JAFP-15-0125
November 6, 2015

United States Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555-0001

Subject: LER: 2015-004-00, Concurrent Opening of Reactor Building Airlock Doors
James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333
License No. DPR-59

Dear Sir or Madam:

This report is submitted in accordance with 10 CFR 50.73(a)(2)(v)(C).

There are no commitments contained in this report.

Questions concerning this report may be addressed to Mr. Chris M. Adner, Regulatory Assurance Manager, at (315) 349-6766.

Sincerely,

Brian R. Sullivan
Site Vice President

Enclosure(s): JAF LER: 2015-004-00, Concurrent Opening of Reactor Building Airlock Doors

cc: USNRC, Region 1
    USNRC, Project Directorate
    USNRC, Resident Inspector
    INPO Records Center (ICES)
Concurrent Opening of Reactor Building Airlock Doors

On the morning of September 17, 2015, while operating at 100% power, workers opened doors concurrently when entering a secondary containment access airlock. The individuals involved each closed their respective doors upon encountering this unexpected condition; however, the result was a brief inoperability of secondary containment.

This resulted in an 8 hour reportable event. The Resident Inspector was notified, and an Event Notification was made pursuant to 10 CFR 50.72(b)(3)(v)(C) due to a condition at the time of discovery that prevented the fulfillment of the Secondary Containment safety function (Reference ENS 51405). Following the event, the doors functioned properly, and no deficiencies were noted with either door.

There were no radiological releases associated with this event.
Background

The Secondary Containment [EIS identifier: NG] boundary surrounds the primary containment and refueling equipment. The boundary forms a control volume to contain, dilute, and hold up fission products. The Secondary Containment consists of four systems which include the Reactor Building, the Reactor Building Isolation and Control System, the Standby Gas Treatment System, and the Main Stack. Secondary Containment is designed to provide containment for postulated design basis accident scenarios: loss-of-coolant accident and refueling (fuel handling) accident. Since pressure may increase in Secondary Containment relative to the environmental pressure, support systems are required to maintain a differential pressure vacuum such that external atmosphere would leak into containment rather than fission products leak out.

The systems which maintain a differential pressure vacuum inside Secondary Containment include the normal Reactor Building Ventilation and Cooling (RBV) System [VA] (during normal plant operations) and the safety-related Standby Gas Treatment (SBGT) System [BH] for post-accident conditions.

Technical Specification (TS) Surveillance Requirement (SR) 3.6.4.1.3 requires one Secondary Containment access door in each access opening to remain closed. Failure to meet this SR results in the Secondary Containment Limiting Condition for Operation (LCO) not being met, and requires the Secondary Containment to be declared Inoperable.

Event Description

On September 17, 2015, with the James A. FitzPatrick Nuclear Power Plant (JAF) operating at 100 percent power, a member of the Radiation Protection (RP) department and the Nuclear Regulatory Commission (NRC) were about to conduct a walk down of the Reactor Building, and entered the north door of the north Secondary Containment access opening on Elevation 272'. A chemistry contractor simultaneously entered the same Secondary Containment access opening via the opposing door on the south side, which resulted in the concurrent opening of the airlock doors. This condition was corrected within approximately five (5) seconds. At the time of the closure of either door, secondary containment integrity was restored as the SR for one door closed was met, and no other SRs (such as negative pressure) were being exceeded. Therefore at this time, the condition no longer exists.

For the condition in which Secondary Containment did not meet the Technical Specification (TS) Surveillance Requirement (SR) 3.6.4.1.3 for at least one door in secondary containment access opening being closed, the TS Limiting Condition of Operation (LCO) 3.6.4.1 required action was to restore secondary containment to Operable status in 4 hours. A short term LCO declaring Secondary Containment inoperable was entered at the time of discovery and subsequently exited.

An NRC notification was made via ENS 51405. This Licensing Event Report (LER) is being submitted per 10 CFR 50.73(a)(2)(v)(C) as a condition that could have prevented the fulfillment of safety function to control the release of radioactive material.
Event Analysis
Timeline of Events on 9/17/2015
1120 Condition discovered and subsequently corrected within approximately five (5) seconds
1220 Short Term LCO Entry/Exit (Late Entry) – Secondary Containment momentarily inoperable
1624 NRC notified via ENS 51405

Cause
Secondary Containment access openings are equipped with green indicating lights that are lit when the opposing access opening door is fully shut. Both parties involved indicated they observed the green indicating light prior to opening the airlock door. Therefore, the cause of this condition was determined to be simultaneous opening of the doors.

Similar Events
Internal Events
No similar events were identified at JAF.

External events:
Quad Cities Nuclear Generating Station: LER 2015-008, Interlock Doors Opened Simultaneously Cause Loss of Secondary Containment.
Duane Arnold Energy Center: LER 2015-003-01, Both Doors in Secondary Containment Airlock Opened Concurrently.

Corrective Actions
Completed Actions
- Both airlock doors on the north Reactor Building 272 elevation Secondary Containment access opening were closed within approximately five (5) seconds.
- A prompt investigation was conducted, including interviews with all involved personnel.

Planned Actions
- Submittal of a License Amendment Request, Ref. TSTF-551, “Revise Secondary Containment Surveillance Requirements,” which is currently under NRC review.

Safety Consequence and Implications
Actual Consequences
There were no actual consequences of this event relative to nuclear, industrial, or radiological safety.

Potential Consequences
The Secondary Containment differential pressure remained more negative than 0.25 inches of water vacuum while this condition existed. Therefore, there are no potential consequences of this event relative to nuclear, industrial, or radiological safety.
## References

- Technical Specifications