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Attachment
Licensee Event Report 83-033/01T-0

While the plant was in a cold shutdown condition and the Standby Gas Treatment System (SGTS) was in operation, it was determined that two blank flanges were missing from the Reactor Building HVAC ductwork that went from the Unit 1 re-fuel floor to the Unit 2 side of the Reactor Building. The absence of the two blanks compromised secondary containment integrity as defined in the Technical Specifications (1.37.a.2). The missing blanks did not affect the operability of the SGTS because the indicated flow rate, though higher than allowed by the Technical Specification surveillance requirement (4.6.5.1.c.2) for secondary containment integrity, was within the limits of the SGTS. In addition, the HVAC system as well as the SGTS had no difficulty maintaining 0.25 inches vacuum water gauge. There have not been any radioactive releases on the Unit 1 refuel floor. There were no consequential effects to the public health and safety.

The blanks were part of the Unit Separation Program and were known to be installed at one time and were shown on design drawings but, were not tagged as separation items. The Unit Separation Program was instituted prior to Unit 1 fuel load to eliminate interactions with Unit 2 systems in the construction phase. The two blanks were removed by unknown persons on an unknown date. The last time the SGTS was run to check the secondary containment flow rate (18 month surveillance) was in October of 1982. It is therefore possible that higher than allowed flow rates for secondary containment integrity existed while in an applicable operating condition.

The blanks were installed, the fasteners were tack welded and the blanks were tagged as unit separation items. The SGTS surveillance test was performed and resulted in an acceptable flow rate for secondary containment integrity.

To prevent recurrence, the following actions are planned or are in progress:

- 1 - Perform an adequacy review of unit separation utilizing personnel from the Unit 1 and Unit 2 engineering staffs and the Integrated Startup Group.
- 2 - Revise the Boundary Tag Program to include as a controlled document the summary sheets of separation components.
- 3 - Revise the Plant Modification Request Program to include a unit separation review and the implementation of the Boundary Tag Program when a modification is being performed.
- 4 - Verify that the identified boundaries have a unique boundary tag utilizing Operations and Electrical Maintenance personnel followed by an independent verification by QC personnel.
- 5 - Perform a review on unit separation components located in Unit 2 for adequate security controls in order to avert unauthorized removal.
- 6 - Review the Analysis Reports of the charcoal beds made from the SGTS test canisters that were removed.
- 7 - Develop surveillance procedures to routinely check safety related and radiation protection components that are part of the separation program.