



Monticello Nuclear Generating Plant  
2807 West County Road 75  
Monticello, MN 55362-9637

Operated by Nuclear Management  
Company LLC

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October 13, 2000

US Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

**MONTICELLO NUCLEAR GENERATING PLANT**  
Docket No. 50-263 License No. DPR-22

**Revision 1 to LER 2000-013**  
**Initiation of Containment Purge Prior to Sampling and Analysis of**  
**Containment Atmosphere in Violation of Technical Specifications**

A revised Licensee Event Report for this occurrence is attached. The original report contained two incorrect dates. This report contains no new NRC commitments.

Contact David Musolf, Consulting Production Engineer, at (763) 295-1201 if you require further information.

Byron Day  
Plant Manager  
Monticello Nuclear Generating Plant

c: Regional Administrator - III NRC  
NRR Project Manager, NRC

Sr Resident Inspector, NRC  
Minnesota Department of Commerce

Attachment

IE22

NRC FORM 366 (6-1998)		U.S. NUCLEAR REGULATORY COMMISSION			<b>APPROVED BY OMB NO. 3150-0104      EXPIRES 06/30/2001</b> Estimated burden per response to comply with this mandatory information collection request: 50 hrs. Reported lessons learned are incorporated into the licensing process and fed back to the industry. Forward comments regarding burden estimate to the Records Management Branch(T-6 F33), U.S. Nuclear Regulatory Commission, Washington, DC 205555-0001, and to the Paperwork Reduction Project (3150-0104), Office of Management and Budget, Washington, DC 20503. If 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.							
<b>LICENSEE EVENT REPORT (LER)</b>												
(See reverse for required number of digits/characters for each block)												
FACILITY NAME (1) <b>MONTICELLO NUCLEAR GENERATING PLANT</b>				DOCKET NUMBER (2) <b>05000263</b>			PAGE (3) <b>1 OF 4</b>					
<b>TITLE (4) Initiation of Containment Purge Prior to Sampling and Analysis of Containment Atmosphere in Violation of Technical Specifications</b>												
<b>EVENT DATE (5)</b>			<b>LER NUMBER (6)</b>			<b>REPORT DATE (7)</b>			<b>OTHER FACILITIES INVOLVED (8)</b>			
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER		
09	02	00	00	-- 013 --	01	10	13	00		05000		
<b>OPERATING MODE (9)</b>		N	<b>THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)</b>									
<b>POWER LEVEL (10)</b>		25	20.2201(b)		20.2203(a)(2)(v)		<input checked="" type="checkbox"/>		50.73(a)(2)(i)			
			20.2203(a)(1)		20.2203(a)(3)(I)				50.73(a)(2)(ii)			
			20.2203(a)(2)(i)		20.2203(a)(3)(ii)				50.73(a)(2)(iii)			
			20.2203(a)(2)(ii)		20.2203(a)(4)				50.73(a)(2)(iv)			
			20.2203(a)(2)(iii)		50.36(c)(1)				50.73(a)(2)(v)			
			20.2203(a)(2)(iv)		50.36(c)(2)				50.73(a)(2)(vii)			
Specify in Abstract below or in NRC Form 366A												
<b>LICENSEE CONTACT FOR THIS LER (12)</b>												
NAME <b>David Musolf</b>						TELEPHONE NUMBER (Include Area Code) <b>763-295-1201</b>						
<b>COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)</b>												
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX			
<b>SUPPLEMENTAL REPORT EXPECTED (14)</b>						<b>EXPECTED SUBMISSION DATE (15)</b>			MONTH	DAY	YEAR	
YES (If yes, complete EXPECTED SUBMISSION DATE).				<input checked="" type="checkbox"/>	NO							

**ABSTRACT** (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

On the morning of September 2, 2000, the plant was in the process of starting up following a short maintenance outage. At 1040, believing all prerequisites had been met, the Shift Supervisor authorized containment purging with nitrogen to begin. Approximately two hours later, following a review of the prestart checklist, it was determined that a grab sample of the containment atmosphere had not been obtained and analyzed prior to containment purging as required by Technical Specification 4.8.B.6.b. At 1306 purging was stopped and the containment vent and purge valves were closed. The required containment atmosphere grab sample was obtained and analyzed at approximately 1350 and purging was resumed at 1435. Based on analysis of the containment grab sample, no significant release of radionuclides occurred as a result of the purge. The event was caused by inadequate procedures.

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TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

### Problem Definition

During plant startup, containment purging was initiated prior to taking and analyzing a sample of the containment atmosphere. This is a violation of Technical Specification 4.8.B.6.b.

### Description

On the morning of September 2, 2000, the plant was in the process of starting up following a short maintenance outage. With the reactor in run mode, believing all prerequisites had been met, the Shift Supervisor authorized containment<sup>1</sup> purging with nitrogen to begin at 1040.

Following a review of a prestart checklist, it was discovered that a sample of the containment atmosphere had not been obtained and analyzed prior to initiating containment purging as required by Technical Specification 4.8.B.6.b. At 1306 purging was stopped and the containment vent and purge valves<sup>2</sup> were closed.

The required containment atmosphere grab sample was obtained and analyzed at approximately 1350. Results were acceptable and containment inerting was resumed at 1435 and completed at 2130.

### Event Analysis

#### **Analysis of Reportability**

This event was determined to be reportable as a condition prohibited by the Technical Specifications in accordance with 10 CFR Part 50, Section 50.73(a)(2)(i)(B).

This event would not have prevented the fulfillment of the safety function of any plant safety related structure or system. The event is therefore not reportable in accordance with 10 CFR 50.73(a)(2)(v).

<sup>1</sup> EIS System Code: NH

<sup>2</sup> EIS Component Code: V

<sup>3</sup> EIS Component Code: VPR

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### Safety Significance

The safety significance of this event is believed to be minimal for the following reasons:

- The Reactor Building vent continuous radiation monitoring system was operable during the entire period. There was no significant increase in monitored activity attributable to the purge. This monitoring system is set to alarm automatically in the Control Room at Reactor Building vent release rates well below the Technical Specification site boundary dose rate limit.
- Analysis of grab samples of the containment atmosphere found only very small concentrations of airborne radionuclides. Calculated offsite dose attributable to these radionuclides was negligible.

### Cause

Procedure 2138, "Inerting the Primary Containment During Reactor Startup," is used when containment inerting is required. This procedure does not list each specific prerequisite that must be met before beginning the inerting operation. It instead contains a prerequisite that other documents that contain the specific prerequisites have been reviewed. The Shift Supervisor overlooked the specific prerequisite to sample the containment that was contained in two of the other referenced documents (i.e., the Technical Specifications and the Primary Containment Operations Manual). This was a non-cognitive personnel error.

The root cause of this event was determined to be inadequacies in procedure format and content. Prerequisites for containment purging should have been explicitly contained in Procedure 2138.

### Corrective Actions

This event will be included in Operations continuing training as an example of how human performance enhancement techniques are needed to support correct performance of complex procedures.

Procedure 2138 has been revised to list the specific prerequisites for containment purging.

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TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

The adequacy of procedure writers' guidelines with respect to the identification of procedure prerequisites will be evaluated.

Failed Component Identification

Not applicable.

Similar Events

None