

## LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Dresden Nuclear Power Station, Unit 3										DOCKET NUMBER (2) 0 5 0 0 0 2 4 9				PAGE (3) 1 OF 03		
TITLE (4) Vessel Not Vented Below Temperature Limit																
EVENT DATE (5)			LER NUMBER (6)				REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)						
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES				DOCKET NUMBER(S)			
									N/A				0 5 0 0 0			
0 9	2 3	8 5	8 5	0 1	9	0 0	1 0	2 2	N/A				0 5 0 0 0			
OPERATING MODE (9)		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 3: (Check one or more of the following) (11)														
N		20.402(b)				20.405(c)				50.73(a)(2)(iv)				73.71(b)		
POWER LEVEL (10)		20.405(a)(1)(i)				50.38(c)(1)				50.73(a)(2)(v)				73.71(c)		
0 1 0 0		20.405(a)(1)(ii)				50.38(c)(2)				50.73(a)(2)(vi)				OTHER (Specify in Abstract below and in Text, NRC Form 306A)		
		20.405(a)(1)(iii)				50.73(a)(2)(i)				50.73(a)(2)(vii)(A)						
		20.405(a)(1)(iv)				50.73(a)(2)(ii)				50.73(a)(2)(vii)(B)						
		20.405(a)(1)(v)				50.73(a)(2)(iii)				50.73(a)(2)(ix)						
LICENSEE CONTACT FOR THIS LER (12)																
NAME Michael Moy										TELEPHONE NUMBER AREA CODE 8 1 5 9 4 2 - 2 9 2 0						
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)																
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDOS		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDOS						
D				N												
SUPPLEMENTAL REPORT EXPECTED (14)																
YES (If yes, complete EXPECTED SUBMISSION DATE)										X NO		EXPECTED SUBMISSION DATE (15)		MONTH	DAY	YEAR

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

On September 23, 1985, with the Dresden Unit 3 reactor in the shutdown mode, the Shift Control Room Engineer (SCRE) observed that the reactor vessel was not vented at less than 149°F. The SCRE immediately notified the Unit 3 Operating Engineer of the anomaly and the reactor head vents were immediately opened at 0730.

This event was contrary to the wording of Technical Specification 3.6.B.1.

The event was caused by an inadequacy of the Dresden Unit 2/3 shutdown procedure (Dresden General Procedure 2-1) to completely outline the conditions under which the reactor vessel must be vented.

To prevent this event from recurring, a procedure change was initiated to add a "Caution" statement to DGP 2-1 stating that the reactor pressure vessel must be vented when any portion of the vessel is less than 149°F and the reactor vessel moderator and flange temperature requirements as stated in DGP 2-1 step D.58 are met. If this is not possible, reactor vessel temperatures must be maintained at or above 149°F. A Technical Specification change was initiated to change the minimum operating temperature of 149°F to 100°F. Also, the event will be reviewed by Operating personnel in a future weekly tailgate session. The safety significance of the event was minimal since no control rod drive pumps were running. If the reactor vessel had been inadvertently pressurized, vessel temperatures were still above the minimum temperature requirement for an inservice pressure test. Also, the mode switch was in shutdown and all control rods were fully inserted and could not be moved. Due to the relatively short period of time that the reactor vessel was not vented, the probability of a control rod drop accident to occur was minimal. The last previous occurrence was reported by LER 85-011 on Docket #050237

## LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO. 3150-0104

EXPIRES: 8/31/85

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Dresden Nuclear Power Station, Unit 3	0 5 0 0 0 2 4 9	8 5	— 0 1 9	— 0 0	0 2	OF	0 3

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

On September 23, 1985, with the Dresden Unit 3 reactor in the shutdown mode, the Shift Control Room Engineer (SCRE) observed that the reactor vessel was not vented at less than 149°F. The SCRE immediately notified the Unit 3 Operating Engineer of the anomaly and the reactor head vents were immediately opened at 0730.

This event was contrary to Technical Specification 3.6.B.1 which states that the reactor vessel shall be vented and power operation shall not be conducted unless the reactor vessel temperature is equal to or greater than that shown in Curve C of Figure 3.6.1. The minimum operating temperature specified for the reactor vessel at low reactor pressures is 149°F.

The event was caused by an inadequacy of the Dresden Unit 2/3 shutdown procedure (Dresden General Procedure 2-1) to completely outline the conditions under which the reactor vessel must be vented. The conditions under which this event occurred were that the reactor vessel temperature in the area of the flange was greater than 190°F and the reactor vessel temperature below water level was less than 149°F. Dresden General Procedure 2-1 step D.58 states that the reactor vessel head vents should only be opened at the direction of the Shift Engineer or Shift Foreman and when both the reactor moderator temperature is less than or equal to 190°F and when the reactor pressure vessel in the area of the flange is less than 190°F. This step and Technical Specification 3.6.B.1 provided conflicting information.

To prevent this event from recurring, a procedure change was initiated to add a "Caution" statement to DGP 2-1 step D.58 stating that the reactor pressure vessel must be vented when any portion of the vessel is less than 149°F and the conditions stated in DGP 2-1 step D.58 are met. If this is not possible, reactor vessel temperatures must be maintained at or above 149°F. A Technical Specification change was initiated to change the minimum operating temperature of 149°F to 100°F. Also, the event will be reviewed by Operating personnel in a future weekly tailgate session. The procedure changes will remain in effect until the Technical Specification changes are approved. The safety significance of the event was minimal since no control rod drive pumps were running. Reactor water temperature was being maintained between 120°F and 130°F and if the reactor vessel had been inadvertently pressurized, vessel temperatures were still above 100°F which is the minimum temperature requirement for an inservice pressure test. Also, the mode switch was in shutdown and all control rods were fully inserted and could not be moved. Due to the relatively short period of time that the reactor vessel was not vented (approximately 61 hours), the probability of a control rod drop accident to occur was minimal.

The last previous occurrence was reported by LER 85-011 on Docket #050237, Deviation Report #12-2-85-24.

A review of previous and current revisions of 10 CFR Part 50 Appendix G indicates that technical justification for the wording of Technical Specification 3.6.B.1 does not exist. Dresden Station believes that under the conditions that actually prevailed during the event, reactor vessel temperatures were to be limited by Curve B of Figure 3.6.1 rather than Curve C as implied by the wording of Technical Specification 3.6.B.1. During noncritical cooldown conditions, the minimum allowable reactor vessel temperature shown on Curve B is 100°F which was well below the actual vessel temperature that occurred at all times during the event. Since the original intent of the vessel venting requirement is unclear, section 3.6.B.1 of the Technical

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

Specifications is undergoing revision to comply with the current revisions of 10 CFR Part 50 Appendix G. This should avoid recurrence of the event in the future.



**Commonwealth Edison**

Dresden Nuclear Power Station

R.R. #1

Morris, Illinois 60450

Telephone 815/942-2920

October 22, 1985

DJS Ltr #85-1002

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

Licensee Event Report #85-019-0, Docket #050249 is being submitted as required by Technical Specification 6.6, NUREG 1022 and 10 CFR 50.73 (a)(2)(i)(B).

fr

D.J. Scott  
Station Manager  
Dresden Nuclear Power Station

DJS/kjl

Enclosure

cc: J.G. Keppler, Regional Administrator, Region III  
File/NRC  
File/Numerical

IE22  
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