

**NORTHEAST UTILITIES**

THE CONNECTICUT LIGHT AND POWER COMPANY  
WESTERN MASSACHUSETTS ELECTRIC COMPANY  
HOLYOKE WATER POWER COMPANY  
NORTHEAST UTILITIES SERVICE COMPANY  
NORTHEAST NUCLEAR ENERGY COMPANY

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July 1, 1983

Docket No. 50-336  
A03074

Mr. Darrell G. Eisenhut, Director  
Division of Licensing  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

References: (1) D. G. Eisenhut letter to All Licensees with Combustion Engineering Designed Nuclear Steam Supply Systems, dated February 8, 1983.

(2) W. G. Council letter to D. G. Eisenhut, dated March 28, 1983.

Millstone Nuclear Power Station, Unit No. 2  
NUREG-0737 Item II.K.3.5, Automatic Trip of Reactor Coolant Pumps

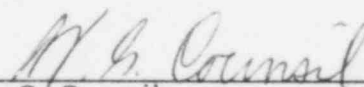
Reference (1) requested all licensees with Combustion Engineering designed nuclear steam supply systems to provide the Staff their plans and schedules for resolving TMI Action Plan Item II.K.3.5, Automatic Trip of Reactor Coolant Pumps. Northeast Nuclear Energy Company (NNECO), on behalf of Millstone Unit No. 2, provided an initial response to the Staff's concerns in Reference (2), which noted that NNECO would address the automatic trip of reactor coolant pumps issue by utilizing input from the Combustion Engineering Owner's Group (CEOG).

The CEOG program description and schedule for resolving NUREG-0737 Item II.K.3.5 is included as Attachment 1 to this letter. The completion of the program is currently scheduled for the end of year 1983 and, as such, NNECO will inform the Staff by December 31, 1983, of the results of the CEOG analysis and the dates when operator training and revision of emergency operating procedures will be completed.

The Staff will be informed should any CEOG schedular slippage adversely impact our plans to submit the above-noted December 31, 1983 status report.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

  
W. G. Council  
Senior Vice President

Attachment

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ATTACHMENT NO. 1  
MILLSTONE NUCLEAR POWER STATION, UNIT NO. 2  
COMBUSTION ENGINEERING OWNER'S GROUP  
PROGRAM DESCRIPTION FOR RESOLVING TMI ACTION  
PLAN ITEM II.K.3.5, AUTOMATIC TRIP OF  
REACTOR COOLANT PUMPS

JULY, 1983

Program Description for Resolving  
TMI Action Plan Item II.K.3.5 -  
"Automatic Trip of Reactor Coolant Pumps"

INTRODUCTION

In accordance with NRC Guidelines and Criteria provided in Generic Letters No. 83-10a and 83-10b (see Reference 1), the C-E Owners Group (CEOG) has developed a program which will close out TMI Action Plan Item II.K.3.5, "Automatic Trip of Reactor Coolant Pumps" for participating utilities. The "trip two/leave two" Reactor Coolant Pump (RCP) trip strategy has been identified in the past as the preferred approach and forms the basis for the program which is described in the following section. This trip strategy is described in Appendix A in more detail and consists of manually tripping two RCPs initially and later on manually tripping the remaining two RCPs at the time a LOCA has been diagnosed.

It is recognized that the evaluation of pertinent plant parameters might lead to a selection of setpoints which could result in tripping of the second two RCPs a short time after tripping the first two RCPs. In this case, the practical difference between a trip two/leave two and a trip four strategy might become small enough from an operational point of view to result in a reassessment of the trip two/leave two strategy after the determination of the trip setpoints is completed.

Regardless of what trip strategy will be implemented, the objective is to avoid tripping the RCPs for non-LOCA and steam generator tube rupture accidents and to provide the appropriate justifications for the adopted trip scheme.

DESCRIPTION OF PROGRAM

The program will provide information which both meets the NRC guidelines stated in Reference 1 and provides the operational requirements for participating utilities to use in developing emergency operating procedures and conducting training. The program consists of selection of RCP trip setpoints, justification of the manual RCP trip relative to the NRC Guidelines and Criteria in Reference 1, and development of information for use in implementing the trip two/leave two scheme into emergency operating procedures.

The basic approach in selecting and justifying the trip setpoints is to determine on the basis of Conservative Best Estimate (CBE) considerations for small break LOCA and non-LOCA events the setpoints for manually tripping the first two RCPs and for tripping the second two RCPs. Thereafter, on the basis of ECCS Evaluation Model (EM) considerations, compliance with 10CFR50.46 limits for the LOCA events will be evaluated. If the limits are exceeded, the possibility of requesting an exemption from specific requirements of 10CFR50.46 will be considered. In addition, compliance with draft ANSI Standard N660 will be demonstrated for LOCA events.

The use of conservative best estimate methods for the determination of the setpoints includes the assumption of availability of only one high pressure safety injection pump, a 1.0 factor on the ANS decay heat curve, homogeneous equilibrium break flow model, and a best estimate pump head degradation model from C-E/EPRI Pump Tests. The 2700 Mwt Reference Plant selected for this program will conservatively bound the core cooling performance of plants of other participating utilities (e.g., 3410 Mwt and System 80 classes). This CBE approach provides setpoints for tripping the first two RCPs for depressurization transients. The second setpoints are selected so that the second two RCPs will not be tripped for non-LOCA depressurization events but will be tripped for LOCAs.

Justification of manual RCP trip is performed relative to the criteria in 10CFR50.46 and the draft ANSI Standard N660. Using the ECCS Evaluation Model (EM), it will be determined whether the limits of 10CFR50.46 are met if the RCPs are tripped according to the selected setpoint scheme. The EM methods are based on Appendix K groundrules which include flowrate of only one HPSI pump, 1.2 factor on the ANS decay heat curve, and use of the Moody break flow model. Compliance with the draft ANSI standard will be demonstrated relative to the version ANS 58.8/ANSI N 660, Rev. 2 of March 1981.

The justification of the RCP trip setpoints assumes that Section II of the NRC Guidelines and Criteria of Reference 1, "Pump Operation Criteria Which Will Not Result in RCP Trip", does not apply to the trip two/leave two strategy because the strategy will result in tripping of all RCPs for LOCAs.

To support implementation of the trip two/leave two scheme into operator guidance, applicable items from the Guidance and Criteria in Reference 1 will be addressed, e.g., challenges to PORV, reactor vessel head voiding. In addition,

instrumentation capabilities needed for implementation of the RCP trip scheme will be examined on a generic basis. This operations-related information will be applied toward the development of generic bases which can be used by participating utilities in modifying operator guidance.

The completion of the program is scheduled for the end of year 1983.

#### REFERENCE

1. NRC Letter from Darrell G. Eisenhut (Director of Licensing, NRC) to All Applicants [or Licensees] with Combustion Engineering Designed Nuclear Steam Supply Systems, Resolution of TMI Action Item II.K.3.5, "Automatic Trip of Reactor Coolant Pumps", (Generic Letter No. 83-10a and 83-10b), February 8, 1983.

APPENDIX A  
THE TRIP TWO/LEAVE TWO STRATEGY

Tripping the RCPs during a small break LOCA minimizes the loss of coolant from the primary system. Keeping the RCPs running during non-LOCA depressurization events, however, maximizes the margin to fuel failure or radiological releases. The trip two/leave two RCP operating strategy reconciles the conflicting preferences of RCP operation for small break LOCAs and non-LOCAs.

The trip two/leave two RCP strategy is shown schematically in Figure 1. The sequence of events during a depressurization which results in RCP trip begins with event initiation,  $t_1$ . This could be a small break LOCA, steam generator tube rupture, certain secondary breaks, or anticipated operational occurrences which result in primary system depressurization (e.g., increase in main or auxiliary feedwater flow, decrease in main feedwater temperature, etc). The reactor trip occurs, for example, on low primary system pressure, at  $t_2$ . At  $t_3^*$ , the setpoint for trip of the first two RCPs is reached. The operator then trips two RCPs in opposing loops (to maintain pressurizer spray) at  $t_3$ . Tripping the second two RCPs depends on whether or not the second trip setpoint is reached. For a LOCA, the setpoint for trip of the second two RCPs occurs in Figure 1 at  $t_4^*$ . The operator then trips the remaining two RCPs at  $t_4$ . For a non-LOCA, the second trip setpoint will not be reached and the remaining two RCPs will continue running.

FIGURE 1  
PROPOSED RCP TRIP STRATEGY

