

## LICENSEE EVENT REPORT

[illegible]

Description of Occurrence:

On August 28, 1978, the plant was taken off-line in order to permit repairs to CRDM seals and to PCP seals. During PCS cooldown, the containment building was ventilated through the purge supply and exhaust valves. Because of leakage problems in a 3-way selector valve in the air supply system to the T-rings for CVs 1805, 1806 and 1807, these selector valves were bypassed in April 1978. As a result of this bypass, the T-rings for these valves required manual operation in order to be either pressurized or depressurized. This in turn meant that the valves were inoperable from an automatic closing/sealing point of view. Because the PCS was at 305°F when the purge valves were opened, the containment integrity requirements of Technical Specification 3.6.1 were not met.

Proximate Cause:

The decision to open the purge valves was prompted by the necessity to ventilate the containment building prior to opening the equipment hatch. The purging requirement was discussed at length during a plant staff meeting on August 28; however, at that time none of the staff members present recognized that opening CVs 1805, 1806 and 1807 would render those valves inoperable and thereby lead to a violation of containment integrity requirements. Prior to opening the valves, it was found that the valves had previously been tagged closed. The reason that they had been tagged was to prevent unnecessary usage of the valves in order to minimize the probability of valve failure (these valves have exhibited a high failure rate over the past several years). This tagging, which was performed prior to bypassing the T-ring 3-way valves, was not tied to containment integrity requirements. As a result, tagging clearance was requested and received and the valves were opened.

Probable Consequences:

All of the containment purge valves would have closed upon receipt of either a manual or automatic closing signal. However, no sealing air would have been supplied to the T-rings of CVs 1805, 1806 and 1807. As a result, a path for leakage through the purge exhaust valves (CVs 1806 and 1805) would have existed until air could have been manually restored to their T-rings. At the time of the occurrence, PCS temperature was 305°F. The corresponding saturation pressure for this temperature is approximately 57 psig. As a result, the energy stored in the PCS was relatively low as compared to that at normal operating temperature and pressure. Consequently, if a loss of coolant accident had occurred at the same time the valves were inoperable, the peak pressure inside containment would have been considerably lower than 55 psig and the corresponding leakage out of containment would, in all probability, have been of a small magnitude. Because of the lowered PCS temperature, it is felt that public health or safety was not threatened.

Root Cause:

This occurrence could have been prevented by proper tagging of the valves (i.e., tags with statements that valve opening would result in a breach of containment integrity). When the 3-way valves were bypassed, the Plant Review Committee dictated that the valves should be tagged. Apparently, the individual who was to perform the tagging saw that the valves had previously been tagged (see details in "Proximate Cause" above) and concluded that no additional tagging was needed. As discussed above (Proximate Cause) the tagging which was already on the valves was insufficient to assure containment integrity. The lesson learned, therefore, is that when an item needs to be tagged for reasons different from existing tags, new tags must be issued.

Corrective Action:

The valves were closed and the T-rings pressurized. The valve tagging was modified to reflect the containment integrity requirements. This occurrence, and the lessons learned, will be discussed with appropriate supervisory personnel. When materials are available, the valves will be repaired in order to restore them to a fully operable status.