

# ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:9005160333 DOC.DATE: 90/05/11 NOTARIZED: NO DOCKET #  
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SUBJECT: LER 90-001-01:on 900313,potential emergency filter train sys  
 inoperability due to interaction w/NRE.

W/9 ltr.

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May 11, 1990

Report Required By  
10 CFR Part 50, Section 50.73

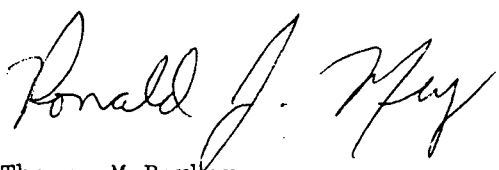
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MONTICELLO NUCLEAR GENERATING PLANT  
Docket No. 50-263 License No. DPR-22

Supplemental Report - Potential Emergency Filter Train System  
Inoperability Due to Interaction With Non-Safety Related Equipment

A supplemental Licensee Event Report for this occurrence is attached (see  
Licensee Event Report 90-001 Rev. 0, dated April 12, 1990).

This event is being reported under the requirements of 10 CFR Part 50 Section  
50.73 (a)(2)(ii).

*for*   
Thomas M Parker  
Manager  
Nuclear Support Services

c: Regional Administrator - III, NRC  
Sr Resident Inspector, NRC  
NRR Project Manager, NRC  
MPCA  
Attn: Dr J A Ferman

Attachment

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FDR ADDCK 05000243  
FDC

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*11*

## LICENSEE EVENT REPORT (LER)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1) Monticello Nuclear Generating Plant DOCKET NUMBER (2) 0 5 0 0 0 2 6 3 PAGE (3) 1 OF 0 8

TITLE (4) Potential Emergency Filter Train System Inoperability  
Due to Interaction with Non-Safety Related Equipment

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 3	1 3	9 0	9 0	0 0 1	0 1	0 5	1 1	9 0	None	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)	20.402(b)	20.406(a)(1)(i)	20.406(a)(1)(ii)	20.406(a)(1)(iii)	20.406(a)(1)(iv)	20.406(a)(1)(v)	20.406(c)	50.73(a)(2)(iv)	50.73(a)(2)(v)	50.73(a)(2)(vii)	50.73(a)(2)(viii)(A)	50.73(a)(2)(viii)(B)	50.73(a)(2)(ix)	73.71(b)	73.71(c)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)
1 0 0																

LICENSEE CONTACT FOR THIS LER (12) Sue Peterson, System Engineer TELEPHONE NUMBER 6 1 2 2 9 5 - 1 2 3 3

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) YES (If yes, complete EXPECTED SUBMISSION DATE) NO EXPECTED SUBMISSION DATE (15) 0 8 0 9 9 0

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

This is revision 1 of a Licensee Event Report originally submitted on April 12, 1990.

The report concerns the discovery of system design deficiencies. No operational events, equipment failures or procedure violations occurred.

On March 13, 1990, design deficiencies in the Emergency Filter Train system, and systems which interact with the Emergency Filter Train system were discovered during a special test. An in-depth investigation of the Emergency Filter Train design was initiated which uncovered additional design deficiencies and Safety Related/Non-Safety Related system interactions.

Immediate corrective actions were taken to isolate and secure various ventilation units and ductwork to prevent Safety Related/Non-Safety Related systems interaction and ensure operability of the Emergency Filter Train system. Following completion of functional and safety analyses, and issuance of procedure changes, some of the isolated equipment has been returned to service. Investigation into known design deficiencies is continuing. Final results of the investigation will be discussed in a supplemental Licensee Event Report.

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TEXT (If more space is required, use additional NRC Form 356A's) (17)

## DESCRIPTION

This is an update of a Licensee Event Report submitted April 12, 1990.

On March 13, 1990, with the plant operating at 100% power, Special Procedure #8878 "Emergency Filter Train Filter Fan Low Flow Logic Test" was performed. The purpose of the test was to assess whether operability of the Emergency Filter Train system (EIIS System Code : VI) had been compromised by a former design deficiency in the system logic. The test showed that the logic design deficiency had no adverse impact on Emergency Filter Train system operability.

However, the test disclosed a previously unidentified interaction between one of the Administration Building ventilation units (V-AC-14) (EIIS System Code : UD) (a Non-Safety Related system) and the Emergency Filter Train. With the outside air temperature between 40° and 70°F, the ventilation unit supplies a significant amount of outside air, resulting in pressurization of portions of the administration building. During the test, outdoor air temperature was 49°-50°F. (The 'worst case' temperature for maximum building pressurization, as subsequently identified by the ventilation unit's manufacturer). The test showed that the B train of the Emergency Filter Train, when operating alone, was unable to maintain a positive differential pressure between the Main Control Room (EIIS System Code : NA) and the Administration building (EIIS System Code : MA) as required by Technical Specification 4.17.B.2.b(3). The A train of the Emergency Filter Train was able to maintain the required positive differential pressure. Currently, the Emergency Filter Train actuation logic does not automatically trip ventilation unit V-AC-14. V-AC-14 was immediately tripped and secured to ensure Emergency Filter Train operability.

On March 30, 1990 during subsequent investigation of the Emergency Filter Train system design, engineers determined that administration building ventilation supply units V-AC-11 and S-1 (see Figure 1, Simplified Administration Building Ventilation system drawing), may not trip in the event of an Emergency Filter Train High Radiation Mode automatic initiation. The trip signal for these ventilation units is initiated by a single Non-Safety Related relay and associated Non-Safety Related switchgear. This is contrary to the design basis for the Emergency Filter Train system which requires all equipment related to Control Room habitability to be single failure proof and Safety Grade. Failure of these ventilation units to trip during a High Radiation event could potentially pressurize the Administration Building and degrade the Emergency Filter Train's ability to maintain a positive differential pressure between the Control Room and the Administration

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Building. The ventilation units were immediately tripped and secured to ensure Emergency Filter Train operability.

This same design deficiency exists with the Control Room kitchen and lavatory exhaust fan (V-EF-36). This fan exhausts air out of the Control Room. It is possible that if the fan does not trip as designed in the event of an Emergency Filter Train High Radiation emergency, it could exhaust enough air from the Control Room to keep it from being pressurized. The fan was immediately tripped and secured pending further investigation and testing.

Finally, the same design deficiency also potentially exists between the Turbine Operating Floor Ventilation Units V-AH-1 and V-AH-2 (EIS System Code : UD) and the Emergency Filter Train System. The Control Room is adjacent to the Turbine Building at the Turbine Operating Floor level. V-AH-1 and V-AH-2 are not automatically tripped upon EFT High Radiation mode initiation. These fans were immediately tripped and secured pending further investigation.

On April 6, 1990, further review of the Emergency Filter Train design determined that a passive break in the Non-Safety Grade portions of the Emergency Filter Train system ducting (EIS Component Code : DUCT) serving the Emergency Response Facilities (EIS System Code : NC) may divert pressurizing air from the Control Room to the duct break. Detailed review of the postulated ductwork failure has revealed that a potential problem does exist if one Emergency Filter Train Ventilation unit fails. The dampers supplying pressurizing air to the Emergency Response Facilities have been secured closed. Other ductwork and non-Safety-related equipment failures in the Administration Building have been postulated which may allow contamination to enter the Control Room. For this reason, the non-Safety Related ductwork from the Emergency Filter Train to the Emergency Response Facilities and a return register which is in the B Emergency Filter Train room were blocked.

## CAUSE

The root cause of this potential Emergency Filter Train inoperability was design inadequacy.

The Emergency Filter Train was installed in response to the Three Mile Island Action Plan. The system was designed to enhance Control Room habitability following a Loss of Coolant event. During the final stages of the Emergency Filter Train construction, a second addition to the plant Administration Building was constructed (see Figure 1). The potential for the second Administration Building addition's Non-Safety Related ventilation system

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(V-AC-14) to interact with the Emergency Filter Train system was never considered in the design of V-AC-14. No direct Safety Related trips from the Emergency Filter Train were included in the design of V-AC-14.

The design of ventilation systems for the original Administration Building and its first addition took into account the need to provide a level of protection for the facilities during a High Radiation Event. With this in mind, Administration Building ventilation units were provided with an automatic trip upon initiation of the Emergency Filter Train High Radiation Mode. Since the ventilation systems serving these areas are not required to be single failure proof, the automatic trips and associated ductwork were designed and installed utilizing Non-Safety Related components. Also, redundant isolation between safety and non-Safety Related portions of the ductwork was never installed. The design did not take into account the potential interactions with the Safety Related Emergency Filter Train system, and the Non-Safety Related ventilation systems and non-Safety-Related ductwork.

## ANALYSIS

The original design of the Emergency Filter Train system resulted in conditions where a failure of the Non-Safety Related ventilation units to trip could have potentially resulted in pressurization of portions of the Administration Building and degradation of the Emergency Filter Train system's ability to maintain a positive differential pressure between the Control Room and the Administration Building. A failure of the ductwork could have degraded the Emergency Filter Train System's ability to pressurize the Control Room, or have allowed unfiltered airborne activity to be brought into the Control Room. These deficiencies had the potential to adversely affect the habitability of the Main Control Room.

The dose received by operators in the Main Control Room has been shown by previous design reviews to be the most limiting plant condition during events which release gaseous radiation to the environment (reference Licensee Event Reports 89-29 and 89-40). Analyses have shown thyroid dose to be the limiting Control Room dose condition. Self Contained Breathing Apparatus are available to protect Control Room operators during a release of gaseous radioactivity.

An analysis has been performed to determine the effect of the failure of the Administration Building ventilation systems to trip, along with delayed tripping of the Reactor Building Plenum fans, on the dose received by a Control Room Operator. This analysis assumed that a Loss of Coolant Accident resulting in core damage has taken place and that the Primary Containment

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(EIIIS System Code : NH) leaks at its Technical Specification limit of 1.2 percent per day, on a weight basis. The analysis shows that Control Room operator dose does not exceed the limits of 10 CFR Part 100 if the Reactor Building Plenum and Administration Building fans are tripped within 39 minutes. Therefore, sufficient time is available for operators to take manual action to assure Control Room habitability in the event of a release of gaseous radioactivity due to core damage.

A probabilistic analysis was performed to determine the probability of the Non-Safety Related breakers associated with the Administration Building ventilation system not opening. This analysis assumed a Loss of Coolant Accident leading to core damage had taken place. The analysis showed that the probability of a Non-Safety Related breaker failing to open, together with a Loss of Coolant event was extremely small (less than  $7 \times 10^{-7}$  per year).

The ductwork for pressurizing air from the Emergency Filter Train system to the Emergency Response Facilities has been blocked. This assures that the Emergency Filter Train will be able to pressurize the Control Room in the High Radiation mode of operation as required if the ductwork in the Emergency Response Facilities fails. This is acceptable because it does not affect the ability of the Emergency Filter Train system to pressurize the Control Room if one or both Emergency Filter Train ventilation units is available. In this configuration, pressurizing air is supplied to the Emergency Response Facilities providing both Emergency Filter Train ventilation units are operable. Upon failure of one Emergency Filter Train ventilation unit, no ventilation or pressurizing air is supplied to the Emergency Response Facilities. The Emergency Response Facilities ventilation is not required to be single failure proof per NUREG 0696.

All ductwork connecting the Emergency Response Facilities to the Emergency Filter Train system has been blocked because of the possibility of contamination migrating from the Emergency Response Facilities to the Control Room through common ductwork. The ductwork has been blocked in a manner so that it may be restored as needed, and procedures have been issued for restoration of ventilation to the Emergency Response Facilities. This restoration will occur only if both Emergency Filter Train ventilation units are available, all Administration Building Ventilation units have been verified tripped, and the ductwork has been verified to be intact, thus assuring that operability of neither Emergency Filter Train unit is affected. Manual action for Emergency Response Facilities emergency ventilation was verified to be acceptable per NUREG 0696 (the boundary for the Emergency Response Facilities is already manually initiated).

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Blocking of the return register from the B Emergency Filter Train room to the suction of the A Emergency Filter Train ventilation unit is acceptable because return air from the B train room is not required in the normal or emergency modes of Emergency Filter Train operation. The flow through the register is minimal (400 CFM <10% of unit ventilation flow), so it will have a negligible effect on either the A or B Emergency Filter Train ventilation unit.

## CORRECTIVE ACTIONS

1. The breakers for all ventilation units which could potentially degrade the Emergency Filter Train due to a Safety Related/Non-Safety Related interaction were immediately secured opened.

An analysis (using the Commercial Grade Dedication process) was completed to show that the Administration Building ventilation unit (V-AC-11, V-AC-14, and S-1) breakers, motor contactors, and relay trip logic would be able to perform their intended functions in the event of an accident. In the most limiting case, the ventilation units are required to trip in a Design Basis Loss of Coolant Accident. (Analysis does not have to be made for a simultaneous seismic event per Generic Letter 87-02.)

Two independent methods of tripping each unit were identified and evaluated. Procedures that specify the required manual actions were issued. It was physically verified that the units could be tripped in time to assure that 10CFR Part 100 guidelines are not exceeded.

The Administration Building ventilation breakers were returned to service following completion of a 10CFR50.59 safety evaluation.

2. The Control Room kitchen and lavatory exhaust fan, and the Turbine Operating Floor ventilation units remain secured pending further investigation. They will be restarted when a determination has been made that they may be operated in a manner that will not affect the operability of the Emergency Filter Train system. A Supplemental Licensee Event Report will be submitted on or before August 9, 1990 discussing the results of the investigation.



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3. Ductwork has been blocked to assure separation of the Safety Related and Non-Safety Related portions of the Emergency Filter Train ducting.

Procedures have been issued to restore the ventilation to the Emergency Response Facilities, if needed, in a manner which does not affect Emergency Filter Train system operability. A 10CFR50.59 review was completed and documented for these procedures.

4. The ductwork connecting the A Emergency Filter Train ventilation unit with the B Emergency Filter Train room has been blocked and sealed closed to prevent system interactions. A 10CFR50.59 review was completed and documented for this change.
5. A Design Basis/Configuration Management review of the Emergency Filter Train system will be given high priority.
6. Long-term corrective actions are being considered and will be discussed in a Supplemental Licensee Event Report to be submitted on or before August 9, 1990.

## ADDITIONAL INFORMATION

Failed Component Identification

None

Previous Similar Events

None

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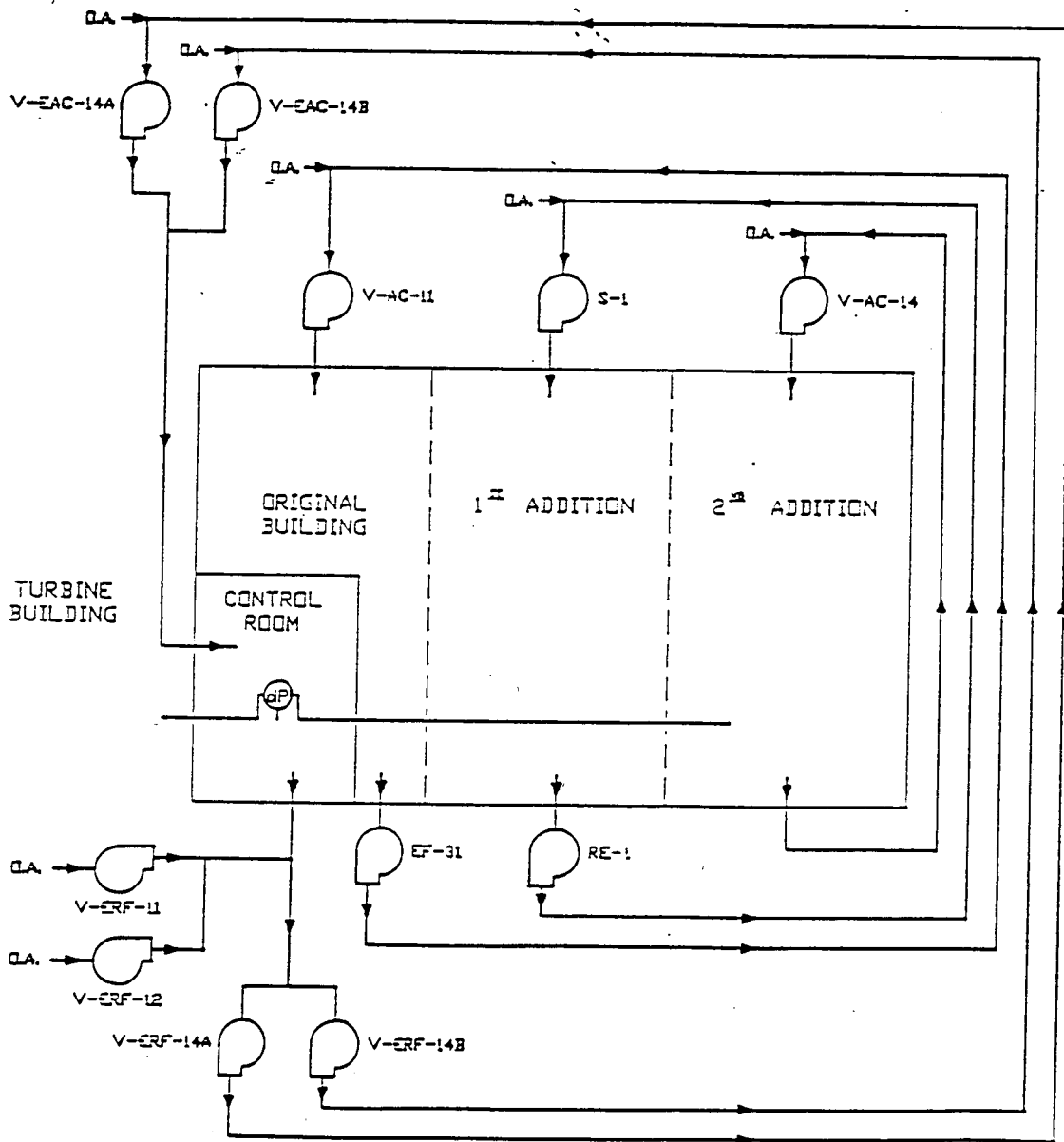


FIGURE 1 SIMPLIFIED ADMINISTRATION BUILDING VENTILATION