

# ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9104170209      DOC. DATE: 91/04/12      NOTARIZED: NO      DOCKET #  
 FACIL: 50-387 Susquehanna Steam Electric Station, Unit 1, Pennsylvania      05000387  
 AUTH. NAME      AUTHOR AFFILIATION  
 LLOYD, H.      Pennsylvania Power & Light Co.  
 STANLEY, H.G.      Pennsylvania Power & Light Co.  
 RECIP. NAME      RECIPIENT AFFILIATION

SUBJECT: LER 87-033-01: on 871116, latching mechanism on control structure door 160 failed, resulting in inoperability of door & control room emergency outside air supply sys. TS rev re time to restore door will be submitted. W/910412 ltr.

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NOTES: LPDR 1 cy Transcripts. 05000387

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April 12, 1991

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SUSQUEHANNA STEAM ELECTRIC STATION  
LICENSEE EVENT REPORT 87-033-01  
FILE R41-2  
PLAS - 479

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Docket No. 50-387  
License No. NPF-14

Attached is Licensee Event Report 87-033-01. This report is an update to LER 87-033 which was made pursuant to 10CFR50.73(a)(2)(i)(B) as a condition prohibited by the plant's Technical Specifications. This condition existed while repairs were made to a door which is part of the pressure boundary of the Control Room Emergency Outside Air Supply System (CREOASS). This door affects both sub-systems of CREOASS and the Technical Specification does not address condition. A change to the Technical Specifications has been initiated.

H.G. Stanley  
Superintendent of Plant - Susquehanna

HL/mjm

cc: Mr. T. T. Martin  
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PDR ADDCK 05000387  
S PDR



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-830), 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) <u>Susquehanna Steam Electric Station - Unit 1</u>	DOCKET NUMBER (2) <u>0 5 0 0 0 3 8 7</u>	PAGE (3) <u>1 OF 0 3</u>
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TITLE (4)  
**CREOASS Boundary Door Repair - Condition Prohibited by Technical Specifications**

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)
11	16	87	87	033	01	04	12	91	SSES - Unit 2	0 5 0 0 0 3 8 8
THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)										

OPERATING MODE (9) <u>4</u>	20.402(b)	20.406(c)	50.73(a)(2)(iv)	73.71(b)
POWER LEVEL (10) <u>0 0 0</u>	20.406(a)(1)(i)	50.36(c)(1)	50.73(a)(2)(v)	73.71(c)
	20.406(a)(1)(ii)	50.36(c)(2)	50.73(a)(2)(vii)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)
	20.406(a)(1)(iii)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)	50.73(a)(2)(viii)(A)	
	20.406(a)(1)(iv)	50.73(a)(2)(ii)	50.73(a)(2)(viii)(B)	
	20.406(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(ix)	

LICENSEE CONTACT FOR THIS LER (12)

NAME <u>H. Lloyd, Jr. - Power Production Engineer - Compliance</u>	TELEPHONE NUMBER AREA CODE: <u>7 1 7</u> NUMBER: <u>5 4 2 - 3 9 1 7</u>
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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
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ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

On November 16, 1987 at 1145 hours with Unit 1 in Condition 5 (Refueling) and Unit 2 in Condition 1 (100% power), the latching mechanism on Control Structure door #160 failed. This door is part of the pressure boundary for the Control Room Emergency Outside Air Supply System. As a result of the door's inoperability, both CREOASS sub-systems were considered inoperable while the door latching mechanism was being repaired. Because no action exists for this condition, Limiting Condition for Operation (LCO) 3.0.3 was entered for Unit 2. Unit 1 was in Condition 5 thus the LCO was not applicable. This entry into 3.0.3 constituted an operations prohibited by Tech Specs. At 1230 hours on November 16, 1987, the LCO was cleared following repairs to the door. PP&L has conducted a review of the CREOASS Design Requirements and of the Technical Specification requirements and has determined that entry into LCO 3.0.3 action is required. However, a change to both Unit's Technical Specifications has been initiated to specify ACTIONS for this situation (i.e. - both sub-systems of CREOASS inoperable and boundary door inoperable). PP&L will continue to take the proper action of entering LCO 3.0.3. action until such time that a license Amendment is granted.

**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-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 1 Susquehanna Steam Electric Station	DOCKET NUMBER (2)  0   5   0   0   0   3   8   7	LER NUMBER (8)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		8   7	-   0   3   3	-   0   1	0   2	OF 0   3	

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

DESCRIPTION OF EVENT

On November 16, 1987 at 1145 hours, with Unit 1 shutdown for its third refueling and Unit 2 operating at 100% power, LCO 3.0.3 action was entered for Unit 2 when the latching mechanism on Control Structure door #160 failed. This door is part of the pressure boundary for the Control Room Emergency Outside Air Supply System (CREOASS: EIIS Code: BH). As a result of the door's inoperability, both CREOASS trains were considered inoperable while the door latching mechanism was being repaired. At 1230 hours on November 16, 1987, LCO action of 3.0.3 was cleared when the door was returned to service.

CAUSE OF EVENT

With the latching mechanism failed for a door which is part of the CREOASS pressure boundary, the ability of the system to maintain positive pressure in the Control Structure is impaired. This condition affects both sub-systems of the CREOASS system. Technical Specification Limiting Condition for Operation 3.7.2 only specifies action for one sub-system inoperable. Therefore, with both sub-systems inoperable, Limiting Condition for Operation 3.0.3 action was required to be entered until the door latching mechanism was repaired. The cause of the latch mechanism failure was normal wear.

REPORTABILITY/ANALYSIS

This event was determined to be reportable per 10CFR50.73(a)(2)(i)(B), in that Technical Specification 3.7.2 was not met while the latching mechanism for door #160 was inoperable and thus both sub-systems of CREOASS were inoperable. This condition required entry into LCO 3.0.3 action and constituted operation prohibited by the Technical Specification (NUREG 1022, Supplement 1, item 2.4).

CORRECTIVE ACTION

Several approaches were taken to address this issue. Plant staff personnel initially pursued an interpretation that would allow a short period of time from when the door latch became inoperable until the door could be secured closed and administratively controlled, without having to consider the CREOASS system inoperable. However, it was concluded that there was no technical basis for allowing this time period since no analysis had been performed to determine if the CREOASS system could still perform its function (maintain positive pressure in Control Structure) with a door which was not properly latched. The

LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

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-830), 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 1 Susquehanna Steam Electric Station	DOCKET NUMBER (2)  0   5   0   0   0   3   8   7	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		8   7	0   3   3	0   1	0   3	OF	0   3

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

next approach was pursuing a clarification of the design analysis as described in the FSAR. The engineering analysis however, could not justify CREOASS operability with an inoperable boundary door. Based on this information, it was decided that a change to the Technical Specification would be pursued to allow an appropriate time period to allow for restoring at least one sub-system to OPERABLE status if both sub-systems are inoperable and/or a specific action addressing boundary doors. The Tech Specs presently only specify an action with one sub-system inoperable. This would preclude unnecessary entry into LCO 3.0.3 while still applying appropriate compensatory action to the degraded condition. PP&L is presently pursuing this change. Since initially reporting this event, our practice has been to enter LCO 3.0.3 action immediately upon determining that both sub-systems are inoperable. This situation has occurred only once since 1988 (see LER 88-001 referenced below).

ADDITIONAL INFORMATION

Failed Component Identification: Door latching mechanism  
Manufacturer: Chicago Bullet Proof Equip Co.

Previous Similar Events:

Docket No. 50-387 LER 86-033-00 Entry Into LCO 3.0.3 - CREOASS Boundary Door Repair.

Docket No. 50-387 LER 88-001-00 Entry Into LCO 3.0.3 - CREOASS Boundary Door Repair.