



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555
July 1, 1985

Docket Nos.: 50-424
50-425

Docket File
NRC PDR
Local PDR
PRC System
NSIC

Mr. Donald O. Foster
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Dear Mr. Foster:

Subject: Request for Additional Information on Vogtle Response to
Generic Letter 83-28, Items 4.2.1 and 4.2.2

The staff has reviewed your response to Generic Letter 83-28, Items 4.2.1 and 4.2.2 dated November 8, 1983. Based on this review, the staff has determined that additional information is needed before it can complete the review. The request for additional information is enclosed. We request prompt attention to this matter. Generic Letter 83-28 has been identified as an open item in the Vogtle Safety Evaluation Report.

The reporting and/or recordkeeping requirements contained in this letter affect fewer than ten respondents; therefore, OMB clearance is not required under P. L. 96-511.

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Enclosure: As stated
cc: See next page

DESIGNATED ORIGINAL

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Vogtle Electric Generating Plant

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VOGTLE ELECTRIC GENERATING PLANT, UNITS 1 AND 2

REQUEST FOR ADDITIONAL INFORMATION

GL 83-28, ITEMS 4.1, 4.2.1 AND 4.2.2.

INTRODUCTION

Georgia Power, the applicant for Vogtle Electric Generating Plant, Units 1 and 2, submitted their response to Generic Letter 83-28 on November 8, 1983. The response has been reviewed with respect to Items 4.1, 4.2.1 and 4.2.2 of the Generic Letter. The applicant's response was not sufficiently detailed to permit an evaluation of the adequacy of the periodic maintenance and trending programs for the breakers. The following additional information is required to evaluate compliance with Items 4.1, 4.2.1 and 4.2.2.

- I. Item 4.2.1 - Periodic Maintenance Program for Reactor Trip Breakers.

Criteria for Evaluating Compliance with Item 4.2.1

The Vogtle Electric Generating Plant, Units 1 and 2 Reactor Trip Systems utilize Westinghouse DS-416 circuit breakers. The primary criteria for an acceptable maintenance program for the DS-416 Reactor Trip Breaker (RTB) are contained in Westinghouse Maintenance Manual for the DS-416 Reactor Trip Circuit Breaker, Revision 0, October 1984. The NRC staff, Equipment Qualification Branch, has reviewed this document and endorsed the maintenance program described in it. More specifically, the criteria used to evaluate compliance include those items in this document that relate to the safety function of the breaker, supplemented by those measures that must be taken to accumulate data for trending.

Issues Relating to Item 4.2.1

The applicant's response states that his maintenance and surveillance programs will be completed by July 1986. The applicant will address the requirements expressed in the Generic Letter in that program.

The Vogtle Electric Generating Plant, Units 1 and 2 periodic maintenance program for the reactor trip breakers, when completed, should include, on a six-month basis (or when 500 breaker operations have been counted, whichever comes first):

1. General inspection to include checking of breaker's cleanliness, all bolts and nuts, pole bases, arc chutes, insulating link, wiring and auxiliary switches;
2. The retaining rings inspection, including those on the undervoltage trip attachment (UVTA) and shunt trip attachment (STA);
3. Arcing and main contacts inspection as specified by the Westinghouse Maintenance Manual;
4. UVTA check as specified by the Westinghouse Maintenance Manual, including replacement of UVTA if dropout voltage is greater than 60% or less than 30% of rated UVTA coil voltage;
5. STA check as specified by the Westinghouse Maintenance Manual;
6. Lubrication as specified by the Westinghouse Maintenance Manual;
7. Functional check of the breaker's operation prior to returning it to service.

The Vogtle Electric Generating Plant, Units 1 and 2 Periodic Maintenance Program for the reactor trip breakers should include, on a refueling interval basis (or when 500 breaker operations have been counted, whichever comes first):

1. Pre-cleaning insulation resistance measurement and recording;
2. RTB dusting and cleaning;
3. Post-cleaning insulation resistance measurement and recording, as specified by the Westinghouse Maintenance Manual;
4. Inspection of main and secondary disconnecting contacts, bolt tightness, secondary wiring, mechanical parts, cell switches, instruments, relays and other panel mounted devices;
5. UVTA trip force and breaker load check as specified by the Westinghouse Maintenance Manual;
6. Measurement and recording RTB response time for the undervoltage trip;
7. Functional test of the breaker prior to returning to service as specified by the Westinghouse Maintenance Manual.

The maintenance procedure should include a caution to the maintenance personnel against undocumented adjustments or modifications to RTBs.

The applicant is to confirm that the periodic maintenance program will include these fourteen items at the specified intervals or commit to their inclusion.

- II. Item 4.2.2 - Trending of Reactor Trip Breaker Parameters to Forecast Degradation of Operability.

3.1 Criteria for Evaluating Compliance with Item 4.2.2

Four parameters have been identified as trendable and are included in the criteria for evaluation. These are (a) undervoltage trip attachment dropout voltage, (b) trip force, (c) breaker response time for undervoltage trip, and (d) breaker insulation resistance.

3.2 Issues Relating to Item 4.2.2

The applicant did not commit to trend the four parameters identified in the criteria for evaluating compliance with Items 4.2.2. The NRC requires this trending data to forecast the reactor trip breakers degradation of operability. The applicant is to commit to inclusion of trip force, breaker response time and dropout voltage for undervoltage trip and breaker insulation resistance as trending parameters. The licensee should also identify the organization which will perform trend analysis, how often the analysis will be performed and how the information derived from the analysis will be used to affect periodic maintenance.