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EDWARD J. NELSON
VICE PRESIDENT

January 19, 1970

Dr. Peter A. Morris, Director
Division of Reactor Licensing
United States Atomic Energy Commission
Washington, D. C. 20545



Subject: Violation of Containment Integrity, January 9, 1970
Ginna Station Unit No. 1
Docket 50-244

Dear Dr. Morris:

The reactor plant was taken to a cold shutdown condition on January 8, 1970 in preparation for the replacement of six failed reactor coolant temperature detectors (RTD type) and for work on the "B" reactor coolant pump. Circulation flow from the Residual Heat Removal System was stopped at 1035 hours. At 1300 hours, and with the reactor coolant system at 100°F, the Shift Foreman gave permission for both personnel air lock doors to be opened to permit flow of tools and equipment for the maintenance planned.

To facilitate removal of the RTD's, partial draining of the reactor coolant system is required and this step was initiated at 1310 hours. Draining was held to a minimum rate for control and surveillance. When indications were that the reactor coolant level was below the RTD location, the drainage was terminated. This was reported as of the hour of 0135 on the morning of January 9, 1970. *See Procedure*

At 0800 hours on January 9, 1970 it was found that the reactor coolant system level still covered the lower RTD and more drainage was required to permit replacement of the RTD's. Additional draining was in process when incore thermocouple readings taken at 1030 hours indicated temperature readings ranging from 175°F to 185°F. These temperatures exceeded the temperature limit for cold shutdown of 140°F and to be in accordance with the Technical Specification, containment integrity should have been in effect. One personnel access door was immediately closed and the personnel air lock doors were returned to their normal interlocking condition within an hour.

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TO Dr. Peter A. Morris

Maintenance work was immediately suspended and approximately 5,000 gallons of refueling water was added to the reactor coolant system through the Residual Heat Removal System at 1130 hours. The incore temperatures were observed to drop from a high temperature of 190°F to below 140°F and the Residual Heat Removal System was placed in service at 1143 hours. At 1245 hours the incore thermocouples indicated temperatures of 100°F to 101°F and the Residual Heat Removal System was removed from service.

The Plant Operating Review Committee met early that afternoon to review the incident. It was recognized that the incident was brought about by the failure to monitor the reactor coolant temperature by alternate means when the normally monitored RTD's were no longer in service. The committee then prepared a written procedure that would properly accommodate the RTD replacement or any other work that would require partial coolant system draining. This procedure prescribes running the Residual Heat Removal System during draining; replacement of one RTD at a time; maintaining continuous surveillance of incore thermocouple readings along with the recording of these on the half hours; and setting a maximum limit of 130°F on the reactor coolant system above which cooling must be initiated when containment integrity is not maintained.

These administrative recommendations were then implemented and the change of the RTD's was accomplished without further incident.

On the day of this occurrence Mr. Doyle Hannicutt of the AEC Division of Compliance was notified by telephone and Mr. R. W. Kirkman, Director, Region I, Division of Compliance was advised by telegram.

Very truly yours,

Edward J. Nelson
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