

# ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:9011200125 DOC.DATE: 90/11/13 NOTARIZED: NO DOCKET #  
 FACIL:50-263 Monticello Nuclear Generating Plant, Northern States 05000263  
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SUBJECT: LER 89-040-01:on 891219,failure to meet secondary  
 containment performance requirements due to design defects.

DISTRIBUTION CODE: IE22T COPIES RECEIVED:LTR 1 ENCL 1 SIZE: 9  
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NOTES:NRR/LONG,W.

05000263

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pcD  
Northern States Power Company

414 Nicollet Mall  
Minneapolis, Minnesota 55401-1927  
Telephone (612) 330-5500

November 13, 1990

Report Required by  
10 CFR Part 50, Section 50.73

Director of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

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

Failure to Meet Secondary Containment Performance  
Requirements Due to Design Deficiencies

A revised Licensee Event Report for this occurrence is attached.

This event was reported via the Emergency Notification System in accordance  
with 10 CFR Part 50 Section 50.72 on December 19, 1989.

*for Monica Vik*  
Thomas M Parker  
Manager  
Nuclear Support Services

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

Attachment

9011200125 901113  
PDR ADDOCK 05000263  
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## 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.

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OPERATING MODE (9)										THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5: (Check one or more of the following) (11)																																																								
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David Scott, Senior Production Engineer																				AREA CODE																																														
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YES (If yes, complete EXPECTED SUBMISSION DATE)																				XX NO																																														

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

On December 19, 1989, while the plant was operating at 100% power, Secondary Containment failed to meet operability requirements during a special test which was performed to verify Secondary Containment Capability as part of corrective actions for LER 89-029. Secondary Containment was declared inoperable. A Notice of Unusual Event (NUE) was declared. Preparations for a normal orderly shutdown were initiated which would have placed the reactor in the cold shutdown condition within 24 hours per Technical Specification 3.7.C.4.

System design deficiencies caused this event. Review of the Standby Gas Treatment System revealed that, during normal operation, Standby Gas Treatment system flow was limited by flow to the Offgas Stack from the Steam Packing Exhauster. Three other design deficiencies were identified.

Corrective actions were completed including revising operating procedures and placing an administrative hold on one system component. Secondary Containment was declared operable and the NUE was terminated on 12/19/89. Design changes are being considered to eliminate Standby Gas Treatment vulnerability to Non-Safety system effects.

LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BUREAU 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.

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

DESCRIPTION:

On December 19, 1989, with the plant operating at 100% power, Special Test #8234, Secondary Containment Capability Test with Turbine Building Ventilation Shutdown and Plant at Power Operation, was performed. The test was performed as part of a periodic testing program developed following the discovery of degraded conditions in the Secondary Containment System (see LER 89-029). During the test, Standby Gas Treatment system (EIIS Component Code: BH) could not maintain a vacuum of 0.25 inches water within Secondary Containment as required for Secondary Containment operability during isolation conditions.

Secondary Containment was declared inoperable and a Notice of Unusual Event (NUE) was declared at 0640. Preparations for a normal orderly shutdown were initiated which would have placed the reactor in the cold shutdown condition within 24 hours per Technical Specification 3.7.C.4.

An inspection of Secondary Containment revealed no degraded conditions which could cause reduced Secondary Containment vacuum. Interfaces of Standby Gas Treatment with Non-Safety Related systems were also verified to be functioning as designed. However, investigations identified two design deficiencies that either directly affected or could potentially affect Standby Gas Treatment flow and one design deficiency that could potentially affect the source of Standby Gas Treatment flow.

Corrective actions were implemented for the above design deficiencies and the NUE was terminated at 1831 on December 19, 1989.

On October 11, 1990, while performing a field verification of the design basis review for Secondary Containment and Standby Gas Treatment systems, it was determined that during operation of the Standby Gas Treatment system, a failure of the operating Offgas Dilution fan (V-EF-18A or V-EF-18B) would not initiate a low flow start of the standby Offgas Dilution fan. The setpoint for each of the low flow pressure switches (PS-8000-J15 or PS-8000-J16) (EIIS Component Code: PS) was less than the flow that a Standby Gas Treatment fan operating alone could produce through the Offgas flow path. Depending on operating conditions and system alignment, a system failure could then result in only one Standby Gas Treatment fan operating during an accident condition and no Offgas Dilution fan operating. Under this condition there would be insufficient flow through Standby Gas Treatment to maintain the required vacuum within Secondary Containment. This deficiency made the Standby Gas Treatment system susceptible to a single active failure and therefore had effectively lost its redundancy feature. Due to this vulnerability Plant Management invoked a 7-day Limiting Condition for Operation consistent with

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

Technical Specification 3.7.B.1.a. The design deficiency was corrected on October 18, 1990 by raising the setpoint for starting the standby Offgas Dilution Fan on low flow and normal operation of Standby Gas Treatment system was resumed.

CAUSE

The root cause of this event was design inadequacy. The original design resulted in a condition where normal operation of Non-Safety Related equipment (i.e. Steam Packing Exhauster blowers (K-3A, K-3B) (EIIS Component Code: FAN)) could adversely affect a Safety Related system (i.e. Standby Gas Treatment).

The maximum flow through Standby Gas Treatment that could be achieved during the test was 3500 CFM which produced only a 0.22 to 0.23 inches water vacuum within Secondary Containment. Investigation of the operation of Standby Gas Treatment revealed that, during Secondary Containment isolation conditions with the reactor at power and without a loss of offsite power, Standby Gas Treatment system flow was being limited by flow to the Offgas Stack from the Steam Packing Exhauster discharge (See Figure 1.) Steam Packing Exhauster flow injects into the Offgas Stack after the discharge of the Offgas Dilution Fans (V-EF-18A, V-EF-18B) (EIIS Component Code: FAN) and before the flow sensors (SPS 8000-H1, SPS 8000-H2) (EIIS Component Code: TC) which are used to control the flow through the dilution fans. This causes a reduction in flow through the Dilution Fans and Standby Gas Treatment Fans (V-EF-17A, V-EF-17B) (EIIS Component Code: FAN). This condition may then prevent the achievement of the 0.25 inches water vacuum required within Secondary Containment.

It was determined that a failure of either of two discharge dampers (EIIS Component Code: DMP) for the Turbine Building exhaust fans (V-EF-11 or V-EF-26) (EIIS Component Code: FAN) could lead to higher back pressure in the Standby Gas Treatment discharge line and likewise prevent Standby Gas Treatment from achieving full rated flow. These fans run in parallel to supply 50% of the dilution flow during normal operation. During a Secondary Containment isolation, dampers on the discharge of these fans open to release their discharge to the Reactor Building Plenum Room. However, either of the discharge dampers could stick in a closed position and the respective fan would continue to discharge to the dilution fans. This flow could create a back pressure on the running Standby Gas Treatment fan and limit its flow.

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

It was also determined that failure of Primary Containment Exhaust to Plenum isolation valve (AO-2982) (EIIIS Component Code: ISV) in the open position during a Secondary Containment Isolation would allow the Standby Gas Treatment fans to draw on the Reactor Building Exhaust Plenum Room instead of the Reactor Building. Therefore, Standby Gas Treatment would not be able to maintain the required vacuum within Secondary Containment.

The setpoint deficiency discovered On October 11, 1990, was caused by the original design which did not adequately consider interactions between the Offgas Dilution fans and the Standby Gas Treatment fans.

ANALYSIS

Since Standby Gas Treatment could not maintain 0.25" WC vacuum within Secondary Containment, Secondary Containment integrity can not be taken credit for in Offsite and Control Room dose calculations. As a result, Offsite and Control Room doses could not be assured to meet 10 CFR 100 and 10 CFR 50 limits assuming Reg. Guide 1.3 and Reg. Guide 1.25 source terms.

However, when assuming USAR source terms, Offsite and Control Room doses could be assured to be less than 10 CFR 100 and 10 CFR 50 limits with a complete loss of Secondary Containment integrity.

The actual vacuum obtained during the test conducted on 12/19/89 indicated only a slight degradation in Secondary Containment integrity (i.e., capable of maintaining 0.22 inches water instead of 0.25 inches water vacuum). The effect of decreased building vacuum is to increase Secondary Containment exfiltration under high wind velocity. At high wind speeds, Offsite and Control Room doses are significantly lower than the doses calculated for licensing purposes due to lack of fumigating effects at low wind speeds and due to increased dilution effects at high wind speeds.

Only two design basis accidents in the USAR take credit for Secondary Containment integrity and Standby Gas Treatment operation: the Loss of Coolant Accident and the Fuel Handling Accident. Required Operator actions would have secured the Steam Packing Exhauster blowers during reactor shutdown for the Loss of Coolant Accident. A hold was placed on fuel handling equipment as part of corrective actions for LER 89-029. The consequences of the design deficiencies would have been mitigated during either accident by Operator actions and Emergency Plan actions. Therefore, the risk to the public due to this event was minimal.

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

On December 19, 1989, following identification of system design inadequacies, a safety evaluation was performed and procedures revised to ensure that Secondary Containment integrity could be maintained during all design basis accident conditions. Operating procedures were revised such that, in the event of a Secondary Containment isolation due to a release of radioactivity from within Secondary Containment, the following would be accomplished:

- a. The Turbine Building Exhaust Fans would be tripped.
- b. Reactor recirculation flow would be reduced, the reactor would be manually scrammed, the main turbine would be tripped, and the Steam Packing Exhauster blowers would be tripped.

After the operating procedures were revised, Secondary Containment was declared operable, the NUE was terminated, and the preparations for a normal orderly shutdown were canceled. No reduction in reactor power had yet occurred.

Secondary containment was declared inoperable for a total of 11 hours and 51 minutes on 12-19-89.

On October 16, 1990, following identification of the system setpoint design inadequacy, a safety evaluation was performed on proposed setpoint changes. It was determined that a single Standby Gas Treatment fan operating without an Offgas Dilution fan could produce only 2300 to 2330 CFM through the system. Although this flow rate was lower than the estimated required flow to maintain 0.25 inches water vacuum in Secondary Containment, a vacuum would have been expected to be developed. Therefore, unfiltered exfiltration would not have been expected unless high winds developed. The effects of high wind speeds would result in lowered doses as discussed above. It was verified that a flow of 2300 to 2330 CFM was low enough to actuate Standby Gas Treatment system alarms and alert Operators of system degradation. Since there are indications and controls for the Offgas Dilution fans in the Control Room, the problems could be promptly diagnosed and corrected following existing alarm response procedures.

It was also demonstrated that the Division II Standby Gas Treatment fan would have automatically started on low flow through the Division I Standby Gas Treatment fan in the event of both Off Gas Dilution fans having failed. The flow developed under this condition may have been sufficient to maintain 0.25 inches water vacuum within Secondary Containment. However, due to testing limitations of Secondary Containment while the plant is operating, it could not be verified whether the required vacuum within Secondary Containment could have been maintained.

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

The plant was in the Limiting Condition for Operation for the setpoint deficiency from 1600 on 10/11/90 to 1340 on 10/18/90 for a total of 6 days 21 hours 20 minutes.

CORRECTIVE ACTIONS

## Summary of Corrective Actions Taken:

1. An administrative hold was placed on AO-2982 to secure it in the closed position when Standby Gas Treatment is required to be operable.
2. Operating procedures were revised to require tripping the Turbine Building Exhaust Fans and tripping the Steam Packing Exhauster blowers after an initiation of Standby Gas Treatment and isolation of Secondary Containment which was caused by a radioactive release from within Secondary Containment.
3. The initial findings of this event were communicated to other utilities with nuclear plants via the "Nuclear Network".
4. The Secondary Containment Capability Test was performed satisfactorily while the Reactor was in cold shutdown on July 6, 1990.
5. Possible design changes were identified which would:
  - a. Increase system flow
  - b. Eliminate the effects of exhauster flow on dilution flow
  - c. Eliminate the vulnerability of the Standby Gas Treatment and Secondary Containment Systems to single component failures.

Detailed evaluation of the feasibility and selection of appropriate design changes are in progress.

6. The design basis review for Secondary Containment and Standby Gas Treatment systems was completed.
7. The Offgas Dilution fan low flow standby start setpoint was raised to assure that the standby fan would receive a start signal.
8. Standby Gas Treatment system low alarm response procedures were reviewed and determined to be adequate.



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

Summary of Corrective Actions to be Taken:

1. Field verifications of the design basis review are in progress.
2. Further review will be done on similar setpoints as part of the on-going design basis documentation program.

## ADDITIONAL INFORMATION

1. Failed Component Identification:

NONE

2. Previous Similar Events:

LER 89-029

Note: Corrective actions of LER 89-029 directly led to the discovery of the design deficiencies identified in this LER.

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ESTIMATED BUREAU PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 500 HRS. FORWARD COMMENTS REGARDING BUREAU 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.

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# REACTOR BUILDING VENTILATION SYSTEM

