

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) PLANT HATCH, UNIT 2	DOCKET NUMBER (2) 0 5 0 0 0 3 6 6	PAGE (3) 1 OF 3
---	---	---------------------------

TITLE (4)
PERSONNEL ERROR ALLOWS VALVE TO BE OPENED RESULTING IN PRIMARY CONTAINMENT VIOLATION

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)																																			
04	15	88	88	013	00	05	16	88			05000																																			
<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:15%;">OPERATING MODE (9) 1</td> <td colspan="11">THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11):</td> </tr> <tr> <td rowspan="5">POWER LEVEL (10) 1,00</td> <td><input type="checkbox"/> 20.02(b)</td> <td><input type="checkbox"/> 20.405(c)</td> <td><input type="checkbox"/> 50.73(a)(2)(iv)</td> <td><input type="checkbox"/> 73.71(b)</td> </tr> <tr> <td><input type="checkbox"/> 20.405(a)(1)(i)</td> <td><input type="checkbox"/> 50.36(c)(1)</td> <td><input type="checkbox"/> 50.73(a)(2)(v)</td> <td><input type="checkbox"/> 73.71(c)</td> </tr> <tr> <td><input type="checkbox"/> 20.405(a)(1)(ii)</td> <td><input type="checkbox"/> 50.36(c)(2)</td> <td><input type="checkbox"/> 50.73(a)(2)(vi)</td> <td rowspan="3">OTHER (Specify in Abstract below and in Text, NRC Form 366A)</td> </tr> <tr> <td><input type="checkbox"/> 20.405(a)(1)(iii)</td> <td><input checked="" type="checkbox"/> 50.73(a)(2)(i)</td> <td><input type="checkbox"/> 50.73(a)(2)(vii)(A)</td> </tr> <tr> <td><input type="checkbox"/> 20.405(a)(1)(iv)</td> <td><input type="checkbox"/> 50.73(a)(2)(ii)</td> <td><input type="checkbox"/> 50.73(a)(2)(vii)(B)</td> </tr> <tr> <td><input type="checkbox"/> 20.405(a)(1)(v)</td> <td><input type="checkbox"/> 50.73(a)(2)(iii)</td> <td><input type="checkbox"/> 50.73(a)(2)(ix)</td> <td></td> </tr> </table>												OPERATING MODE (9) 1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11):											POWER LEVEL (10) 1,00	<input type="checkbox"/> 20.02(b)	<input type="checkbox"/> 20.405(c)	<input type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> 73.71(b)	<input type="checkbox"/> 20.405(a)(1)(i)	<input type="checkbox"/> 50.36(c)(1)	<input type="checkbox"/> 50.73(a)(2)(v)	<input type="checkbox"/> 73.71(c)	<input type="checkbox"/> 20.405(a)(1)(ii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(vi)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)	<input type="checkbox"/> 20.405(a)(1)(iii)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)	<input type="checkbox"/> 50.73(a)(2)(vii)(A)	<input type="checkbox"/> 20.405(a)(1)(iv)	<input type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(vii)(B)	<input type="checkbox"/> 20.405(a)(1)(v)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(ix)	
OPERATING MODE (9) 1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11):																																													
POWER LEVEL (10) 1,00	<input type="checkbox"/> 20.02(b)	<input type="checkbox"/> 20.405(c)	<input type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> 73.71(b)																																										
	<input type="checkbox"/> 20.405(a)(1)(i)	<input type="checkbox"/> 50.36(c)(1)	<input type="checkbox"/> 50.73(a)(2)(v)	<input type="checkbox"/> 73.71(c)																																										
	<input type="checkbox"/> 20.405(a)(1)(ii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(vi)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)																																										
	<input type="checkbox"/> 20.405(a)(1)(iii)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)	<input type="checkbox"/> 50.73(a)(2)(vii)(A)																																											
	<input type="checkbox"/> 20.405(a)(1)(iv)	<input type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(vii)(B)																																											
<input type="checkbox"/> 20.405(a)(1)(v)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(ix)																																												

LICENSEE CONTACT FOR THIS LER (12)

NAME J. D. Heidt, Nuclear Licensing Manager - Hatch	TELEPHONE NUMBER AREA CODE: 4 0 4 5 2 6 - 4 5 3 0
---	---

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

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDOS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDOS

SUPPLEMENTAL REPORT EXPECTED (14)

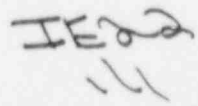
<input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE) <input checked="" type="checkbox"/> NO	EXPECTED SUBMISSION DATE (15) MONTH: DAY: YEAR:
--	--

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

On 4/15/88 at approximately 0930 CDT, Unit 2 was in the run mode at an approximate power level of 2432 Mwt (approximately 100 percent of rated thermal power). At that time, plant operations personnel were performing a functional test procedure in order to return a Hydrogen Recombiner (EIIS Code BB) to service and they opened a Primary Containment Isolation System (PCIS EIIS Code JM) valve. This valve was opened prior to ensuring that the system piping was leak or pressure tested after being repaired. The piping was the second PCIS barrier and the failure to test the piping violated primary containment integrity.

The root cause of this event is cognitive personnel error. Plant personnel did not initially realize the piping was the second primary containment barrier.

Corrective actions for this event included: 1) closing isolation valves, 2) initiating controls to prevent opening of the valves, 3) performing testing of the piping, and 4) counseling involved personnel.

8805240202 880516
 PDR ADDCK 05000366
 S PDR


LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1) PLANT HATCH, UNIT 2	DOCKET NUMBER (2) 0 5 0 0 0 3 6 6	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		8 8	0 1 3	0 0	0 2	OF	1 3

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

A. REQUIREMENT FOR REPORT

This report is required per 10 CFR 50.73 (a)(2)(i), because a condition existed that was prohibited by the plant's Technical Specifications. Specifically, primary containment integrity was not maintained as required by the Unit 2 Technical Specifications section 3.6.1.1.

B. UNIT(s) STATUS AT TIME OF EVENT

1. Power Level/Operating Mode

Unit 2 was in steady state operation at an approximate power level of 2432 Mwt (approximately 100 percent of rated thermal power). The reactor mode switch was in the run position.

2. Inoperable Equipment

The "A" Hydrogen Recombiner (EIIS Code BB) was inoperable. The recombinder was undergoing functional testing following corrective maintenance when the event occurred.

C. DESCRIPTION OF EVENT

1. Event

On 4/13/88 at 1710 CDT, the "A" Hydrogen Recombiner failed its functional test. A Maintenance Work Order (MWO) was written, in accordance with the plant's administrative control procedures, to investigate and repair, as necessary, the recombinder.

On 4/14/88, during the investigation of the problem with the Hydrogen Recombiner, plant maintenance personnel found evidence of a possible obstruction in a portion of the system's piping. On 4/15/88, a blockage was found in the area of one of the system's venturi. The blockage was due to some plastic sheeting material that had apparently been in the Recombiner piping since initial installation of the system. Plant personnel verified that past surveillances met Technical Specifications requirements. It is believed that the plastic sheeting material was most likely used as a pipe opening covering during initial installation. The piping was cut on one side of the venturi and a flange was uncoupled on the other side of the venturi. The obstruction was removed and the piping was replaced (rewelded and flange reconnected).

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1) PLANT HATCH, UNIT 2	DOCKET NUMBER (2) 0 5 0 0 0 3 6 6	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		8 8	0 1 3	0 0	0 3	OF	1 3

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

On 4/15/88 at approximately 0700 CDT, plant operations personnel began performing plant procedure 34SV-T49-001-2S (Primary Containment Hydrogen Recombiner System Functional Test [Heatup to 1200 Degrees F]) on the "A" Hydrogen Recombiner. This procedure was being performed to prove the "A" Hydrogen Recombiner operable following performance of corrective maintenance.

Earlier in the day (4/15/88), plant operations and the Manager of Nuclear Safety and Compliance (NSC) had discussed the sequence of testing necessary to prove that the "A" Hydrogen Recombiner was operable (following corrective maintenance). It was thought the best sequence in which to perform system testing was to first perform procedure 34SV-T49-001-2S and then the hydrostatic and leak rate tests.

The Unit 2 Technical Specifications were reviewed to determine if this sequence of testing met the primary containment requirements. Specifically, Unit 2 Technical Specification Table 3.6.3-1, "Primary Containment Isolation Valves," was reviewed. Item B.3 lists the Hydrogen Recombiner Isolation Valves. Based on the review of the Technical Specification table, it was decided it was acceptable to perform the functional test before the hydrostatic and leak rate tests.

On 4/15/88 at approximately 0930 CDT, operations personnel opened "A" Hydrogen Recombiner system Primary Containment Isolation System (PCIS EIIS Code JM) isolation valves 2T49-F002A and 2T49-F004A, as required by plant procedure 34SV-T49-001-2S.

At approximately 1100 CDT, the Plant Hatch NRC Resident Inspector was informed of the status of the "A" Hydrogen Recombiner repair and testing. At that time, he questioned the testing sequence, i.e., performing the functional test before the hydrostatic and leak rate tests. In response to this question, the Manager of NSC again reviewed the Hydrogen Recombiner's primary containment isolation boundaries in the Technical Specifications and the Final Safety Analysis Report (FSAR). Based on this review, it was determined that the system's piping served as the second isolation boundary.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1) PLANT HATCH, UNIT 2	DOCKET NUMBER (2) 0 5 0 0 0 3 6 6	LER NUMBER (3)			PAGE (3)		
		YEAR 8 8	SEQUENTIAL NUMBER 0 1 3	REVISION NUMBER 0 0			
					0 4	OF 1 3	

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

At approximately 1110 CDT, the Manager NSC informed the Operations Supervisor On Shift (OSOS) of the violation of Unit 2 primary containment integrity. Plant operations personnel initiated Limiting Condition for Operation (LCO) 2-88-352 as required by the plant's administrative control procedures.

At approximately 1115 CDT, plant operations personnel closed isolation valves 2T49-F002A and 2T49-F004A, thereby restoring primary containment integrity. At approximately 1525 CDT, plant operations personnel initiated LCO 2-88-353 to ensure the "A" Hydrogen Recombiner system piping was tested properly and satisfactorily before the isolation valves were opened. LCO 2-88-352 was terminated at this time.

On 4/16/88, Quality Control (QC) personnel performed a radiographic examination (RT) of the pipe welds; Instrument and Control (I&C) personnel performed a Local Leak Rate test (LLRT) of the system's piping per plant procedure 42SV-TET-001-2S (Primary Containment Periodic Type B & Type C Leakage Tests); and Engineering Support personnel performed a hydrostatic test on the pipe per plant procedure 42IT-TET-001-0S (Pressure Testing of Piping and Components).

The "preliminary" LLRT results revealed a leak at a bolted flange connection. The flange had been uncoupled to remove the obstructed section of piping. Following two unsuccessful attempts to stop the leak by increasing the torque on the bolts, the flange gasket was replaced and the bolts torqued to 150 ft-lbs. At this point, the leak was stopped and the LLRT was performed successfully. All other examinations and tests were satisfactory.

On 4/16/88 at approximately 1105 CDT, LCO 2-88-353 was terminated based on the successful completion of the above listed examination/tests. At approximately 1120 CDT, plant operations personnel began performing the "A" Hydrogen Recombiner functional test per the requirements of plant procedure 34SV-T49-001-2S.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1) PLANT HATCH, UNIT 2	DOCKET NUMBER (2) 0 5 0 0 0 3 6 6	LER NUMBER (5)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		8 8	0 1 3	0 0	0 5	OF	1 3

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

On 4/17/88 at approximately 0035 CDT, plant operations personnel successfully completed the "A" Hydrogen Recombiner functional test and declared it operable.

2. Dates/Times

<u>Date</u>	<u>Time (CDT)</u>	<u>Description</u>
4/13/88	1710	The "A" Hydrogen Recombiner failed its functional test. An MWO was written to investigate and repair the recombinder.
4/14/88		During the investigation of the problem, maintenance personnel found evidence of a possible obstruction in a portion of the system's piping.
4/15/88		A blockage was found in the area of one of the system's venturi. The piping was cut on one side of the venturi and a flange was uncoupled on the other side of the venturi. The obstruction was removed and the piping was replaced (rewelded and flange reconnected).
	0700	Plant operations personnel began performance of the "A" Hydrogen Recombiner functional test per plant procedure 34SV-T49-001-2S.
	0930	Isolation valves 2T49-F002A and 2T49-F004A were opened as required by plant procedure 34SV-T49-001-2S.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1) PLANT HATCH, UNIT 2	DOCKET NUMBER (2) 0 5 0 0 0 3 6 6	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		8 8	0 1 3	0 0	0 6	OF	1 3

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

<u>Date</u>	<u>Time (CDT)</u>	<u>Description</u>
4/15/88	1100	The Plant Hatch NRC Resident Inspector was informed of the status of the recombiner repair and testing. He questioned the sequence of testing whereby the functional test was done before the hydrostatic test and LLRT. The Manager of NSC reviewed the Unit 2 Primary Containment Isolation Valve Technical Specifications table and FSAR. He determined the piping served as the second primary containment barrier.
	1110	The Manager of NSC notified the OSOS that primary containment integrity had been violated. Plant operations personnel initiated LCO 2-88-352.
	1115	Plant operations personnel closed isolation valves 2T49-F002A and 2T49-F004A.
	1525	Plant operations personnel initiated LCO 2-88-353 to ensure the piping is tested properly and satisfactorily before the isolation valves were opened. LCO 2-88-352 was terminated.
4/16/88		Plant QC, I&C, and Engineering Support personnel performed RT examination, LLRT, and hydrostatic test, respectively, on the recombiner pipe welds and piping. All test results were satisfactory.
	1105	Plant operations personnel terminated LCO 2-88-353 based upon the successful completion of the above listed examinations/tests.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1) PLANT HATCH, UNIT 2	DOCKET NUMBER (2) 0 5 0 0 0 3 6 6 8 8	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		0 1 3	0 0	0 0	0 7	OF	1 3

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

Date	Time (CDT)	Description
4/16/88	1120	Plant operations personnel began the "A" Hydrogen Recombiner functional test per plant procedure 34SV-T49-001-2S.
4/17/88	0035	Plant operations personnel successfully completed the functional test and declared the "A" Hydrogen Recombiner operable.

3. Other Systems Affected

No safety systems, other than the "A" Hydrogen Recombiner and the primary containment, were affected by this event. These systems have no secondary functions.

4. Method of Discovery

The event was discovered as a result of the investigation initiated as a result of the NRC Resident Inspector's concerns relative to the sequence of testing for the "A" Hydrogen Recombiner.

5. Operator Actions

Plant operations personnel performed the following actions:

1. Wrote MWO 2-88-2027 to investigate the failure of the "A" Hydrogen Recombiner during functional testing.
2. Began another functional test following system repair on 4/15/88. During this functional test, they opened PCIS valves 2T49-F002A and 2T49-F004A as required by procedure.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1) PLANT HATCH, UNIT 2	DOCKET NUMBER (2) 0 5 0 0 0 3 6 6	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		8 8	0 1 3	0 0	0 8	OF	1 3

TEXT (If more space is required, use additional NRC Form 365A's) (17)

3. Closed the two PCIS valves following notification that the opening of the valves violated primary containment integrity.
4. Wrote LCO 2-88-352 on the loss of primary containment integrity and LCO 2-88-353 to administratively control the subsequent opening of valves 2T49-F002A and 2T49-F004A.
5. Terminated LCO 2-88-352 when LCO 2-88-353 was written and terminated LCO 2-88-353 when the required system piping testing was completed satisfactorily.
6. Performed a functional test per plant procedure 34SV-T49-001-2S on the "A" Hydrogen Recombiner.
7. Declared the "A" Hydrogen Recombiner operable upon satisfactory completion of its functional test.

The Manager of Nuclear Safety and Compliance performed the following actions:

1. Reviewed the Unit 2 Technical Specifications to determine if it was acceptable to perform the recombinder functional test before the piping hydrostatic test and LLRT.
2. Informed operations personnel it was acceptable to perform the functional test based on the above review.
3. Performed another review of the Technical Specifications and FSAR in response to the NRC Resident Inspector's concerns about the testing sequence.
4. Informed the OSOS that primary containment integrity had been lost when valves 2T49-F002A and 2T49-F004A were opened.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1) PLANT HATCH, UNIT 2	DOCKET NUMBER (2) 0 5 0 0 0 3 6 6	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		8 8	0 1 3	0 0	0 9	OF	1 3

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

5. Reported the event per the requirements of 10 CFR 50.73.

Maintenance personnel performed the following actions:

1. Investigated the failure of the "A" Hydrogen Recombiner during initial functional testing.
2. Removed an obstructed section of the recombinder system piping, cleared it, and replaced it.
3. Performed LLRT on the piping per plant procedure 42SV-TET-001-2S (done by I&C personnel).

Engineering Support personnel performed the following actions:

1. Assisted in the repair of the leaking flange connection.
2. Assisted in the performance of the LLRT.
3. Performed the RT examination of the welds (done by QC personnel).
4. Performed the hydrostatic test of the piping per plant procedure 42IT-TET-001-0S.

6. Auto/Manual Safety System Response

The PCIS valves 2T49-F002A and 2T49-F004A were opened manually to perform the "A" Hydrogen Recombiner system functional test. The PCIS valves were closed manually when it was discovered their being opened violated primary containment integrity. No automatic safety system response occurred during this event, nor were any required to occur.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1) PLANT HATCH, UNIT 2	DOCKET NUMBER (2) 0 5 0 0 0 3 6 6	LER NUMBER (5)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
		8 8	0 1 3	0 0	1 0	OF 1 3

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

D. CAUSE OF EVENT

1. Immediate Cause

The immediate cause of the violation of Unit 2 Technical Specifications requirements regarding primary containment integrity is PCIS valves 2T49-F002A and 2T49-F004A being open longer than one hour without having first verified the integrity of the "A" Hydrogen Recombiner system's piping following repair.

2. Root/Intermediate Cause

The intermediate cause of the violation of Unit 2 Technical Specifications requirements regarding primary containment integrity is an unclear Technical Specifications table. Specifically, Unit 2 Technical Specification Table 3.6.3-1, "Primary Containment Isolation Valves," does not identify the recombinder system piping as the second isolation boundary.

The table lists two valves for each of the two recombiners. Since the usual configuration is to have two isolation valves, having two valves listed implies they are the two isolation valves (boundaries). It is not at all apparent the valves are the first isolation boundary for two penetrations with the second isolation boundary for each penetration being the system piping.

The root cause of this event is cognitive personnel error by non-licensed utility personnel. Specifically, the Manager of NSC incorrectly informed plant operations personnel that it was acceptable to open the two PCIS valves before hydrostatic and leak rate testing of the piping had been successfully completed.

E. ANALYSIS OF EVENT

The Primary Containment Isolation System (PCIS) is provided to isolate those lines that could become a leakage path for radioactivity past the containment barrier during abnormal conditions within the containment. The Hydrogen Recombiners are provided to ensure that hydrogen does not accumulate within the primary containment in combustible concentrations following a postulated Loss of Coolant Accident (LOCA).

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1) PLANT HATCH, UNIT 2	DOCKET NUMBER (2) 05000366	LER NUMBER (6)			PAGE (3)		
		YEAR 88	SEQUENTIAL NUMBER 013	REVISION NUMBER 00			
					11	OF	13

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

The Hydrogen Recombiner system is a closed loop system that takes suction from the drywell atmosphere (primary containment), processes the atmosphere, and then discharges the processed fluid into the suppression pool air space (primary containment). The process piping can be isolated from the primary containment by two keylocked closed isolation valves at each penetration (the suction and the discharge penetration). Since the Hydrogen Recombiners communicate with the primary containment, the system contains components that are part of the PCIS.

While the Hydrogen Recombiner system consists of 2, 100 percent each capacity thermal recombiners (meaning that only one of the two installed recombiners is required in order to satisfy the safety function of the recombinder system), should both recombiners become inoperable, the capability to purge the containment is not lost. The Standby Gas Treatment System (SGTS EIIIS Code BH) can provide a backup containment purge capability for the Hydrogen Recombiners. While the purge system for Unit 2 was not specifically designed for combustible gas control, containment purging combined with the SGTS can reduce the possibility of excessive hydrogen gas concentrations in the primary containment. Both the Hydrogen Recombiners and the SGTS are located in the reactor building (which forms the secondary containment structure).

During all modes of plant operation except when being tested, the Hydrogen Recombiner isolation valves are closed and the Hydrogen Recombiner primary containment penetrations are isolated. During a LOCA, the isolation valves would be opened, if required, approximately six hours after the onset of the accident. Until such time as the recombiners are needed, the isolation valves would remain closed. During those times when the valves are opened (when in service and when tested), the system piping provides the isolation barrier, thus, a primary containment leakage path is not created.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1) PLANT HATCH, UNIT 2	DOCKET NUMBER (2) 0 5 0 0 0 3 6 6	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		8 8	0 1 3	0 0	1 2	OF	1 3

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

In this event, the first PCIS barrier was removed (i.e., the isolation valves were opened) before the second (redundant) PCIS barrier (the system piping) integrity was verified after it was repaired. In fact, subsequent testing found a minor leak at a flanged connection. Had a LOCA occurred during the time the valves were open, a leakage path from the primary containment would have existed (the isolation valves do not receive an automatic isolation signal). It is however, highly unlikely a LOCA would have occurred during the short period of time the valves were opened and before the flange was tightened. In the event of some leakage through the recombiners, the SGTS would process the radioactivity before it was released to the environment. The SGTS could also have been used as a backup system to the Hydrogen Recombiners to purge concentrations of hydrogen were an accident to have occurred.

Based on the above information, it is concluded that this event did not have any adverse nuclear safety impact. Additionally, since the event occurred at rated power it is not believed that the consequences of this event would be more severe under other operating conditions.

F. CORRECTIVE ACTIONS

The corrective actions for this event included:

1. Closing isolation valves 2T49-F002A and 2T49-F004A.
2. Initiating LCO 2-88-353 to ensure all required testing was performed before the isolation valves were reopened.
3. Performing successful radiographic examination of the pipe welds, and local leak rate and hydrostatic testing of the system's piping.
4. Counseling the Manager of NSC relative to this event and the consequences of not investigating thoroughly the requirements of the Technical Specifications and FSAR, especially as they relate to the primary containment isolation barrier configuration.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1) PLANT HATCH, UNIT 2	DOCKET NUMBER (2) 0 5 0 0 0 3 6 6	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		8 8	0 1 3	0 0	1 3	OF	1 3

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

G. ADDITIONAL INFORMATION

1. FAILED COMPONENT(S) IDENTIFICATION

No components failed during this event.

2. PREVIOUS SIMILAR EVENTS

There has been one similar event in which failure to perform required testing led to inoperable primary containment penetrations. This event was reported in LER 50-366/1988-009 (dated 4/18/88). This LER describes an event where repair work was performed on a PCIS component and no LLRT was performed before returning the component to service.

This event was caused by personnel error. Corrective action for this event included: 1) performing an LLRT on the affected penetrations, 2) reviewing the computer tracking LLRT MWO database, 3) reviewing outage related MWOs, 4) issuing a letter to control LLRT performance, and 5) scheduling procedure revisions.

The corrective actions for this event would not have prevented the event described herein because it was not obvious the Hydrogen Recombiner system piping was an isolation boundary.

Georgia Power Company
333 Piedmont Avenue
Atlanta, Georgia 30306
Telephone 404 526-6626

Mailing Address
Post Office Box 4545
Atlanta, Georgia 30302

Executive Department



Georgia Power

the southern electric system

SL-4649
0258I
X7GJ17-H310

May 16, 1988

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

PLANT HATCH - UNIT 2
NRC DOCKET 50-366
OPERATING LICENSE NPF-5
LICENSEE EVENT REPORT
PERSONNEL ERROR ALLOWS VALVE TO BE OPENED
RESULTING IN PRIMARY CONTAINMENT VIOLATION

Gentlemen:

In accordance with the requirements of 10 CFR 50.73(a)(2)(i), Georgia Power Company is submitting the enclosed Licensee Event Report (LER) concerning a condition that was prohibited by the plant's Technical Specifications. The event occurred at Plant Hatch - Unit 2.

Sincerely,

R. P. McDonald
Executive Vice President,
Nuclear Operations

LGB/lg

Enclosure: LER 50-366/1988-013

c: (see next page)

IE22
11

U. S. Nuclear Regulatory Commission
May 16, 1988
Page Two

c: Georgia Power Company
Mr. J. T. Beckham, Jr., Vice President - Plant Hatch
Mr. L. T. Gucwa, Manager Nuclear Safety and Licensing
GO-NORMS

U. S. Nuclear Regulatory Commission, Washington, D. C.
Mr. L. P. Crocker, Licensing Project Manager - Hatch

U. S. Nuclear Regulatory Commission, Region II
Dr. J. N. Grace, Regional Administrator
Mr. P. Holmes-Ray, Senior Resident Inspector - Hatch

02581