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Dresden Generating Station  
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**ComEd**

June 29, 1995

TPJLTR 95-0073

U.S. Nuclear Regulatory Commission  
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Washington, D. C. 20555

Licensee Event Report 95-012, Docket 50-249 is being  
submitted as required by Technical Specification 6.6,  
10CFR50.73(a)(2)(v) and 10CFR50.73(a)(2)(i)(B).

Sincerely,



Thomas P. Joyce  
Site Vice President

TPJ/JTW:bjk

Enclosure

cc: J. Martin, Regional Administrator, Region III  
NRC Resident Inspector's Office  
File/NRC  
File/Numerical

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NRC FORM 366 (5-92)			U.S. NUCLEAR REGULATORY COMMISSION			APPROVED BY OMB NO. 3150-0104 EXPIRES 5/31/95				
<b>LICENSEE EVENT REPORT (LER)</b>										
FACILITY NAME (1) Dresden Nuclear Power Station, Unit 3						DOCKET NUMBER (2) 05000249		PAGE (3) 1 OF 5		
TITLE (4) Degraded Secondary Containment Condition Observed During Testing Due to Procedure Deficiency										
EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)				
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR		
05	31	95	95	-- 012 --	00	06	29	95		
						OTHER FACILITIES INVOLVED (8)				
						FACILITY NAME Dresden Unit 2		DOCKET NUMBER 05000237		
						FACILITY NAME None		DOCKET NUMBER		
OPERATING MODE (9)		N	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)							
POWER LEVEL (10)		000	20.2201(b)		20.2203(a)(3)(i)		50.73(a)(2)(iii)		73.71(b)	
			20.2203(a)(1)		20.2203(a)(3)(ii)		50.73(a)(2)(iv)		73.71(c)	
			20.2203(a)(2)(i)		20.2203(a)(4)		X 50.73(a)(2)(v)		OTHER	
			20.2203(a)(2)(ii)		50.36(c)(1)		50.73(a)(2)(vii)		(Specify in Abstract below and in Text, NRC Form 366A)	
			20.2203(a)(2)(iii)		50.36(c)(2)		50.73(a)(2)(viii)(A)			
			20.2203(a)(2)(iv)		X 50.73(a)(2)(i)		50.73(a)(2)(viii)(B)			
		20.2203(a)(2)(v)		50.73(a)(2)(ii)		50.73(a)(2)(x)				
LICENSEE CONTACT FOR THIS LER (12)										
NAME Jesse Williams, System Engineer						TELEPHONE NUMBER (Include Area Code) Ext. 2708 (815) 942-2920				
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)						EXPECTED SUBMISSION DATE (15)		MONTH	DAY	YEAR
YES (If yes, complete EXPECTED SUBMISSION DATE).						X NO				

ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

On May 31, 1995 at 0330 hours, during performance of Dresden Technical Surveillance (DTS) 1600-22, Secondary Containment Leak Rate Test, the Standby Gas (SBGT) System did not maintain 0.25 inches of water vacuum in the Secondary Containment with the Reactor Building Ventilation System isolated and the Recirculation Pipe Replacement (RPR) Material Interlock Inner Door open. A differential pressure of 0.22 inches of water with respect to the atmosphere was observed. The RPR Material Interlock door was immediately closed and Secondary Containment pressure was restored to 0.30 inches water vacuum. Upon review of the procedure, it was determined that a Technical Specification Limiting Condition for Operation (LCO) should have been entered under this condition. The RPR Material interlock inner door is tested without opening the outer door; however, the outer door has been occasionally opened over 4 hours in the untested configuration, thus potentially exceeding the LCO. The cause of the event is procedure deficiencies. The corrective actions to prevent recurrence are to revise DTS 1600-22 and Dresden Administrative Procedure (DAP) 13-14, Unit 3 Reactor Building Material Interlock Door Access Control. The safety significance of this concern was minimal because the current procedures required an individual to be in attendance at the RPR material interlock door and close it under any conditions challenging secondary containment.

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

# EVENT IDENTIFICATION:

Degraded Secondary Containment Condition Observed During Testing Due to Procedure Deficiency.

## A. PLANT CONDITIONS PRIOR TO EVENT:

Unit: 2(3)                      Event Date: 05/31/95                      Event Time: 0330

Reactor Mode: N                      Mode Name: Run (Shutdown)                      Power Level: 78% (0)

Reactor Coolant System Pressure: 1000 (0) psig

## B. DESCRIPTION OF EVENT:

On May 31, 1995 at 0330 hours, during the performance of Dresden Technical Surveillance (DTS) 1600-22, Secondary Containment Leak Rate Test, the Standby Gas Treatment (SBGT) System was unable to maintain 0.25 inches of water vacuum in the Secondary Containment with the Reactor Building Ventilation System isolated and the Recirculation Pipe Replacement (RPR) Material Interlock inner door open and the RPR Material Interlock outer door closed. When it was determined that the SBGT System could only maintain 0.22 inches of water vacuum with respect to the atmosphere under these conditions, personnel stationed at the Material Interlock immediately closed the inner door as required by DTS 1600-22. With the RPR Material Interlock inner door closed, the SBGT System immediately increased the Secondary Containment vacuum to 0.30 inches of water, restoring Secondary Containment integrity.

Review of DTS 1600-22 by the Shift Manager concluded that a Technical Specification LCO should have been entered during the brief period of time that the Secondary Containment was greater than 0.25 inches of water vacuum as required by Technical Specification 3.7.C.1. He also questioned whether the material interlock inner door had ever remained open over the 4 hour limit imposed by TS allowable outage time (AOT). A review of the June 1, 1994 to June 11, 1995 Material Interlock Inner Door's security alarm record indicates that the door has not been open longer than the 4 hour LCO period for establishing Secondary Containment Integrity during this period of time. Interviews with station personnel suggest that in the past, the door may have been opened for periods of time that exceeded the TS AOT of 4 hours. Another portion of the surveillance satisfactorily tested the Material Interlock Inner Door in the closed position with the outer door also closed; however, this door arrangement could provide assistance to the inner door seal. When the Material Interlock Outer Door is opened the interlock is in a untested configuration. The outer Material Interlock Door has been open longer than 4 hours in the past and the LCO action statement had not been entered.

Dresden Station Technical Specifications (TS) 3.7.C., Limiting Conditions for Operation require Secondary Containment integrity during all modes of plant operation except when all of the following conditions are met:

- a. The Reactor is subcritical and the core reactivity margins are met.

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- b. The Reactor water temperature is below 212 degrees fahrenheit and the reactor coolant system is vented.
- c. No activity is being performed which can reduce the shutdown margin below that specified in TS 3.3.A.
- d. The fuel cask or irradiated fuel is not being moved in the reactor building.

If TS 3.7.C. cannot be met for either Unit 2 or Unit 3, (the reactor buildings are a common structure), Secondary Containment Integrity must be restored within 4 hours or Units 2 and 3 must be in at least hot shutdown within the next 12 hours and in cold shutdown within the following 24 hours. This specification also requires testing of the Secondary Containment capability to maintain a 0.25 inch of water vacuum, with less than a 5 mile per hour wind with a filter train flow of not more than 4000 scfm, prior to each refueling outage.

The Secondary Containment Leakage tests are performed using Dresden Technical surveillance (DTS) 1600-22. This surveillance tests the Secondary Containment with several interlock door positions. The interlock door positions are: all 8 interlock doors closed, the equipment interlock inner door open, the equipment interlock outer door open, and the Recirculation Pipe Replacement (RPR) Material Inner Door open. A simulated 5 inch hole in the refuel floor wall is also tested if appropriate based on scope of outage work. The procedure also required that the doors be closed if the SGBT System could not maintain Secondary Containment at 0.25 inches of water vacuum. DTS 1600-22 prerequisites has a sign off for DTS 1600-08, Secondary Containment Interlock Door Inspection, which has the engineer perform a visual inspection of the Secondary Containment interlock door seals. DTS 1600-22 limitations and actions require that Secondary Containment Integrity be maintained as required by TS section 3.7.C. and also states that openings of the RPR Material Interlock is controlled by DAP 13-14. The limitation and action section of DTS 1600-22 also states that if the SGBT System cannot maintain 0.25 inches of water vacuum water the requirements of technical Specification 3.7.C.1., limiting Condition for operation (LCO) must be executed.

DAP 13-14 governs access to the Unit 3 Reactor Building RPR Material Interlock. This procedure specifies the approval and involvement of the Operations Shift Management, and provides for constant attendance of the inner door as well as closure of the inner door under conditions challenging to secondary containment. These controls ensure secondary containment integrity is maintained.

#### C. CAUSE OF EVENT:

This report is being issued pursuant to 10CFR 50.73(a)(2)(v), any event or condition alone could have prevented the fulfillment of the safety function of structures of systems that are needed to control the release of radioactive material. This report is also being issued pursuant to 10CFR 50.73 (a)(2)(i)(B) because the LCO was exceeded.

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The cause of the event was due to procedural deficiencies. DAP 13-14 and DTS 1600-22 referenced the proper Technical Specifications; however, neither procedure required an LCO entry when the Secondary Containment pressure is greater than 0.25 inches of water vacuum or when either RPR interlock door is opened.

DAP 13-14 governs the operation of the RPR Material Interlock Doors. The outer RPR Material Interlock structure is a corrugated steel building which is not missile proof nor is it designed to withstand tornado forces. DAP 13-14 requires personnel to be stationed at the interlock to manually close the inner door if conditions occurred that challenged the RPR Material Interlock integrity. The outer RPR Material Interlock door was not opened during previous testing of the Secondary Containment. For these reasons, any entry into the RPR Material Interlock through the Inner door will now require in an entry into Technical Specification 3.7.C LCO action statement.

An investigation to determine whether the RPR Interlock inner door had been open 4 hours or longer was initiated. A review of the RPR Material Interlock Alarm Log from 06/1/94 to 06/11/95 documents that the inner door was not continuously open for 4 hours or longer. The Technical Specification LCO was not exceeded within this period of time. However, based on undocumented personnel recognition, the RPR Interlock outer door has been open greater than 4 hours an undetermined number of times.

#### D. SAFETY ANALYSIS:

This event identified a slightly degraded condition of the secondary containment whereby a vacuum of 0.22 inches of water with respect to the outside atmosphere was observed with the RPR Material Interlock Inner door open during performance of the secondary containment leak rate test. This differential pressure value was slightly less than the 0.25 inches of water vacuum required by the Technical Specifications, but did provide negative pressure within the Reactor Building as is intended to prevent exfiltration of airborne contamination during postulated accident conditions. Also, as described earlier in this report, administrative procedures were in place requiring constant attendance of the inner door whenever it is open, and prompt closure of the door under conditions challenging to secondary containment. The Technical Specifications allow for planned entries into degraded secondary containment conditions. For these reasons, the safety significance of this event was minimal. Self-identification of this issue is an example of higher standards of literal procedure adherence and conservative decision making at Dresden Station, and appropriate actions have been initiated.

#### E. CORRECTIVE ACTIONS:

The immediate corrective action was to close the RPR Material Interlock inner door. Subsequent actions were to post signs on the RPR material interlock inner and outer door instructing personnel using the door to notify the control room that opening the door will require entering an LCO. Further actions under way are as follows.

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1. Revise DTS 1600-22 to require entering Technical Specification 3.7.C. LCO whenever the Secondary Containment cannot be maintained at 0.25 inches of water vacuum with SBTG System operating and the reactor Building Ventilation System Isolated for each procedure step being executed (249-180-95-01201).
2. Revise DAP 13-14 to require entering Technical Specifications 3.7.C. if Secondary Containment cannot be maintained at 0.25 inches of water vacuum with SBTG System operating and the Reactor Building Ventilation System Isolated.  
  
Write a Temporary Procedure Change to require entering Technical Specification 3.7.C. if the Material Interlock Inner or outer door is opened (249-180-95-01202).
3. Perform DTS 1600-22 with the RPR Material Interlock outside door open to prove secondary Containment integrity with the door open. If the test is successful, delete the requirement to enter specification 3.7.C. if the outer door is opened (249-180-95-1203).
4. Train Licensed Operating Personnel on the procedure changes (249-180-95-01204).

F. PREVIOUS OCCURRENCES:

LER 88-003 DOCKET 50-249, POTENTIAL VIOLATION OF SECONDARY CONTAINMENT INTEGRITY DUE TO MANAGEMENT DEFICIENCY.

\*

A NRC Inspector observed the Unit 3 Reactor Building Material Interlock Inner Door open and unattended. This was brought about to the attention of a Technical Staff Engineer entering the area. The door was immediately closed and secured. The Unit 3 Reactor Building Interlock Door was closed throughout this event.

G. COMPONENT FAILURE DATA:

N/A