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NRC Form 366 (9.83) LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION APPROVED OMB NO 3150-3104

EXPIRES 8/31/88

ACILITY NAME (1)	OOCKET NUMBER (2)	LER NUMBER (6)	PAGE (3)		
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THIS IS A REVISION TO LER 85-042 SUBMITTED ON SEPTEMBER 30, 1985

ON AUGUST 29, 1985, AT 1140 HOURS WITH BOTH UNITS 1 AND 2 IN MODE 5 (COLD SHUTDOWN), IT WAS DETERMINED FOLLOWING SURVEILLANCE TEST ACTIVITIES, THAT THE UNIT 2 CONTROL ROOM EMERGENCY AIR INTAKE DAMPER (HV-ACRDA-2) (IEEE/VI) HAD BEEN IMPROPERLY POSITIONED FOR A PERIOD OF APPROXIMATELY 14 DAYS. BECAUSE OF THE INTERDEPENDENCY OF THE UNIT 1 AND UNIT 2 VENTILATION SYSTEMS, THIS WOULD HAVE PREVENTED BOTH UNITS CONTROL ROOMS FROM ACHIEVING PRESSURIZATION AS REQUIRED BY TECHNICAL SPECIFICATION 4.7.5.1.

IN THE EVENT OF A RELEASE OF TOXIC GAS OR RADIOLOGICAL MATERIAL, THE CONTROL ROOM EMERGENCY VENTILATION SYSTEM WOULD BE ALICNED IN THE CLEANUP MODE. IN THIS MODE, HV-ACRDA-2 CLOSES TO A PRESET INTERMEDIATE POSITION TO ALLOW APPROXIMATELY 700 CFM OF FILTERED MAKEUP AIR INTO THE CONTROL ROOM. IN THIS INSTANCE, DUE TO THE IMPROPER ADJUSTMENT, THE DAMPER WOULD HAVE CLOSED (FROM THE INTERMEDIATE POSITION), THEREFORE, NOT PERMITTING THE FLOW NECESSARY TO ADEQUATELY PRESSURIZE THE CONTROL ROOMS.

ON AUGUST 16, 1985, A SURVEILLANCE TEST (12 THP 4030 STP.229) WAS CONDUCTED FOLLOWING THE COMPLETION OF MODIFICATIONS TO THE UNIT 1 CONTROL ROOM VENTILATION SYSTEM. DURING THE TEST A NEW INTERMEDIATE DAMPER POSITION WAS DETERMINED. THE IMPROPER ADJUSTMENT OF THE DAMPER OCCURRED WHILE ATTEMPTING TO SET THE DAMPER ACTUATOR LIMITORQUE SWITCH TO THE NEWLY DETERMINED INTERMEDIATE POSITION. THE PROCEDURE USED FOR DAMPER ADJUSTMENT (12 THP 6040 PER.094) DID NOT CONTAIN ADEQUATE DETAIL TO ENSURE CORRECT DAMPER OPERATION. THE DAMPER WAS CORRECTLY ADJUSTED AND VERIFIED OPERABLE AT APPROXIMATELY 1100 HOURS, AUGUST 29, 1985.

TO PREVENT RECURRENCE THE APPLICABLE PROCEDURES (12 THP 4030 STP.229 AND 12 THP 6040 PER.094) HAVE BEEN REVISED TO INSURE PROPER DAMPER ADJUSTMENT/OPERATION.

## SAFETY REVIEW

NRC Form 366A

AS A RESULT OF NUREG-0737 ITEM III.D.3.4 (CONTROL ROOM HABITABILITY), A SIGNIFICANT EFFORT WAS MADE TO SEAL THE CONTROL ROOMS BY WEATHER STRIPPING DOORS AND HATCHES. ADDITIONALLY, THE HVAC EQUIPMENT ROOMS WHICH COMMUNICATE WITH THE CONTROL ROOMS WERE MADE TIGHTER BY SEALING DRAINS AND PENETRATIONS IN MARCH OF 1985. (LESS THAN 700 CFM OF MAKEUP AIR IS REQUIRED FOR PRESSURIZATION TO 1/16" WG).

IT IS NOTED THAT THE IMPROPER DAMPER SETTING WOULD NOT HAVE PREVENTED THE CHARCOAL AND HEPA FILTERS FROM OPERATING. THEY STILL WOULD HAVE BEEN AVAILABLE FOR FILTERING RADIOLOGICAL GASES RECIRCULATED THROUGH THEM.

ADDITIONAL PROTECTION IS PROVIDED BY THE 5 SELF-CONTAINED BREATHING PACKS LOCATED OUTSIDE THE CONTROL ROOMS, AS WELL AS APPROXIMATELY 25 OTHERS LOCATED THROUGHOUT

(9-83) LICENSEE EVENT REPORT (LER) TEXT CONTINUATION												U.S. NUCLEAR REGULATORY COMMISSION APPROVED OMB NO. 3150-0104 EXPIRES. 8/31:85									
FACILITY NAME (1)			DOCKET NUMBER (2)								LER NUMBER (6)							-	AGE (3)		
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THE PLANT. FILTRATION TYPE MASKS ARE ALSO AVAILABLE NEARBY IN THE ACCESS CONTROL AREA. FOR RADIOLOGICAL RELEASES, CONTROL ROOM PERSONNEL WOULD HAVE BEEN ALERTED TO INCREASING RADIATION LEVELS BY THE R1 MONITORS, AND, AS DIRECTED BY HEALTH PHYSICS PERSONNEL, WOULD THEN HAVE DONNED THE APPROPRIATE PROTECTIVE CLOTHING.

## CONCLUSION

THE CONTROL ROOM VENTILATION SYSTEM WAS NOT REQUIRED TO OPERATE IN THE EMERGENCY MODE DURING THE TIME THE DAMPER WAS MISALIGNED. AS SUCH, THE CONDITION DID NOT POSE A HAZARD TO THE HEALTH AND SAFETY OF THE PUBLIC. ADDITIONALLY, BECAUSE THE CHARCOAL FILTERS WOULD HAVE BEEN AVAILABLE FOR CLEANUP, AND BECAUSE PROTECTIVE BREATHING APPARATUS AND CLOTHING WOULD BE AVAILABLE TO CONTROL ROOM PERSONNEL, IT IS CONCLUDED THAT NO SIGNIFICANT HAZARD TO PUBLIC HEALTH AND SAFETY WOULD HAVE EXISTED HAD THE SYSTEM BEEN REQUIRED TO FUNCTION.