ATTACHMENT I

LICENSEE EVENT REPORT NARRATIVE REPORT

TMI-1 LER 82-001

I. CURRENT ACTIVITIES AT THE TIME OF THE OCCURRENCE

TMI Unit 1 was in a long term cold shutdown. Engineering was performing a design review on the Control Building Ventilation System.

II. LEADING CIRCUMSTANCES

A preliminary safety concern which dealt with the potential of breaching an environmental barrier at the time of installation of an air conditioning unit to service the Control Building computer room has been evaluated. The concern identified the possibility of introducing make-up air from the Auxiliary and Fuel Handling buildings, a potentially contaminated area (post accident), into the Control Building Ventilation System which serves the Control Room. The concern further identified the installation as having been made with no provision for automatic isolation on high airborne radioactivity to exclude the potential contaminants from the Control Building Ventilation System.

III. DESCRIPTION

In November 1975, criteria was developed for the installation of a "closed-loop" air conditioning unit to support the Modular Computer System in the Control Building. In early 1976, the installation was completed. During the 1979 Refueling Outage the ductwork for this air conditioning system was modified with the installation of seismically qualified UL listed 3-hour rated fire dampers (FD-48 and FD-49) to isolate the Control Building side (computer room) from the Fuel Handling side where the air conditioner (AH-E-108) is mounted. The fire dampers trip closed and the air conditioner shuts down when a fire detection system actuated and not on high airborne radioactivity in the area. The fire detection system was installed in conjunction with a Halon 1301 fire suppression system for the computer room sub-floor area.

Although the fire dampers and control building wall penetrations are seismically designed, the adjacent suction and discharge duct work are not. The concern is that if a seismic event were to sufficiently damage this ductwork, in conjunction with a high airborne radioactivity condition in the fuel and auxiliary building ventilation system; the control room ventilation system could potentially become contaminated. Also, should the air conditioning system make-up line let contaminated air into the mod comp room, it could potentially contaminate the control building ventilation system.

IV. RESULTANT EVENTS

None

V. PREVIOUS EVENTS OF A SIMILAR NATURE

None

VI. ROOT CAUSE

Recent design reviews have determined that the "closed-loop" air conditioning system was not built or designed in accordance with the standard review plan (SRP) and, therefore, the system does not meet the requirements of NUREG 0737 Section III.D.3.4. The application of the criteria contained in the SRP has resulted in a "new look" at the purpose of the control room ventilation envelope and has resulted in a reconsideration of the air conditioning system.

VII. IMMEDIATE CORRECTIVE ACTION

The installation of a block off plate on the make-up air duct work has minimized the possibility of the introduction of contaminated make-up air into the Control Building Envelope in the event of a radiation accident.

VIII. LONG TERM CORRECTIVE ACTION

The procedure for responding to a seismic event will be modified to require that the Control Building computer room air conditioner be turned off and the seismic fire dampers ED-48 and ED-49 be manually closed. This procedure is initiated based on seismic event alarms in the Control Room.

The closed fire dampers would preclude significant migration of contamination from the hallway area in the event of contaminated air being present in the Fuel Handling Building.

IX. COMPONENT FAILURE DATA

Since no components failed, no data is included.