

## September 7, 2012

L-2012-322 10 CFR 50.73

U-S. Nuclear Regulatory Commission Attn: Document Control Desk Washington, D.C. 20555

Re: St. Lucie Unit 1

Docket No. 50-335

Reportable Event: 2012-003-01 Date of Event: March 31, 2012

Manual Trip during Steam Bypass Control System Post-Modification Testing

The attached supplement to Licensee Event Report 2012-003 is being submitted pursuant to the requirements of 10 CFR 50.73 to provide notification of the subject event.

Very trulxyours,

Joseph Jersen Site Vice President

St. Lucie Plant

JJ/rcs Attachment

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| NRC FORM 366 U.S. NUCLEAR REGULATORY COMMISSION (10-2010)  LICENSEE EVENT REPORT (LER)                 |   |  |   |   | APPROVED BY OMB: NO. 3150-0104 EXPIRES: 10/31/2013 Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the FOIA/Privacy Section (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to infocollects resourse@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection. |  |   |  |   |                |  |  |
| 1. FACILITY NAM  | E<br>St. Lucie Unit 1   |  | 2   | <b>2. DOCKET NUMBER</b>   |   |  |   |  |   |                |  |  |
| 4. TITLE  Manual Trip during Steam Bypass Control System Post-Modification Testing                     |   |  |   |   |   |  |   |  |   |                |  |  |
| 5. EVENT DATE  | 6. LER NUMBER   | 7. REPORT  |   |   |   | HER FA   | ACILI   | TIES IN  |   |                |  |  |
| MONTH DAY YEAR   | YEAR SEQUENTIA REV<br>L NUMBER NO.  |  | YEAR  | FACILITY  | ΥNAME<br>   | NA   | _   |  | DOCKE<br>NUMBE                              |                |  |  |
| 03 31 2012   |   | 09 07  | 2012  | FACILITY  |   |  |   |  | DOCKE<br>NUMBE                              | R              |  |  |
| 9. OPERATING MODE  | 11. THIS REPORT I   | S SUBMITTED PURS   | SUANT TO  | THE REC   | QUIREME   | NTS OF   | 10 CFF  | ₹§: (Check   | all that app                                | oly)           |  |  |
| 1  10. POWER LEVEL   | ☐ 20.2201(b) ☐ 20.2203(a)(3)(i) ☐ 20.2201(d) ☐ 20.2203(a)(3)(ii) ☐ 20.2203(a)(1) ☐ 20.2203(a)(4) ☐ 20.2203(a)(2)(i) ☐ 50.36(c)(1)(i)(A)  VEL ☐ 20.2203(a)(2)(ii) ☐ 50.36(c)(1)(ii)(A)   |  |   | □ 50.73(a)(2)(i)(C)       □ 50.73(a)(2)(vii)         □ 50.73(a)(2)(ii)(A)       □ 50.73(a)(2)(viii)(A)         □ 50.73(a)(2)(iii)(B)       □ 50.73(a)(2)(viii)(B)         □ 50.73(a)(2)(iii)       □ 50.73(a)(2)(ix)(A)         □ 50.73(a)(2)(iv)(A)       □ 50.73(a)(2)(ix)(A) |   |  |   |  |   |                |  |  |
| 10%  | ☐ 20.2203(a)(2)(iii) ☐ 20.2203(a)(2)(iv) ☐ 20.2203(a)(2)(v) ☐ 20.2203(a)(2)(vi)   | 50.36(c)(2)<br>50.46(a)(3)<br>50.73(a)(2)<br>50.73(a)(2)   | )<br>)(ii)<br>)(i)(A)   | ☐ 50.73(a)(2)(v)(A)<br>☐ 50.73(a)(2)(v)(B)<br>☐ 50.73(a)(2)(v)(C)<br>☐ 50.73(a)(2)(v)(D)  |   |  |   | ☐ 73.71(a)(4) ☐ 73.71(a)(5) ☐ OTHER Specify in Abstract below or in NRC Form 366A  |   |                |  |  |
|  |   | 12. LICENSEE CON   | TACT FOR  | R THIS LE   | ER  |  |   |  |   |                |  |  |
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| 13. CC   | MPLETE ONE LINE FO  | OR EACH COMPO  | NENT F  | AILURE  | DESCF   | RIBED  | IN TI   | HIS REPO   | ORT   |                |  |  |
| CAUSE SYSTEM   | COMPONENT MANU-<br>FACTURE  | REPORTABL  | LE CZ   |   | SYSTEM COMPONENT  |  |   | MANU-<br>FACTURE   | REPO  | RTABLE<br>EPIX |  |  |
| B JI   | PCV C635  | YES  |   |   |   | i  |   |  |   |                |  |  |
| 14.  | SUPPLEMENTAL REPO   | RT EXPECTED  |   |   |   | EXPECT   | į.  | MONTH  | DAY   | YEAR           |  |  |
| ☐ YES (If yes, complete 15. EXPECTED SUBMISSION DATE)  |   |  |   |   | SUBMISSION<br>DATE  |  |   |  |   |                |  |  |
| On March 31, performing poreactor was meDT. Immediaterminating taccordance wisteam generatered. RCEAs) | to 1400 spaces, in 2012 at 0022 EDT, State and ification test manually scrammed after the cooldown. Additionally the cooldown. Additionally state and the Emergency Operation of the cooldown of the cooldown of the Emergency Operation inserted. No automatic state and the cooldown of the | t. Lucie Unit in ting (PMT) of the ter a steam by reactor scram to ionally, Operating Procedure ing to less the atic safety sysmaintained with | 1 was in the steam action and stall and stall and stall and stall and stall the steam action | n Mode am bypa ontrol v am bypa osed th ), "Sta psia. tuation iary fe ble.  | 1 at 1 ass convalve o ass con he main andard All cons were eedwate  | lO% reantrol soppened ntrol von steam Post Tontrol e requier and | actor system unexp valve n isol Trip A eleme tred a atmos | power and (SBCS) pectedly closed, lation value assembled assembled assembled to the control of t | nd when t at 001 alves i due to mblies dump | he<br>9<br>n   |  |  |

The root cause for failure of the control valve was less than adequate analyses supporting a recently implemented design change and less than adequate post modification testing that failed to provide appropriate contingency actions to mitigate potentially unfavorable SBCS test responses.

Corrective actions include isolating the malfunctioning SBCS valve until it can be redesigned and replaced. SBCS capability is provided by the remaining four SBCS valves.

# LICENSEE EVENT REPORT (LER)

| CONTINUATION SHEET |           |               |                      |                    |             |  |  |  |
|--------------------|-----------|---------------|----------------------|--------------------|-------------|--|--|--|
| 1. FACILITY NAME   | 2. DOCKET | 6. LER NUMBER |                      |                    | 3. PAGE     |  |  |  |
|                    | 05000335  | YEAR          | SEQUENTIAL<br>NUMBER | REVISION<br>NUMBER |             |  |  |  |
| St. Lucie Unit 1   |           | 2012          | - 003 -              | 01                 | Page 2 of 3 |  |  |  |

### NARRATIVE

### Description of the Event

On March 31, 2012 at 0022 EDT, St. Lucie Unit 1 was in Mode 1 at 10% reactor power and performing post modification testing of the SBCS when the reactor was manually scrammed after a steam bypass control valve [PCV] opened unexpectedly at 0019 EDT. Immediately following the reactor scram the steam bypass control valve closed, terminating the cooldown. Additionally, Operators closed the main steam isolation valves in accordance with EOP-01 due to steam generator pressure decreasing to less than 750 psia. All CEAs fully inserted. No automatic safety system actuations were required and none occurred. RCS heat removal was maintained with auxiliary feedwater and atmospheric dump valves. The offsite power grid was available and stable.

#### Cause

The root cause for failure of the control valve was less than adequate analyses supporting a recently implemented design change and less than adequate PMT that failed to provide appropriate contingency actions to mitigate potentially unfavorable SBCS test responses.

### Analysis of the Event

The review and analysis of the design change and subsequent post maintenance test requirements did not account for fluid momentum loads and binding of the valve plug in the full open position. The resulting internal forces exceeded the capability of the actuator and caused a steam dump valve to fail open under dynamic load. The engineering change did not require dynamic testing to validate that actual valve forces were within actuator capacity.

### Analysis of Safety Significance

The failed steam bypass control valve closed when steam pressure was reduced during the cooldown terminating the event immediately following the reactor scram. Upon closure of the failed steam bypass control valve, RCS temperature stabilized at 505 degrees and began to recover. The failed steam bypass control valve was subsequently isolated by a manual valve.

During post trip recovery actions the Shift Manager determined that EOP-05, "Excess Steam Demand" was required to be entered as a result of not meeting the Reactor Trip Safety Function (Reactor Coolant System (RCS) average temperature between 525 and 535 degrees). The procedure was exited with no actions taken when temperature increased into the required band. With the exception of not meeting the Reactor Trip Safety Function Status Check for RCS Heat Removal in EOP-02, "Reactor Trip Recovery" as a result of low reactor coolant system temperature, there were no equipment complications identified post reactor trip, and all CEAs fully inserted. No automatic safety system actuations were required and none occurred. RCS heat removal was maintained with auxiliary feedwater and atmospheric dump valves. The offsite power grid was available and stable.

# LICENSEE EVENT REPORT (LER) CONTINUATION SHEET

| ONTINOATION OTILET |           |               |                      |                    |             |  |  |  |
|--------------------|-----------|---------------|----------------------|--------------------|-------------|--|--|--|
| 1. FACILITY NAME   | 2. DOCKET | 6. LER NUMBER |                      |                    | 3. PAGE     |  |  |  |
|                    | 0500005   | YEAR          | SEQUENTIAL<br>NUMBER | REVISION<br>NUMBER |             |  |  |  |
| St. Lucie Unit 1   | 05000335  | 2012          | - 003 -              | · 01               | Page 3 of 3 |  |  |  |

#### NARRATIVE

The Conditional Core Damage Probability (CCDP) and Conditional Large Early Release Probability (CLERP) values were evaluated for the stated event and were found to be significantly below the thresholds required by RG-1.174 for the risk to be "Small", where CCDP is below 1.0E-06 and CLERP is below 1.0E-07. Given the response of the plant and small CCDP and CLERP values, the health and safety of the public was not affected by this event.

This licensee event report is being reported in accordance with 10 CFR 50.73(a)(2)(iv)(A) as an event or condition that resulted in manual or automatic actuation of the Reactor Protection System including reactor scram or reactor trip.

### Corrective Actions

The corrective actions listed below are entered into the site corrective action program. Any changes to the actions will be managed under the corrective action program.

- 1. The failed steam bypass control valve was manually isolated, and steam bypass capability is provided by the remaining four SBCS pressure control valves.
- 2. The Steam Bypass Control System pressure control valves are being redesigned and replaced.

### Similar Events

A search of the St. Lucie corrective action database for three years was performed and identified no issues that were related to the faults identified with this report.

### Failed Component(s)

Copes-Vulcan 10", 600 # Class, Generation II Tandem (Balanced) control valve with a SD-ATI L165SRR68.6 dual acting piston actuator

### Manufacture

Copes-Vulcan, SPX Valves & Controls