



INTER-COMPANY AND OFFICE CORRESPONDENCE

TO: D. L. Young

FROM: S. P. Graham

{ Dept.
Branch
Division
Company

LOCATED AT: Leominster, Mass.

SUBJECT: D-324 Opening Loss Incident

DATE: December 7, 1982

D-324 was opened at 2235 on 11/28/82 out of spec. The EPA Tech, P. Godin, did the initial opening loss test through the riser manifold and got an average reading of 7,000ppm's. Due to a slow heat-up of the reactor, P. Godin thought there might be product left in the reactor and cracked the manhole cover to check visually. At this point, the cable pulley jammed and despite his and the operator's efforts, they were unable to close the cover. The reactor was emitting vapors out the opened manhole cover so P. Godin put an exhaustor in the reactor to avoid personnel exposure in the area. He then called the supervisor and informed him of the situation.

I talked with all the EPA Technicians about this particular situation and informed them that neither they nor the shift supervisors have the authority to open a reactor out of spec. It would seem to me that after the manhole cover had been opened for five minutes, and it was physically impossible to close the cover without maintenance assistance, that the reactor had been effectively vented to atmosphere.

A repurge of the reactor at this point would have been misleading and not in keeping with the intent of the reactor opening loss test.

The best way to avoid a repeat of a situation such as this is for quicker and better communication among the people involved. After a reasonable period of time has elapsed, with the manhole cover open, it would seem best to me to write the reactor up as out of spec rather than attempt a repurge that would be at best of questionable effectiveness in keeping with the intent of opening loss tests.

S. P. Graham
EPA Coordinator

SPG/kml

cc: N. M. Blackman
M. R. Thorsen

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