Consumers Power Company

General Offices: 1945 West Parnall Road, Jackson, MI 49201 • (517) 788-0550

August 21, 1985

US Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT -
LICENSEE EVENT REPORT 85-008 - LICENSEE EVENT REPORT 85-008 - INOPERABLE CONTROL ROOM EMERGENCY AIR CLEANUP SYSTEM

Licensee Event Report (LER) 85-008 (Inoperable Control Room Emergency Air Cleanup System) is attached. This LER was determined to be voluntary and is submitted for your information.

Brian D Johnson
Staff Licensing Engineer

CC Administrator, Region III, USNRC
NRC Resident Inspector - Palisades

Attachment

IE22
1/1

OC0885-0007B-NL02

NRC Form 366
(9-83)

U.S. NUCLEAR REGULATORY COMMISSION
APPROVED OMB NO 3150-0104
EXPIRES 8/31/88

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
PALISADES NUCLEAR PLANT	0 5 0 0 0 2 5 5	1 OF 0 2

TITLE (4)

INOPERABLE CONTROL ROOM EMERGENCY AIR CLEANUP SYSTEM

EVENT DATE (5)			LER NUMBER (6)				REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR		SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES	DOCKET NUMBER(S)
0 7	2 3	8 5	8 5	-	0 0 8	- 0 0	0 8	2 1	8 5	N/A	0 5 0 0 0
										N/A	0 5 0 0 0

OPERATING MODE (9)	N	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)			
POWER LEVEL (10)	0 9 8	20.402(b)	20.405(c)	50.73(a)(2)(iv)	73.71(b)
		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)	X OTHER (Specify in Abstract below and in Text, NRC Form 366A)
		20.405(a)(1)(iii)	50.73(a)(2)(i)	50.73(a)(2)(viii)(A)	
		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)	Voluntary

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER
	AREA CODE
RAFenech; Technical Engineer; Palisades	6 1 6 7 6 4 - 8 9 1 3

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)		EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
YES (If yes, complete EXPECTED SUBMISSION DATE)	X NO				

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

On July 22, 1985, with the Plant at 98% power, a Control Room exhaust fan and its associated ducting were removed by contract personnel. On July 23, 1985, Plant personnel noted that removal of the ducting created an unisolable path to the external environment and had rendered the Control Room Emergency Air Cleanup System inoperable. A plant shutdown was commenced until a temporary cover was installed to seal the opening. Subsequently, normal power operation was resumed.

An evaluation of the occurrence determined that inadequate information had been provided on plant drawings. The drawings did not identify the necessary seal location for Control Room integrity. Personnel incorrectly assumed that removal of the equipment would not affect the required seal. A review of the Control Room ventilation drawings will be performed and revisions will be provided as required.

This occurrence involved a condition prohibited by a proposed Technical Specification and has been submitted as a voluntary report.

IE22 1/1

1C0885-0154B-LI02

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
PALISADES NUCLEAR PLANT INOPERABLE CONTROL ROOM EMERGENCY AIR CLEANUP SYSTEM	0 5 0 0 0 2 5 5	8 5	— 0 0 8	— 0 0	0 2 OF 0 2

TEXT (If more space is required, use additional NRC Form 366A's) (17)

On July 22, 1985, at 1530, with the Plant at 98% power, removal of Control Room exhaust fan V-16 [VI;FAN] and its associated ducting [VI;DUCT] was completed by contract personnel. The equipment was removed to allow access for an inspection of the Safety Injection and Refueling Water Tank [BP;TK] support structure.

On July 23, 1985, at 0950, plant personnel noted that removal of the ducting had created an unisolable path to the Control Room from the external environment. As a result, the Control Room Emergency Air Cleanup System [VI] was considered to be inoperable.

Under proposed Technical Specification 3.14.1, for plant conditions above cold shutdown, the Control Room Emergency Air Cleanup System must be operable. Allowance is provided for one of the two trains of the system to be inoperable under a Limiting Condition of Operation. However, removal of the ventilation ductwork rendered both trains inoperable. Technical Specification 3.0.3 was determined to be applicable in that circumstances in excess of those addressed in specifications existed.

At 0958, personnel commenced a plant shutdown to hot standby in accordance with Technical Specification 3.0.3. At 1038, a temporary closure was installed to seal the unisolable opening. At 1040, power escalation was commenced to normal power operation.

Exhaust fan V-16 and the associated ducting provide ventilation during normal operation to a portion of the Control Room. During accident conditions, the fan and the external environment are isolated by dampers [VI;DMP] D-17 and D-18 installed beneath the fan and within the ducting. Personnel incorrectly assumed that a seal was provided at the dampers and that the ducting was unnecessary for operability of the Control Room Emergency Air Cleanup System. In actuality, the seal was provided by the ducting at the roof area rather than at the dampers. Therefore, removal of the ducting created a free path from the environment around the dampers to the Control Room.

An evaluation of the occurrence determined that inadequate information had been provided on plant drawings of the Control Room ventilation system. The drawings did not clearly identify the necessary seal location. A review of all Control Room ventilation drawings will be performed. Revisions will be provided as necessary to assure all required system boundary seals are annotated.

This occurrence involved a proposed Technical Specification for the Control Room Emergency Air Cleanup System. Although no requirement exists to implement corrective action, personnel elected to follow the actions specified in the proposal. This event has been submitted as a voluntary report of a condition prohibited by a proposed Technical Specification.