

SIEMENS

HDC:97:014

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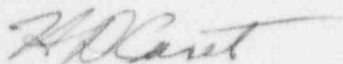
Comments on Draft Information Notice Regarding 50.46 Reporting

Ref.: 1. Letter, Alfred E. Chaffee (USNRC) to H. D. Curet (SPC), "Request for a Technical Review of a Draft Information Notice Regarding Nonconservative Errors and Changes in Siemens Power Corporation Large-Break Loss-of-Coolant Accident Evaluation Model and Compliance with 10 CFR 50.46(a)(3)," February 5, 1997.

The reference requests comments regarding licensee responsibilities in compliance to 10 CFR 50.46(a)(3). Siemens Power Corporation (SPC) appreciates the opportunity to provide comments to the NRC regarding the reporting issue. Our comments have been noted by way of incorporating editorial changes to the attached copy of the draft Information Notice. The editorial changes attempted to make the notice more generic since both General Electric (GE) and SPC are cited in the Description of Circumstances section of the notice. The changes are identified with bold text font. Please note that the format of the draft Information Notice was not faithfully duplicated in the scanning and word processing transfer processes.

If you have any questions or if I can be of further assistance, please call me at (509) 375-8563.

Very truly yours,



H. Donald Curet, Manager
Product Licensing

/smg

Attachment

cc: Mr. A. E. Chaffee (USNRC, O 11 E4)
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
OFFICE OF NUCLEAR REACTOR REGULATION
WASHINGTON, D.C. 20555-0001

February XX, 1997

NRC INFORMATION NOTICE 97-XX: **NONCONSERVATIVE REPORTING OF ERRORS**

AND CHANGES IN A LARGE-BREAK
LOSS-OF-COOLANT ACCIDENT EVALUATION
MODEL OF A FUEL VENDOR AND
COMPLIANCE WITH 10 CFR 50.46(a)(3)

Addressees

All holders of operating licenses or construction permits for nuclear power reactors and all reactor fuel vendors.

Purpose

The U.S. Nuclear Regulatory Commission (NRC) is issuing this information notice to alert addressees about ~~two the recent events staff findings~~ related to the review of ~~Siemens Power Corporation (SPC, formerly Exxon Nuclear)~~ large-break (LB) loss-of-coolant accident (LOCA) emergency core cooling system (ECCS) analysis evaluation model changes and also to remind licensees and reactor fuel vendors of the requirements contained in Section 50.46(a)(3) of Title 10 of the Code of Federal Regulations [10 CFR 50.46(a)(3)] concerning the reporting of ECCS cooling model changes and errors. It is expected that recipients will review the information for applicability to their facilities and consider actions, as appropriate, to avoid similar problems. However, suggestions contained in this information notice are not NRC requirements; therefore, no specific action or written response is required.

Description of Circumstances

Recently identified changes and errors in ~~Siemens Power Corporation (SPC)~~ and General Electric (GE) LBLOCA analysis models have led to a series of 30-day reports and 10 CFR 50.72 reports as required by 10 CFR 50.46, "Acceptance Criteria for Emergency Core Cooling Systems for Light Water Nuclear Power Reactors."

SPC LBLOCA ECCS Evaluation Model Changes

The SPC LBLOCA ECCS model, TOODEE2, was originally approved by the NRC staff to meet the requirements of 10 CFR 50.46 in a letter dated July 8, 1986 [Accession number 8607150319], from D. M. Crutchfield (NRC) to G. Ward (Exxon). In 1991, SPC had made changes to the NRC-approved fuel cooling test facility (FCTF) reflood heat transfer coefficient correlation used in TOODEE2.

During August 1995, the NRC met with SPC about the LBLOCA ECCS evaluation model. As a result of that meeting, the staff sent a letter to SPC, dated November 13, 1995 [951115021 1], that identified problems concerning changes in the TOODEE2 computer code

specifically related to the 1991 changes to the NRC-approved FCTFreflood heat transfer coefficient correlation and the significance of the code changes. The staff then requested in a letter dated March 13, 1996 [9603150002], that SPC formally submit to the staff for its review and approval all model revisions and corrections implemented in TOODEE2 since the staffs approval of the code in July 1 1986.

On June 2, 1996, SPC submitted topical report XN-NF-82-20, "EXEM/PWR Large Break LOCA ECCS TOODEE2 Updates," Revision 1, Supplement 5 [9606260239], which described the updates made in the TOODEE2 computer code between 1986 and 1991. TOODEE2 is part of the evaluation model used by SPC for pressurized-water reactors. The staff has completed its review of this report and has concluded that the proposed LBLOCA-ECCS model (i.e., the 1991 model) is not acceptable and the previously approved model (i.e., the 1986 model) contains an unacceptable error. This information was formally communicated to SPC in a safety evaluation enclosed in a letter dated November 29, 1996 [9612040294].

After concluding that the 1991 model was unacceptable, the staff met with SPC and those licensees using SPC's LBLOCA evaluation model on October 16, 1996, to discuss the unacceptable error in the 1986 model. The staff also requested and received information from the licensees that demonstrated that they were in compliance with 10 CFR 50.46 (see meeting summary dated November 5, 1996 [9611140318]).

Public Service Electric & Gas (PSE&G) Audit of GE

During a recent licensee-conducted quality assurance (QA) audit of the fuel vendor (GE Wilmington, North Carolina), PSE&G, the licensee of Hope Creek Nuclear Generating Station, identified a weakness in GE's tracking of errors and changes in the LOCA evaluation models. Between 1990 and 1995, information sent to the licensee indicated that there had been no known impact on the calculated peak cladding temperature (PCT). Earlier in 1996, two impacts had been reported by GE to the licensee and when reviewing the handling of this information during the audit, three additional impacts not previously reported to the licensee were discovered, dating back to 1990, 1992, and 1993. In addition, the audit determined that GE had not been tracking the cumulative impact of errors and changes on the PCT as expected by the licensee and as required by 10 CFR 50.46. The cumulative PCT impact was previously known to be 35°F (19 °C); however, on the basis of the errors identified during the audit, the value is now raised to 100°F (56 °C) exceeding the 50 °F (28 °C) reporting threshold. The licensee's recalculated PCT still remains below the ECCS acceptance criteria of 2200 °F (1200 °C).

The licensee stated that GE had been submitting annual reports to the NRC on behalf of its boiling water reactor customers since 1990. Although the audit determined that the cumulative change to the PCT was in error for the Hope Creek

licensee, it was not clear at this time whether the vendor reports to the NRC were either wholly or partially in error, or if other licensees were similarly affected.

Discussion

Although the LOCA analyses are performed by the fuel vendors, licensees are responsible for compliance with the regulations related to the LOCA analysis, that is, 10 CFR 50.46(a). Section 50.46(a)(1)(i) requires licensees to calculate ECCS cooling performance with an acceptable evaluation model. The staff's recent interactions with the licensees using the SPC's LBLOCA methodology (the review experience of the SPC LOCA evaluation model changes) and the Hope Creek QA audit indicate that licensees may not be closely monitoring the work of their respective fuel vendors. When the error in the 1986 model was discovered and when SPC changed the TOODEE2 code in 1991, the resulting changes in the PCT were, in some cases, significant, and the responsible licensees were not aware of the significant changes. "Significant" is defined in 10 CFR 50.46(a)(3)(i) as follows: "a significant change or error is one which results in a calculated peak fuel cladding temperature different by more than 50 °F from the temperature calculated for the limiting transient using the last acceptable model, or is a cumulation of changes and errors such that the sum of the absolute magnitudes of the respective temperature changes is greater than 50 °F."

Licensees may not be performing adequate ~~assessments of errors when they are aware of them. Furthermore, licensees'~~ audits of ~~the fuel vendors' quality assurance procedures related to SPC's evaluation model code~~ changes. Audits appear to have been ineffective in identifying the ~~technical~~ inadequacy of the ~~procedures to assure the adequacy of reporting evaluation model code~~ changes. It should be noted that 10 CFR 50.46 allows fuel vendors or licensees to make ~~evaluation model code~~ changes without the staff's prior approval; however, the licensees are responsible for identifying any deficiencies in the change process and reporting them to the NRC staff accordingly. In addition, the licensee determines whether the changes are significant.

It also appears that licensees may not be monitoring the cumulative effect of the ~~evaluation model code~~ changes. In a given year, the impact of the ~~evaluation model code~~ change may be less than 50 °F (28 °C) and hence the change is not significant. But the impact of the ~~evaluation model code~~ changes ~~over several years, on the limiting peak cladding temperature calculated with the last acceptable model together~~ can exceed 50 F (28 °C) and, therefore, will be reportable as significant.

Section 50.46 places the responsibility for the reporting ~~impact of evaluation model code~~ changes ~~on the limiting peak cladding temperature calculated with the last acceptable model~~ on the licensees. Some licensees have apparently considered that the annual reports sent by the fuel vendor are sufficient to meet the requirements under 10 CFR 50.46(a)(3)(ii). Specifically, the applicant or licensee shall report the nature of the change or error and its estimated effect on the limiting ECCS analysis to the Commission at least annually as specified in §50.4. If the change or error is significant, the applicant or licensee shall provide this report within 30 days..... The reports submitted by the fuel vendors will not satisfy these reporting

requirements; however, licensees are allowed to refer to the vendors annual reports. As stated in 10 CFR Part 50, Appendix B, Section VII, "The effectiveness of the control of quality by contractors and subcontractors shall be assessed by the applicant or designee at intervals consistent with the importance, complexity, and quantity of the product or services."

In summary, licensees are reminded that to meet the ECCS acceptance criteria their responsibilities include:

- (1) Section 50.46(a)(1)(i) requires licensees to calculate ECCS cooling performance with an acceptable evaluation model.
- (2) Section 50.46(a)(3)(ii) requires licensees to report changes and/or errors and their estimated effects on the limiting ECCS analysis to the Commission at least annually, and if the change or error is significant, the licensee shall provide this report within 30 days.
- (3) Individual licensees are responsible to assess effectiveness of quality of ECCS evaluation models provided by the vendors as required by Part 50, Appendix B.

~~Meaningful technical audits~~ **Periodical QA audits** may be necessary to meet Appendix B.

This information notice requires no specific action or written response. If you have any question about the information in this notice, please contact one of the technical contacts listed below or the appropriate Office of Nuclear Reactor Regulation (NRR) project manager.

Thomas T. Martin, Director
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Office of Nuclear Reactor Regulation

Technical contacts: George Thomas, NRR
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Attachment- List of Recently Issued NRC Information Notices