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8 9 10 NAME OF PREPARER Kevin McLaughlin PHONE: (315)343-2110	80 5

LER 82-08

EVENT DESCRIPTION AND PROBABLE CONSEQUENCES:

During normal operation, while reviewing Operation Surveillance Test N1-ST-R7, "High Radiation Emergency Cooling System Vent Monitors Instrument Channel Test", it was discovered that a potential path for reactor steam from emergency condenser steam line vents to atmosphere could result if emergency condenser tube leaks occur and operator action is not taken to close the remote manual emergency steam line vent blocking valve, or this single (per system) valve fails to close or grossly leaks. This is in violation of the Site Technical Specification requirement which concerns discovery during plant life of conditions not considered in the SAR. Since the startup of the unit after the 1981 refuel outage, no emergency condenser system isolations have been required and, therefore, no risks to the general public have resulted from this postulated leakage path.

CAUSE DESCRIPTION AND CORRECTIVE ACTIONS

During the refuel outage of 1981, a modification to the Emergency Condenser Venting System was made. This modification was made to comply with NUREG 0737, Item II.B.1, "Reactor Coolant System Vents". The modification included the installation of piping and remote manual valves to allow venting of the Emergency Condensers to the suppression pool in the event that venting is required and the reactor main steam isolation valves are closed.

Normal operation of the emergency condensers is in the "standby" mode. In this mode the emergency condenser steam supply lines from reactor to emergency condensers are continuously vented to the main steam lines. This allows for immediate actuation on system initiation.

Emergency condenser isolation is required in the event of tube failure or emergency condenser steam line break. Radiation sensors and flow sensors are utilized to accomplish the isolation, which closes the steam isolation valves, the vent valves, the drain valves and the condensate return valves for the affected system.

As a result of the modification made in 1981, complete auto-isolation of the affected emergency condenser system cannot be accomplished. This is due to the fact that vent blocking valve #BV-05-01 for #11 system and vent blocking valve #BV-05-04 for #12 system are no longer in the "auto isolation" scheme.

This could result in reactor steam from the unaffected emergency condenser system passing through its steam line vents through a common vent line into the affected emergency condenser and possibly through a failed tube or tubes to the shell side and to atmosphere.

To preclude this possibility, Standing Order #30, "Emergency Condenser Isolation" has been issued, which details that whenever emergency condenser system isolation is required, all auto-isolation valves be checked closed and that a remote manual vent blocking valve be closed for the affected system. Remote manual operation is accomplished from the main Control Room. Additionally, Standing Order #30 requires that a manual blocking valve also be closed, which provides redundancy.

Because Nine Mile Point Unit #1 is presently shutdown, a schedule for these modifications will be developed. At that time, proper notification will be made.