

PHILADELPHIA ELECTRIC COMPANY

PEACH BOTTOM ATOMIC POWER STATION

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KEN POWERS  
PLANT MANAGER

October 9, 1992

Docket No. 50-277

Document Control Desk  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555

SUBJECT: Licensee Event Report  
Peach Bottom Atomic Power Station - Unit 2

This LER concerns a Technical Specification violation when a train of Standby Gas Treatment was inoperable during Containment de-inerting activities.

Reference: Docket No. 50-277  
Report Number: 2-92-016  
Revision Number: 00  
Event Date: 09/11/92  
Report Date: 10/09/92  
Facility: Peach Bottom Atomic Power Station  
RD1, Box 208, Delta, PA 17314

This LER is being submitted pursuant to the requirements of 10 CFR 50.73(a)(2)(i)(B).

Sincerely,

cc: J. J. Lyash, US NRC Senior Resident Inspector  
T. T. Martin, US NRC, Region I

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ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.6 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (F-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.

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

On 9/11/92, during a controlled plant shutdown for the Unit 2 Refueling Outage, it was discovered that Containment venting and purging activities had been started while the "A" Standby Gas Treatment System (SBGTS) filter was removed from service and inoperable. Per Technical Specification 3.7.E.2.e, both SBGTS trains are required to be operable with one train in standby condition whenever Containment de-inerting is in progress. The cause of the event has been determined to be that the Reactor Operator failed to properly comply with the prerequisites as specified in the operating procedure. No actual safety consequences occurred as a result of this event. After discovery of the event, Containment de-inerting was terminated and the appropriate containment valves were isolated until the "A" SBGTS filter was returned to an operable condition. The pertinent information from this event will be provided to the appropriate Operations personnel. No previous similar LERS have been identified.

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.

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

Requirements of the Report

This report is being submitted to satisfy the requirements of 10 CFR 50.73 (a)(2)(i)(B) due to both Standby Gas Treatment Systems (SBGTS)(EIIS:BH) not being operable as specified in Technical Specification (Tech. Spec.) 3.7.E.2.E.

Unit Conditions at Time of Event

Unit 2 was being shutdown in the "RUN" mode at 50% of thermal reactor (EIIS:EA) power. There were no other systems, structures, or components that were inoperable that contributed to the event.

Description of the Event

On 9/11/92 at approximately 2130 hours, during a controlled plant shutdown for the Unit 2 Refueling Outage, it was discovered that Containment venting and purging activities had been started at 1707 hours while the "A" SBGTS filter was removed from service and inoperable. Per Tech. Spec. 3.7.E.2.a, both SBGTS trains are required to be operable with one train in standby condition whenever containment de-inerting is in progress. If this requirement can not be met, Tech Specs require that the containment purging and venting penetrations be isolated in 4 hours or the plant be in Hot Shutdown in 12 hours and Cold Shutdown in 24 hours. The "A" SBGTS had been removed from service and considered inoperable on 9/9/92 to support repairs to a defective filter (EIIS:FLT) heater (EIIS:EHTR) control circuit (EIIS:69). After discovery of the condition, the de-inerting process was terminated at 2211 hours and the appropriate containment valves were isolated in accordance with Tech. Specs. until the "A" SBGTS filter was returned to an operable condition at 1720 hours on 9/12/92.

Cause of the Event

The cause of the event has been determined to be that the Reactor Operator (RO)(Utility:Licensed) failed to properly comply with the prerequisites as specified in the operating procedure (SO 7B.4.A-2) "Containment Atmosphere De-Inerting and Purging via SBGT System". The operating procedure prerequisite was clear but the RO misinterpreted the information.

Analysis of Event

No actual safety consequences occurred as a result of this event.

This Tech. Spec. requirement is intended to provide additional assurance that a train of SBGTS is available if a Loss of Coolant Accident (LOCA) would occur coincident with Containment purge and vent isolation valves (EIIS:IV) being open. The closure times for the Containment purge and vent isolation valves are fast enough, following a LOCA, to protect the inservice SBGTS filter train and to contain released fission products. In addition, the large Containment purge and vent isolation valves are subject to Tech. Spec. restrictions which also limit

LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 500 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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Peach Bottom Atomic Power Station  
Unit 2

YEAR

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TEXT (If more space is required, use additional NRC Form 306A's) (17)

when the valves can be opened and specify a total time limit per calendar year. The likelihood of a LOCA during purge and venting activities, which could have resulted in a "B" SBGTS filter failure, is very low. However, if a LOCA did occur and resulted in a failure of the "B" SBGTS filter, the "A" SBGTS filter could have been returned to service in a timely manner.

Corrective Actions

After discovery of the event, Containment de-inerting was terminated and the appropriate containment valves were isolated in accordance with Tech. Specs. until the "A" SBGTS was returned to an operable condition.

The involved RO has been coached and counselled regarding this event. The pertinent information from this event will be provided to the appropriate Operations personnel.

Previous Similar Events

No previous similar LERS have been identified which involved an inoperable SBGTS train during Containment purge and venting activities.