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C. R. Hutchinson

March 28, 1994

U.S. Nuclear Regulatory Commission Mail Station P1-137 Washington, D.C. 20555

Attention:

Document Control Desk

SUBJECT:

Grand Gulf Nuclear Station

Unit 1

Docket No. 50-416 License No. NPF-29

ESF Switchgear Room Temperatures Could Exceed

Allowable Limits LER 94-002-00

GNRO-94/00048

Gentlemen:

Attached is Licensee Event Report (LER) 94-002 which is an interim report.

Yours truly,

CRH/RR/

attachment

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NRC FORM 366 U.S. NUCLEAR REGULATORY COMMISSION (5-92)						School State of the State of th	APPROVED BY OMB NO. 3150-0104 EXPIRES 5/31/95								
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ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

On February 25, 1994, Design Engineering personnel identified that equipment in four ESF switchgear rooms may not be operable during post-LOCA conditions if the associated room cooler was out of service. The condition identification was based on preliminary calculations of ventilation cooling loads. Specifically, with the room cooler out of service, the associated room could reach temperatures that were not previously evaluated. The availability of equipment in these rooms could not be guaranteed.

Preliminary investigations revealed that non-conservative assumptions were made in the original design calculation performed by the Architect/Engineer. The original calculation did not address all heat loads that would be expected during accident conditions. They did not adequately consider loads created by certain electrical cables, space heaters, etc. Further evaluations are still in progress to determine the scope of the potential deficiency and determine long term corrective actions. A supplemental report will be submitted by December 01, 1994.

NRC FORM 366A (5-92)	U.S. NUCLEAR REGULATORY COMMISSION		ED BY OMB NO. 3 EXPIRES 5/31/95	150-0104
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TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

A. Reportable Occurrence

During a review of preliminary cooling load calculations, plant personnel identified the potential for four ESF switchgear rooms to exceed the allowable temperature limits in certain post-LOCA conditions. This is considered to be an unanalyzed condition and is being reported pursuant 10 CFR 50.73(a)(2)(ii)(A).

B. Initial Condition

The reactor was in OPERATIONAL CONDITION 1 with reactor power indicating 100 percent power. Reactor temperature was indicating approximately 532 degrees F at the time of discovery.

C. Description of Occurrence

The ESF switchgear room coolers provide a support function for the ESF electrical switchgear covered by GGNS Technical Specification (TS) Section 3.8.3. The operability of the electrical distribution system must be evaluated in the event a room cooler is out of service. Following the identification of cooling load deficiencies in 1986 (as reported in LER 86-029 and its supplements), an evaluation was performed to determine the impact of the increased temperatures that would be experienced in affected rooms. This evaluation was based on the original design calculation and assumptions for cooling loads. The evaluation determined that equipment located in the ESF switchgear rooms would not be significantly affected by the loss of one room cooler during a design basis accident (DBA).

Room coolers are removed from service for routine maintenance, repair or other procedures, as required. Since the TS do not address the operability of the switchgear room coolers, a TS position statement (PS) was developed to establish actions in the event a cooler was out of service. The justification used to support the PS was based on the aforementioned evaluation. The actions specified by the PS required an inoperable room cooler to be restored within 72 hours. Otherwise, obtain Management approval of a plan and schedule for restoration with the next 8 hours. In the event more than one were inoperable, the associated onsite power distribution system would be declared inoperable and the appropriate TS actions taken.

NRC FORM 366A (5-92)	U.S. NUCLEAR REGULATORY COMMISSION		ED BY OMB NO. 3 EXPIRES 5/31/95	150-0104		
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On February 25, 1994, while performing a review of preliminary ventilation cooling loads calculations, plant personnel identified four ESF switchgear rooms that could exceed allowable temperatures during a DBA if the associated room cooler was not in service. The operability of the equipment located in the switchgear rooms could not be guaranteed. These preliminary calculation indicated that the temperature in these four rooms would exceed the maximum temperature for which equipment operability is assured.

As a result of the findings, more stringent actions (TSPS 128, R1) were implemented for rooms that could possibly exceed the previously evaluated temperatures. The required action with one room cooler inoperable, is to restore the inoperable cooler within 72 hours or be in HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

D. Apparent Cause

The investigation of this condition revealed the following cause.

Calculations performed by the Architect/Engineer (Bechtel) were based on non-conservative assumptions regarding the loads created by certain electrical cables, space heaters, etc. The capacity of the room coolers is based on the maximum expected heat loads during accident conditions. However, the heat loads generated by electrical equipment in the rooms was underestimated in original design calculations.

The calculations described above were approved without adequate technical review. During initial design, there were no approved design standards providing a methodology for calculating heat loads for electrical components. Therefore, the calculations were developed using assumptions made by the responsible engineer and checker. Some of these assumptions were non-conservative.

A contributing factor was also identified during the investigation. Plant personnel missed an opportunity to identify the above deficiencies during a review that took place following Service Water deficiencies identified in 1986. Reviews were performed; however the non-conservative assumptions made by the AE were not identified.

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

E. Supplemental Corrective Actions

An evaluation of the four rooms is in progress to determine the functional capability of the affected equipment that is located in the rooms. Also, reviews of other areas served by safety related ventilation is planned. Based on the results of the evaluations, a long term resolution will be proposed.

A supplemental report is scheduled to be submitted by December 1, 1994.

F. Safety Assessment

The above evaluations will determine the full impact of the condition that existed prior to the issuance of the revised PS. The revised PS imp'ements actions commensurate with the significance of this condition. Therefore the health and safety of the public are not in question.

G. Additional Information

Energy Industry Identification System (EIIS) codes are identified in the text within brackets [].