

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO. 3150-0104

EXPIRES 8/31/85

FACILITY NAME (1) R.E. Ginna Nuclear Power Plant	DOCKET NUMBER (2) 0 5 0 0 0 2 4 4 8 5 - 0 1 2 - 0 0 0 2	LER NUMBER (6)			PAGE (3)		
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TEXT (If more space is required, use additional NRC Form 306A's) (17)

The Ginna containment has two redundant charcoal filter systems which serve to reduce, along with containment spray, the radiation dose following a LOCA. The filters have been assumed to be effective in LOCA dose analyses and the filters are therefore required to be operable by Technical Specifications. The filters are a parallel flow path on two of the four containment fan coolers and are normally isolated from service. Following a safety injection signal, isolation dampers are automatically positioned to divert air flow from the two fan coolers through the filters and back to the distribution system.

Inservice test have indicated that the minimum required containment fan cooler air flow is met but little margin exists when the filters are in service. An evaluation of potential means to increase the margin was being performed by engineering personnel when it was discovered that portions of the discharge ducting from both charcoal filters are located at an elevation which may be flooded following a large break LOCA after the refueling water storage tank (RWST) has been emptied to containment. Drawings indicated that relief dampers above the flood elevation might provide flow paths to establish the required flow.

A containment entry was made (the plant was operating at 100% power) to verify the locations of the ducting and the type and locations of relief dampers. Personnel making the entry were instructed, depending upon their findings, to secure open dampers or duct openings near the filter exits which matched the duct size. The entry verified the suspect location of the filter ducting and established that the dampers relieved pressure into the ducting. A single large damper was secured open at the A filter exit and one smaller damper was secured open on the B filter exit.

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R.E. Ginna Nuclear Power Plant

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TEXT (If more space is required, use additional NRC Form 305A's) (17)

The engineering evaluation that was in progress had evaluated the required effectiveness of iodine removal to meet regulatory limits. Containment spray is the dominant factor soon after an accident and removes 99% of the elemental iodine before the end of the first hour. Containment spray removes iodine from the free volume above the operating floor of the containment. The charcoal filters are effective in removing the remaining iodine from the lower levels of containment to limit the 30 day dose. Air distribution within containment from the fan cooler/filter units is to several locations, less than half of which are above the operating floor. Suction for the fan cooler/filter units is below the operating floor at the intermediate level. Creating openings at the filter exits resulted in greater discharge of cleansed air above the operating floor, hereby reducing "short circuiting", and would result in higher concentration of contaminated air entering the filters.

Following the containment entry, and based upon the duct opening sizes and the distribution of filtered air, the A charcoal filter was declared operable and the B filter was declared inoperable. During the next several days, two more inspection ports were opened and an additional access opening was installed in the B filter discharge duct in accordance with Emergency Maintenance procedure EM-509. These openings assured the required air flow from the B filter and it was declared operable within the Technical Specification seven day Limiting Condition for Operation.

During the time that the filters were inoperable for large break LOCAs there was no effect on normal plant operations or the plant operations. For all accidents except the large break LOCA, plant response to the accidents would have been bounded by the existing analyses because the ducts would not be flooded. Two aspects of the large break LOCA may have been affected; LOCA containment integrity pressure and the dose analysis. Previous analyses have established that the LOCA containment integrity pressure has peaked and is decreasing by the time the fan coolers are available, so there would have been no adverse effect upon the containment. The 30 day LOCA dose would have been increased because of the inoperable filters. A preliminary evaluation of the dose indicates that it would have remained within regulatory limits.



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Washington, DC 20555

Subject: LER 85-012, Inoperable Containment Charcoal Filters
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

In accordance with 10 CFR 50.73, Licensee Event Report System, item (a)(2)(i)(B) which requests a report of, "any operation or conditions prohibited by the plant Technical Specification"; item (a)(2)(ii)(B) which requests a report of, "any event or condition...that resulted in the nuclear power plant being in a condition that was outside the design basis of the plant."; item (a)(2)(v)(D) which requests report of, "any event or condition that alone could have prevented the fulfillment of the safety function of structures or systems that are needed to mitigate the consequences of an accident."; item (a)(2)(vii)(D) which requests a report of, "any event where a single cause or condition...caused at least one independent train or channel to become inoperable in a single system designed to mitigate the consequences of an accident."; the attached Licensee Event Report LER 85-012 is hereby submitted.

Very truly yours,

Roger W. Kober
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