## TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401 400 Chestnut Street Tower II

85 MMarzes 29.7 1985

WB RD-50-390 /83-70 WB RD-50-391 /83-65

U.S. Nuclear Regulatory Commission Region II Attn: Dr. J. Nelson Grace, Regional Administrator 101 Marietta Street, NW, Suite 2900 Atlanta, Georgia 30323

Dear Dr. Grace:

WATTS BAR NUCLEAR PLANT UNITS 1 AND 2 - CONTROL HOOM PRESSURIZATION BOUNDARY LOSS THROUGH FLOOR AND EQUIPMENT DRAINS - WBRD-50-390/83-70 AND WBRD-50-391/83-65 - REVISED FINAL REPORT

The subject deficiency was initially reported to NRC-OIE Inspector P. E. Fredrickson on November 21, 1983 in accordance with 10 CFR 50.55(e) as NCR WBN WBP 8335. Interia reports were submitted on December 21, 1983 and January 24 and February 15, 1984. Our final report was submitted on April 6, 1984. Enclosed is our revised final report.

If you have any questions, please get in touch with R. H. Shell at FTS 858-2688.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

Licensing and Regulations

Enclosure cc (Enclosure):

Mr. James Taylor, Director Office of Inspection and Enforcement U.S. Nuclear Regulatory Commission Washington, D.C. 20555

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## Description of Deficiency

Floor and equipment drains, as well as potable water lines, which penetrate the floor slab of the main control room (MCR) (elevation 755) were designed without considering the need to prevent loss of the main control room habitability system (MCRHS) pressure boundary. As such, a method to ensure that pipe traps maintain enough water to seal off the leak paths between the MCRHS and other areas during control room isolation has not been provided, nor are the pipes supported to maintain their pressure boundary in a seismic event.

The design discrepancy was discovered while implementing the corrective action for nonconformance report (NCR) WBN QAB 8204 (WBRD No. 50-390/82-71, 391/82-66). This was caused by a lack of procedural controls which would assure identification of all piping requiring seismic supports and would ensure that piping would be analyzed and supported.

## Safety Implications

The MCR is designed for minimum air leakage in the event of room isolation so that the MCRHS can maintain a slightly positive air pressure within the room. This positive pressure prevents the entrance of airborne contaminants which may exist outside the MCR. Loss of drain lines or traps in the lines could create sufficient leakage to eliminate the room's positive pressure and allow the entrance of contaminants, forcing evacuation of the MCR. While the plant could then be safely shutdown from the auxiliary control room, TVA considers this potential loss of the MCR an unnecessary challenge to the plant's safety systems.

## Corrective Action

TVA has instituted design changes through engineering change notice (ECN) 4451 to cover all piping penetrating the MCR boundary such that:

1. Floor and equipment drain lines have been redesigned and seismic supports provided to maintain both the MCRHS pressure boundary and water seals in the traps. These traps were moved from the MCR floor slab and additional traps were designed in certain areas where it was determined necessary to guard against the effects of the postulated main steam line break (MSLB). The drains were then provided with seismic supports from the floor penetrations to a point just downstream of the traps where pipe anchors were provided to terminate the seismic analysis. A direct connection to the potable water system was also designed to provide a continuous drip supply of water to the trap seals.

2. Potable water system piping in the control room has been redesigned to include two check valves in the 2-inch potable water supply line and a manually-operated butterfly valve in the 4-inch vent pipe at a location just below the ceiling slab at elevation 777.0'. Seismic supports to assure pressure boundary integrity were then provided for the 2-inch potable water supply line from the floor penetrations to the upstream check valve and for the 4-inch vent pipe from the ceiling slab to the butterfly valve. All design and construction work for these modifications have been completed.

The previous report on this item specified that two motor-operated plug valves would be installed in the 4-inch waste drain piping downstream of the last tributary branch line. However, problems were encountered due to plug valves becoming clogged. Therefore, this portion of the corrective action has changed from that described in our previous report. Instead of plug valves, two motor-operated ball valves will be installed in the drain piping downstream of the last tributary branch line. The control panel for these valves will be located within the habitability zone. The pressure boundary integrity for this line will be assured by seismic supports from the MCR floor to the downstream valve. The 4-inch ball valves will be installed per ECN 5483 prior to the first refueling outage.

As a temporary measure, until the two motor-operated ball valves are installed, the 4-inch waste drain piping will be sealed by operator action after determination of line breakage during a safe shutdown earthquake (SSE) by removing the porcelain fixtures and sealing the openings with duct tape and/or similar materials. These instructions will be incorporated into the plant abnormal operating instruction, AOI-9.0, by May 1, 1985.

To prevent recurrence of this problem, TVA believes that the recent issuance of Watts Bar Nuclear Plant (WBN) Engineering Project Engineering Procedure (EP) 43.24, "Piping Analysis Techniques - Selection," will be adequate even though this procedure was issued as part of the corrective action for item WBN SWP 8265 (WBRD-50-390,391/83-05) and not specifically as a correction for this NCR. TVA's opinion is based on the fact that EP 43.24 specifically mentions piping which penetrates MCR habitability zone as requiring seismic analysis while generally providing guidance to the piping designer in identifying the proper seismic analysis requirements for all piping in seismic category I structures.