March 31, 1983
4410-83-L-0072

Office of Inspection and Enforcement
Attn: Mr. Ronald C. Haynes, Regional Administrator
US Nuclear Regulatory Commission
Region I
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
Licensee Event Report 83-08/01L-0

Attached please find Licensee Event Report 83-08/01L-0 concerning the transfer of radwaste through the Auxiliary Building while the exhaust flowrate was below Technical Specification limits.

This event constitutes a violation of Section 3.9.12.2(b) and is considered reportable under Section 6.9.1.8(b) of the Interim Recovery Technical Specifications.

Sincerely,

[Signature]
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

GPU Nuclear Corporation is a subsidiary of the General Public Utilities Corporation
On February 16, 1983, liquid radwaste was transferred through the Aux. Bldg. (AB) while the AB Air Cleanup Exhaust System was in a degraded mode due to replacement of its supply filters. This event is considered prompt reportable pursuant to Tech Spec 6.9.1.8(b) due to entry into and exceeding of the requirement of Tech Spec 3.9.12.2(b). This event had no effect on the health and safety of the public.

The cause of the event was the failure of the Shift Foreman to recognize the water as radwaste. The water contained krypton in excess of 1.0 E-5 luci/ml limit as identified in Tech Spec Change Request No. 35 for non-specified isotopes. The criteria for classifying liquids as radwaste was emphasized to Site Operations staff personnel.
EXPLANATION OF OCCURRENCE

At 0900 hours on March 3, 1983, it was determined that the conditions described herein were prompt reportable.

At 0804 hours on February 16, 1983, the Auxiliary Building (AB) Supply Fans AH-E-7A/B and AH-E-8C were secured in order to replace the AB Supply Filters. Since the ventilation was not yet restored at 1204 hours, Action Statement 3.9.12.2(b) was entered which required that all liquid radwaste transfers through the AB be terminated. At 1225 hours, normal ventilation flow was restored, thereby removing the restriction on transfer of liquid radwaste through the AB.

A subsequent investigation revealed that from 1138 to 1300 hours, waste water was pumped from Tank WDL-T-11A (located in the Service Building) through the AB to Tank CC-T-9 (located in the Chemical Cleaning Building). A sample was taken at 0700 hours which revealed that the waste water contained Krypton in excess of $1.0 \times 10^{-5}$ uCi/ml. This classified the water as radwaste as defined in Tech Spec Change Request No. 35 which was accepted by the NRC in Amendment to Order dated September 24, 1982. Therefore, between 1204 to 1225 hours, radioactive water was transferred through the AB, while ventilation exhaust flowrate was below that required. This exceeded the Action Statement Requirements of Tech Spec 3.9.12.2 and hence, constituted a prompt reportable event pursuant to Tech Spec 6.9.1.8(b).

II. CAUSE OF THE OCCURRENCE

The cause of the event was the failure of the Shift Foreman to identify the water as radwaste. Tech Spec Change Request No. 35 specifies separate and distinct limits for eight (8) isotopes. In addition, a limit is specified for all other isotopes (including Krypton 85) as $1.0 \times 10^{-5}$ uCi/ml. The Shift Foreman was unaware of this limit; therefore, he categorized the water as non-radwaste based on the results of the 0700 sample.

The water in WDL-T-11A originated from an operation that drained the steam lines as a part of Steam Generator Secondary Side Layup. From the steam lines, the water was processed through a temporary demineralizer and staged to WDL-T-11A. This demineralizer removed most isotopes, but did not remove the Krypton 85 which existed at a concentration of $2.4 \times 10^{-4}$ uCi/ml in the water.

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

Immediate
None

Long-Term
Site Operations staff personnel have been advised of the above incident. Emphasis was placed on the criteria defined in Tech Spec Change Request No. 35 for classifying liquids as radwaste.

V. COMPONENT FAILURE DATA

N/A