

LICENSEE EVENT REPORT

Attachment 1

CONTROL BLOCK: (PLEASE PRINT OR TYPE ALL REQUIRED INFORMATION)

01 PATMI 2000-000000-000341111145
7 8 9 14 15 25 26 30 57 CAT 58

CON'T
01 REPORT SOURCE L050003207091181805119839
7 8 60 61 68 69 74 75 80

EVENT DESCRIPTION AND PROBABLE CONSEQUENCES (10)

02 During a NRC inspection it was discovered that the Control Building charcoal filters
03 were laboratory tested to an acceptance criteria of 95% rather than 99% required by
04 Reg. Guide 1.52, 1978. Since the filters tested to 95.29% the filters are considered
05 inoperable per Tech. Spec. 3.7.7.1(c). The Tech. Specs. are unclear as they reference
06 Reg. Guide 1.52-1978 which are for R.H. controlled systems. These filters are uncon-
07 trolled, therefore, none of the tests apply. No significant occurrence took place and
08 there was no impact on the health and safety of the public.

09 SYSTEM CODE CAUSE CODE CAUSE SUBCODE COMPONENT CODE COMP. SUBCODE VALVE SUBCODE
S G 11 D 12 Z 13 F I L T E R 14 Z 15 Z 16
7 8 9 10 11 12 13 18 19 20
17 LER/RO REPORT NUMBER EVENT YEAR 8 1 23 24 26 27 28 29 30 31 32 REVISION NO. 1
21 22 23 24 26 27 28 29 30 31 32
18 ACTION TAKEN FUTURE ACTION EFFECT ON PLANT SHUTDOWN METHOD HOURS ATTACHMENT SUBMITTED NPD-4 FORM SUB. PRIME COMP. SUPPLIER COMPONENT MANUFACTURER
G 18 X 19 Z 20 Z 21 0 0 0 0 Y 23 N 24 Z 25 Z 9 9 9 9
33 34 35 36 37 40 41 42 43 44 47

CAUSE DESCRIPTION AND CORRECTIVE ACTIONS (27)

10 The test procedure was written utilizing the "assigned" efficiency of 95% from Reg.
11 Guide 1.52 instead of the penetration efficiency of 99%. This was due to misunder-
12 standing the Reg. Guide and confusion due to the number of various regulations. New
13 filters were installed. The Tech. Spec. requirement and test procedures were revised
14 to incorporate the acceptance criteria of 95% from ANSI 509-1980.

15 FACILITY STATUS % POWER OTHER STATUS METHOD OF DISCOVERY DISCOVERY DESCRIPTION
X 28 0 0 0 29 Recovery Mode C 31 NRC inspection
7 8 9 10 12 13 44 45 46 80
16 ACTIVITY CONTENT RELEASED OF RELEASE AMOUNT OF ACTIVITY LOCATION OF RELEASE
Z 33 Z 34 N/A
7 8 9 10 11 12 44 45 80
17 PERSONNEL EXPOSURES NUMBER TYPE DESCRIPTION
0 0 0 37 Z 38 N/A
7 8 9 11 12 13 80
18 PERSONNEL INJURIES NUMBER DESCRIPTION
0 0 0 40 N/A
7 8 9 11 12 80
19 LOSS OF OR DAMAGE TO FACILITY TYPE DESCRIPTION
Z 42 N/A
7 8 9 10 80
20 PUBLICITY ISSUED DESCRIPTION
N 44 N/A
7 8 9 10 80

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PDR ADOCK 05000320
S PDR

NRC USE ONLY

NAME OF PREPARER Bob Swartzwelder

PHONE (717) 948-8693

LICENSEE EVENT REPORTNARRATIVE REPORTTMI-II

LER 81-023/03X-1

EVENT DATE - September 11, 1981

I. EXPLANATION OF OCCURRENCE

During a NRC inspection in September, 1981, it was discovered that the Control Building charcoal filters were laboratory tested to the wrong acceptance criteria, 95% instead of 99% as required by Reg. Guide 1.52, 1978. Since the latest test date (May 15, 1980) indicated an efficiency of 95.29%, the filters are considered inoperable per Tech. Spec. 3.7.7.1(c). The 24-hour time clock expired at 1300 hours on September 11, 1981, and is thus considered reportable per 6.9.1.8(b). It should be noted that based on the October 1981 test, the charcoal filters still exceed the required testing efficiency based on the FSAR accident analysis. The FSAR takes credit for 90% efficiency.

II. CAUSE OF THE OCCURRENCE

The test procedure was inadvertently written utilizing the "assigned efficiency" of 95% from Table 2 of Reg. Guide 1.52 instead of a test efficiency of 99% as required by the Reg. Guide. The Reg. Guide states that 95% is the efficiency assigned to the filter if the penetration of methyl iodine is less than 1% during lab tests. Apparently the wrong efficiency was used when the procedure was written. Tech. Spec. 3.7.7.1(c) refers to Table 2 of Reg. Guide 1.52. Additional confusion exists because the Control Room charcoal filters do not specifically fit any of the categories in Table 2 of the Reg. Guide, in that the relative humidity is not controlled. Uncertainty then existed as to what acceptance criteria applied.

III. CIRCUMSTANCES SURROUNDING THE OCCURRENCE

At the time of the occurrence, the Unit 2 facility was in a long-term cold shutdown state. The reactor decay heat was being removed via loss to ambient. Throughout the event there was no effect on the Reactor Coolant System or the core.

IV. CORRECTIVE ACTIONS TAKEN OR TO BE TAKEN

- 1) New charcoal filters were installed on February 16th, 1982. Laboratory test results indicated that the filters had been tested to 99.87% efficiency, which satisfied the requirements of both Table 2 of Reg. 1.52 and ANSI 509-1980.
- 2) The test procedure (4303-R25, Rev. 1, dated 9/15/81) and surveillance requirement 4.7.7.1 (ROPC No. 15 dated 7/13/82) were revised to incorporate the acceptance criteria of 5% penetration maximum (95% efficiency) for laboratory tests per Table 5-1 of ANSI 509-1980.
3. Tech. Spec. 3.7.7.1 was revised on April 9, 1982, to delete the reference to Table 2 of Reg. Guide 1.52.

JUN 15 1983



GPU Nuclear Corporation
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Middletown, Pennsylvania 17057
717 944-7621
TELEX 84-2386
Writer's Direct Dial Number:

May 19, 1983
4410-83-L-0082

Office of Inspection and Enforcement
Attn: Mr. J. M. Allan
Acting Regional Administrator
Region I
US Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

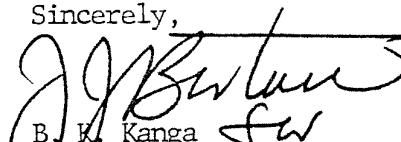
Dear Sir:

Three Mile Island Nuclear Station, Unit 2 (TMI-2)
Operating License No. DPR-73
Docket No. 50-320
Updated Licensee Event Reports

The Licensee Event Reports listed in Attachment 1 have been updated and are enclosed as Attachment 2 to this letter.

If you have any questions, please contact Mr. J. J. Byrne of my staff.

Sincerely,


B. K. Kanga
Director, TMI-2

BKK/RDW/jep

Attachments

CC: Mr. L. H. Barrett, Deputy Program Director - TMI Program Office
Dr. B. J. Snyder, Program Director - TMI Program Office

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LIST OF UPDATED LICENSEE EVENT REPORTS

<u>LER NO.</u>	<u>LER NO.</u>
80-01	81-12
80-05	81-20
80-07	81-22
80-12	81-23
80-49	81-32
80-54	81-34
80-55	81-35
80-56	81-36
80-57	81-38
81-04 *	82-34
81-08	
81-10	

* Event date on original Licensee Event Report was incorrect. This revision corrects the event date.