

LICENSEE EVENT REPORT (LER)

Form Rev 2.0

Facility Name (1) Dresden Nuclear Power Station, Unit 3  
 Docket Number (2) 0 15 10 10 10 12 14 19  
 Page (3) 1 of 0 4

Title (4)  
 Potential Violation of Secondary Containment Integrity Due to Management 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 Names	Docket Number(s)	
1	1	15	8	8	8	0	1	8	0	0	
									Dresden Unit 2	0 15 10 10 10 12 13 17	
									N/A	0 15 10 10 10 11 11	

OPERATING MODE (9) N  
 THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10CFR (Check one or more of the following) (11)  
 20.402(b) \_\_\_\_\_ 20.405(c) \_\_\_\_\_ 50.73(a)(2)(iv) \_\_\_\_\_ 73.71(b) \_\_\_\_\_  
 20.405(a)(1)(i) \_\_\_\_\_ 50.36(c)(1) \_\_\_\_\_ 50.73(a)(2)(v) \_\_\_\_\_ 73.71(c) \_\_\_\_\_  
 20.405(a)(1)(ii) \_\_\_\_\_ 50.36(c)(2) \_\_\_\_\_ 50.73(a)(2)(vii) \_\_\_\_\_ Other (Specify in Abstract below and in Text)  
 20.405(a)(1)(iii) X 50.73(a)(2)(i) \_\_\_\_\_ 50.73(a)(2)(viii)(A) \_\_\_\_\_  
 20.405(a)(1)(iv) \_\_\_\_\_ 50.73(a)(2)(ii) \_\_\_\_\_ 50.73(a)(2)(viii)(B) \_\_\_\_\_  
 20.405(a)(1)(v) \_\_\_\_\_ 50.73(a)(2)(iii) \_\_\_\_\_ 50.73(a)(2)(x) \_\_\_\_\_

LICENSEE CONTACT FOR THIS LER (12)  
 Name: Anthony Anandappa, Technical Staff Engineer  
 Telephone Number: 8 1 1 5 9 14 12 -12 19 12 10  
 Ext. 2529

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) X | NO

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

At 1130 hours on November 15, 1988, with Unit 3 operating at 99% rated core thermal power and Unit 2 shutdown for a refuel outage, a Nuclear Regulatory Commission (NRC) Region III Inspector observed the Unit 3 reactor building material interlock inner door open and unattended. This was brought to the attention of a Technical Staff Engineer entering the area, and the door was immediately secured. Investigation revealed that contractor personnel had left the door open for approximately 15 minutes in violation of Dresden Administrative Procedure (DAP) 13-14, Material Interlock Access Control. It was also determined that the door was left open for approximately 30 minutes earlier that morning. This was a potential violation of secondary containment integrity since the inner door was not opened during the previously performed secondary containment leak rate test. The root cause was determined to be management deficiency in that adequate direction was not provided to the personnel involved. Corrective actions included improved labeling, administrative controls and testing. The safety significance of this event was minimal as the Unit 3 reactor building material interlock outer door was locked closed and an overall reactor building to atmosphere differential pressure of >= 0.25 inches of water was maintained throughout these events. A previous event involving secondary containment interlock doors was reported in LER 88-008/050249.

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 PDR ADDCK 05000249  
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TEXT Energy Industry Identification System (EIIS) codes are identified in the text as [XX]

PLANT AND SYSTEM IDENTIFICATION:

General Electric Boiling Water Reactor - 2527 Mwt rated core thermal power.

Nuclear Tracking System (NTS) tracking code numbers are identified in the text as (XXX-XXX-XX-XXXXX).

EVENT IDENTIFICATION:

Potential Violation of Secondary Containment [NG] Integrity Due to Management Deficiency.

A. CONDITIONS PRIOR TO EVENT:

Unit(s): 2 (3)                      Event Date: November 15, 1988                      Event Time: 1200 hours

Reactor Mode(s): N (N)                      Mode Name(s): Shutdown (Run)                      Power Level(s): 0% (99%)

Reactor Coolant System (RCS) Pressure(s): 0 psig (1003 psig)

B. DESCRIPTION OF EVENT:

At 1130 hours on November 15, 1988, with Unit 3 operating at 99% rated core thermal power and Unit 2 shutdown for scheduled refueling and maintenance outage, a Nuclear Regulatory Commission (NRC) Region III Inspector observed the Unit 3 reactor building material interlock inner door open and unattended. The Unit 3 reactor building material interlock is a steel structure attached to the outer south wall of the Unit 3 reactor building which was constructed during the 1985 Unit 3 reactor recirculation system [AD] piping replacement project. It is equipped with an outer roll-up door; the inner door is a heavy steel construction hatch. Investigation revealed that contractor personnel had left the inner door open for approximately 15 minutes in violation of Dresden Administrative Procedure (DAP) 13-14, Material Interlock Access Control. It was also determined that the door was left open for approximately 30 minutes earlier that morning. This was a potential violation of secondary containment integrity because the inner door was not opened during the secondary containment leak rate test (SCLRT) performed prior to beginning the Unit 2 refuel outage on October 22, 1988 in accordance with Technical Specification 4.7.C.1.c. The SCLRT procedure, Dresden Technical Staff Surveillance (DTS) 1600-22, did not require opening the inner door. A special SCLRT was then performed on November 20, 1988 in accordance with Special Procedure (SP) 88-11-163 in order to verify the integrity of the Unit 3 material interlock outer door and structure and the Unit 2 reactor building trackway interlock outer door. The Unit 2 reactor building trackway interlock is equipped with train doors for railroad car access; the SCLRT was also previously performed with the inner trackway door closed. Completion of SP 88-11-163 indicated the following results while operating one train of the Standby Gas Treatment (SBGT) [BH] System at <= 4000 cubic feet per minute (CFM); Technical Specification 4.7.C.1.c requires that an overall reactor building to atmosphere differential pressure of >= 0.25 inches of water be maintained under calm (< 5 miles per hour) wind conditions.

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TEXT Energy Industry Identification System (EIIS) codes are identified in the text as [XX]

Unit 2 Reactor Building Trackway Inner Door Position	Unit 2 Reactor Building Trackway Outer Door Position	Unit 3 Reactor Building Material Interlock Inner Door Position	Unit 3 Reactor Building Material Interlock Outer Door Position	SCLRT Results, Inches of Water dP
Closed	Closed	Closed	Closed	0.28
Closed	Closed	Open	Closed	0.21
Open	Closed	Closed	Closed	0.27
Open	Closed	Open	Closed	0.23

As shown above, the overall reactor building to atmosphere differential pressure was satisfactory with the Unit 2 reactor building trackway interlock inner door open. However, the overall reactor building to atmosphere differential pressure did not satisfy the 0.25 inches of water requirement with the Unit 3 reactor building material interlock inner door open. It should be noted that this data was taken under prevailing wind conditions exceeding 5 mph; these higher wind conditions tend to result in lower overall differential pressure data. However, it is the Station policy to conservatively report any SCLRT data not meeting the 0.25 inches of water requirement as unsatisfactory, regardless of the prevailing wind conditions.

C. APPARENT CAUSE OF EVENT:

Performance of the SCLRT is governed by DTS 1600-22, which did not require opening either the Unit 2 reactor building trackway interlock inner door or the Unit 3 reactor building material interlock inner door. Therefore, the SCLRT data from October 22, 1988 (most recent test data) did not verify the integrity of the outer doors.

Administrative procedures are provided for use of the doors. Dresden Administrative Procedure (DAP) 13-14, Unit 3 Reactor Building Material Interlock Access Control, requires that the Unit 3 reactor building material interlock inner door be continuously attended when open. Until March 29, 1988, attendance of the door was performed by a Security Officer; on this date DAP 13-14 was changed via a temporary procedure change such that the Security Officer need not be continuously present as long as the outer door is locked closed with appropriate alarm circuitry operational. Continuous attendance is still required by the personnel requiring use of the interlock.

The Unit 3 reactor building material interlock inner door was equipped with signs requiring approval of the Radiation Protection Supervisor and prohibiting opening the inner and outer door simultaneously. A controlled copy of DAP 13-14 (including the temporary procedure change) was also posted adjacent to the inner door. However, the posted signs did not clearly state that the working group personnel were required to continuously monitor the inner door.

Review of these factors indicate that the root cause of this event was management deficiency as adequate direction was not provided to the personnel involved. This report is submitted in accordance with 10CFR50.73(a)(2)(i)(B), which requires the reporting of any condition prohibited by the Technical Specifications.

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TEXT Energy Industry Identification System (EIIS) codes are identified in the text as [XX]

D. SAFETY ANALYSIS OF EVENT:

The safety significance of this event was minimal as the Unit 3 reactor building material interlock outer door was locked closed and an overall reactor building to atmosphere differential pressure of well in excess of the 0.25 inches of water was maintained via the Reactor Building Ventilation [VA] System during the approximately 45 minute total time period that the Unit 3 reactor building material interlock inner door was open. Additionally, the SCLRT subsequently performed with the inner door open indicated that the SGBT System was capable of maintaining the reactor building at a negative pressure with respect to the atmosphere, which would have prevented exfiltration of contamination to the environment under postulated accident conditions.

E. CORRECTIVE ACTIONS

The following corrective actions were initiated regarding this event.

1. Improved signs were fabricated and installed at the Unit 3 reactor building material interlock. These signs refer to DAP 13-14 and clearly state that continuous attendance is required at all times when the inner door is open.
2. A permanent revision to DAP 13-14 is in progress. This revision will better define requirements for use of the Unit 3 reactor building material interlock doors (249-200-88-11701).
3. SCLRT procedure DTS 1600-22 will be revised to include opening the Unit 2 reactor building trackway interlock inner door and the Unit 3 reactor building material interlock inner door during performance of the test (249-200-88-11702). In this manner, the integrity of the outer and inner doors will be verified.
4. After completion of repairs to the Unit 3 reactor building material interlock structure and outer door, an additional SCLRT will be performed (249-200-88-11703).
5. The Project and Construction Services Superintendent reviewed this event with site contractor supervisory personnel. At this meeting, attention to detail regarding procedural adherence in general and control of secondary containment integrity in particular was discussed.

F. PREVIOUS EVENTS:

LER Number      Title

88-008/050249 Violation of Secondary Containment Integrity Due to Personnel Interlock Door Circuitry Failure.

This event involved the turbine to reactor building interlock being bypassed, allowing the door to open simultaneously due to a loose fuse in the interlock circuitry. The fuse was tightly inserted to restore the interlock circuitry. The corrective actions included installing enclosures around the fuses.

G. COMPONENT FAILURE DATA:

As this event did not involve a component failure, this section is not applicable.



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Telephone 815/942-2920

December 15, 1988

EDE LTR #88-938

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

Licensee Event Report #88-018-0, Docket #050249 is being submitted as required by Technical Specification 6.6, NUREG 1022 and 10 CFR 50.73(a)(2)(i)(B).

E.D. Eenigenburg  
Station Manager  
Dresden Nuclear Power Station

EDE/ade

Enclosure

cc: A. Bert Davis, Regional Administrator, Region III  
File/NRC  
File/Numerical

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