

LICENSEE EVENT REPORT (LER)

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) Susquehanna Steam Electric Station - Unit 1						DOCKET NUMBER(2) 0 5 0 0 0 3 8 7 -1			PAGE (3) OF 0 3		
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TITLE (4)  
Condition Prohibited By Technical Specification - Technical Specification 3.0.3 Entry

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	9	2	1	9	7	9	7	0	2	1	0	1	1	0	3	1	9	7	0	5	0	0	0

OPERATING MODE (9) 1		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 101.11: (Check one or more of the following) (11)										
POWER LEVEL (10) 1 0 0	20.402(b)		20.405(c)		50.73(a)(2)(v)		73.71(b)					
	20.405(a)(1)(i)		50.38(c)(1)		50.73(a)(2)(v)		73.71(c)					
	20.405(a)(1)(ii)		50.38(c)(2)		50.73(a)(2)(w)		OTHER (Specify in Abstract below and in Text, NRC Form 366A)					
	20.405(a)(1)(iii)		X 50.73(a)(2)(x)		50.73(a)(2)(y)(A)							
	20.405(a)(1)(iv)		50.73(a)(2)(y)(B)		50.73(1)(2)(v)(i)(B)							
20.405(a)(1)(v)		50.73(a)(2)(z)		50.73(a)(2)(z)								

(LICENSEE CONTACT FOR THIS LER (12))

NAME Stephen J. Ellis - Nuclear Licensing Engineer		TELEPHONE NUMBER	
		AREA CODE	
		7 1 7	5 4 2 - 3 5 3 7

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
X	V	A D M P	A 3 4 0	No					

SUPPLEMENTAL REPORT EXPECTED (14)

YES (if yes, complete EXPECTED SUBMISSION DATE)	X	NO	EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR

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

On September 21, 1997, at 1247 hours, with Unit 1 in Condition 1 (Power Operation) at 100% Power and Unit 2 in Condition 4 (Cold Shutdown) at 0% Power, a voluntary entry into Technical Specification 3.0.3 was made. Prior to this, a damper in the Common Refuel Floor Ventilation System failed its stroke time test. As a result, the associated penetration was isolated as required by the ACTION statement of Technical Specification 3.6.5.2. Following the damper repair, dynamic stroke testing is required for operability. To accomplish this, the damper must be stroked with the ventilation system in service, requiring entry into Technical Specification 3.0.3, since there is no exception to the requirements in the ACTION of Technical Specification 3.6.5.2 to allow administrative control of the isolating dampers. This condition is addressed and corrected in the Improved Technical Specifications. The damper was modified to improve its closing time. The required building pressure (-1/4" wg) was maintained, and Standby Gas Treatment was available for the duration of the event. The safety significance of the event was minor. The health and welfare of the public was not compromised. This event is reportable pursuant to 10CFR50.73(a)(2)(i)(B), in that this event resulted in a voluntary entry into Technical Specification 3.0.3, and is required to be reported per the guidance of NUREG 1022, Supplement No. 1.

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TEXT CONTINUATION

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		YEAR		SEQUENTIAL NUMBER		REVISION NUMBER				
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TEXT (if more space is required, use additional NRC Form 366A's) (17)

**EVENT DESCRIPTION**

On September 21, 1997, at 1247 hours, with Unit 1 in Condition 1 (Power Operation) at 100% Power and Unit 2 in Condition 4 (Cold Shutdown) at 0% Power, a Technical Specification 3.0.3 entry was voluntarily made. On September 15, 1997, at 0845 hours, a damper in the Common Refuel Floor Ventilation System (Zone III) (EIS Code: VA) was declared inoperable when it failed to stroke within its surveillance time limit. Technical Specification 3.6.5.2 requires the damper be restored to operable within 8 hours, or the affected penetration isolated. The damper could not be restored within the 8 hours, and the penetration was isolated as required (not applicable to Unit 2 which was in Condition 4 (Cold Shutdown)). Upon repair/modification to the damper, the appropriate surveillance testing is required to be performed prior to declaring the damper operable. This surveillance requires the damper to be stroked with the ventilating system in service. To meet this requirement, both isolation dampers on this penetration must be open, thus requiring the plant to enter into Technical Specification 3.0.3.

**CAUSE OF EVENT**

The root cause of the Technical Specification 3.0.3 entry is an administrative omission in current Technical Specifications. The omission is such that entry in 3.0.3 is required when the operable deactivated damper is re-opened to allow retest of the inoperable damper.

The failed damper had a history of operating just under the closure time limit and traditional maintenance was not providing a long term resolution. The damper was modified to allow a faster closure by installation of a quick exhaust solenoid valve.

**REPORTABILITY/ANALYSIS**

This Licensee Event Report is being made pursuant to 10CFR50.73(a)(2)(i)(B), in that NUREG 1022, Supplement No. 1 requires the reporting of any entry into Technical Specification Limited Condition for Operation 3.0.3. The Technical Specification 3.0.3 entry was made when both secondary containment isolation dampers were opened on the penetration that was previously isolated to comply with the ACTION Statement of Technical Specification 3.6.5.2. A damper in the Refuel Floor Ventilation System had exceeded its Technical Specification stroke time and had been declared inoperable. As required by 3.6.5.2, the associated penetration had been isolated by deactivating the alternate damper on that penetration in the closed position. Upon completion of the repair/modification of the failed damper, an operability test must be performed before declaring the damper operable. This testing requires dynamic stroking of the damper with the ventilation system in service. In order to do this testing, the penetration

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must be opened. Technical Specification 3.6.5.2 does not provide an exception that allows the dampers to be opened and controlled administratively. Therefore, Technical Specification 3.0.3 was entered to document this condition. The similar Technical Specification for Primary Containment, Technical Specification 3.6.3, allows administrative control for penetration isolation valves on an intermittent basis. This shortcoming for Technical Specification 3.6.5.2 is addressed in the Improved Technical Specifications (ITS), presently in review by NRC.

Compliance with Technical Specification 3.6.5.2 isolated the affected Secondary Containment penetration. This action required the Unit 2 Zone III Ventilation to be secured, however, the Unit 1 Zone III System remained in service and maintained Secondary Containment at the required -1/4" wg pressure. The Standby Gas Treatment (EISS Code: BH) system remained operable throughout the event. The safety significance of the event is minor. The health and welfare of the public was not compromised.

In accordance with the guidance provided in NUREG-1022, Supplement 1, the required submission date was determined to be October 21, 1997.

**CORRECTIVE ACTIONS**

The damper that failed was repaired and modified to effect a long term resolution of its historic slow stroke time.

The Technical Specification shortcoming had previously been identified and is addressed appropriately in ITS, and awaiting NRC approval.

**ADDITIONAL INFORMATION**

Past Similar Events: None

Entries into Technical Specification 3.0.3 have been reported on numerous occasions, although none of the previous reports were a result of a similar failure.

Failed Component: Damper in the Common Refuel Floor Ventilation System - slow stroke time.  
Series: 13808  
Manufacturer: American Warming and Ventilating