

LICENSEE EVENT REPORT (LER)

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ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

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|---|---|---------------------------|
| FACILITY NAME (1) MONTICELLO NUCLEAR GENERATING PLANT | DOCKET NUMBER (2) 05000 - 263 | PAGE (3) 1 OF 5 |
|---|---|---------------------------|

TITLE (4)
Failure to Comply with Tech Spec Requirement to Verify that the Control Room Ventilation System Maintains a Positive Pressure with Respect to Adjacent Areas

| EVENT DATE (5) | | | LER NUMBER (6) | | | REPORT NUMBER (7) | | | OTHER FACILITIES INVOLVED (8) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|-------|---|-------------------------------------|-------------------|----------------------|--|-----|------|-------------------------------|------------------------|--------------------|---|---|--|--|--|--|--|--|--|--|-----------|-----------|-----------------|----------|------------------|-------|-----------------|-------------|----------------|----------|------------------|-------------|------------------|-------|--|--|-------------------|-------------------------------------|----------------|----------------------|--|--|--|------------------|--|-----------------|----------------------|--|--|-----------------|--|------------------|----------------|
| MONTH | DAY | YEAR | YEAR | SEQUENTIAL NUMBER | REVISION NUMBER | MONTH | DAY | YEAR | FACILITY NAME | DOCKET NUMBER | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 12 | 12 | 96 | 96 | 013 | 00 | 01 | 13 | 97 | FACILITY NAME | DOCKET NUMBER 05000 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <table border="1"> <tr> <td rowspan="2">OPERATING MODE (9)</td> <td rowspan="2">N</td> <td colspan="9">THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)</td> </tr> <tr> <td>20.402(b)</td> <td>20.405(c)</td> <td>50.73(a)(2)(iv)</td> <td>73.71(b)</td> </tr> <tr> <td rowspan="2">POWER LEVEL (10)</td> <td rowspan="2">100 %</td> <td>20.405(a)(1)(i)</td> <td>50.36(c)(1)</td> <td>50.73(a)(2)(v)</td> <td>73.71(c)</td> </tr> <tr> <td>20.405(a)(1)(ii)</td> <td>50.36(c)(2)</td> <td>50.73(a)(2)(vii)</td> <td>OTHER</td> </tr> <tr> <td colspan="2"></td> <td>20.405(a)(1)(iii)</td> <td><input checked="" type="checkbox"/></td> <td>50.73(a)(2)(i)</td> <td>50.73(a)(2)(viii)(A)</td> <td rowspan="3">(Specify in Abstract below and in Text, NRC Form 366A)</td> </tr> <tr> <td colspan="2"></td> <td>20.405(a)(1)(iv)</td> <td></td> <td>50.73(a)(2)(ii)</td> <td>50.73(a)(2)(viii)(B)</td> </tr> <tr> <td colspan="2"></td> <td>20.405(a)(1)(v)</td> <td></td> <td>50.73(a)(2)(iii)</td> <td>50.73(a)(2)(x)</td> </tr> </table> | | | | | | | | | | | OPERATING MODE (9) | N | THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11) | | | | | | | | | 20.402(b) | 20.405(c) | 50.73(a)(2)(iv) | 73.71(b) | POWER LEVEL (10) | 100 % | 20.405(a)(1)(i) | 50.36(c)(1) | 50.73(a)(2)(v) | 73.71(c) | 20.405(a)(1)(ii) | 50.36(c)(2) | 50.73(a)(2)(vii) | OTHER | | | 20.405(a)(1)(iii) | <input checked="" type="checkbox"/> | 50.73(a)(2)(i) | 50.73(a)(2)(viii)(A) | (Specify in Abstract below and in Text, NRC Form 366A) | | | 20.405(a)(1)(iv) | | 50.73(a)(2)(ii) | 50.73(a)(2)(viii)(B) | | | 20.405(a)(1)(v) | | 50.73(a)(2)(iii) | 50.73(a)(2)(x) |
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| | | 20.402(b) | 20.405(c) | 50.73(a)(2)(iv) | 73.71(b) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| POWER LEVEL (10) | 100 % | 20.405(a)(1)(i) | 50.36(c)(1) | 50.73(a)(2)(v) | 73.71(c) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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LICENSEE CONTACT FOR THIS LER (12)

| | |
|---------------------------|---|
| NAME Tom Parker | TELEPHONE NUMBER (Include Area Code) 612-295-1014 |
|---------------------------|---|

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

| CAUSE | SYSTEM | COMPONENT | MANUFACTURER | REPORTABLE TO NPRDS | CAUSE | SYSTEM | COMPONENT | MANUFACTURER | REPORTABLE TO NPRDS |
|-------|--------|-----------|--------------|---------------------|-------|--------|-----------|--------------|---------------------|
| | | | | | | | | | |
| | | | | | | | | | |

SUPPLEMENTAL REPORT EXPECTED (14)

| | | | | | |
|--|--|-------------------------------|-------|-----|------|
| YES (IF YES, COMPLETE EXPECTED SUBMISSION DATE) | <input checked="" type="checkbox"/> NO | EXPECTED SUBMISSION DATE (15) | MONTH | DAY | YEAR |
|--|--|-------------------------------|-------|-----|------|

ABSTRACT LIMIT TO 1400 SPACES, I.E., APPROXIMATELY 15 SINGLE-SPACED TYPEWRITTEN LINES) (16)
NCR FORM 366 (5-91)

A surveillance procedure for the Control Room Emergency Filtration System was found not to comply with Technical Specification surveillance requirement. The requirement specifies that once every 18 months the control room ventilation and emergency filtration systems be placed in the pressurization mode and demonstrated to maintain the control room "... at a positive pressure with respect to adjacent areas ...". The positive pressure ensures that contaminated air does not leak into the control room. All adjacent areas had not been tested.

The cause of this event is that the original surveillance failed to require the testing of all adjacent areas. The original surveillance tested those areas that were tested in the pre-operational test and not all areas adjacent to the control room. All areas adjacent to the control room were measured and the control room was found to be at a positive pressure relative to the adjacent areas.

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PDR ADOCK 05000263
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LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

| FACILITY NAME (1) | DOCKET NUMBER (2) | LER NUMBER (6) | | | PAGE (3) |
|-------------------------------------|-------------------|----------------|-------------------|-----------------|----------|
| | | YEAR | SEQUENTIAL NUMBER | REVISION NUMBER | |
| MONTICELLO NUCLEAR GENERATING PLANT | 05000 263 | 96 | 013 | 00 | 2 of 5 |

Description

On December 12, 1996, while at 100% power, a surveillance procedure, 0466-1, for the Control Room Emergency Filtration System (EIS system Code: VI) was found not to comply with Technical Specification surveillance requirement, 4.17.B.2.b.(3). The requirement specifies that once every 18 months the control room ventilation and emergency filtration systems be placed in the pressurization mode and demonstrated to maintain the control room "... at a positive pressure with respect to adjacent areas" The positive pressure ensures that contaminated air does not leak into the control room (EIS System Code: NA). All adjacent areas had not been tested.

Originally, the "adjacent areas" were determined to be the Turbine Building and the Administration Building. The following additional areas are adjacent to the control room: the cable spreading room, reactor building, heating/ventilation room and the Recirc MG set room.

Until August 12, 1996, the only differential pressures measured were between the control room/turbine building and the control room/administrative building. We believe this was based on the fact that there are two doors to the control room, one to the turbine building and one to the administrative building. Testing with respect to these areas was originally determined to be sufficient as this is the location of the most probable leakage.

The following is the sequence of events associated with this event:

August 8, 1996 The system engineer was reviewing Technical Specification 4.17.B.2.b.(3) and identified a compliance concern. The issue was documented in Condition Report 96001855.

August 12, 1996 The periodic performance of surveillance procedure 0466-1 was scheduled for this day. Until the matter was resolved, it was decided to measure the differential pressure between the control room and the following areas: cable spreading room, reactor building and heating/ventilation room. The control room pressure was found to positive with respect to all three areas.

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|-------------------------------------|-------------------|----------------|-------------------|-----------------|----------|
| | | YEAR | SEQUENTIAL NUMBER | REVISION NUMBER | |
| MONTICELLO NUCLEAR GENERATING PLANT | 05000 263 | 96 | 013 | 00 | 3 of 5 |

- September 12, 1996 The operations committee concurred that the issue was not reportable, but more documentation was needed to support this conclusion.

- December 12, 1996 The operations committee determined that prior to August 12th, the plant had not strictly followed this specification and this situation was therefore reportable.

- January 7, 1997 Another area was discovered to be adjacent to the control room, the Recirc MG Set room. The Recirc MG set room is next to the reactor building and basically one level above the control room. However, the bottom of the ceiling of the control room is 6 inches above the top of the Recirc MG Set room floor. A surveillance test was performed and the control room was found to be at a positive pressure with respect to the Recirc MG set room.

Summary of Areas Adjacent to the Control Room

| Area | Positive Pressure Measurement |
|------------------------------|------------------------------------|
| Turbine Building | Always measured |
| Administration Bldg | |
| Cable Spreading Room | |
| Reactor Building | Began measuring on August 12, 1996 |
| Heating and Ventilating Room | |
| Recirc MG Set Room | Began measuring on January 7, 1997 |

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|-------------------------------------|-------------------|----------------|-------------------|-----------------|----------|
| | | YEAR | SEQUENTIAL NUMBER | REVISION NUMBER | |
| MONTICELLO NUCLEAR GENERATING PLANT | 05000 263 | 96 | 013 | 00 | 4 of 5 |

Cause

The cause of this event is that the original surveillance failed to require the testing of all adjacent areas. The original surveillance only tested those areas that were tested in the pre-operational test.

Pre-operation testing was observed by the NRC as documented on page 7 of the May 30, 1989 NRC Safety Evaluation Report that issued surveillance requirement 4.17.B.2.b.(3). The NRC staff were comfortable with the areas being measured. This may have lead those involved to conclude that the pre-operational testing would comply with the Technical Specification.

Analysis of Reportability

This event was identified in August and determined to be reportable in December. Several recent regulatory events suggested that verbatim compliance with the Technical Specifications was required. Following the evaluation of these events, it was decided that this event was reportable.

This event is reportable per 10 CFR Part 50, Section 50.73(a)(2)(i)(B) since this event resulted in "... operation or condition prohibited by the plant's Technical Specifications;".

Safety Significance

The purpose of the requirement for the control room to be at a positive pressure relative to the adjacent areas, ensures that following any accidents contaminated air does not leak into the control room. This ensures that the control room will remain habitable at all times. All adjacent areas were found to be a lower pressure than the control room.

Therefore, there is no safety significance to this event.

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| FACILITY NAME(1) | DOCKET NUMBER (2) | LER NUMBER (8) | | | PAGE (3) |
|-------------------------------------|-------------------|----------------|-------------------|-----------------|----------|
| | | YEAR | SEQUENTIAL NUMBER | REVISION NUMBER | |
| MONTICELLO NUCLEAR GENERATING PLANT | 05000 263 | 96 | 013 | 00 | 5 of 5 |
| | | | | | |

Actions

Corrective Actions

The areas adjacent to the control room were evaluated and determined to be acceptable by testing.

A door between the Recirc MG set room and the heating and ventilating room will be moved. There is a gap between the reactor building and the administration building. The door was located in the administration building wall opening, making the gap at the same pressure as the Recirc MG set room. The door will be moved to the reactor building opening. This will make the gap at the same pressure as the heating and ventilation room rather than that of the Recirc MG set room. Following completion of this move, the Recirc MG set room to control room differential pressure will no longer need to be measured.

Preventive Actions

All surveillances associated with the control room ventilation will be reviewed to ensure similar problems do not exist.

Failed Component Identification - None

Similar Events - None