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### Abstract

On October 19, 1987 at 1918 Waste Gas Decay Tank (WGDT) T-101B [WE;TK] was released to the atmosphere after having been isolated at 0907 that same day. This is contrary to Plant Technical Specification (TS) 3.24.6.1 which states that "the Waste Gas Decay Tank System shall be used to reduce radioactive gases by holding gaseous waste collected by the system for a minimum of 15 days up to 60 days." The Plant was in cold shutdown condition at the time of the event.

WGDT T-101B was inadvertently released when a data transposition error was made when completing the Waste Gas Release Authorization form. WGDT T-101C was to be released and all data on the authorization form was for T-101C, with the exception of the tank identification. This error was not identified during release approvals. Both T-101B and T-101C were sampled prior to the release. The alarm setpoint of process monitor, RIA-1113 (calculated for T-101C) was upscaled during the monitor line purge and not returned to its original position. The release was calculated to be equal to 4.87E-4 mRem/hr or 0.85 percent of the value listed in 10CFR20.106.

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NRC Form <b>366A</b> (9-83) •	LICENSEE EVENT REPORT (LER) TEXT CONTINU		EGULATORY COMMISSION OMB NO. 3150-0104 /31/85	
FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)	PAGE (3)	
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TEXT (If more space is required, use additional NRC Form 306A's) (17)

Description

On October 19, 1987 at 1918 Waste Gas Decay Tank (WGDT) T-101B [WE;TK] was released to the atmosphere after having been isolated at 0907 that same day. This is contrary to Plant Technical Specification (TS) 3.24.6.1 which states that "the Waste Gas Decay Tank System shall be used to reduce radioactive gases by holding gaseous waste collected by the system for a minimum of 15 days up to 60 days." The Plant was in cold shutdown condition at the time of the event.

On October 19, 1987 at 0907, WGDT T-101B was isolated from service. At 0950 the tank was sampled and gamma spectroscopic analysis initiated. At 1100, at the request of the Radioactive Material Control (RMC) Supervisor, samples of WGDT T-101C were taken and analyzed in support of its later release. Analyses were reviewed and a WGDT Release Authorization (batch card) prepared.

The batch card consists of three pages of data and calculations to support the release. During the batch card processing, all data was filled in and calculations completed satisfactorily to support the release authorization form, WGDT T-101B was identified as the "tank to be released". The batch card was reviewed by the RMC Supervisor and the Shift Supervisor (SS), however, the data transposition error was not identified.

Prior to initiating the release, Control Room Operator (CRO) set the alarm setpoint for Waste Gas Discharge Process Monitor RIA-1113 [WE;DET] at 14,700 counts per minute (cpm). This value was calculated by the RMC group and was correct for the release of WGDT T-101C. At 1918, per the approved batch card, the primary side Auxiliary Operator (AO) initiated the release of WGDT T-101B.

At the start of the batch release of WGDT T-101B, RIA-1113 immediately alarmed and tripped interlocks, terminating the release. The CRO then upscaled the alarm setpoint of RIA-1113 from the 10^o scale to 10^o scale in order to purge the discharge and monitoring system. Upscaling of the alarm setpoint is a common practice at the start of batch releases that permits gases remaining in the discharge and monitoring system to be purged while the WGDT is being released. The monitor is then placed on the proper scale to support the alarm setpoint. During the release of WGDT T-101B, the monitor was upscaled to 10^o to support the purge, however, it remained there throughout the release as the CRO forgot to return the scale to 10^o. Therefore, RIA-1113 was set to alarm and terminate the release at 147,000 cpm, rather than the appropriately calculated value of 14,700 cpm. Had the process monitor been set back to required 10^o scale, the inadvertent release of WGDT T-101B would have been automatically stopped.

(9-83) LICENSEE EVE	LICENSEE EVENT REPORT (LER) TEXT CONTINUATION							
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#### EXT (If more space is required, use additional NRC Form 3864's) (17) Cause Of The Event

The inadvertent release of WGDT T-101B was initiated by a data transposition error when completing the batch card. The RMC technician preparing the batch card indicated WGDT T-101B instead of T-101C. All other information on the card reflected data relating to T-101C. This transposition error was not recognized by the RMC Supervisor and SS during their reviews and release authorizations and further not identified by the AO physically performing associated value line-ups.

The inadvertent failure of the CRO to downscale the alarm setpoint on process monitor RIA-1113 caused the continued release of the unauthorized WGDT T-101B.

# **Corrective** Actions

The total activity released and consequences of the release were evaluated using Palisades automated off-site dose assessment program. Inputs were derived from samples taken of WGDT T-101B at 0950 and live time meteorology.

A meeting was held by the RMC Superintendent with all RMC personnel stressing the importance of accurate documentation. This event will be presented to all Operations Department personnel during their continuing training program.

The trip function of process monitor RIA-1113 was satisfactorily tested on October 20, 1987 by performance of a Technical Specification Surveillance Test.

A procedure revision is in progress which will direct Operations personnel to bypass the alarm setpoint actuated trip functions of the process monitor for approximately 30 seconds during the monitor purge. This is a "hands on" practice which will eliminate the current practice of upscaling the alarm setpoint.

The waste gas release system is being evaluated to determine if a more efficient purge system can be implemented. This system would be utilized prior to and after batch releases to flush the waste gas headers and monitoring system.

## Analysis Of The Event

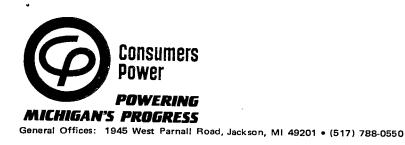
The inadvertent batching of WGDT T-101B on October 19 1987 released 7.199 curries of mixed fission product gasses to the atmosphere. Utilizing the Palisades automated off-site dose assessment system and live time meteorology input, the projected dose rate at site boundary was 4.872E-4 mRem/hr to the whole body or 0.85 percent of the value

(9-83) BELICENSEE EVENT	REPORT (LER) TEXT CONTIN		GULATORY COMMISSIO DMB NO. 3150-0104 11/85	
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This event is being reported per 10CFR50.73 (a)(2)(i) as an operational condition prohibited by Plant Technical Specifications.

# Additional Information

Reference Licensee Event Report 87-020 for additional information regarding the inadvertent release of a WGDT with less than a 15 day hold time.



November 18, 1987

Nuclear Regulatory Commission Document Control Desk Washington, DC 20555

DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT -LICENSEE EVENT REPORT 87-036 - WASTE GAS DECAY TANK RELEASED CONTRARY TO TECHNICAL SPECIFICATIONS

Licensee Event Report (LER) 87-036 (Waste Gas Decay Tank Released Contrary to Technical Specifications) is attached. This event is reportable to the NRC per 10CFR50.73(a)(2)(i).

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James L Kuemin Staff Licensing Engineer

CC Administrator, Region III, NRC NRC Resident Inspector - Palisades

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