# ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

# REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: FACIL: 50-263	9011200125 DOC.DATE: 90/11/13 NOTARIZED: NO Monticello Nuclear Generating Plant, Northern States	DOCKET #
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		IX IX

SUBJECT: LER 89-040-01:on 891219, failure to meet secondary containment performance requirements due to design defects.

DISTRIBUTION CODE: IE22T COPIES RECEIVED:LTR / ENCL / SIZE: 9 TITLE: 50.73/50.9 Licensee Event Report (LER), Incident Rpt, etc.

### NOTES:NRR/LONG,W.

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	AEOD/DSP/TPAB	1	1	AEOD/ROAB/DSP	2	2	3
	NRR/DET/ECMB 9H	1	1	NRR/DET/EMEB 7E	1	1	
	NRR/DLPQ/LHFB11	1	1	NRR/DLPQ/LPEB10	1	1	
	NRR/DREP/PRPB11	2	2	NRR/DST/SELB 8D	1	1	
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	NRR/DST/SRXB 8E	1	1	REG FILE 02	1	1	
	RES/DSIR/EIB	1	1	RGN3 FILE 01	1	1	
EXTERNAL:	EG&G BRYCE, J.H	3	3	L ST LOBBY WARD	1	1	
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Northern States Power Company

414 Nicollet Mall Minneapolis, Minnesota 55401-1927 Telephone (612) 330-5500

November 13, 1990

Report Required by 10 CFR Part 50, Section 50.73

Director of Nuclear Reactor Regulation 💉 U.S. Nuclear Regulatory Commission Attn: Document Control Desk Washington, DC 20555

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

Failure to Meet Secondary Containment Performance Requirements Due to Design Deficiencies

A revised Licensee Event Report for this occurrence is attached.

This event was reported via the Emergency Notification System in accordance with 10 CFR Part 50 Section 50.72 on December 19, 1989.

honica Vik

Thomas M Parker Manager Nuclear Support Services

Regional Administrator - III NRC c: Sr Resident Inspector, NRC NRR Project Manager, NRC MPCA Attn: Dr J W Ferman

Attachment

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ADOC

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NRC FORM 366 (6-39)			-	U.S. NU	CLEAR RE	GULATOR	T COMMIS	210N	_	APPROVED	OMB NO.	3150-010 1/92	4	_
LICENSEE EVENT REPORT (LER) LICENSEE EVENT REPORT (LER) ESTIMATED BURGEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (PSIOL US. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT 1315041041, OFFICE OF MANAGEMENT AND BURDET WASHINGTON, DC 20551									THIS RWARO ECOROS ICLEAR ANO TO OFFICE					
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U.S. 1 (6-89) LICENSEE EVENT REPORT ( TEXT CONTINUATION	APPROVED OMB NO. 3150-0104 EXPIRES: 4/30/92 ESTIMATED BURDEN PER RESPONSE TO CDMPLY WTH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS, FORWARO COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P.530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (315031041), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.				
Monticello Nuclear Generating Plant	DOCKET NUMBER (2)	LER NUMBER (6)           YEAR         SEQUENTIAL         REVISION NUMBER           8         9         0         4         0         0         1	PAGE (3)		
TEXT (If more spece is required, use additional NRC Form 365A's/ (17)					

#### DESCRIPTION:

On December 19, 1989, with the plant operating at 100% power, Special Test #8234, Secondary Containment Capability Test with Turbine Building Ventilation Shutdown and Plant at Power Operation, was performed. The test was performed as part of a periodic testing program developed following the discovery of degraded conditions in the Secondary Containment System (see LER 89-029). During the test, Standby Gas Treatment system (EIIS Component Code: BH) could not maintain a vacuum of 0.25 inches water within Secondary Containment as required for Secondary Containment operability during isolation conditions.

Secondary Containment was declared inoperable and a Notice of Unusual Event (NUE) was declared at 0640. Preparations for a normal orderly shutdown were initiated which would have placed the reactor in the cold shutdown condition within 24 hours per Technical Specification 3.7.C.4.

An inspection of Secondary Containment revealed no degraded conditions which could cause reduced Secondary Containment vacuum. Interfaces of Standby Gas Treatment with Non-Safety Related systems were also verified to be functioning as designed. However, investigations identified two design deficiencies that either directly affected or could potentially affect Standby Gas Treatment flow and one design deficiency that could potentially affect the source of Standby Gas Treatment flow.

Corrective actions were implemented for the above design deficiencies and the NUE was terminated at 1831 on December 19, 1989.

On October 11, 1990, while performing a field verification of the design basis review for Secondary Containment and Standby Gas Treatment systems, it was determined that during operation of the Standby Gas Treatment system, a failure of the operating Offgas Dilution fan (V-EF-18A or V-EF-18B) would not initiate a low flow start of the standby Offgas Dilution fan. The setpoint for each of the low flow pressure switches (PS-8000-J15 or PS-8000-J16) (EIIS Component Code: PS) was less than the flow that a Standby Gas Treatment fan operating alone could produce through the Offgas flow path. Depending on operating conditions and system alignment, a system failure could then result in only one Standby Gas Treatment fan operating during an accident condition and no Offgas Dilution fan operating. Under this condition there would be insufficient flow through Standby Gas Treatment to maintain the required vacuum within Secondary Containment. This deficiency made the Standby Gas Treatment system susceptible to a single active failure and therefore had effectively lost its redundancy feature. Due to this vulnerability Plant Management invoked a 7-day Limiting Condition for Operation consistent with

NRC FORM 366A (8-89)	U.S. M	NUCLEAR REGU	LATORY CO	OMMISSION	APPROVED OMB NO. 3150-0104 EXPIRES: 4/30/92					
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Technical Specification 3.7.B.l.a. The design deficiency was corrected on October 18, 1990 by raising the setpoint for starting the standby Offgas Dilution Fan on low flow and normal operation of Standby Gas Treatment system was resumed.

## CAUSE

The root cause of this event was design inadequacy. The original design resulted in a condition where normal operation of Non-Safety Related equipment (i.e. Steam Packing Exhauster blowers (K-3A, K-3B) (EIIS Component Code: FAN)) could adversely affect a Safety Related system (i.e. Standby Gas Treatment).

The maximum flow through Standby Gas Treatment that could be achieved during the test was 3500 CFM which produced only a 0.22 to 0.23 inches water vacuum within Secondary Containment. Investigation of the operation of Standby Gas Treatment revealed that, during Secondary Containment isolation conditions with the reactor at power and without a loss of offsite power, Standby Gas Treatment system flow was being limited by flow to the Offgas Stack from the Steam Packing Exhauster discharge (See Figure 1.) Steam Packing Exhauster flow injects into the Offgas Stack after the discharge of the Offgas Dilution Fans (V-EF-18A, V-EF-18B) (EIIS Component Code: FAN) and before the flow sensors (SPS 8000-H1, SPS 8000-H2) (EIIS Component Code: TC) which are used to control the flow through the dilution fans. This causes a reduction in flow through the Dilution Fans and Standby Gas Treatment Fans (V-EF-17A, V-EF-17B) (EIIS Component Code: FAN). This condition may then prevent the achievement of the 0.25 inches water vacuum required within Secondary Containment.

It was determined that a failure of either of two discharge dampers (EIIS Component Code: DMP) for the Turbine Building exhaust fans (V-EF-11 or V-EF-26) (EIIS Component Code: FAN) could lead to higher back pressure in the Standby Gas Treatment discharge line and likewise prevent Standby Gas Treatment from achieving full rated flow. These fans run in parallel to supply 50% of the dilution flow during normal operation. During a Secondary Containment isolation, dampers on the discharge of these fans open to release their discharge to the Reactor Building Plenum Room. However, either of the discharge dampers could stick in a closed position and the respective fan would continue to discharge to the dilution fans. This flow could create a back pressure on the running Standby Gas Treatment fan and limit its flow.

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Monticello Nuclear Generating Plant 0 5 0 0 2 6 3 8 9 - 0 4 0 - 0 1 0 4 0F TEXT (If more space is required, use additional NAC form 3854's) (17) It was also determined that failure of Primary Containment Exhaust to Plenum isolation valve (AO-2982) (EIIS Component' Code: ISV) in the open position during a Secondary Containment Isolation would allow the Standby Gas Treatment fans to draw on the Reactor Building Exhaust Plenum Room instead of the Reactor Building. Therefore, Standby Gas Treatment would not be able to maintain the required vacuum within Secondary Containment.	FACILITY NAME [1]	· · · · · ·	<u></u>		DOCK	T NUN	BER (2				LER NUMBER (6) PAGE (3)	
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Reactor Building. Therefore, Standby Gas Treatment would not be able to maintain the required vacuum within Secondary Containment.	It was isolati during fans to	also dete on valve a Seconda draw on	ermined that (AO-2982) ( ary Containn the Reactor	: fail (EIIS ment I : Buil	ure Comp sola ding	of one tio	Prim nt`C n wc haus	ary ode ulc t H	Co a: ] l a] Plen	ont ISV 110 num	tainment Exhaust to Plenum /) in the open position ow the Standby Gas Treatment n Room instead of the	
The setpoint deficiency discovered On October 11, 1990, was caused by the	Reactor maintai The set	Building n the rec point def	z. Therefor Juired vacuu ficiency dis	re, St um wit scover	andb hin ed C	y G Sec In O	as I ond <i>a</i> ctob	rea ry er	Cor 11	ent nta , 1	t would not be able to ainment. 1990, was caused by the	1

#### ANALYSIS

Since Standby Gas Treatment could not maintain 0.25" WC vacuum within Secondary Containment, Secondary Containment integrity can not be taken credit for in Offsite and Control Room dose calculations. As a result, Offsite and Control Room doses could not be assured to meet 10 CFR 100 and 10 CFR 50 limits assuming Reg. Guide 1.3 and Reg. Guide 1.25 source terms.

However, when assuming USAR source terms, Offsite and Control Room doses could be assured to be less than 10 CFR 100 and 10 CFR 50 limits with a complete loss of Secondary Containment integrity.

The actual vacuum obtained during the test conducted on 12/19/89 indicated only a slight degradation in Secondary Containment integrity (i.e., capable of maintaining 0.22 inches water instead of 0.25 inches water vacuum). The effect of decreased building vacuum is to increase Secondary Containment exfiltration under high wind velocity. At high wind speeds, Offsite and Control Room doses are significantly lower than the doses calculated for licensing purposes due to lack of fumigating effects at low wind speeds and due to increased dilution effects at high wind speeds.

Only two design basis accidents in the USAR take credit for Secondary Containment integrity and Standby Gas Treatment operation: the Loss of Coolant Accident and the Fuel Handling Accident. Required Operator actions would have secured the Steam Packing Exhauster blowers during reactor shutdown for the Loss of Coolant Accident. A hold was placed on fuel handling equipment as part of corrective actions for LER 89-029. The consequences of the design deficiencies would have been mitigated during either accident by Operator actions and Emergency Plan actions. Therefore, the risk to the public due to this event was minimal.

NRC FORM 366A U.S. NUCLEAR 16-891	REGULATORY COMMISSION	APPROVED OM8 NO. 3150-0104 EXPIRES: 4/30/92			
LICENSEE EVENT REPORT (LER) TEXT CONTINUATION	ESTIMATED BURDEN PER RESPONSE TO COMPLY WTH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-5301, U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.				
FACILITY NAME (1)	NUMBER (2)	LER NUMBER (6) PAGE (3)			
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Honcicerto Aucrear Generating Flant					
On December 19, 1989, following iden a safety evaluation was performed an	tification of s d procedures re	ystem design inadequacies, vised to ensure that			
Secondary Containment integrity coul accident conditions. Operating proc event of a Secondary Containment iso from within Secondary Containment, t	d be maintained edures were rev lation due to a he following wo	during all design basis ised such that, in the release of radioactivity uld be accomplished:			
a. The Turbine Building Exh	aust Fans would	be tripped.			
b. Reactor recirculation fl manually scrammed, the m Steam Packing Exhauster	ow would be red ain turbine wou blowers would b	uced, the reactor would be ld be tripped, and the e tripped.			
After the operating procedures were declared operable, the NUE was termi orderly shutdown were canceled. No occurred.	revised, Second nated, and the reduction in re	ary Containment was preparations for a normal actor power had yet			
Secondary containment was declared i minutes on 12-19-89.	noperable for a	total of 11 hours and 51			
On October 16, 1990, following ident inadequacy, a safety evaluation was It was determined that a single Star Offgas Dilution fan could produce or Although this flow rate was lower th 0.25 inches water vacuum in Secondar expected to be developed. Therefore been expected unless high winds deve would result in lowered doses as dis of 2300 to 2330 CFM was low enough t alarms and alert Operators of system and controls for the Offgas Dilution could be promptly diagnosed and com- procedures.	ification of th performed on pr adby Gas Treatme aly 2300 to 2330 an the estimate y Containment, , unfiltered ex loped. The eff cussed above. to actuate Stand a degradation. a fans in the Co rected following	ne system setpoint design oposed setpoint changes. Int fan operating without an OCFM through the system. Ind required flow to maintain a vacuum would have been filtration would not have fects of high wind speeds It was verified that a flow Uby Gas Treatment system Since there are indications ontrol Room, the problems c existing alarm response			
It was also demonstrated that the Di have automatically started on low fil Treatment fan in the event of both O flow developed under this condition inches water vacuum within Secondary limitations of Secondary Containment not be verified whether the required have been maintained.	vision II Stand ow through the Off Gas Dilution may have been s v Containment. while the plar d vacuum within	by Gas Treatment fan would Division I Standby Gas a fans having failed. The sufficient to maintain 0.25 However, due to testing at is operating, it could Secondary Containment could			

NRC FORM 36 (6-89)	6A	U.S. /	NUGLEAR REGULATORY COMMISSION	APPROVEO OMB NO. 3130-0104					
	•	LICENSEE EVENT REPORT ( TEXT CONTINUATION	(LER)	EXTINES: 4130/324 ESTIMATED BURDEN PER RESPONSE TO COMPLY WTH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS, FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.					
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		· · ·							
	The pl defic: hours	Lant was in the Limiting Co iency from 1600 on 10/11/90 20 minutes.	ondition for Operati 0 to 1340 on 10/18/9	ion for the setpoint 90 for a total of 6 days 21					
	<u>CORRE(</u>	<u>CTIVE ACTIONS</u>		•					
	Summar	ry of Corrective Actions Ta	aken:						
	1.	An administrative hold was position when Standby Gas	s placed on AO-2982 Treatment is requir	to secure it in the closed red to be operable.					
	2.	Operating procedures were revised to require tripping the Turbine Building Exhaust Fans and tripping the Steam Packing Exhauster blowers after an initiation of Standby Gas Treatment and isolation of Secondary Containment which was caused by a radioactive release from within Secondary Containment.							
	3.	The initial findings of the with nuclear plants via t	his event were commu he "Nuclear Network"	unicated to other utilities ".					
	4.	The Secondary Containment while the Reactor was in	Capability Test was cold shutdown on Ju	s performed satisfactorily ly 6, 1990.					
	5.	Possible design changes w	ere identified which	h would:					
- -		<ul> <li>a. Increase system flow</li> <li>b. Eliminate the effec</li> <li>c. Eliminate the vulne</li> <li>Secondary Containme</li> </ul>	w ts of exhauster flow rability of the Star ent Systems to single	w on dilution flow ndby Gas Treatment and e component failures.					
		Detailed evaluation of the design changes are in pro	e feasibility and send send send send send the sender set of the s	election of appropriate					
	6.	The design basis review f Treatment systems was com	or Secondary Contain pleted.	nment and Standby Gas					
	7.	The Offgas Dilution fan le assure that the standby f	ow flow standby standard stan Standard standard stan	rt setpoint was raised to start signal.					
	8.	Standby Gas Treatment systand determined to be adeq	tem low alarm respon uate.	nse procedures were reviewed					
1									

NRC FORM 366A (6-89)	U.S. I	NUCLEAR REGULATORY COMMISSION	APPROVED OMB NO. 315	0-0104
•.	LICENSEE EVENT REPORT ( TEXT CONTINUATION	(LER)	ESTIMATED BURDEN PER RESPONSE T INFORMATION COLLECTION REQUEST: COMMENTS REGARDING BURDEN ESTIM AND REPORTS MANAGEMENT BRANCH REGULATORY COMMISSION, WASHINGT THE PAPERWORK REDUCTION PROJEC OF MANAGEMENT AND BUDGET, WASHIN	O COMPLY WTH THIS 50.0 HRS. FORWARD ATE TO THE RECORDS (F-530). U.S. NUCLEAR ON, DC 20555, ANO TO T (3150-0104), OFFICE VIGTON, DC 20503,
FACILITY NAME (1)		DOCKET NUMBER (2)	LER NUMBER (6)	PAGE (3)
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Montioollo	Nuclear Concreting Plant	0 15 10 10 10 12 16 13		017 OF 018
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Summa	ry of Corrective Actions to	be Taken:		Į
1.	Field verifications of the	design basis revie	w are in progress.	
2.	Further review will be don design basis documentation	e on similar setpoi program.	nts as part of the on	-going
ADDIT	IONAL INFORMATION		•	
1.	Failed Component Identific	ation:		
	NONE			
2.	Previous Similar Events:			
	LER 89-029			
	Note: Corrective actions of the design defic	of LER 89-029 direc iencies identified	tly led to the discov in this LER.	ery
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