

# ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9007260189      DOC. DATE: 90/07/20      NOTARIZED: NO      DOCKET #  
 FACIL: 50-388 Susquehanna Steam Electric Station, Unit 2, Pennsylv      05000388  
 AUTH. NAME      AUTHOR AFFILIATION  
 WEHRY, R.R.      Pennsylvania Power & Light Co.  
 STANLEY, H.G.      Pennsylvania Power & Light Co.  
 RECIP. NAME      RECIPIENT AFFILIATION

SUBJECT: LER 90-008-00: on 900621, discovered that util personnel blocking open personnel access door.

DISTRIBUTION CODE: IE22T      COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 5 <sup>W/9</sup> ltr.  
 TITLE: 50.73/50.9 Licensee Event Report (LER), Incident Rpt, etc.

NOTES: LPDR 1 cy Transcripts. 05000388

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INTERNAL:	ACNW	2 2	ACRS	2 2
	AEOD/DOA	1 1	AEOD/DSP/TPAB	1 1
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	NRR/DET/EMEB9H3	1 1	NRR/DLPQ/LHFB11	1 1
	NRR/DLPQ/LPEB10	1 1	NRR/DOEA/OEAB11	1 1
	NRR/DREP/PRPB11	2 2	NRR/DST/SELB 8D	1 1
	NRR/DST/SICB 7E	1 1	NRR/DST/SPBB8D1	1 1
	NRR/DST/SRXB 8E	1 1	<del>REG-FILE 02</del>	1 1
	RES/DSIR/EIB	1 1	RGN1 FILE 01	1 1
EXTERNAL:	EG&G BRYCE, J.H	3 3	L ST LOBBY WARD	1 1
	LPDR	1 1	NRC PDR	1 1
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NOTES:		2 2		

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Pennsylvania Power & Light Company

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July 20, 1990

U.S. Nuclear Regulatory Commission  
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SUSQUEHANNA STEAM ELECTRIC STATION  
LICENSEE EVENT REPORT 90-008-00  
FILE R41-2  
PLAS - 434

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Docket No. 50-388  
License No. NPF-22

Attached is Licensee Event Report 90-008-00. This event was determined reportable per 10CFR50.73(a)(2)(ii) in that a blocked open personnel access door between the Reactor Building Heating, Ventilating and Air Conditioning (HVAC) system Zone II and the Reactor Building roof resulted in an alignment in which Secondary Containment leakage rates could have potentially exceeded the authorized limits of 10CFR100 and 10CFR50 General Design Criterion 19 in the event of a HVAC Zone II and III or a Zone I, II and III isolation, with a single postulated component (damper) failure.

H.G. Stanley  
Superintendent of Plant - Susquehanna

RRW/mjm

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LICENSEE EVENT REPORT (LER)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH 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.

FACILITY NAME (1) <b>Susquehanna Steam Electric Station - Unit 2</b>		DOCKET NUMBER (2) <b>0 5 0 0 0 3 8 8</b>	PAGE (3) <b>1 OF 0 4</b>
TITLE (4)			

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES	DOCKET NUMBER(S)
0	6	2 1 9	0	9	0	0	7	2	0 9	0
THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)										SSES - Unit 1 0 5 0 0 0 3 8 17 0 5 0 0 0

OPERATING MODE (8) <b>1</b>	20.402(b) 20.406(a)(1)(i) 20.406(a)(1)(ii) 20.406(a)(1)(iii) 20.406(a)(1)(iv) 20.406(a)(1)(v)	20.406(e) 50.36(c)(1) 50.36(c)(2) 50.73(a)(2)(i) 50.73(a)(2)(ii) 50.73(a)(2)(iii)	50.73(a)(2)(iv) 50.73(a)(2)(v) 50.73(a)(2)(vi) 50.73(a)(2)(viii)(A) 50.73(a)(2)(viii)(B) 50.73(a)(2)(ix)	73.71(b) 73.71(c) OTHER (Specify in Abstract below and in Text, NRC Form 368A)
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LICENSEE CONTACT FOR THIS LER (12)		TELEPHONE NUMBER	
NAME <b>R.R. Wehry - Power Production Engineer</b>	AREA CODE <b>7 1 7</b>	NUMBER <b>5 4 2 - 3 6 6 4</b>	

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)										
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPROS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPROS	

SUPPLEMENTAL REPORT EXPECTED (14)		EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
<input checked="" type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE)	<input type="checkbox"/> NO		1	2	0

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

On June 21, 1990 with both Unit 1 and Unit 2 operating at 100% power, it was discovered that utility personnel had been blocking open a personnel access door between the Unit 2 Reactor Building elevation 836' and the roof hatch which provides access to the Reactor Building roof. This door is a Secondary Containment boundary between the Reactor Building ventilation Zone II and the plenum which leads to the roof hatch and the outside atmosphere. The blocking open of this door results in a plant system alignment in which Secondary Containment leakage rates could have exceeded the authorized limits of 10CFR100 and 10CFR50 General Design Criterion 19 in the event of a Zone II and III or a Zone I, II and III isolation, with a single postulated component (damper) failure. This incident was caused by personnel error. The involved personnel failed to comply with the station policy prohibiting the blocking open of station doors. The Secondary Containment atmosphere pressure requirement was maintained at 0.25 inches of vacuum water gauge during this event. Immediate corrective action consisted of issuance and implementation of a memorandum to all shifts of the subject work group stating the requirements and controls necessary for personnel access through the subject door. Additional reviews of existing work planning guidelines and door labeling are being performed. Since Secondary Containment leakage rates may have been exceeded, further engineering evaluation is being performed to determine what effects this incident may have had on offsite dose predictions, had an accident occurred.

LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

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FACILITY NAME (1)  Unit 2 Susquehanna Steam Electric Station	DOCKET NUMBER (2)  0 5   0 0   0 3   8 8	LER NUMBER (6)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
		9   0	-   0   0   8	-   0   0	0   2	OF 0   4

TEXT (If more space is required, use additional NRC Form 368A's) (17)

DESCRIPTION OF EVENT

On June 21, 1990, with both Unit 1 and Unit 2 operating at 100% power, during a work evolution involving modifications to the Reactor Building Heat Tracing system, it was discovered that a personnel access door between the Unit 2 Reactor Building elevation 836' and a plenum leading to a roof hatch and the Reactor Building roof had been blocked open and was guarded by a Security Officer. The subject door is a Secondary Containment boundary door between the Heating, Ventilating and Air Conditioning (HVAC; EIIS Code: VA) Zone II and the plenum leading to the roof hatch and the outside atmosphere. The door had been blocked open a total of twenty-one times during the work evolution from June 1, 1990 through June 21, 1990, the longest duration being for 2 hours and 46 minutes. The blocking open of this door results in a plant system alignment in which Secondary Containment leakage rates could have exceeded the authorized limits of 10CFR100 and 10CFR50 General Design Criterion 19 in the event of a Zone II and III or a Zone I, II and III isolation, with a single postulated component (damper) failure.

CAUSE OF EVENT

This incident was caused by personnel error. The subject door was labeled as a fire door and that the Operations Control Room be contacted prior to opening the door. The work planning group observed these requirements and had initiated an "Access Only" Equipment Release Form (ERF) stating, "Contact Security and Operations each day access is needed to the Reactor Building roof". The ERF did not reference affected Technical Specification 3.6.5, however.

The work group foreman contacted Operations daily prior to accessing the roof and a Security Officer was stationed at the door during the durations that it was unlocked. However, between this door and the roof hatch is the plenum, which has no installed lighting and is dark unless the subject door or the roof access hatch is opened. Accordingly, considering safety reasons, the door was propped open during each work evolution with the Security Officer stationed at the door. The blocking open of the door in this manner is contrary to station policy and resulted in the breach of Secondary Containment.

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

REPORTABILITY/ANALYSIS

This event was determined to be reportable per 10CFR50.73(a)(2)(ii) in that the blocked open personnel access door resulted in a plant system alignment in which Secondary Containment leakage rates could have exceeded the authorized limits of 10CFR100 and 10CFR50 General Design Criterion 19 in the event of a HVAC Zone II and III or a Zone I, II and III isolation, with a single postulated component (damper) failure. The subject door was blocked open a total of twenty-one times from June 1, 1990 through June 21, 1990. The longest duration that the door was blocked open was 2 hours and 46 minutes on June 2, 1990. Technical Specification 3.6.5.1 ACTION a. requires that Secondary Containment Integrity be restored within 4 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours. Since Secondary Containment Integrity was restored within 4 hours for each of the twenty-one times the door was blocked open, no violations of the Technical Specifications occurred. The Secondary Containment atmosphere pressure requirement was maintained at 0.25 inches of vacuum water gauge throughout the work evolutions and there were no events resulting in any Reactor Building HVAC zones being isolated and drawn down by the Standby Gas Treatment System (SGTS; EIIS Code: BH). If there would have been a Zone II and III or a Zone I, II and III isolation/drawdown however, Secondary Containment leakage rates could have been exceeded, based on the increased volume and in-leakage as a result of the subject door being blocked open. Since the impact of the increased SGTS drawdown times on the predicted offsite radiation dose effects in the event of an accident is not known at this time, further engineering analysis is being performed, the results of which will be forwarded in an update to this LER.

In accordance with the guidance provided in NUREG 1022 Supplement 1, Items 14.1 and 14.10, the required submission date for this report was determined to be July 23, 1990.

CORRECTIVE ACTIONS

Upon discovery of the blocked open door, it was immediately closed. A memorandum was issued to all Security Shift Supervisors and implemented by all Security shifts. The memorandum included explicit direction that Operations be contacted prior to any opening of the door; the door be immediately closed and secured following personnel access; and that the Security Officer remain stationed where he/she can observe the roof access hatch during the entire work evolution.



LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

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

The work group planning sections are evaluating existing planning guidelines/checklists to ensure that adequate direction is provided to require consideration of HVAC Zone and fire barrier breach, including applicable Technical Specifications, during performance of similar work activities. A review of all single isolation HVAC Zone boundary door, hatch and fire door labeling will be performed and labeling applied that clarifies to all users that the doors/hatches are not to be blocked open for any reason.

ADDITIONAL INFORMATION

Failed Components Identification: Not Applicable

Previously Reported Similar Event: Docket No. 50-387 LER 88-004-01 - A Secondary Containment boundary door was blocked open approximately three inches for passage of a power cable during a work evolution.



