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 AUTH.NAME AUTHOR AFFILIATION
 WARD,A. Northern States Power Co.
 PARKER,T.M. Northern States Power Co.
 RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: LER 90-001-03:on 911113,design deficiencies discovered in
 emergency filter train sys.Caused by sys interaction w/
 nonsafety-related equipment.Breakers secured open & ductwork
 blocked to ensure separation of sys.W/911218 ltr.

DISTRIBUTION CODE: IE22T COPIES RECEIVED:LTR 1 ENCL 1 SIZE: 10
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December 18, 1991

Report Required by
10 CFR Part 50. Section 50.73

U.S. Nuclear Regulatory Commission
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MONTICELLO NUCLEAR GENERATING PLANT
Docket No. 50-263 License No. DPR-22

Potential Emergency Filter Train System Inoperability
Due to Interaction with Non-Safety Related Equipment

A supplemental Licensee Event Report for this occurrence is attached. The report has been revised to reflect updated information resulting from further review of the Emergency Filtration Train design basis.

This supplemental report is being submitted in accordance with 10 CFR Part 50, Section 50.73(a)(2)(v).

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

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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.

FACILITY NAME (1)										DOCKET NUMBER (2)										PAGE (3)							
Monticello Nuclear Generating Plant										0 5 0 0 0 2 6 3										1 OF 0 9							
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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)																		
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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)		1		0		0		20.402(b)		20.405(d)		50.736(2)(iv)		72.71(b)													
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								20.405(a)(1)(ii)		50.736(2)(ii)		50.736(2)(vi)		OTHER (Specify in Abstract below and in Test, NRC Form 365A)													
								20.405(a)(1)(iii)		50.736(2)(iii)		50.736(2)(vii)(A)															
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LICENSEE CONTACT FOR THIS LER (12)																											
NAME												TELEPHONE NUMBER															
Anne Ward, Supt Reactor Engineering												AREA CODE 6 1 2 TELEPHONE NUMBER 2 9 5 - 1 2 5 6															
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)																											
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC																	
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ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

This is revision 3 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.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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FACILITY NAME (1)

DOCKET NUMBER (2)

LER NUMBER (8)

PAGE (3)

Monticello Nuclear Generating Plant

0 5 0 0 0 2 6 3

YEAR

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NUMBERREVISION
NUMBER

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

DESCRIPTION

This the third 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 (EIS System Code : VI) had been compromised by a former design deficiency (currently eliminated) in the system logic. The test showed that the previous 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) (EIS 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 ((EIS System Code : NA) and the Administration building (EIS 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 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 Building. The ventilation units were immediately tripped and secured to ensure Emergency Filter Train operability.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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FACILITY NAME (1)

DOCKET NUMBER (2)

LER NUMBER (6)

PAGE (3)

Monticello Nuclear Generating Plant

0 5 0 0 0 2 6 3

YEAR

SEQUENTIAL
NUMBERREVISION
NUMBER

9 0

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3 OF

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

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 keeping it from being pressurized. The fan was immediately tripped and secured pending further investigation and testing.

Further investigation has revealed a potential concern involving interaction between the Turbine Building Ventilation Units V-AH-1, V-AH-2, V-MZ-1, V-MZ-4, V-MZ-5, and V-MZ-6 (EIIS System Code : UD) and the Emergency Filter Train System. The Control Room is adjacent to the Turbine Building at the Turbine Operating Floor level. The Turbine Building Ventilation Units (supply fans) are not automatically tripped upon Emergency Filter Train High Radiation mode initiation and failure of non-safety-related Reactor Building Exhaust fans, which also exhaust from the Turbine Building, could result in pressurization of the turbine building relative to the control room. Procedures are in place to instruct operators to trip the turbine building ventilation units as needed in a High Radiation event to assure the Control Room remains at a positive pressure with respect to the Turbine Building.

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 (EIIS Component Code : DUCT) serving the Emergency Response Facilities (EIIS 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.

As part of the corrective actions initiated by the event, a Design Basis/Configuration Management review was initiated. On November 18, 1991 at 0845 it was discovered, through this review, that a single failure of damper VD-9212B, Battery Room Supply Damper, could prevent the Emergency Filter Train from performing its design function. If the above damper failed to close it could prevent the Control Room from pressurizing during a radiation release event which is inconsistent with the Emergency Filter Train design basis.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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FACILITY NAME (1)

DOCKET NUMBER (2)

LER NUMBER (6)

PAGE (3)

Monticello Nuclear Generating Plant

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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 (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 or Turbine 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 or Turbine 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

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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FACILITY NAME (1)

DOCKET NUMBER (2)

LER NUMBER (6)

PAGE (3)

Monticello Nuclear Generating Plant

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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 Administration Building or Turbine Building pressurizing and the resulting dose received by a Control Room Operator. This analysis assumed that a Loss of Coolant Accident resulting in core damage has taken place, that the Primary Containment (EIIIS System Code : NH) leaks at its Technical Specification limit of 1.2 percent per day, on a weight basis, and that the Main Steam Isolation Valves leak at their Technical Specification limit. The analysis showed that Control Room operator dose does not exceed the limits of 10 CFR Part 100 if the Reactor Building Plenum, Turbine Building, and Administration Building fans are tripped within 33 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 or Turbine 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 7×10^{-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, however, the Emergency Response Facilities ventilation is not required to be single failure proof per NUREG 0696.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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)

DOCKET NUMBER (2)

LER NUMBER (6)

PAGE (3)

Monticello Nuclear Generating Plant

0 5 0 0 0 2 6 3

9 0

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OF

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

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 neither Emergency Filter Train unit operability 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).

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.

During normal operation the Battery Room receives ventilation from the Emergency Filter Train system, but is isolated from the Emergency Filter Train system upon a high radiation signal. If the damper failed to close during emergency isolation condition, air from the Emergency Filter Train system used for pressurizing the Control Room could be diverted through the Battery Room thus reducing the Control Room pressurization and possibly resulting in increased operator dose. This postulated failure is unlikely as the damper is safety related and is designed to fail closed. However, the damper was secured in the closed position to eliminate any potential for diverting pressurizing air. This is an acceptable interim corrective action since an additional air supply to the Battery Room with an in line duct heater exists to maintain room temperature during the winter months. A low temperature alarm will annunciate should the area temperature drop below 65 °F. This alternate air supply has no means of cooling incoming air (which may be necessary during warmer months of the year), so further evaluation will be completed by April 1, 1992 to ensure the acceptability of continued operation. A supplemental report will be submitted at that time documenting the results of the evaluation.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
Monticello Nuclear Generating Plant	0 5 0 0 0 2 6 3	9 0	- C 0 1	- 0 3	0 7	OF 0 9	

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

Since the effect of diverting pressurizing air from the Control Room is to lower the differential pressure between the Control Room and the Administration and Turbine Buildings, the analysis of operator dose resulting from a failure of Non-Safety related administration building ventilation units to trip off during a radiation release event (previously discussed in this report) is bounding. As discussed previously, this analysis indicates time exists for operators to take manual action to secure VD-9212B closed. Procedures are in place that require operators to verify VD-9212 is closed following detection of radiation in the outside air. Since the capacity of the battery room exhaust fan is less than the pressurizing air fan, some pressurization capability may still exist even following a failure of VD-9212 to close.

There were no consequences to the health and safety of the public because the postulated event did not occur. Even in the unlikely event that the damper were to fail concurrent with a radiation release, Control Room habitability could be maintained by operator action.

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 contractors, and relay trip logic would be able to perform their intended functions in the event of an accident. Analysis of the Turbine Building ventilation unit (V-AH-1, V-AH-2, V-MZ-1, V-MZ-4, V-MZ-5, V-MZ-6) breakers was also completed, showing that the breakers are 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 to trip 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 10CFR50 guidelines are not exceeded.

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

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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FACILITY NAME (1)

DOCKET NUMBER (2)

LER NUMBER (6)

PAGE (3)

Monticello Nuclear Generating Plant

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

2. The Control Room kitchen and lavatory exhaust fan remains secured until modifications can be made to allow fan to operate without affecting Emergency Filter Train operability.
3. Procedures have been issued to trip Turbine Building Ventilation Units as needed during a radioactive release to keep the Control Room at a positive pressure with respect to the Turbine Building. A 10CFR 50.59 evaluation was completed to justify these actions.
4. Ductwork has been blocked to assure separation of the Safety Related and Non-Safety Related portions of the Emergency Filter Train ducting.
5. 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.
6. 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.
7. A Design Basis/Configuration Management review of the Emergency Filter Train system has been initiated.
8. Damper VD-9212B has been blocked in the closed position.
9. An evaluation and any necessary corrections will be completed prior to April 1, 1992 to resolve the single failure concern and the potential Division II 250VDC/Control Room Ventilation-Emergency Filter Train interaction.
10. Long term corrective actions are being developed.

ADDITIONAL INFORMATIONFailed Component Identification

None

Previous Similar Events

None

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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FACILITY NAME (1)

DOCKET NUMBER (2)

LER NUMBER (3)

PAGE (3)

Monticello Nuclear Generating Plant

0 5 0 0 0 2 6 3

9 0 0 0 1 0 3 0 9 OF 0 9

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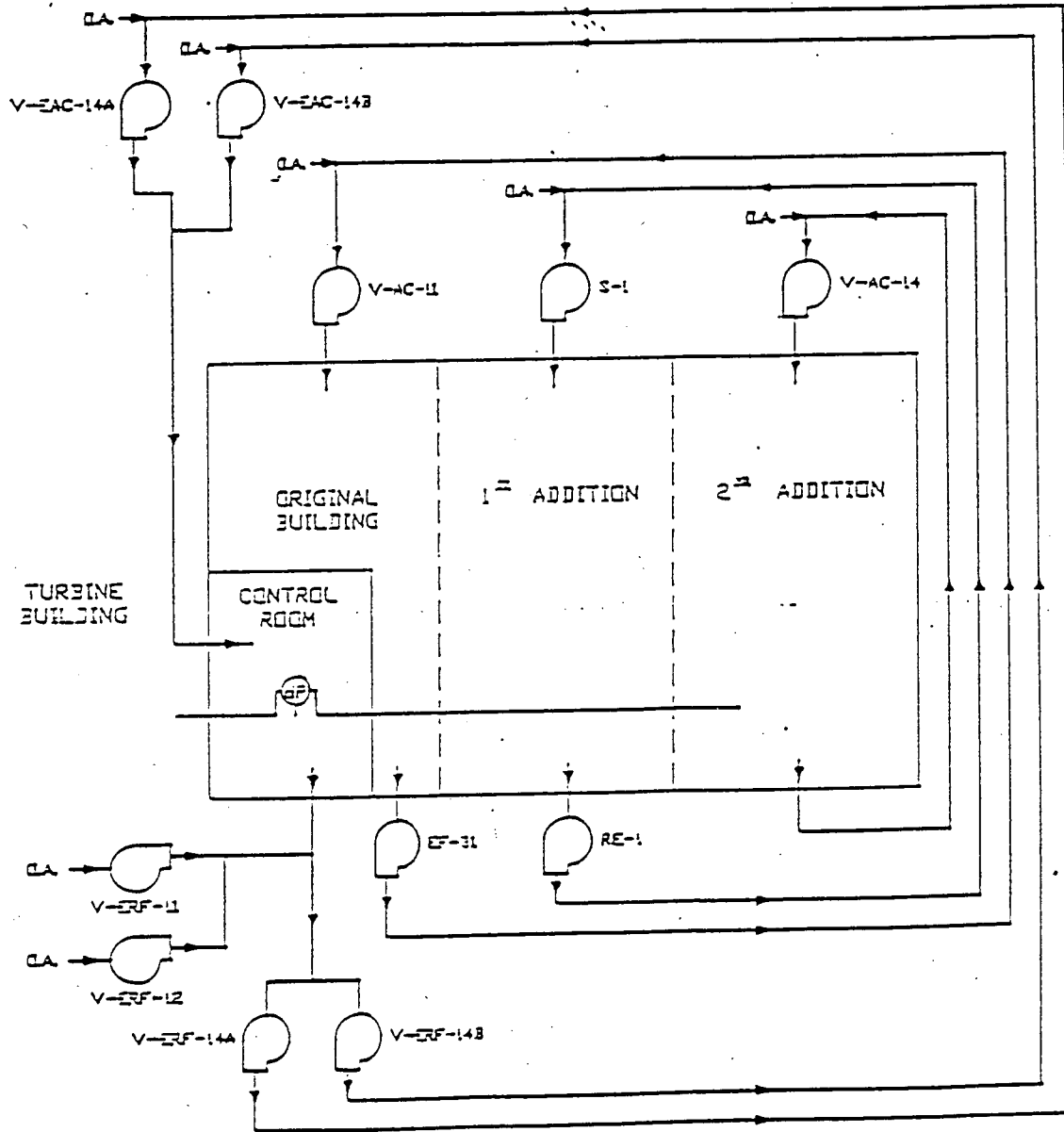


FIGURE 1 SIMPLIFIED ADMINISTRATION BUILDING VENTILATION