

**SAFETY SIGNIFICANCE OF FIRE INDUCED SHORTS ON THE
1E12*MOVF009 and 1B21*MOVF019 VALVES**

By

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SAFETY SIGNIFICANCE EVALUATION

- o Engineering Analysis Was Requested To Evaluate The Safety Significance Of Leaving The Valves Energized

- o Of Specific Concern Were
 - 1E12*MOVF009 RHR SDC Suction Valve
 - 1B21*MOVF019 MSL Drain Valve

- o Mechanistic Evaluations
 - Stress Analysis On RHR Piping (F009)
 - Off-site Dose Calculation For Discharge For Steam Piping (F019)

- o Mechanistic Analyses Used Standard Design Basis Analytical Techniques

- o Probabilistic Safety Assessments
 - Interfacing LOCA With Potential Core Damage (RHR System)
 - Steam Bypass To Condenser - No Core Damage (Main Steam)

- o Probabilistic Analyses Based On Standard PRA Techniques
 - NUREG-1150's Interfacing System LOCA Methodology
 - Kuosheng's PRA Fire Risk Analysis

MECHANISTIC ANALYSIS OF 1B21*MOV*F019 AND MOV*F021 VALVES FAILED OPEN

- o Not An Important Contributor To Core Damage
 - Location And Effect Of Value On Other Reactor Systems
 - Low Flow (~ 124 GPM) To Condenser

- o Primary Concerns Was Continued Blowdown And Offsite Release
 - Offsite Dose Calculation Was Based On Expected Activity In Reactor Water (Design Basis Value Based On NUREG-16)

 - Using Expected Activity Offsite Dose After 72 Hours Of Release Is Less Than 10CFR20 Limits (7.5 mrem For 72 Hour Release Versus 1500 mrem/Year 10CFR20 Limits)

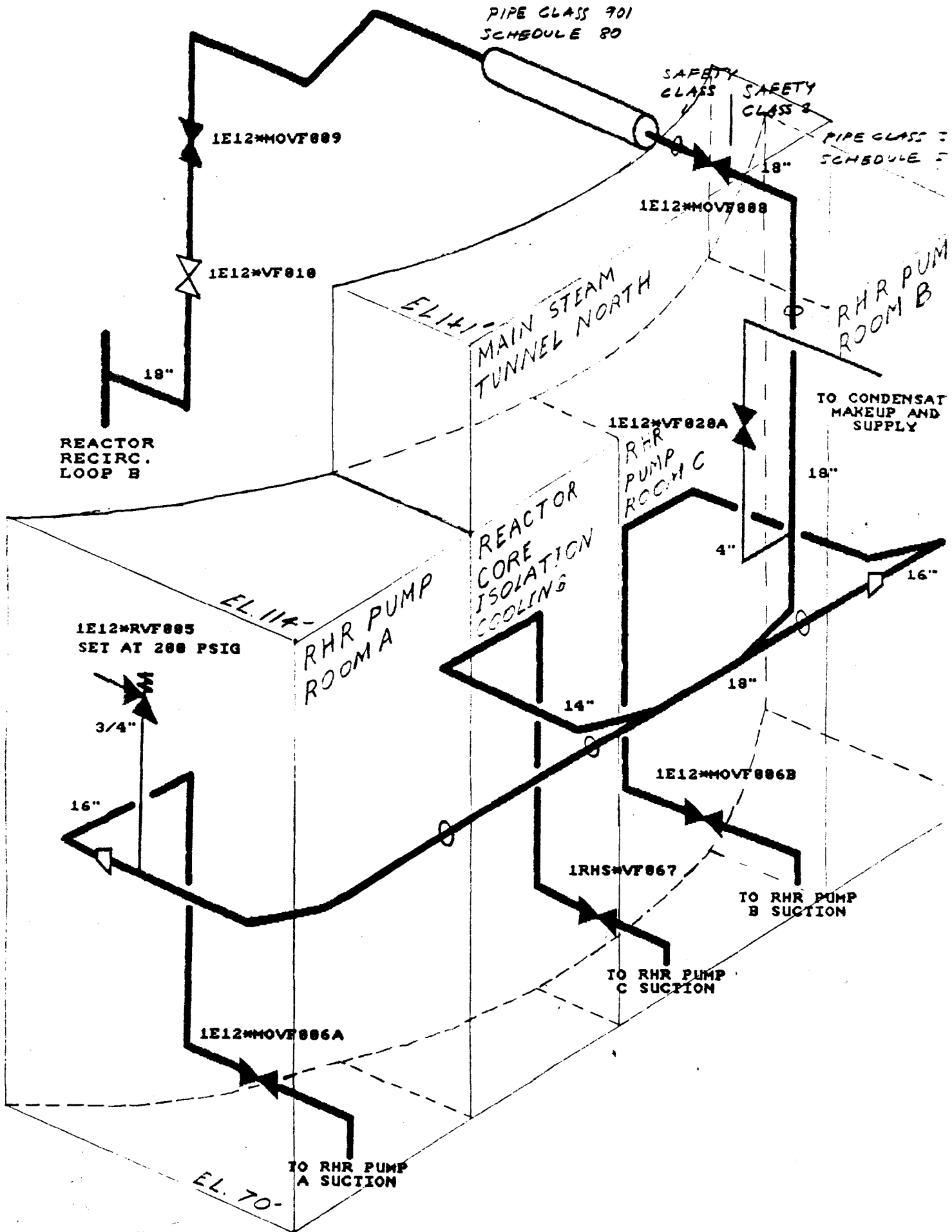
- o Offsite Calculations Are Conservative
 - During the 72 Hours For Going To Cold Shutdown The Reactor Pressure Decreases, Thereby Impacting Postulated Release Flow. The Flow (Release Rates) Was Held Constant For These Calculations.

 - Expected Activity Is Approximately 100 Times Greater Than Actual Activity. Therefore, Assumed Activity Is Very Conservative.

 - Operator Action To Shut F085 Should Occur Via AOP-31 And AOP-03.

- o Therefore Consequences Of This Release Are Insignificant And Well Within The Design Basis Offsite Release Limits

FIGURE: RHR SHUTDOWN COOLING SUCTION LINE



RHR PIPING STRESS ANALYSIS

- o From Reactor Vessel To MOVF008 Design Pressure Is 1070 Psig And Temperature 552^oF (ASME Class I)

- o From MOVF008 To RHR Valves F006A, F006B, And F067 Design Pressure Is 200 Psig And Temperature 344^oF (ASME Class II)

- o Stress Analysis Based On 1070 Psig And 552^oF For Class II Piping

- o All Stress Levels Meet Stress Allowables Per ASME-III And The Piping Material Is Within Yield Strength

- o Therefore, For The Prescribed Pressurization Event The Piping Would Not Rupture

DATA USED FOR PSA

- | | | |
|--|---------------------------|----------------------------------|
| 1. Fire In RSS Panel | 3×10^{-4} /yr | (Kuosheng PRA) |
| Fire In MCR | 9.3×10^{-3} /yr | (Kuosheng PRA) |
| 2. F008 Opens Due To Hot Short
Caused By Fire | 0.1/Event | (Sandia) |
| 3. F009 Opens Due To Hot Short | 0.1/Event | (Sandia) |
| 4. Pipe Rupture Due To
Overpressurization | 1×10^{-2} /Event | (NRC - NUREG-4550,
AEOD/C502) |
| 5. HPCS Fail To Maintain RPV
Water Level (Short Term) | 5×10^{-2} /Event | (RBS PRA) |
| 6. Standard PRA Methodology Used | | |

FIGURE 1.0 EVENT TREE FOR A CONTAINMENT BYPASS VIA CONDENSER DUE TO A FIRE IN THE MAIN CONTROL ROOM

FIRE IN THE MAIN CONROL ROOM (MCR)	FIRE IS NOT IN THE PANEL FOR 1B21*MOVFO16, 1B21*MOVFO19 & 1B21*MOVFO85	FIRE IS SUPPRESSED PRIOR TO SPREADING TO OTHER PANNELS	SPURIOUS SIGNAL TO OPEN 1B21-MOVFO21 IS NOT GENERATED	SEQUENCE NUMBER	SEQUENCE FREQUENCY	SEQUENCE OUTCOME
				1	8.75E-03	OK - No Leakage
				2	4.14E-04	OK - No Leakage
				3	4.60E-05	Potential leakage Path (Core Damage Not Considered)
				4	8.73E-05	OK - No Leakage
				5	9.30E-06	Potential leakage Path (Core Damage Not Considered)

TOTAL FREQUENCY OF POENTIAL RELEASE PATH = 5.5×10^{-5} per Reactor-Year

**FIGURE 2.0 EVENT TREE FOR A INTERFACING SYSTEM LOCA
DUE TO A FIRE IN THE MAIN CONTROL ROOM**

FIRE IN THE MAIN CONTROL ROOM (MCR)	FIRE IS NOT IN THE PANEL FOR 1E12*MOVFO08 & 1E12*MOVFO09	FIRE IS SUPPRESSED PRIOR TO SPREADING TO OTHER PANNELS	SPURIOUS SIGNAL TO OPEN 1E12*MOVFO08 IS NOT GENERATED	SPURIOUS SIGNAL TO OPEN 1E12*MOVFO09 IS NOT GENERATED	RHR PIPING DOES NOT RUPTURE GIVEN HIGH PRESSURE	SUCCESSFUL RPV MAKEUP (ECCS &/OR OTHER SYSTEMS)		SEQUENCE NUMBER	SEQUENCE FREQUENCY	SEQUENCE OUTCOME
						SHORT TERM	LONG TERM			
						1	9.2E-03	OK - No LOCA		
						2	4.1E-07	OK - No LOCA		
						3	4.1E-08	OK - No LOCA		
						4	4.6E-09	OK - No LOCA		
						5	4.6E-11	LOCA and Core Damage		
						6	8.4E-05	OK - No LOCA		
						7	8.4E-06	OK - No LOCA		
						8	9.2E-07	OK - No LOCA		
						9	8.7E-09	LOCA, Containment Bypassed but <u>No Core Damage</u>		
						10	5.3E-11	LOCA and Core Damage		
						11	5.5E-10	LOCA and Core Damage		

PROBABILITY OF PIPE RUPTURE = 1.0×10^{-2}

FOR ECCS - SHORT TERM ASSUMED THAT LPCS IS FAILED, ONLY HPCS CAN RESPOND TO BREAK

TOTAL CORE DAMAGE FREQUENCY DUE TO FIRES IN MCR = 6.5×10^{-10} Per Reactor-Year

FIGURE 3.0 EVENT TREE FOR A INTERFACING SYSTEM LOCA DUE TO A FIRE IN THE DIVISION I REMOTE SAFE SHUTDOWN (RSS) PANEL

FIRE IN RSS DIV I PANEL	SPURIOUS SIGNAL TO OPEN 1E12*MOVFO08 IS NOT GENERATED	SPURIOUS SIGNAL TO OPEN 1E12*MOVFO09 IS NOT GENERATED	RHR PIPING DOES NOT RUPTURE GIVEN PRESSURIZATION	SUCCESSFUL RPV MAKEUP (ECCS &/OR OTHER SYSTEMS)		SEQUENCE NUMBER	SEQUENCE FREQUENCY	SEQUENCE OUTCOME
				SHORT TERM	LONG TERM			
				1	3.1E-04	OK - No LOCA		
				2	3.1E-05	OK - No LOCA		
				3	3.4E-06	OK - No LOCA		
				4	3.2E-08	LOCA, Containment Bypassed, but <u>No Core Damage</u>		
				5	1.9E-10	LOCA and Core Damage		
				6	2.0E-09	LOCA and Core Damage		

PROBABILITY OF PIPE RUPTURE = 1.0×10^{-2}

FOR ECCS - SHORT TERM ASSUMED THAT LPCS IS FAILED, ONLY HPCS CAN RESPOND TO BREAK

TOTAL CORE DAMAGE FREQUENCY DUE TO FIRES IN DIVISION I RSS PANEL = 2.2×10^{-9} Per Reactor-Year

SUMMARY OF RESULTS

Interfacing LOCA (RHR System)

	<u>CDF</u>
o F009 Open, Probability Pipe Rupture At 10^{-2} /year	3.2×10^{-9} /Reactor Year
o F009 Open, Probability Of Pipe Rupture At 1.0	5.8×10^{-8} /Reactor Year
o NRC Safety Goal For Core Damage	10^{-4} /Reactor Year
o Grand Gulf (NUREG-4550)	4.0×10^{-6} /Reactor Year
o NRC Safety Goal For Large Release	10^{-6} /Reactor Year
o Therefore Safety Implications Of This Situation On Core Damage Are Insignificant	

Steam Bypass (Main Steam)

- o Probability Of Steam Bypass To The Condenser is 5.5×10^{-5} /Year
- o If Occurred, Consequences Are Low
 - No Significant Offsite Dose Rates (Well Below 10CFR20 Limits)
 - A 72 Hour Continuous Release Is Less Than 10CFR20 Limits And Well Within The Design Basis Of RBS 10CFR100 Limits
 - No Core Damage

CONCLUSIONS

- o Probability Of Core Damage For Fire Induced Interfacing LOCA Is Less Than 10^{-8} /year

- o Probability Of Fire Induced Steam Bypass To The Condenser Is Low ($\sim 5.5 \times 10^{-5}$)/year

- If Steam Bypass Occurred Offsite, Consequences Are Low (Less Than Offsite Operating Limit) And No Core Damage Is Expected

- o Therefore, The Safety Consequences Of Having 1E12*MOVF009 And 1B21*MOVF019 Energized During Normal Operation Are Very Low

Plant Response To Postulated Events

Plant Status

- Reactor at pressure

Postulated Event 1

- Main control room (MCR) fire, or Division I remote shutdown (RSS1) fire
- Fire Suppression systems and fire brigade assumed ineffective

Plant Response

- E12*F008 and E12*F009 open due to multiple hot shorts
- Potential overpressurization and damage to shutdown cooling suction piping

Response to potential overpressurization in residual heat removal (RHR) or reactor core isolation cooling (RCIC) cubicle:

- MCR annunciation of pre-trip and trip condition by leak detection system area temperature and differential temperature monitors
- Back panel indication of area temperatures and differential temperatures
- Nuclear steam supply shutoff system (NSSSS) isolation of RHR/RCIC valves, MCR isolation annunciation, backpanel isolation indication, valve position indication
- Digital rad monitoring system (DRMS) alarm and indication of elevated activity due to postulated coolant leakage
- Alternate/supplemental temperature, radiation, and equipment status provided by local surveys
- Explicit procedural guidance in EOP-1, RPV Control, and EOP-3, Secondary Containment Control, to isolate the postulated discharge
- Symptom based EOP's may subsequently lead to reactor scram, or ultimately to emergency reactor depressurization
- Reactor scram, full NSSSS and balance of plant (BOP) isolation, and Emergency Core Cooling (ECCS) initiated prior to MCR evacuation

Postulated Event 1 - continued

Response to potential overpressurization in main steam tunnel

- Similar to response to potential overpressurization in RHR/RCIC cubicle
- Postulated discharge isolated manually or electrically with jumpers
- Automatic NSSS isolation of main steam isolation valves (MSIV's) due to high area temperature, high area differential temperature
- Automatic reactor scram due to MSIV closure

Emergency Action Level

- Site Area Emergency (SAE) implemented due to a fire compromising the function of a safety system
- The full resources of the emergency plan would be available to assist on shift personnel in controlling the postulated casualty

Plant Status

- Reactor at pressure

Postulated Event 2

- MCR fire
- Loss of offsite power (LOOP)
- Fire suppression system and fire brigade assumed ineffective
- Loss of Division II

Plant Response

- Reactor scram on LOOP
- B21*F019 opens due to a hot short, opening a steam drain path to the condenser

Response To Postulated Steam Drain

- Relatively minor effect of increased reactor pressure decay would be noted during the shutdown process
- Required isolations verified by local operator action in accordance with AOP-3, Automatic Isolations

Emergency Action Level

- SAE implemented due to a fire compromising the function of a safety system
- The full resources of the emergency plan would be available to assist on shift personnel in controlling the postulate casualty