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Dresden Nuclear Power Station
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10 CFR 50.73

SVPLTR #08-0054

October 16, 2008

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

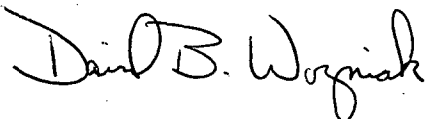
Dresden Nuclear Power Station, Unit 3
Renewed Facility Operating License No. DPR-25
NRC Docket No. 50-249

Subject: Licensee Event Report 249/2008-001-00, "Unit 3 Drywell Floor Drain Sump Monitoring System Declared Inoperable"

Enclosed is Licensee Event Report 249/2008-001-00, "Unit 3 Drywell Floor Drain Sump Monitoring System Declared Inoperable" for Dresden Nuclear Power Station, Unit 3. This event is being reported in accordance with 10 CFR 50.73(a)(2)(i)(B), "Any operation or condition which was prohibited by the plant's Technical Specifications." There are no regulatory commitments contained in this submittal.

Should you have any questions concerning this report, please contact Mr. Stephen Taylor, Regulatory Assurance Manager, at (815) 416-2800.

Respectfully,



David B. Wozniak
Site Vice President
Dresden Nuclear Power Station

Enclosure

cc: Regional Administrator – NRC Region III
NRC Senior Resident Inspector – Dresden Nuclear Power Station

IE22
MRR

NRC FORM 366 (9-2007)		U.S. NUCLEAR REGULATORY COMMISSION		APPROVED BY OMB: NO. 3150-0104		EXPIRES: 08/31/2010	
LICENSEE EVENT REPORT (LER) (See reverse for required number of digits/characters for each block)							
1. FACILITY NAME Dresden Nuclear Power Station, Unit 3				2. DOCKET NUMBER 05000249		3. PAGE 1 OF 4	
4. TITLE Unit 3 Drywell Floor Drain Sump Monitoring System Declared Inoperable							
5. EVENT DATE			6. LER NUMBER			7. REPORT DATE	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NO.	MONTH	DAY
08	17	2008	2008	- 001 -	00	10	16
8. OTHER FACILITIES INVOLVED							
FACILITY NAME N/A						DOCKET NUMBER N/A	
FACILITY NAME N/A						DOCKET NUMBER N/A	
9. OPERATING MODE		11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check all that apply)					
1		<input type="checkbox"/> 20.2201(b) <input type="checkbox"/> 20.2203(a)(3)(i) <input type="checkbox"/> 50.73(a)(2)(i)(C) <input type="checkbox"/> 50.73(a)(2)(vii)					
		<input type="checkbox"/> 20.2201(d) <input type="checkbox"/> 20.2203(a)(3)(ii) <input type="checkbox"/> 50.73(a)(2)(ii)(A) <input type="checkbox"/> 50.73(a)(2)(viii)(A)					
10. POWER LEVEL 100		<input type="checkbox"/> 20.2203(a)(1) <input type="checkbox"/> 20.2203(a)(4) <input type="checkbox"/> 50.73(a)(2)(ii)(B) <input type="checkbox"/> 50.73(a)(2)(viii)(B)					
		<input type="checkbox"/> 20.2203(a)(2)(i) <input type="checkbox"/> 50.36(c)(1)(i)(A) <input type="checkbox"/> 50.73(a)(2)(iii) <input type="checkbox"/> 50.73(a)(2)(ix)(A)					
		<input type="checkbox"/> 20.2203(a)(2)(ii) <input type="checkbox"/> 50.36(c)(1)(ii)(A) <input type="checkbox"/> 50.73(a)(2)(iv)(A) <input type="checkbox"/> 50.73(a)(2)(x)					
		<input type="checkbox"/> 20.2203(a)(2)(iii) <input type="checkbox"/> 50.36(c)(2) <input type="checkbox"/> 50.73(a)(2)(v)(A) <input type="checkbox"/> 73.71(a)(4)					
		<input type="checkbox"/> 20.2203(a)(2)(iv) <input type="checkbox"/> 50.46(a)(3)(ii) <input type="checkbox"/> 50.73(a)(2)(v)(B) <input type="checkbox"/> 73.71(a)(5)					
		<input type="checkbox"/> 20.2203(a)(2)(v) <input type="checkbox"/> 50.73(a)(2)(i)(A) <input type="checkbox"/> 50.73(a)(2)(v)(C) <input type="checkbox"/> OTHER					
		<input type="checkbox"/> 20.2203(a)(2)(vi) <input checked="" type="checkbox"/> 50.73(a)(2)(i)(B) <input type="checkbox"/> 50.73(a)(2)(v)(D)					
		Specify in Abstract below or in NRC Form 366A					
12. LICENSEE CONTACT FOR THIS LER							
FACILITY NAME Dresden Nuclear Power Station – George Papanic Jr.						TELEPHONE NUMBER (Include Area Code) (815) 416-2815	
13. COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT							
CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT
N/A					N/A		
14. SUPPLEMENTAL REPORT EXPECTED						15. EXPECTED SUBMISSION DATE	
<input checked="" type="checkbox"/> YES (If yes, complete 15. EXPECTED SUBMISSION DATE) <input type="checkbox"/> NO						MONTH	DAY
						04	23
YEAR 2009							
ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines)							
<p>On August 16, 2008, at approximately 2000 hours (CDT), with Unit 3 at approximately 100 percent power, Dresden Nuclear Power Station Operations personnel attempted to pump the Unit 3 drywell floor drain sump, which is used to partially satisfy Surveillance Requirement 3.4.4.1. The pumps started as expected, however, the drywell floor drain sump monitoring system flow integrator indicated no flow. Since the water volume in the drywell floor drain sump could not be measured, the plant was not able to meet Technical Specification 3.4.4, "RCS Operational Leakage." Unit 3 initiated a plant shutdown on August 17, 2008 at approximately 0902 hours (CDT), as the repairs to the system could not be made with Unit 3 online. Dresden Nuclear Power Station requested a Notice of Enforcement Discretion on August 17, 2008 at approximately 1030 hours (CDT) to allow Unit 3 to remain at power for 7 days to allow time for the processing of an emergency Technical Specification amendment. The NRC granted the Notice of Enforcement Discretion on August 17, 2008 at approximately 1200 hours (CDT). Dresden Nuclear Power Station requested and received an emergency Technical Specification amendment to allow continued power operation with an inoperable Unit 3 drywell floor drain sump monitoring system within the time allowed by the Notice of Enforcement Discretion.</p> <p>The cause of the event is indeterminate until the drywell floor drain sump monitoring system can be examined during an outage of sufficient duration, but no later than the startup from D3R20.</p>							

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NARRATIVE

Dresden Nuclear Power Station (DNPS) Unit 3 is a General Electric Company Boiling Water Reactor with a licensed maximum power level of 2957 megawatts thermal. The Energy Industry Identification System codes used in the text are identified as [XX].

A. Plant Conditions Prior to Event:

Unit: 03 Event Date: 8-17-2008
Reactor Mode: 1 Mode Name: Power Operation Power Level: 100 percent
Reactor Coolant System Pressure: 1000 psig

B. Description of Event:

On August 16, 2008, at approximately 2000 hours (CDT), with Unit 3 at approximately 100 percent power, DNPS Operations personnel attempted to pump the Unit 3 drywell floor drain sump [BD], which is used to partially satisfy Surveillance Requirement (SR) 3.4.4.1. The pumps started as expected, however, the drywell floor drain sump monitoring system [IJ] flow integrator indicated no flow. During a second attempt, Operations personnel observed that the positions of the isolation valves were indicated as being in their proper indicated position. The pump breakers were inspected locally and pump motor amps were checked with no abnormalities observed. Since the drywell floor drain sump could not be pumped, the water volume in the drywell floor drain sump could not be measured resulting in the plant not able to satisfactorily complete SR 3.4.4.1. The sumps had been successfully pumped previously at 1600 hours on August 16, 2008.

Troubleshooting was performed to identify the possible malfunction. Based on the troubleshooting, it appeared that a blockage of flow existed in the line to containment isolation valve 3-2001-105 [V] or the valve failed closed. DNPS determined that the repairs to the system could not be made with Unit 3 online. Unit 3 initiated a plant shutdown on August 17, 2008 at approximately 0902 hours (CDT) as the plant was not able to meet Technical Specification (TS) 3.4.4, "RCS Operational Leakage."

On August 17, 2008 at approximately 1211 hours (CDT), an Emergency Notification System call was made for the TS 3.4.4 required plant shutdown. The event was assigned ENS event number 44420. The Unit 3 shutdown was halted at approximately 30 percent power.

DNPS verbally requested a Notice of Enforcement Discretion (NOED) on August 17, 2008 at approximately 1030 hours (CDT). Specifically, the NOED requested a seven-day extension to the TS Completion Times for TS 3.4.4 and TS 3.4.5, "RCS Leakage Detection Instrumentation," to place the unit in Mode 3 within 12 hours and Mode 4 within 36 hours. This extension was requested to provide sufficient time to reconfigure the drywell floor drain sump monitoring system such that the drywell equipment drain sump monitoring system could be used to quantify unidentified drywell leakage. In addition, the seven-day extension provided sufficient time for DNPS to request, and the NRC to process an emergency TS amendment. The NRC granted the NOED on August 17, 2008 at approximately 1200 hours (CDT).

The written NOED request, "Request for Enforcement Discretion for Technical Specifications (TS) 3.4.4, 'RCS Operational Leakage' and TS 3.4.5, 'RCS Leakage Detection Instrumentation' was

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submitted to the NRC on August 19, 2008, consistent with the guidelines provided in Regulatory Issue Summary 2005-01, "Changes to Notice of Enforcement Discretion (NOED) Process and Staff Guidance," and NRC Inspection Manual Part 9900, "Operations – Notices of Enforcement Discretion."

An emergency TS amendment request, "Request for Emergency License Amendment Regarding Drywell Floor Drain Sump Monitoring System," was submitted on August 18, 2008. The submittal requested the use of the Unit 3 drywell equipment drain sump monitoring system to satisfy the TS 3.4.5 requirements applicable to the Unit 3 drywell floor drain sump monitoring system until the drywell floor drain sump monitoring system is repaired during an outage of sufficient duration, but no later than the startup from D3R20. The NRC issued the amendment on August 22, 2008, within the allowed time period specified in the NOED.

This event is being reported in accordance with 10 CFR 50.73(a)(2)(i)(B), "Any operation or condition which was prohibited by the plant's Technical Specifications." The unidentified drywell leakage could not be measured for a period of time that exceeded the TS 3.4.4 Allowed Completion Time and drywell floor drain sump monitoring system was inoperable for a period of time that exceeded TS 3.4.5 Allowed Completion Time. DNPS, as a result of the emergency TS amendment, is currently in compliance with its TS.

C. Cause of Event:

The cause of the event is indeterminate until the drywell floor drain sump monitoring system can be examined during an outage of sufficient duration, but no later than the startup from D3R20.

The equipment in the flow path of the drywell floor drain sump monitoring system are (1) the drywell floor drain sump pumps [3A-2001-451 and 3B-2001-451], (2) the drywell floor drain sump pump discharge check valves [3-2001-101A and 3-2001-101B], (3) the drywell floor drain sump pump discharge manual isolation valves [3-2001-102A and 3-2001-102A] and (4) the drywell floor drain sump pumps AOV containment isolation valves [3-2001-105 and 3-2001-106]. The two pumps with their associated check and manual valves are in parallel and only one pump needs to function to pump down the sump. The two AOV's are in series and both must operate to pump down the sump.

Since both sump pumps operate independently and were run without successful flow, the likelihood of the cause being a failure of both of the pumps or pump associated valves at the same time is very low. Therefore, the location of the proposed flow blockage is down stream of where the two pump discharge lines tie together. The currently proposed Apparent Cause is a blockage of flow in the three-inch (3") line down stream of where the two pumps tie in together. This blockage may be attributed to some foreign material or either of the drywell floor drain sump pumps AOV containment isolation valves [3-2001-105 and 3-2001-106] separating at the process diaphragm to valve stem connection. In either case, the most likely location for this blockage is at the aforementioned valves, since the weir type design of the diaphragm valves can act as a dam for foreign material.

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NARRATIVE**D. Safety Analysis:**

The safety significance of the event is minimal. During this event, DNPS continued to operate within the requirements of the TS and the NRC granted NOED, which temporarily extended the Completion Times of TS 3.4.4 and TS 3.4.5. Additionally, the NRC granted an amendment to allow the use of the Unit 3 drywell equipment drain sump monitoring system to satisfy the TS 3.4.5 requirements applicable to the Unit 3 drywell floor drain sump monitoring system until the drywell floor drain sump monitoring system is repaired during an outage of sufficient duration, but no later than the startup from D3R20. Therefore, the consequences of this event had minimal impact on the health and safety of the public and reactor safety.

E. Corrective Actions:

DNPS verbally requested a NOED on August 17, 2008 at approximately 1030 hours (CDT). The NRC granted the NOED on August 17, 2008 at approximately 1200 hours (CDT).

The written NOED request was submitted to the NRC on August 19, 2008, consistent with the guidelines provided in Regulatory Issue Summary 2005-01 and NRC Inspection Manual Part 9900. An emergency license amendment request was submitted on August 18, 2008. The NRC issued the amendment on August 22, 2008, within the allowed time specified in the NOED.

The drywell floor drain sump monitoring system was reconfigured such that the drywell equipment drain sump monitoring system could be used to quantify unidentified drywell leakage.

The Unit 3 drywell floor drain sump monitoring system will be repaired during an outage of sufficient duration, but no later than the startup from D3R20.

F. Previous Occurrences:

A review of DNPS Licensee Event Reports (LERs) for the last three years did not identified any LERs associated with the drywell floor drain sump monitoring system.

G. Component Failure Data:

N/A