

Attachment to Licensee Event Report 79-037  
Consumers Power Company  
Palisades Nuclear Plant  
Docket 50-255

### Event Description

On September 11, 1979, during performance of a local leak test of Containment Building (CB) penetration 4a (CB exhaust valves bypass\*), the two manual three-inch containment isolation valves in the bypass line were discovered to be locked open. At the time of discovery, the reactor was in a cold shutdown condition. A preliminary investigation was performed, and on September 14, it was determined that contrary to the requirements of Technical Specification 3.6.1, containment integrity had been breached during power operation. Accordingly, on September 14, 1979, this occurrence was deemed reportable per Technical Specification 6.9.2.a.(3) (abnormal degradation of the containment boundary).

### Chronology of Events/Cause Description

On April 5, 1978, the HEPA filter in the CB exhaust valves bypass line was changed. In order to demonstrate the operability of the replacement filter, it was functionally tested in accordance with an approved test procedure. Opening of the two three-inch manual isolation valves was required in order to obtain adequate flow through the filter. At the time the valves were opened on April 6, 1978, the reactor was in a refueling shutdown condition, and containment integrity requirements were satisfied. At the conclusion of the test; however, the valves were apparently not closed, and the subsequent plant start-up took place with containment integrity requirements not met.

The following elements are considered to be key factors related to this occurrence:

- . The surveillance procedure governing the filter testing activities did not have adequate provisions for returning the system to normal.
- . The two valves in question were not on the valve line-up sheet which was used to verify containment integrity prior to the plant start-up at the end of the refueling outage.
- . No evidence of an administrative review of the completed test procedure exists. An administrative review would have provided an opportunity to address system status, and might have led to discovery of the improper valve line-up prior to returning to power.

### Corrective Actions

- . Upon discovery, the affected valves were closed and locked in that position.
- . The surveillance procedure which governs the filter testing will be revised such that return to service requirements are adequately addressed. In addition, all surveillance, operating and other procedures which could impact on containment integrity will be reviewed and revised as necessary to assure that containment integrity requirements are satisfied.

\*Also referred to in the FSAR as the post-accident hydrogen purge line.

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- . The manual valves in the CB exhaust valves bypass line will be added to the containment integrity valve line-up checklist. In addition, prints will be reviewed to verify that all containment integrity isolation valves are included on the checklist, and a walkdown of all piping which penetrates the containment building will be made to verify print and checklist accuracy.
- . This occurrence will be reviewed with applicable plant personnel. The requirement to rigorously follow procedures (ie, obtain administrative reviews when required) will be stressed.
- . The function of the CB exhaust valves bypass will be evaluated, and if possible, the line will be capped.

#### Probable Consequences

An evaluation of the consequences of this occurrence is still in progress. The following major elements will be investigated:

- . The magnitude of the actual release to the main stack will be either calculated or estimated.
- . The off-site effects during a postulated loss of coolant accident will be estimated. To do this, consideration will be given to the operation of the hydrogen purge regulating valve (CV-1804) and the downstream HEPA filter.