

Commonwealth Edison Company
Dresden Generating Station
6500 North Dresden Road
Morris, IL 60450
Tel 815-942-2920



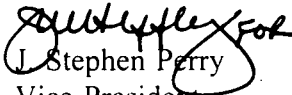
March 28, 1996

JSP Ltr. #96-0046

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, D. C. 20555

Enclosed is Licensee Event Report 95-014, Docket 50-249, Revision 2, which is being submitted pursuant to 10CFR50.73 (a)(2)(iv), which requires the reporting of any event that results in automatic or manual actuation of any Engineered Safety Feature (ESF). This Supplemental LER is provided to update corrective actions associated with the event.

Sincerely,


J. Stephen Perry
Vice President
BWR Operations

Enclosure

cc: H. Miller, Regional Administrator, Region III
NRC Resident Inspector's Office

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Handwritten initials/signature

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|------------------------------------|------------------------------------|---|
| NRC FORM 366 (5-92) | U.S. NUCLEAR REGULATORY COMMISSION | APPROVED BY OMB NO. 3150-0104 EXPIRES 5/31/95 |
| 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 INFORMATION AND RECORDS MANAGEMENT BRANCH (MNB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503. |

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|---|--------------------------------------|---------------------------|
| FACILITY NAME (1) Dresden Nuclear Power Station, Unit 3 | DOCKET NUMBER (2) 05000249 | PAGE (3) 1 OF 4 |
|---|--------------------------------------|---------------------------|

TITLE (4)
Unexpected Operation of the Pressure Suppression Chamber To Drywell Vacuum Breakers Due to Inadequate Training and Procedure Deficiency

| 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 NAME | DOCKET NUMBER |
| 09 | 07 | 95 | 95 | -- 014 -- | 02 | 03 | 28 | 96 | None | |
| | | | | | | | | | | |

| | | | | | | | | | | |
|---------------------------|-----|--|--------------------|--|-------------------|---|----------------------|--|--|--|
| 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) | X | 50.73(a)(2)(iv) | | 73.71(c) | |
| | | | 20.2203(a)(2)(i) | | 20.2203(a)(4) | | 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) | | 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 | TELEPHONE NUMBER (Include Area Code) |
| Jesse Williams, System Engineer 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 |
|-------|--------|-----------|--------------|---------------------|-------|--------|-----------|--------------|---------------------|
| | | | | | | | | | |
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|---|---|----|--|--------------------------------------|--|--|
| SUPPLEMENTAL REPORT EXPECTED (14) | | | | EXPECTED SUBMISSION DATE (15) | | |
| <input checked="" type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE). | X | NO | | | | |

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

On September 9, 1995, at 2233 hours with Unit 3 in startup at 1 percent thermal power, all twelve Pressure Suppression Chamber (Torus) to Drywell Vacuum breakers (3-1601-32A, B, C, D, E, F AND 33A, B, C, D, E, F) opened while relieving negative pressure in the torus per Dresden Operating Procedures (DOP) 1600-1. This constitutes an unexpected actuation of an Engineered Safety Feature. Initial drywell pressure was -0.16 psig, and torus pressure was -0.21 psig. When torus pressure increased to 0 psid all twelve vacuum breakers cycled open. Cause was due to training and procedure deficiencies. Technical Specifications (TS) require Torus to Drywell Vacuum Breakers to open fully with applied force at all valve positions not exceeding the equivalent to 0.5 psi acting on torus face of the valve disk. Operations was aware of the TS requirement but was not aware of actual valve setpoint. DOP 1600-1 instructs operators on how to relieve containment pressure but did not contain a warning that vacuum breakers may open, therefore operators did not expect vacuum breakers to open. Startup continued, however, an administrative heatup rate limit of 25 degrees F per hour was initiated pending an investigation of vacuum breaker set points and an evaluation of startup plans. Setpoints were found to be correct, and administrative heatup limit was removed. This supplemental report is being provided to update corrective actions associated with the event.

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 INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

| FACILITY NAME (1) | DOCKET NUMBER (2) | LER NUMBER (6) | | | PAGE (3) |
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| | | YEAR | SEQUENTIAL NUMBER | REVISION NUMBER | |
| Dresden Nuclear Power Station, Unit 3 | 05000249 | 95 | -- 014 -- | 02 | 3 OF 4 |

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

C. CAUSE OF EVENT:

This event is being issued pursuant to 10CFR50.73 (a)(2)(iv) - any event that results in automatic or manual actuation of any Engineered Safety Feature (ESF).

The cause of the event was due to training and procedure deficiencies. The Technical Specifications (TS) require the Torus to Drywell Vacuum Breakers to open fully with the applied force at all valve positions not exceeding the equivalent to 0.5 psi acting on the Torus face of the valve disk. The Operations Department was aware of the TS requirement but was not aware of the actual valve field setpoint in ft-lbs torque. The section of DOP 1600-01, which provides the method to relieve containment pressure, did not contain a warning that the vacuum breakers may open at the field setpoint of 35 ft-lbs, 0.15 psi, therefore the operators did not expect the vacuum breakers to open.

Dresden Mechanical Surveillance (DMS) 1600-03, Torus To Drywell And Torus To Reactor Building Vacuum Breaker Valve Surveillance, requires the drywell to torus vacuum breaker torque to be set at 35 ft-lbs. Dresden Operating Surveillance (DOS) 1600-9, Pressure Suppression Chamber to Drywell Vacuum Breaker Full Stroke Exercise Test, requires the vacuum breakers to open at less than 58 ft-lbs torque. The procedures do not convert the ft-lbs torque value to an equivalent differential pressure. Because no procedure directly states the opening range for the Drywell Vacuum or the Torus Vacuum breaker, the operators expect the vacuum breakers to open when the DOS 1600-09 limit of 58 ft-lbs, 0.25 psid, is approached.

D. SAFETY ANALYSIS:

After a design basis accident, the drywell vacuum relief valves [BF] open under differential pressure (dp) to allow gas to be drawn from the torus. The torus valves open under dp to allow air to be drawn in from the reactor building. The TS require the drywell vacuum relief valves to open under 0.5 psi dp. This protects the primary containment from collapse by limiting the design basis external to internal dp. Under normal operating conditions the valves must be closed and leak tight. The safety significance of this event was minimal since the Pressure Suppression to Drywell vacuum Breakers operated at the desired setpoint, which is conservative to the TS requirement of 0.5 psid.

| NRC FORM 366A (5-92) | | U.S. NUCLEAR REGULATORY COMMISSION | | APPROVED BY OMB NO. 3150-0104 EXPIRES 5/31/95 | | | | | | | |
|---|-------------------|------------------------------------|--|---|-------------------|-----------------|----|-----------|----|--------|--|
| 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 INFORMATION AND RECORDS MANAGEMENT BRANCH (MNB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503. | | | | | | | |
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| Dresden Nuclear Power Station, Unit 3 | | 05000249 | <table border="1"> <tr> <th>YEAR</th> <th>SEQUENTIAL NUMBER</th> <th>REVISION NUMBER</th> </tr> <tr> <td>95</td> <td>-- 014 --</td> <td>02</td> </tr> </table> | YEAR | SEQUENTIAL NUMBER | REVISION NUMBER | 95 | -- 014 -- | 02 | 4 OF 4 | |
| YEAR | SEQUENTIAL NUMBER | REVISION NUMBER | | | | | | | | | |
| 95 | -- 014 -- | 02 | | | | | | | | | |

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

E. CORRECTIVE ACTIONS:

1. Train Operators on the Torus to Drywell and Reactor Building to Torus Vacuum Breaker Setpoints (NTS#: 249-180-95-01401).
2. Simulator fidelity for the Torus to Drywell and the Reactor Building to Torus Vacuum Breakers was completed by station work request U06763 and U06777 which adjusted the setpoints for the vacuum breakers. (Reference NTS #: 249-180-95-01402).
3. DOP 1600-9 has been changed to warn operators that the Torus to Drywell vacuum breakers may open while performing excess pressure relief of the Drywell and Pressure Suppression chamber.
4. The basis for the vacuum breaker setting was determined to be as a result of the Plant Unique Analysis Report (Mark I Containment Analysis). No revisions to the maintenance procedures which set the vacuum breaker setpoint setting was performed. Station procedures DAN 902(3)-4 G-14, DAN 902(3)-4 H-14 and DOS 1600-09 have been revised to include field setpoints. (Reference NTS #: 249-180-95-01403).

F. PREVIOUS OCCURRENCES:

Not Applicable.

G. COMPONENT FAILURE DATA:

Not Applicable.