NRC FOR	M 366 U. S. NUCLEAR REGULATORY COMMISSION
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0 1	CONTROL BLOCK: $(PLEASE PRINT OR TYPE ALL REQUIRED INFORMATION)$ $(M D C C N 2 2 0 0 - 0 0 0 0 0 0 - 0 0 0 3 4 1 1 1 1 1 0 0 57 CAT 58 5$
CON'T	PORT LICENSEE CODE 14 15 LICENSE NUMBER 25 26 LICENSE TYPE 30 57 CAT 56 REPORT SOURCE LL 6 0 5 0 0 0 3 1 8 7 1 0 2 2 8 2 8 1 1 1 1 2 8 2 9 DOCKET NUMBER 68 69 EVENT DATE 74 75 REPORT DATE 80 9 EVENT DESCRIPTIO'S AND PROBABLE CONSEQUENCES 10
0 2	At Ci30 with the RCS partially drained in Mode 6, hydrolasing water
03	filled the S/G past the nozzle lip and may have diluted the RCS boron
0 4	concentration. Conservative boron samples indicate a possible dilution
05	of 107 ppm (+1.1% reactivity, T.S. 6.9,1.8.d). Shutdown margin remained
06	greater than 22%. CEA's were inserted and fuel shuffle had not commenced.
0 7	By 1450 the RCS boron samples returned to near pre-event level without
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10	A portable drain pump was installed and checked but the improper pump
11	orientation was not identified. Although the procedure contained a pre-
1 2	caution to maintain S/G level below the nozzle lip, a procedural step
13	has been added to check level every 15 min. of hydrolasing. Subsequent
14	hydrolasing will use borated water or will recirculate a finite volume.
1 5	FACILITY STATUS S POWER OTHER STATUS Image: St
	ACTIVITY CONTENT ELEASED OF RELEASE AMOUNT OF ACTIVITY 35 UCATION OF RELEASE 36 LOCATION OF RELEASE 36 N/A 45 B0
1 7 7 8	NUMBER     TYPE     DESCRIPTION (39)       9     11     12     13     N/A     80
18	NUMBER     DESCRIPTION (41)       0     0     0     0     N/A       9     11     12     80
19 7 B	LOSS OF OR DAMAGE TO FACILITY (43) TYPE DESCRIPTION (43) 2 (42) N/A 9 10 PUBLICITY (45) B211290597 B21112 PUBLICITY (45) B211290597 B21112 PDR ADDCK 05000318 PDR MDCK 05000318
20	N (44) N/A S
7 8	9 10 68 69 80 3 NAME OF PREPARER J. J. Napier PHONE: 301-269-4984

LER NO.	82-49/1T
DOCKET NO.	50-318
LICENSE NO.	DPR 69
EVENT DATE	10-22-82
REPORT DATE	11-12-82
ATTACHMENT	

## CAUSE DESCRIPTION AND CORRECTIVE ACTIONS (CONT'D)

After 40 minutes of hydrolasing on 21 S/G cold leg, contractors were checking the S/G drain filter dose rates when they recognized that the drain pump was hooked-up backwards. Temporary nozzle dams were installed in the S/G to prevent tools and hydrolasing spray from entering the RCS. The dams also appeared to have substantially restricted the dilution of the RCS. Contractors realigned the pump and recommenced operation until completion (20 min). The BG&E supervisor arrived and halted further operation until the S/G was pumped dry (less than 1 hour).

Recent borations of 3000 gal. Boric Acid (7.3%/13,300 ppm) on October 20, 1982 at 1325 and 1000 gal. Boric Acid on October 21, 1982 at 0730 negate accurate chemical analysis of the entire RCS until the concentration can equilibrate. The samples are taken from the shutdown cooling which taps off of 22 hot leg and returns via LPSI to all 4 cold legs. However, both cold leg nozzles on 21 were isolated during the event which contributed to the incomplete mixing. Five Boron samples were taken between the boration and the dilution and range from 2306 to 2593 ( $\Delta$ 287) ppm. A Boron sample before the event of 2570 ppm and the minimum Boron sample during the event of 2463 ppm indicate a maximum possible dilution of 107 ppm. However, these Boron samples are only an indication of the Reactor Coolant Boron concentration in the Shutdown Cooling at that particular time and probably represent a small fluctuation from recent borations.

Alternative dilution calculations based on pump operating time yield a dilution of less than 20 ppm or 160 gals. Conservative assumptions used were: (1) Hydrolasing times with and without drain pump, (2) drain pump times with and without hydrolasing, (3) hydrolasing and drain pump flow rate, and (4) RCS volume and concentration. Similarly, to dilute the RCS 107 ppm would require 1300 gals of non-borated water: clearly greater than all the water used by the hydrolasing (960 gals).

Procedures now include specific steps to verify S/G level for every 15 minutes of hydrolasing. Further hydrolasing will require either borated water or recirculation of a finite volume.