

THE DABCOCK & WILCOX COMPANY
POWER GENERATION GROUP

To J. H. TAYLOR - MANAGER, LICENSING

From E. R. KANE - MANAGER, OPERATING PLANT LICENSING (3740)

Cust. File No. or Ref. LS-5

Subj. MONTHLY REPORT - SEPTEMBER, 1979

Date OCTOBER 4, 1979

This letter to cover one customer and one subject only.

Vital Issue Summary

G-PO

Deft. Exh. For ID 400

PM Exh. in

Charles Shapiro CS?
Doyle Reporting Inc.

12/18/81

C.A.

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COUNSEL ONLY

2. Toledo Edison Reactor Trips
See III.E.

3. Anticipatory Reactor Trips
See III.A.

1. Accomplishments

T21148

8307060530 791004
PDR ADOCK 05000289
R HOL

B. NRC Reportability Evaluation

T21149

2. Draft Evaluations Sent Out in September 1979

- PSC 25-79 - Sequence of events that could lead to saturated conditions in the core - determined to be not reportable under 10 CFR 50.55(e) or 10 CFR 21.

B. NRC Reportability Evaluation (Cont'd)

5. The Rogovin Committee, which had previously requested a list of all PSC's submitted to Licensing since 1974, has requested copies of the PSC's for 39 of these concerns; these PSC's have been assembled and submitted to that Committee by Contracts-Legal.
6. A Special Audit was conducted by an NRC Inspector from the Region IV I&E Office on compliance with the requirements of 10 CFR 21. In the exit interview with B&W personnel, summarizing the results of the inspection, the NRC Inspector described two findings that he would recommend to his superiors for review, as follows: (1) a deficiency in procedure NPG 1707-01 that implements Part 21 in that the procedure allows for B&W notification of the affected utilities prior to notification of NRC, rather than immediate direct notification to the NRC by B&W, and also that the procedure does not address a timely schedule for the evaluation of deviations; (2) an infraction in that a potential safety concern identified in a B&W memo by B. M. Dunn dated February 9, 1978 did not result in the origination of a PSC form as required by procedure NPG 1707-01. The NRC Inspector explained that these findings are preliminary, pending review and approval by headquarters; if these findings were to be approved, B&W would be given the opportunity for responding. There are three levels of findings that NRC can determine against a regulation such as Part 21: a violation, an infraction and a deficiency, in descending order of severity; only a violation can carry a civil penalty. Thus, the two findings, if finalized, would not carry a civil penalty such as a fine.
7. Revisions have been proposed for procedure NPG 1707-01, "Processing of Safety Concerns", as follows: (a) the definition of a safety concern has been broadened to provide for the filing of a PSC form for concerns that are not necessarily reportable under 50.55(e) or Part 21; (b) an additional type of safety concern has been identified: this concern is inadequacies or errors in operating procedures or training that could affect safe plant operation; (c) the procedure requires that a scoping meeting be convened shortly after receipt of a PSC by Licensing to prioritize ~~the~~ **21150**

B. NRC Reportability Evaluation (Cont'd)7. (Cont'd)

concern and target the evaluation plan; and (d) the QA Department has been assigned responsibility for ensuring that recommended corrective actions are taken and completed.

C. Topical Reports

3. Topical Reports BAW-10084, "CROV", and BAW-10133, "Mark C LOCA-Seismic", were transferred from Operating Plant Licensing Unit to the Generic Unit.

D. Other Generic Activities2. Anticipatory Reactor Trips

Responses to the NRC's request for additional information on the upgrade of Anticipatory Reactor Trip was completed and forwarded to the 177 owners. Responses to Questions 1-4 and 5-8 went out 9-28-79. Response to Question 9 went out 10-1-79. See also the Problems section of this report.

T21151

II. Deviations From Plan

The following tasks which were not planned for in the beginning of September caused significant expenditures of Operating Plant Licensing Unit man-hours.

C. Anticipatory Reactor Trip Questions.

F. Request for information on PORV lift frequency.

It is estimated that these unplanned issues accounted for between 30 and 45% of OPLU's manpower expenditures for September.

T21152

III. ProblemsA. Anticipatory Reactor Trips

As indicated in I.D.2, B&W provided responses to the NRC request for additional information on anticipatory trips. One problem area associated with our responses was that we could not provide suitable justification that low OTSG inventory would not be anticipatory at low powers. The net result is that Licensing believes a low OTSG inventory trip will be required by the NRC. Licensing will provide its recommendations for further actions on this subject by 10/10/79.

D. Statistical Core Design

The Statistical Core Design program (topical) is still progressing in certain areas. However, it is losing ground in the Thermal Hydraulic Unit where delays caused by higher priority work on ATWS will cause an overall delay in the topical report submittal date. The exact magnitude of that delay is unclear at the present time.

E. Toledo Edison Reactor Trips

Two recent reactor trips caused loss of pressurizer level at Toledo Edison in September. The NRC has not been able to put manpower on this concern because of their own manpower limitations. However, in the near future, they can be expected to come down hard on us because of the "bucking bronco" syndrome. This area of concern does not appear to be receiving sufficient effort at B&W. Work is presently concentrating on the Auxiliary Feedwater Control System which is only one aspect of the problem. It is suggested that the concern be escalated to higher levels of management.

V. Outstanding NRC Letters

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October 4, 1979

- B. September 28, 1979, letter, Reed to Operating Plants, "PORV and Safety Valve Lift Frequency and Mechanical Reliability." Requires information on PORV lift frequency by October 15, 1979. B&W will collate input from all our utilities.

ERK:dsf

Attachment

cc: OPLU

J. S. Tulenko
R. B. Borsum
G. O. Geissler
J. D. Agar
R. E. Ham
M. W. Croft

T21154