

LICENSEE EVENT REPORT

CONTROL BLOCK / / / / / (1) (PLEASE PRINT OR TYPE ALL REQUIRED INFORMATION)  
 /0/1/ /V/A/N/A/S/2/ (2) /0/0/-/0/0/0/0/0/-/0/0/ (3) /4/1/1/1/1/ (4) / / / (5)  
 LICENSEE CODE LICENSE NUMBER LICENSE TYPE CAT  
 /0/1/ REPORT /L/ (6) /0/5/0/0/0/3/3/9/ (7) /0/4/2/5/8/2/ (8) /0/5/2/4/8/2/ (9)  
 SOURCE DOCKET NUMBER EVENT DATE REPORT DATE

EVENT DESCRIPTION AND PROBABLE CONSEQUENCES (10)

/0/2/ / On April 25, 1982, with Unit 2 in Mode 6, the Containment Particulate (RM-259) /  
 /0/3/ / and Gaseous (RM-260) Activity Detectors were removed from service without secur- /  
 /0/4/ / ing the Containment Purge and Exhaust System. This action rendered partially in- /  
 /0/5/ / operable the automatic isolation of the Purge and Exhaust System on a Hi Hi Radi- /  
 /0/6/ / ation Alarm and is contrary to T.S. 3.3.3 and 3.9.9. Since the Manipulator Crane /  
 /0/7/ / Area Monitor was available to provide isolation of the Purge and Exhaust System /  
 /0/8/ / on a Hi Hi Radiation Alarm, the public health and safety were not affected. /

SYSTEM CAUSE CAUSE COMP. VALVE  
 CODE CODE SUBCODE COMPONENT CODE SUBCODE SUBCODE

/0/9/ /B/B/ (11) /A/ (12) /A/ (13) /I/N/S/T/R/U/ (14) /X/ (15) /Z/ (16)  
 LER/RO EVENT YEAR SEQUENTIAL OCCURRENCE REPORT REVISION  
 (17) REPORT NO. NO.  
 NUMBER /8/2/ /-/ /0/2/0/ / \ / /0/3/ /L/ /-/ /0/

ACTION FUTURE EFFECT SHUTDOWN ATTACHMENT NPRD-4 PRIME COMP. COMPONENT  
 TAKEN ACTION ON PLANT METHOD HOURS SUBMITTED FORM SUB. SUPPLIER MANUFACTURER  
 /H/ (18) /Z/ (19) /Z/ (20) /Z/ (21) /0/0/0/0/ (22) /Y/(23) /N/(24) /N/(25) /W/1/2/0/(26)

CAUSE DESCRIPTION AND CORRECTIVE ACTIONS (27)

/1/0/ / RM-259 and 260 were taken out of service in order to replace the Solenoid Operat- /  
 /1/1/ / ed Valves for the Containment Isolation Trip Valves associated with the sample /  
 /1/2/ / lines (suction and return) for the monitors. The responsible supervisor was in- /  
 /1/3/ / formed of the interpretation of Technical Specifications that precluded the above /  
 /1/4/ / action with Containment Purge and Exhaust isolation operability required. /

FACILITY METHOD OF DISCOVERY DISCOVERY DESCRIPTION (32)  
 STATUS %POWER OTHER STATUS (30) DISCOVERY /B/ (31) / Operator Observation /  
 /1/5/ /H/ (28) /0/0/0/ (29) / NA / /

ACTIVITY CONTENT  
 RELEASED OF RELEASE AMOUNT OF ACTIVITY (35) LOCATION OF RELEASE (36)  
 /1/6/ /Z/ (33) /Z/ (34) / NA / / NA /

PERSONNEL EXPOSURES  
 NUMBER TYPE DESCRIPTION (39)  
 /1/7/ /0/0/0/ (37) /Z/ (38) / NA /

PERSONNEL INJURIES  
 NUMBER DESCRIPTION (41)  
 /1/8/ /0/0/0/ (40) / NA /

LOSS OF OR DAMAGE TO FACILITY (43) 8206070451 820524  
 TYPE DESCRIPTION PDR ADOCK 05000399  
 /1/9/ /Z/ (42) / NA / S PDR /

PUBLICITY  
 ISSUED DESCRIPTION (45) NRC USE ONLY  
 /2/0/ /N/ (44) / NA / / / / / / / / / / / /

### Description of Event

On April 25, 1982, with Unit No. 2 in Mode 6, the Containment Particulate Activity Detector (RM-259) and the Containment Gaseous Activity Detector (RM-260) were removed from service without securing the Containment Purge and Exhaust Isolation System. This action rendered the automatic isolation feature of the Purge and Exhaust Isolation System on a Hi Hi Radiation Alarm on either RM-259 or RM-260 partially inoperable. The Manipulator Crane Area Monitor (RM-262) remained available to provide isolation of Containment Purge and Exhaust on a Hi Hi Radiation alarm if required.

This event is contrary to T.S. 3.3.3 and 3.9.9 and is reportable pursuant to T.S. 6.9.1.9.b.

### Probable Consequences of Occurrence

The operability of the Radiation Monitoring channels ensure that the alarm or automatic action is initiated when the radiation level trip setpoint is exceeded. The operability of the Containment Purge and Exhaust Isolation System ensures that the containment vent and purge penetration will be automatically isolated upon detection of high radiation levels in the containment. With both RM-259 and 260 inoperable, Containment Purge and Exhaust isolation would still have occurred with a Hi Hi alarm on RM-262, the Manipulator Crane Area Monitor. In addition, the Auxiliary Building Ventilation Vent Particulate and Gaseous Activity Detectors, (RM-VG-112 and 113 respectively), were continuously monitoring containment Purge and Exhaust air as a portion of the total release through the Auxiliary Building Vent Stack B. A review of recorded data from RM-262, RM-VG-112 and 113, and from daily containment area grab samples taken while RM-259 and 260 were out of service, indicated no significant increases in activity levels. Consequently, the public health and safety were not affected.

### Cause of Event

RM 259 and 260 were removed from service in order to replace the Solenoid Operated Valves (SOV's) for the Containment Isolation Trip Valves associated with the sample lines (both suction from and return to the Containment) for the monitors. The SOV replacement was required by Design Change 81S-07B which called for the replacement of the SOV's because they were not qualified for the post accident environment as determined by the review of NUREG 0588 for Unit 2.

The supervisor who approved the removal of RM-259 and 260 from service with Containment Purge and Exhaust continuing to operate, was not aware that the operation of the above mentioned system was constantly required while in Mode 6 (a requirement of T.S. 3.3.3), regardless of whether or not core alterations were occurring or about to occur (a condition implied by T.S. 3.9.9).

Immediate Corrective Action

A Deviation Report was written upon removing RM-259 and 260 from service. However, operation of the Containment Purge and Exhaust System was permitted to continue due to a misinterpretation of Technical Specifications. (One interpretation required the Containment Purge and Exhaust System to be operable whenever in Mode 6 regardless of the number of open containment penetrations (T.S. 3.3.3); the other interpretation required the Purge and Exhaust System to be operable only 100 hours before and during core alterations (T.S. 3.9.9)).

Subsequent corrective action consisted of informing the responsible Supervisor of the interpretations of Technical Specifications which precluded operation of the Containment Purge and Exhaust Isolation System with RM-259 and RM-260 out of service.

Scheduled Corrective Action

No further action is scheduled.

Actions Taken to Prevent Recurrence

No further action is required.

Generic Implications

There are no generic implications.