Entergy Operations

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November 6, 1990

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

Attention: Document Control Desk

Gentlemen:

SUBJECT: Grand Gulf Nuclear Station Unit 1 Docket No. 50-416 License No. NPF-29 Secondary Containment Doors Found Not Closed During Refueling Outage LER 90-018 AECM-90/0194

Attached is Licensee Event Report (LER) 90-018, which is a final report.

Yours truly,

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RR/WTC:cq Attachment

cc:	Mr. D. C. Hintz (w/a)
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	U.S. Nuclear Regulatory Commission
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	Washington, D.C. 20555
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Attachemnt to AECM 90/0194

#### A. Reportable Condition

On October 8, 1990, plant personnel observed Secondary Containment Door 1A201 not fully closed. On October 9, 1990, Secondary Containment Door 1A401 was observed not closed. On October 20, 1990, Secondary Containment Door 1A401 was found open. These three incidents occurred after secondary containment integrity had been established in order to commence refueling operations. This condition is prohibited by plant Technical Specifications and is reported pursuant to 10CFR50.73(a)(2)(i)(B).

# B. Initial Condition

The plant was in Operational Condition 5, Refueling, at the time of the discoveries. Secondary containment integrity had been established to perform refueling operations for Refueling Outage 4.

### C. Description of Occurrence

On October 8, 1990 while conducting a routine tour of the Auxiliary Building, Operations personnel discovered Secondary Containment Door 1A201 not fully closed. Upon discovery of the breach in secondary containment, the door was closed and the Control Room was notified. On the following day, October 9, 1990, Operations personnel discovered Secondary Containment Door 1A401 not closed. Upon discovery of the condition, the door was closed and the Control Room was notified. On October 20, 1990 during refueling operations, Secondary Containment Door 1A401 was found open. Upon discovery of the condition, the Control Room was notified and the appropriate actions for Technical Specification 3.6.6.1 were taken.

## D. Apparent Cause

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During outages, the number of personnel passing through secondary containment doors increases substantially. In the described events, the doors were inadvertently left open.

In each case, the breach in secondary containment is attributed to personnel error.

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### E. Supplemental Corrective Action

Following the first two discoveries, roving Security personnel were required, once per 10 minutes. to verify all secondary containment doors, which are used for normal access, to be closed. This action would limit the time any door, which was not adequately closed, was open to under 10 minutes.

Following the third incident, access to/from secondary containment was further limited to specific doors. These doors were posted at all times with Security personnel to ensure doors are closed after each use. Other normal access doors have been deactivated and labeled to prevent use. Doors not used for normal access to/from secondary containment are verified closed by roving Security personnel during their hourly building tours.

The above corrective actions will continue to be utilized during future refueling outages until more viable means for secondary containment door control can be established.

GGNS believes the current procedural controls adequately emphasize the need to maintain doors in the losed position.

### F. Safety Assessment

After further investigations, it was determined that the handling of irradiated fuel in primary and secondary containment, core alterations and operations with the potential for draining the reactor vessel were not in progress at the time of the first two incidents.

The third incident occurred with the handling of irradiated fuel in progress. The doors were previously being verified closed once per ten minutes. The last verification on door 1A401 was performed approximately eight minutes before the door was discovered open.