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RECORD #222

TITLE: Reportability of Operating Event

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*J. Wigginton*



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

JUN 01 1988

MEMORANDUM FOR: R. Lee Spessard, Director  
Division of Operational Assessment  
Office for Analysis and Evaluation of Operational Data

FROM: Charles E. Rossi, Director  
Division of Operational Events Assessment  
Office of Nuclear Reactor Regulation

SUBJECT: REPORTABILITY OF SUSQUEHANNA UNIT 2 MARCH 23, 1988 EVENT

In the enclosed memorandum (dated May 3, 1988) you recommend some "appropriate followup action" be taken with Susquehanna concerning their failure to report a March 23, 1988 event in a timely manner. The event, an inadvertent flushing of radioactive resin fines into the spent fuel pool letdown line, resulted in increased radiation levels in the reactor building. The licensee subsequently evacuated the reactor building and manned the Technical Support Center.

Your memorandum states that this event was reportable under the two provisions of 10 CFR 50.72 listed below.

50.72(b)(1)(vi) - "Any event that... significantly hampers site personnel in the performance of duties necessary for the safe operation of the nuclear power plant."

50.72(b)(2)(vi) - "Any event... related to the health and safety of the public or onsite personnel... for which a news release is planned or notification to other government agencies has been or will be made."

*affect*

It is our understanding of the event that the reactor building evacuation and manning of the TSC were precautionary measures taken by the licensee in response to the unknown cause of the increased radiation levels in the reactor building. This conservative response was commended by the region as "prompt and effective" with "very good control" being maintained. The actual radiological consequences of this event amounted to some localized hotspots on the letdown line which did not interfere with free transit of the reactor building, nor effect the operation of any safety system. Therefore, we do not agree that this event was reportable under 50.72(b)(1)(vi) since it did not significantly hamper the performance of duties necessary for safe plant operation.

CONTACT:  
Roger L. Pedersen, NRR  
492-1079

JUN 01 1988

On March 24 the licensee made a press release regarding this event. They were therefore required to make a prompt notification to the NRC by 50.72(b)(2)(vi) and their administrative procedure AD-QA-425. In Inspection Report No. 50-388/88-06 (issued May 4, 1988) the region cited the licensee for failure to promptly notify the NRC following this press release. The region characterized this violation as a severity level IV.

Since the region has taken the appropriate action, we plan no further action on this event.

Original Signed by  
Charles E. Rossi

Charles E. Rossi, Director  
Division of Operational Events Assessment  
Office of Nuclear Reactor Regulation

- Distribution  
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RLPedersen:bt  
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LJCunningham  
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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

MAY 8 1988

MEMORANDUM FOR: Charles E. Rossi, Director  
Division of Operational Assessment  
Office of Nuclear Reactor Regulation

FROM: R. Lee Spessard, Director  
Division of Operational Assessment  
Office for Analysis and Evaluation  
of Operational Data

SUBJECT: REPORTABILITY OF EVENTS THAT SIGNIFICANTLY HAMPER  
SITE PERSONNEL IN THE PERFORMANCE OF THEIR DUTIES

On March 23, 1988, the licensee at Susquehanna Unit 2 inadvertently flushed radioactive resins into a letdown line that runs through the reactor building to the condensate storage tank. The resulting elevated radiation levels inside the reactor building caused the licensee to evacuate all personnel from the reactor building. This evacuation significantly hampered site personnel in the performance of their refueling duties.

The licensee did not initially report this event to the Headquarters Operations Center. Although we recognize that licensees may have a difference of opinion regarding the reportability of events, this licensee should be advised that it was the intent of 10 CFR 50.72 that this type of event should be reported to the NRC. In general, we recommend that all events that significantly hamper site personnel in the performance of their duties be reported to the Headquarters Operations Center in a timely manner.

Description of the Event

On March 23, 1988, with Susquehanna Unit 2 in Operational Condition 5 (Refueling Outage with the core defueled), the fuel pool cooling filter/demineralizer was inadvertently backflushed while shutting down the fuel pool cooling system. As a result, radioactive resin fines and crud were flushed into the fuel pool letdown line which runs through the reactor building to the condensate storage tank. Increased radiation levels throughout the reactor building along the letdown line and in the condensate storage tank were detected. Because of the potential overexposure of personnel working inside the reactor building to these elevated radiation levels, all work inside the reactor building was stopped and all personnel were evacuated from the reactor building. No radioactive material was released from the plant and no plant personnel were overexposed to radiation levels inside the reactor building.

Actions Following the Event

At the plant in the morning after the event, March 24, 1988, the licensee routinely informed the resident inspector of this event. The resident inspector,

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in turn, notified Region I. Region I notified the Commonwealth of Pennsylvania and dispatched regional inspectors to the plant to follow this event. Later in the day, Region I issued Preliminary Notification PNO-I-88-34, but did not immediately transmit a facsimile copy to the Headquarters Operations Center. At 1600 on March 24, 1988, the licensee issued a news release about this event. At 2000 on March 24, 1988, the Commissioners' Assistants were briefed by Region I through the Headquarters Operations Center. At this time, the Headquarters Operations Officer became aware of the details of this event. (See Reportable Event #11853 on March 24, 1988.) This event was included in the Region I Morning Report for March 25, 1988. At 0932 on March 25, 1988, the licensee made an event notification to the Headquarters Operations Center per the requirements of 10 CFR 50.72 based on a news release that had been issued 17 hours and 32 minutes previously. (See Reportable Event #11858 on March 25, 1988.) A copy of Preliminary Notification PNO-I-88-34 arrived at the Headquarters Operations Center through the internal NRC mail in the late morning of March 25, 1988. An update to this event covering licensee cleanup measures was included in the Region I Morning Report for March 28, 1988.

#### Commissioners' Assistants Briefing

During the Commissioners' Assistants Briefing on March 24, 1988, a question arose as to the reportability of this event. The criteria discussed were personnel radiation overexposure limits specified in the licensee's Emergency Plan and personnel radiation overexposure limits specified in 10 CFR 20.403. It was stated that since neither limits had been exceeded, it was concluded that the licensee was not required to make an event notification to the Headquarters Operations Center.

#### Reporting Requirements

There are several NRC documents that address events that significantly hamper site personnel in the performance of their duties that should be reported to the Headquarters Operations Center.

10 CFR 50.72 includes requirements for notifying the Headquarters Operations Center of: (a) any event that significantly hampers site personnel in the performance of duties necessary for the safe operation of the nuclear power plant, and (b) any event or situation, related to the health and safety of onsite personnel, for which a news release is planned or notification to other government agencies has been or will be made. 10 CFR 50.73 also requires that any event internal to a nuclear power plant that significantly hampers site personnel in the performance of duties necessary for the safe operation of the nuclear power plant be reported to the NRC.

#### Conclusions

Because this event included the contamination of the primary plant system with radioactive resin, the evacuation of site personnel from the reactor building to protect them from elevated radiation levels, the significant hampering of site personnel from the performance of routine refueling operations as

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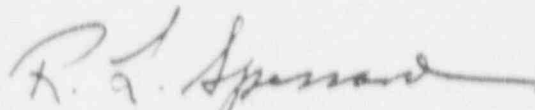
evidenced by the extension of the refueling outage, and the issuance of a news release, we feel that this event should have been reported to the Headquarters Operations Center by the licensee in a timely manner.

Recommended Actions

Although we are not recommending any enforcement action, we recommend that appropriate followup action be taken to explain to the Susquehanna licensee that the NRC has a keen interest in events that significantly hamper site personnel in the performance of their duties and that such events should be reported to the Headquarters Operations Center in a timely manner. Events of this nature increase in significance to the NRC once a news release has been issued.

This event at Susquehanna raises questions regarding the timely reportability of events that significantly hamper site personnel in the performance of their duties. If other events occur in the future which, in our judgement, should be reported to the Headquarters Operations Center in a timely manner, but are not, we will bring these concerns to your attention.

If you have any comments or questions, please contact Eric Weiss (x29005) or Dick Jolliffe (x27159).



R. Lee Spessard, Director  
Division of Operational Assessment  
Office for Analysis and Evaluation  
of Operational Assessment