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While performing fuel moves during shutdown, VY's piping contractor prepared to perform work on the service water portion of the "1B" Reactor Building Air Conditioning (RBAC) unit. The contractor did not properly tag out the RBAC unit as required by plant procedures. This resulted in the "2" RBAC supply line inspirating for 4 hours into the Service Water System and exhausting at the discharge structure. The shift supervisor noted the problem during a tour of the reactor building. He determined that this flow could bypass standby gas treatment and immediately 1) declared Secondary Containment potentially inoperable, 2) stopped all fuel moves and 3) properly isolated the system. Subsequent analysis showed that Operations would have been able to properly respond to a refuel accident (had it occurred during this 4 hr period) without significant release to the environment.

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U.S. NUCLEAR REGULATORY COMMISSION APPROVED OMB NO 3150-0104

EXPIRES 8/31/85

FACILITY NAME (1)	DOCKET NUMBER (2)		LER NUMBER (6)		P.	AGE (J	
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### Identification of Occurrence

NRC Form 366A

During a tour of the reactor building, the shift supervisor inspected the 2" RBAC mechanical bypass installation MB-84-0014. He observed a significant vacuum being drawn into the line and determined then that it bypassed Secondary Containment. He immediately stopped all fuel moves and directed proper tagout of the System.

## System Conditions Prior to the Occurrence

On 6/15/84, Vermont Yankee commenced its Refueling and Maintenance Outage. On 7/16/84 at approximately 1600 hours, the shift supervisor approved Mechanical Bypass 84-0014 while the Reactor Mode Switch was in the Refuel position.

To install a design change, service water supply was isolated to the RBAC's Recirc MG set lube oil coolers and the turbine building SW isolation valve was closed. During the design change review, Reactor Engineering expressed concern that summer conditions would make the refueling effort very uncomfortable. Therefore, a Mechanical Bypass was written to supply cooling water from a conveniently located fire protection hose station to a spool piece between the service water supply header and the RBAC/B unit.

## Description of Occurrence

The sequence of events that caused the unidentified vent path around Secondary Containment are as follows:

- At 1600 hours on July 16, 1984, the shift supervisor reviewed and approved Mechanical Bypass 84-0014, which permitted the contractor to prepare tigs for tagging out equipment and to make other work preparations.
- 2) The contractor's authorized individual had been aware that other work was being performed on the Service Water System. Contrary to procedure, he assumed that the Service Water System was tagged out and did not further review the job with the senior reactor operator.
- At 2330 hours, the SRO turned the shift over to the on-coming SRO and mentioned the MB Request and the lack of tags.
- 4) At approximately 2330 hours, the contractor's authorized individual started work without contacting the Control Room. He tried to vent the 2" RBAC line and noticed vacuum. He then closed the vent valve and installed the temporary PVC Piping and then opened the System. He thought the vacuum was produced by the draining of the water back down the SW pipes and had no concern because he believed service water was totally isolated and air inspiration during draining was normal.
- 5) The contractor's authorized individual called the Control Room at approximately 0200 hours on 7/17/84 and stated that they had finished gluing the PVC Piping and would make the final connection when the glue dried. In conversation with the shift supervisor, the contractor mentioned that he observed a vacuum.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

US NUCLEAR REGULATORY COMMISSION APPROVED ONE NO. 3150-0104 EXPIRES 8/31 85

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)	PAGE (3)		
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VERMONT YANKEE NUCLEAR POWER STATION	0 15 10 10 10 12 17 11	8  4 - 0  1  2 - 0 1	013 05 0 4		

6) The shift supervisor acknowledged the conversation with the contractor and proceded to investigate the situation. At 0230, he went to the Refuel Floor and noticed the aforementioned vacuum condition. He then attempted to isolate the opening with tape and was unsuccessful. The shift supervisor determined that the flow could bypass standby gas treatment and immediately declared Secondary Containment potentially inoperable, stopped refueling operation and closed SW valve 23 D at approximately 0330, after reviewing the Mechanical Bypass.

## Designation of Apparent Cause of Occurrence and Corrective Action

This event resulted from personnel error. The individual who was responsible for tagging did not properly isolate the RBAC-SW System. Normal shift surveillance detected and then properly isolated the affected System. The individual responsible for the System tagout has been removed from the VY Switching and Tagging List.

## Analysis of Occurrence

AC Form 366A

- The event resulted because of personnel error. The person involved did not follow the rules set forth in procedure AP 0140 entitled "Vermont Yankee Local Control Switching Rules". All procedures were reviewed for their potential impact on the event and no corrections are deemed necessary. Proper identification by the shift supervisor terminated the event by halting the refueling operation and isolating the System.
- 2) From the very conservative analysis of a refuel accident at the time of the occurrence, a person standing at the site boundary would receive less than 20% of the 10CFR100 thyroid dose. The analysis considered that the entire release goes through the vented path.
- 3) Although the service water system is an undesirable discharge path, the following safeguards would have mitigated the potential release.
  - a) Two Service Water Radiation Monitors Upon indication of increasing radiation level, Operations would immediately isolate service water to prevent further release.
  - b) The leak path is through service water and out through circ water discharge. If a release were to occur, a factor of 10 reduction would be provided to remove the radioactive Iodine 131.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

#### APPROVED OM8 NO 3150-0104 EXPIRES 8/31/85

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- Additionally, the conservative analysis performed took no credit for the following:
  - a) Removal of any Iodine by standby gas.
  - b) FSAR assumes fuel falls through air over the core and all pins break. Kinetic Energy would be reduced by a factor of 3.5 due to the fact that fuel was moved over the spent fuel pit. An additional reduction due to water resistance was also not considered.
  - c) The FSAR assumes a 7X7 fuel type, where P8X8R is the present fuel used and a 4 to 10% reduction in activity is provided.
  - Neither credit for meteorological conditions nor large reductions for dispersion were considered.
  - e) The DBA assumes power level of 1665 Mwt, since we operate at 1593 Mwt maximum, an additional 5% for activity reduction was not taken.

Based on the information presented, there were no consequences to the health and safety of the public due to this occurrence.

NRC Porm 366A



# VERMONT YANKEE NUCLEAR POWER CORPORATION

P. O. BOX 157 GOVERNOR HUNT ROAD VERNON, VERMONT 05354 VYV-84-475

September 16, 1984

U. S. Nuclear Regulatory Commission Document Control Desk Washington, D. C. 20555

REFERENCE: Operating License DPR-28 Docket No. 50-271 Reportable Occurrence No. LER 84-12, Rev. 1

Dear Sirs:

As defined by 10CFR50.73, we are reporting the attached Reportable Occurrence as LER 84-12, Rev. 1 to correct the word "reduction" in Step 4.d on page 4.

Very truly yours,

formas

IE22

James P. Pelletier Plant Manager

RDP/cjm

cc: Regional Administrator USNRC Office of Inspection and Enforcement Region I 631 Park Avenue King of Prussia, Pennsylvania 19406