.2 summarizes information compiled from a variety of NRC sources, including AEOD analyses and reports, information notices, inspection and enforcement bulletins, and generic letters, and from a variety of INPO reports as well. Some Licensee Event Reports and NPRDS event descriptions were also reviewed. Finally, information was included from reports of NRC-sponsored studies of the effects of plant aging, which include quantitative analysis of AFW system failure reports. This information was used to identify the various root causes expected for the broad PRA-based failure events identified in Section 4.0, resulting in the inspection guidelines presented in Section 3.0.

5.1 Turkey Point Experience

The AFW system at Turkey Point has experienced failures of the AFW pumps, pump discharge flow control valves, the turbine steam pressure control and supply valves, and turbine trip and throttle valves. Failure modes include electrical, instrumentation and control, hardware failures, and human errors.

5.1.1 Turbine Driven Pump Failures

More than sixty events have resulted in decreased operational readiness of the turbine driven pumps. Failure modes involved failures in instrumentation and control circuits, electrical faults, system hardware failures, and human errors. The turbine driven pump has tripped or failed to reach proper speed as a result of clogged lube oil lines, dirty limit switch contacts, water in instrument air supplied to valve actuators, misadjusted speed control settings, shorted relays in the speed control circuit, and dirty breaker contacts. Pump aging and wear has resulted in high bearing temperatures and on one occasion, pump seizure. Improper part replacement and

inadequate maintenance activities have necessitated pump shutdown and repair.

5.1.2 Flow Control and Isolation Valve Failures

More than forty-five events have resulted in impaired operational readiness of the air operated flow control and motor operated isolation valves. Principal failure causes were equipment wear, instrumentation, and control circuit failures, valve hardware failures, and human errors. Valves have failed to operate properly due to blown fuses, failure of control components (such as I/P convertors), broken or dirty contacts, misaligned or broken limit switches, control power loss, and operator calibration problems. Poor quality instrument air has caused degraded flow control valve operation in a number of events due to failure of valve actuators. In many cases, air in sensing lines for flow transmitters has resulted in erroneous flow indication. Human errors have resulted in improper control circuit calibration and limit switch adjustment.

5.1.3 Turbine Driven Pump Steam Supply, Admission, and Control Valves

More than thirty events have resulted in degraded operation of steam isolation or steam pressure control valves. Failure types included failures due to aging. Deterioration of system hardware resulted in many occurrences of valve binding, resulting in tripping of overload devices. Pressure control and isolation valve seats were found to be steam cut. Also, isolation valves were found to leak due to cut or worn seats or foreign material under the valve seat. Dirty, worn, or misaligned limit switch contacts have prevented proper valve operation. Improper air pressure resulting from failed solenoid valves or air line leaks has caused failures. Misaligned or out of calibration control circuits and limit switches have resulted in a degraded operational condition. Plugged air exhaust ports have been found preventing full stroking of numerous valves.

5.1.4 Check Valves

Approximately ten events of check valve failure have occurred since 1972. In all but a few cases, normal wear and aging was cited as the failure mode, resulting in leakage.

5.2 Industry Wide Experience

Human errors, design/engineering problems and errors, and component failures are the primary root causes of AFW System failures identified in a review of industry wide system operating history. Common cause failures, which disable more than one train of this operationally redundant system, are highly risk significant, and can result from all of these causes.

This section identifies important common cause failure modes, and then provides a broader discussion of the single failure effects of human errors, design/engineering problems and errors, and component failures. Paragraphs presenting details of these failure modes are coded (e.g., CC1) and cross-referenced by inspection items in Section 3.

5.2.1 Common Cause Failures

The dominant cause of AFW system multiple-train failures has been human error. Design/engineering errors and component failures have been less frequent, but nevertheless significant, causes of multiple train failures.

CC1. Human error in the form of incorrect operator intervention into automatic AFW system functioning during transients resulted in the temporary loss of all safety-grade AFW pumps during events at Davis Besse (NUREG-1154 1985) and Trojan (AEOD/T416 1983). In the Davis Besse event, improper manual initiation of the steam and feedwater rupture control system (SFRCS) led to overspeed tripping of both turbine-driven AFW pumps, probably due to the introduction of condensate into the AFW turbines from the long, unheated steam supply lines. (The system had never been tested with the abnormal, cross-connected steam supply lineup which resulted.) In the Trojan event the operator incorrectly stopped both AFW pumps due to misinterpretation of MFW pump speed indication. The

diesel driven pump would not restart due to a protective feature requiring complete shutdown, and the turbine-driven pump tripped on overspeed, requiring local reset of the trip and throttle valve. In cases where manual intervention is required during the early stages of a transient, training should emphasize that actions should be performed methodically and deliberately to guard against such errors.

CC2. Valve mispositioning has accounted for a significant fraction of the human errors failing multiple trains of AFW. This includes closure of normally open suction valves or steam supply valves, and of isolation valves to sensors having control functions. Incorrect handswitch positioning and inadequate temporary wiring changes have also prevented automatic starts of multiple pumps. Factors identified in studies of mispositioning errors include failure to add newly installed valves to valve checklists, weak administrative control of tagging, restoration, independent verification, and locked valve logging, and inadequate adherence to procedures. Illegible or confusing local valve labeling, and insufficient training in the determination of valve position may cause or mask mispositioning, and surveillance which does not exercise complete system functioning may not reveal mispositionings.

CC3. At ANO-2, both AFW pumps lost suction due to steam binding when they were lined up to both the CST and the hot startup/blowdown demineralizer effluent (AEOD/C404 1984). At Zion-1 steam created by running the turbine-driven pump deadheaded for one minute caused trip of a motor-driven pump sharing the same inlet header, as well as damage to the turbine-driven pump (Region 3 Morning Report, 1/17/90). Both events were caused by procedural inadequacies.

CC4. Design/engineering errors have accounted for a smaller, but significant fraction of common cause failures. Problems with control circuit design modifications at Farley defeated AFW pump auto-start on loss of main feedwater. At Zion-2, restart of both motor driven pumps was blocked by circuit failure to deenergize when the pumps had been tripped with an automatic start signal present (IN 82-01 1982). In addition, AFW control circuit design reviews at Salem and Indian Point have identified designs where failures of a single component could have failed all or multiple pumps (IN 87-34 1987).

CC5. Incorrect setpoints and control circuit settings resulting from analysis errors and failures to update procedures have also prevented pump start and caused pumps to trip spuriously. Errors of this type may remain undetected despite surveillance testing, unless surveillance tests model all types of system initiation and operating conditions. A greater fraction of instrumentation and control circuit problems has been identified during actual system operation (as opposed to surveillance testing) than for other types of failures.

CC6. On two occasions at a foreign plant, failure of a balance-of-plant inverter caused failure of two AFW pumps. In addition to loss of the motor driven pump whose auxiliary start relay was powered by the inverter, the turbine driven pump tripped on overspeed because the governor valve opened, allowing full steam flow to the turbine. This illustrates the importance of assessing the effects of failures of balance of plant equipment which supports the operation of critical components. The instrument air system is another example of such a system.

CC7. Multiple AFW pump trips have occurred at Millstone-3, Cook-1, Trojan and Zion-2 (IN 87-53 1987) caused by brief, low pressure oscillations of suction pressure during pump startup. These oscillations occurred despite the availability of adequate static NPSH. Corrective actions taken include: extending the time delay associated with the low pressure trip, removing the trip, and replacing the trip with an alarm and operator action.

CC8. Design errors discovered during AFW system reanalysis at the Robinson plant (IN 89-30 1989) and at Millstone-1 resulted in the supply header from the CST being too small to provide adequate NPSH to the pumps if more than one of the three pumps were operating at rated flow conditions. This could lead to multiple pump failure due to cavitation. Subsequent reviews at Robinson identified a loss of feedwater transient in which inadequate NPSH and flows less than design values had occurred, but which were not recognized at the time. Event analysis and equipment trending, as well as surveillance testing which duplicates service conditions as much as is practical, can help identify such design errors.

CC9. Asiatic clams caused failure of two AFW flow control valves at Catawba-2 when low suction pressure caused by starting of a motor-driven pump caused suction source realignment to the Nuclear Service Water system. Pipes had not been routinely treated to inhibit clam growth, nor regularly monitored to detect their presence, and no strainers were installed. The need for surveillance which exercises alternative system operational modes, as well as complete system functioning, is emphasized by this event. Spurious suction switchover has also occurred at Callaway and at McGuire, although no failures resulted.

CC10. Common cause failures have also been caused by component failures (AEOD/C404 1984). At Surry-2, both the turbine driven pump and one motor driven pump were declared inoperable due to steam binding caused by leakage of hot water through multiple check valves. At Robinson-2 both motor driven pumps were found to be hot, and both motor and steam driven pumps were found to be inoperable at different times. Backleakage at Robinson-2 passed through closed motor-operated isolation valves in addition to multiple check valves. At Farley, both motor and turbine driven pump casings were found hot, although the pumps were not declared inoperable. In addition to multi-train failures, numerous incidents of single train failures have occurred, resulting in the designation of "Steam Binding of Auxiliary Feedwater Pumps" as Generic Issue 93. This generic issue was resolved by Generic Letter 88-03 (Miraglia 1988), which required licensees to monitor AFW piping temperatures each shift, and to maintain procedures for recognizing steam binding and for restoring system operability.

CC11. Common cause failures have also failed motor operated valves. During the total loss of feedwater event at Davis Besse, the normally open AFW isolation valves failed to open after they were inadvertently closed. The failure was due to improper setting of the torque switch bypass switch, which prevents motor trip on the high torque required to unseat a closed valve. Previous problems with these valves had been addressed by increasing the torque switch trip setpoint--a fix which failed during the event due to the higher torque required due to high differential pressure across the valve. Similar common mode failures of MOVs have also occurred in other

systems, resulting in issuance of Generic Letter 89-10, "Safety Related Motor-Operated Valve Testing and Surveillance (Partlow 1989)." This generic letter requires licensees to develop and implement a program to provide for the testing, inspection and maintenance of all safety-related MOVs to provide assurance that they will function when subjected to design basis conditions.

CC12. Other component failures have also resulted in AFW multi-train failures. These include out-of-adjustment electrical flow controllers resulting in improper discharge valve operation, and a failure of oil cooler cooling water supply valves to open due to silt accumulation.

5.2.2 Human Errors

HE1. The overwhelmingly dominant cause of problems identified during a series of operational readiness evaluations of AFW systems was human performance. The majority of these human performance problems resulted from incomplete and incorrect procedures, particularly with respect to valve lineup information. A study of valve mispositioning events involving human error identified failures in administrative control of tagging and logging, procedural compliance and completion of steps, verification of support systems, and inadequate procedures as important. Another study found that valve mispositioning events occurred most often during maintenance, calibration, or modification activities. Insufficient training in determining valve position, and in administrative requirements for controlling valve positioning were important causes, as was oral task assignment without task completion feedback.

HE2. Turbine driven pump failures have been caused by human errors in calibrating or adjusting governor speed control, poor governor maintenance, incorrect adjustment of governor valve and overspeed trip linkages, and errors associated with the trip and throttle valve (TTV). TTV-associated errors include physically bumping it, failure to restore it to the correct position after testing, and failures to verify control room indication of TTV position following actuation.

HE3. Motor driven pumps have been failed by human errors in mispositioning handswitches, and by procedure deficiencies.

5.2.3 Design/Engineering Problems and Errors

DE1. As noted above, the majority of AFW subsystem failures, and the greatest relative system degradation, has been found to result from turbine-driven pump failures. Overspeed trips of Terry turbines controlled by Woodward governors have been a significant source of these failures (AEOD/C602 1986). In many cases these overspeed trips have been caused by slow response of a Woodward Model EG governor on startup, at plants where full steam flow is allowed immediately. This oversensitivity has been removed by installing a startup steam bypass valve which opens first, allowing a controlled turbine acceleration and buildup of oil pressure to control the governor valve when full steam flow is admitted.

DE2. Overspeed trips of Terry turbines have been caused by condensate in the steam supply lines. Condensate slows down the turbine, causing the governor valve to open farther, and overspeed results before the governor valve can respond, after the water slug clears. This was determined to be the cause of the loss-of-all-AFW event at Davis Besse (AEOD/602 1986), with condensation enhanced due to the long length of the cross-connected steam lines. Repeated tests following a cold-start trip may be successful due to system heat up.

DE3. Turbine trip and throttle valve (TTV) problems are a significant cause of turbine driven pump failures (IN 84-66). In some cases lack of TTV position indication in the control room prevented recognition of a tripped TTV. In other cases it was possible to reset either the overspeed trip or the TTV without resetting the other. This problem is compounded by the fact that the position of the overspeed trip linkage can be misleading, and the mechanism may lack labels indicating when it is in the tripped position (AEOD/C602 1986).

DE4. Startup of turbines with Woodward Model PG-PL governors within 30 minutes of shutdown has resulted in overspeed trips when the speed setting knob was not exercised locally to drain oil from the speed setting cylinder. Speed control is based on startup with an empty cylinder. Problems have involved turbine rotation due to both procedure violations and leaking steam. Terry has marketed two types of dump valves for automatically draining the oil after shutdown (AEOD/C602 1986).

At Calvert Cliffs, a 1987 loss-of-offsite-power event required a quick, cold startup that resulted in turbine trip due to PG-PL governor stability problems. The short-term corrective action was installation of stiffer buffer springs (IN 88-09 1988). Surveillance had always been preceded by turbine warmup, which illustrates the importance of testing which duplicates service conditions as much as is practical.

DE5. Reduced viscosity of gear box oil heated by prior operation caused failure of a motor driven pump to start due to insufficient lube oil pressure. Lowering the pressure switch setpoint solved the problem, which had not been detected during testing.

DE6. Waterhammer at Palisades resulted in AFW line and hanger damage at both steam generators. The AFW spargers are located at the normal steam generator level, and are frequently covered and uncovered during level fluctuations. Waterhammers in top-feed-ring steam generators resulted in main feedline rupture at Maine Yankee and feedwater pipe cracking at Indian Point-2 (IN 84-32 1984).

DE7. Manually reversing the direction of motion of an operating valve has resulted in MOV failures where such loading was not considered in the design (AEOD/C603 1986). Control circuit design may prevent this, requiring stroke completion before reversal.

DE8. At each of the units of the South Texas Project, space heaters provided by the vendor for use in pre-installation storage of MOVs were found to be wired in parallel to the Class 1E 125 V DC motors for several AFW valves (IR 50-489/89-11; 50-499/89-11 1989). The valves had been environmentally qualified, but not with the non-safety-related heaters energized.

5.2.4 Component Failures

Generic Issue II.E.6.1, "In Situ Testing Of Valves" was divided into four sub-issues (Beckjord 1989), three of which relate directly to prevention of AFW system component failure. At the request of the NRC, in situ testing of check valves was addressed by the nuclear industry, resulting in the EPRI report, "Application Guidelines for Check Valves in Nuclear Power Plants (Brooks 1988)." This extensive report provides information on check valve applications, limitations, and inspection techniques. In situ testing of MOVs was addressed by Generic Letter 89-10, "Safety Related Motor-Operated Valve Testing and Surveillance" (Partlow 1989) which requires licensees to develop and implement a program for testing, inspection and maintenance of all safety-related MOVs. "Thermal Overload Protection for Electric Motors on Safety-Related Motor-Operated Valves - Generic Issue II.E.6.1 (Rothberg 1988)" concludes that valve motors should be thermally protected, yet in a way which emphasizes system function over protection of the operator.

CF1. The common-cause steam binding effects of check valve leakage were identified in Section 5.2.1, entry CC10. Numerous single-train events provide additional insights into this problem. In some cases leakage of hot MFW past multiple check valves in series has occurred because adequate valve-seating pressure was limited to the valves closest to the steam generators (AEOD/C404 1984). At Robinson, the pump shutdown procedure was changed to delay closing the MOVs until after the check valves were seated. At Farley, check valves were changed from swing type to lift type. Check valve rework has been done at a number of plants. Different valve designs and manufacturers are involved in this problem, and recurring leakage has been experienced, even after repair and replacement.

CF2. At Robinson, heating of motor operated valves by check valve leakage has caused thermal binding and failure of AFW discharge valves to open on demand. At Davis Besse, high differential pressure across AFW injection valves resulting from check valve leakage has prevented MOV operation (AEOD/C603 1986).

CF3. Gross check valve leakage at McGuire and Robinson caused overpressurization of the AFW

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suction piping. At a foreign PWR it resulted in a severe waterhammer event. At Palo Verde-2 the MFW suction piping was overpressurized by check valve leakage from the AFW system (AEOD/C404 1984). Gross check valve leakage through idle pumps represents a potential diversion of AFW pump flow.

CF4. Roughly one third of AFW system failures have been due to valve operator failures, with about equal failures for MOVs and AOVs. Almost half of the MOV failures were due to motor or switch failures (Casada 1989). An extensive study of MOV events (AEOD/C603 1986) indicates continuing inoperability problems caused by: torque switch/limit switch settings, adjustments, or failures; motor burnout; improper sizing or use of thermal overload devices; premature degradation related to inadequate use of protective devices; damage due to misuse (valve throttling, valve operator hammering); mechanical problems (loosened parts, improper assembly); or the torque switch bypass circuit improperly installed or adjusted. The study concluded that current methods and procedures at many plants are not adequate to assure that MOVs will operate when needed under credible accident conditions. Specifically, a surveillance test which the valve passed might result in undetected valve inoperability due to component failure (motor burnout, operator parts failure, stem disc separation) or improper positioning of protective devices (thermal overload, torque switch, limit switch). Generic Letter 89-10 (Partlow 1989) has subsequently required licensees to implement a program ensuring that MOV switch settings are maintained so that the valves will operate under design basis conditions for the life of the plant.

CF5. Component problems have caused a significant number of turbine driven pump trips (AEOD/C602 1986). One group of events involved worn tappet nut faces, loose cable connections, loosened set screws, improperly latched TTVs, and improper assembly. Another involved oil leaks due to component or seal failures, and oil contamination due to poor maintenance activities. Governor oil may not be shared with turbine lubrication oil, resulting in the need for separate oil changes. Electrical component failures included transistor or resistor failures due to moisture intrusion, erroneous grounds and connections, diode failures, and a faulty circuit card.

CF6. Electrohydraulic-operated discharge valves have performed very poorly, and three of the five units using them have removed them due to recurrent failures. Failures included oil leaks, contaminated oil, and hydraulic pump failures.

CF7. Control circuit failures were the dominant source of motor driven AFW pump failures (Casada 1989). This includes the controls used for automatic and manual starting of the pumps, as opposed to the instrumentation inputs. Most of the remaining problems were due to circuit breaker failures.

CF8. "Hydraulic lockup" of Limitorque SMB spring packs has prevented proper spring compression to actuate the MOV torque switch, due to grease trapped in the spring pack. During a surveillance at Trojan, failure of the torque switch to trip the TTV motor resulted in tripping of the thermal overload device, leaving the turbine driven pump inoperable for 40 days until the next surveillance (AEOD/E702 1987). Problems result from grease changes to EXXON NEBULA EP-0 grease, one of only two greases considered environmentally qualified by Limitorque. Due to lower viscosity, it slowly migrates from the gear case into the spring pack. Grease changeover at Vermont Yankee affected 40 of the older MOVs of which 32 were safety related. Grease relief kits are needed for MOV operators manufactured before 1975. At Limerick, additional grease relief was required for MOVs manufactured since 1975. MOV refurbishment programs may yield other changeovers to EP-0 grease.

CF9. For AFW systems using air operated valves, almost half of the system degradation has resulted from failures of the valve controller circuit and its instrument inputs (Casada 1989). Failures occurred predominantly at a few units using automatic electronic controllers for the flow control valves, with the majority of failures due to electrical hardware. At Turkey Point-3, controller malfunction resulted from water in the Instrument Air system due to maintenance inoperability of the air dryers.

CF10. For systems using diesel driven pumps, most of the failures were due to start control and governor speed control circuitry. Half of these occurred on demand, as opposed to during testing (Casada 1989).

CF11. For systems using AOVs, operability requires the availability of Instrument Air (IA), backup air, or backup nitrogen. However, NRC Maintenance Team Inspections have identified inadequate testing of check valves isolating the safety-related portion of the IA

system at several utilities (Letter, Roe to Richardson). Generic Letter 88-14 (Miraglia 1988), requires licensees to verify by test that air-operated safety-related components will perform as expected in accordance with all design-basis events, including a loss of normal IA.

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4 Turkey Point Resident Inspections Office

J. H. Taylor
Brookhaven National Laboratory
Bldg. 130
Upton, NY 11973

R. Travis
Brookhaven National Laboratory
Bldg. 130
Upton, NY 11973

J. Bickel
EG&G Idaho, Inc.
P.O. Box 1625
Idaho Falls, ID 83415

Dr. D. R. Edwards
Professor of Nuclear Engineering
University of Missouri - Rolla
Rolla, MO 65401

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26 Pacific Northwest Laboratory

S. R. Doctor
L. R. Dodd
B. F. Gore (10)
N. E. Moffitt (5)
B. D. Shipp
F. A. Simonen
T. V. Vo
Publishing Coordination
Technical Report File (5)

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N. E. Moffitt, B. F. Gore, T. V. Vo

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Pacific Northwest Laboratory
Richland, WA 99352

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11. ABSTRACT (200 words or less)

In a study sponsored by the U.S. Nuclear Regulatory Commission (NRC), Pacific Northwest Laboratory has developed and applied a methodology for deriving plant-specific risk-based inspection guidance for the auxiliary feedwater (AFW) system at pressurized water reactors that have not undergone probabilistic risk assessment (PRA). This methodology uses existing PRA results and plant operating experience information. Existing PRA-based inspection guidance information recently developed for the NRC for various plants was used to identify generic component failure modes. This information was then combined with plant-specific and industry-wide component information and failure data to identify failure modes and failure mechanisms for the AFW system at the selected plants. Turkey Point was selected as one of a series of plants for study. The product of this effort is a prioritized listing of AFW failures which have occurred at the plant and at other PWRs. This listing is intended for use by NRC inspectors in the preparation of inspection plans addressing AFW risk-important components at the Turkey Point plant.

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