



TO R. P. Byars DATE October 1, 1982

FROM C. S. Graybill *CSG by Gm* SUBJECT Non-Incineration of VCM II Vents

A 48 minute non-incineration of VCM II vents occurred on 9-26-82 beginning at 10:29 PM. The following is a summary of events.

At approximately 7:50 PM the incinerator operator noticed the vent header pressure rising without an increase in flow to our incinerator. The lead operator notified the Shift Supervisor that our flame arrestor was nearly plugged in order to get Shift Maintenance to pull it for cleaning. The vents were switched to B-I and they tripped out at 8:03 PM for six minutes until they were reset. Our lead operator went to WTU to check for liquids and to make sure that the valve was opening properly. Some liquid was drained from both sides of the valve and it was found in good working condition. He then proceeded to check bleed valves in the header back to VCM II. The only place that liquid was found was in one "east drain boot" located in the process area. This was full due to a plugged drain line. He proceeded to blow the line clear and drain the boot. During this time the incinerator main burner tripped out and fire-eye problems resulted in cooling down to 1700⁰F before Maintenance could make repairs to keep it running. This delayed putting vents to our incinerator until it could be reheated. Finally at approximately 11:30 PM after 3-1/2 hours of constant attention and 14 trips to the scrubber (only one of which was a violation), the vents were put back into our incinerator and operations returned to normal.

On Monday morning, several attempts were made to route vents to B-I and locate the problem. After not being able to get them into #3 incinerator and draining a large slug of liquids out of the #2 incinerator knock out pot, they were burned in #2 incinerator. On Tuesday, this was again tried and the vents would go to either incinerator without any problem.

This violation is the result of several problems occurring at or near to the same time. Normally any one of these situations should not result in a violation, but this sequence of events was more than could be handled. In speaking with the operators and the Shift Supervisor involved, I could not find any evidence of negligence on anyone's part. Maintenance responded quickly and WTU operators were very cooperative.

The following items will be implemented in an attempt to prevent reoccurrence:

1. We will routinely send vents to B-I for incineration. This has been set up to be done every Tuesday and Friday on day shift. This will be done at our initiation and at times when it will not create problems at WTU. The vents will be burned for a minimum of 30 minutes two times a week.
2. We will inspect and clean our flame arrestor once a week. This will be done on day shift each Friday unless otherwise dictated by operating conditions.

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3. We will initiate a request to have the computer give intermediate or count-down alarms while the vents are being scrubbed. Presently, there are no alarms of this type and it is easy to lose track of time remaining on the 40 minute limit. Warning alarms at 20, 10, and 5 minutes will keep the operators more aware of the limit.
4. We will investigate the main burner problem with our instrument people to trouble shoot this reoccurring problem.

/lp

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