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ACCESSION NBR: 9011280375 DOC. DATE: 90/11/21 NOTARIZED: NO DOCKET #
 FACIL: 50-388 Susquehanna Steam Electric Station, Unit 2, Pennsylvania 05000388
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 RECIP. NAME RECIPIENT AFFILIATION

SUBJECT: LER 90-008-01: on 900621, secondary containment boundary door blocked open. W/901121 ltr.

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

NOTES: LPDR 1 cy Transcripts. 05000388

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Pennsylvania Power & Light Company

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November 21, 1990

~~U.S. Nuclear Regulatory Commission~~
Document Control Desk
Washington, DC 20555

SUSQUEHANNA STEAM ELECTRIC STATION
LICENSEE EVENT REPORT 90-008-01
FILE R41-2
PLAS -36405

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

Attached is Licensee Event Report 90-008-01. 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. A radiological evaluation determined, however, that no offsite doses in excess of 10CFR100 limits or control room operator doses in excess of 10CFR50 General Design Criterion 19 limits would have occurred in the event of a LOCA while the door was blocked open.


H.G. Stanley
Superintendent of Plant - Susquehanna

RRW/mjm

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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.

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Susquehanna Steam Electric Station - Unit 2	DOCKET NUMBER (2) 0 5 0 0 0 3 8 8	PAGE (3) 1 OF 0 4
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TITLE (4)
Secondary Containment Boundary Door Was Blocked Open

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 0 8	0 1	1 1	2 1	9 0		0 5 0 0 0
										0 5 0 0 0

OPERATING MODE (9) 1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)				
POWER LEVEL (10) 1 0 0	<input type="checkbox"/> 20.402(b)	<input type="checkbox"/> 20.406(c)	<input type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> 73.71(b)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)
	<input type="checkbox"/> 20.406(a)(1)(i)	<input type="checkbox"/> 50.36(e)(1)	<input type="checkbox"/> 50.73(a)(2)(v)	<input type="checkbox"/> 73.71(c)	
	<input type="checkbox"/> 20.406(a)(1)(ii)	<input type="checkbox"/> 50.36(e)(2)	<input type="checkbox"/> 50.73(a)(2)(vi)		
	<input type="checkbox"/> 20.406(a)(1)(iii)	<input type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)		
	<input type="checkbox"/> 20.406(a)(1)(iv)	<input checked="" type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)		
<input type="checkbox"/> 20.406(a)(1)(v)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(ix)			

LICENSEE CONTACT FOR THIS LER (12)		TELEPHONE NUMBER	
NAME Richard R. Wehry - Power Production Engineer	AREA CODE 7 1 7	NUMBER 5 4 2 - 3 6 6 4	

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS

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

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. A radiological evaluation determined that no offsite doses in excess of 10CFR100 limits or control room operator doses in excess of 10CFR50 General Design Criterion 19 limits would have occurred in the event of a LOCA during the times the door was blocked open. Additional reviews of existing work planning guidelines and door labeling are being performed.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 60.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-630), 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) Unit 2 Susquehanna Steam Electric Station	DOCKET NUMBER (2) 0 5 0 0 0 3 8 8 9 0	LER NUMBER (3)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
		0	008	01	02	OF 04

TEXT (If more space is required, use additional NRC Form 306A'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.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 500 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) 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 1	0 3	OF 0 4

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

REPORTABILITY/ANALYSIS

Following the event an ENS notification was made pursuant to 10CFR50.72(b)(2)(iii)(C). Further evaluation, in preparation of the LER determined that the event was 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. This would result in the plant being in a condition that was outside its design basis. 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 by chance 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. PP&L understands that even though no specific violation occurred these actions did not meet the intent of technical specification 3.6.5.1. There was also no intention on the part of PP&L to violate the intent of Technical Specification 3.6.5.1, since it is PP&L's policy that HVAC Zone boundary doors, hatches and fire doors are not to be blocked open for any reason. This policy is stressed in General Employee Training which is given to all personnel. 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).

A radiological evaluation determined that no offsite doses in excess of 10CFR100 limits or control room operator doses in excess of 10CFR50 General Design Criterion 19 limits would have occurred in the event of a LOCA since no other doors between the Unit 2 Reactor Building stairwell and the Reactor Building floor elevations were open, except for normal personnel ingress/egress, during the times that the subject door was blocked open. As such, there were no safety consequences or compromise to public health or safety as a result of this event.

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.



LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 600 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-630), 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) Unit 2 Susquehanna Steam Electric Station	DOCKET NUMBER (2) 0 5 0 0 0 3 8 8	LER NUMBER (8)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
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TEXT (If more space is required, use additional NRC Form 306A's) (17)

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.

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. These corrective actions are consistent with PP&L's policy on the blocking open of doors. Estimated completion date for these actions is April 1, 1991.

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.



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