



Monticello Nuclear Generating Plant  
2807 West County Road 75  
Monticello, MN 55362-9637

Operated by Nuclear Management  
Company LLC

April 16, 2001

US Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

**MONTICELLO NUCLEAR GENERATING PLANT**  
Docket No. 50-263 License No. DPR-22

**LER 2001-004**  
**Testing of Recombiner Space Heaters Not**  
**Performed Due to Inadequate Procedures**

A Licensee Event Report for this occurrence is attached. This report contains no new NRC commitments.

Contact Sam Shirey, Senior Production Engineer, at (763) 295-1449 if you require further information.

Byron Day  
Plant Manager  
Monticello Nuclear Generating Plant

c: Regional Administrator - III NRC  
NRR Project Manager, NRC

Sr. Resident Inspector, NRC  
Minnesota Department of Commerce

Attachment

*IE22*

<b>NRC FORM 366</b> (1-2001)	<b>U.S. NUCLEAR REGULATORY COMMISSION</b>	<b>APPROVED BY OMB NO. 3150-0104 EXPIRES 6-30-2001</b>							
<b>LICENSEE EVENT REPORT (LER)</b> (See reverse for required number of digits/characters for each block)		Estimated burden per response to comply with this mandatory information collection request: 50 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the Records Management Branch (T-6 E6), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to bis1@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202 (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the							
<b>FACILITY NAME (1)</b> Monticello Nuclear Generating Plant		<b>DOCKET NUMBER (2)</b> 05000263							
		<b>PAGE (3)</b> 1 OF 4							
<b>TITLE (4)</b> Testing of Recombiner Space Heaters Not Performed Due to Inadequate Procedures									
<b>THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check all that apply) (11)</b>									
<b>EVENT DATE (5)</b> MO DAY YEAR 02 16 2001		<b>LER NUMBER (6)</b> YEAR SEQUENTIAL NUMBER REV NO 2001 - 004 - 00							
<b>REPORT DATE (7)</b> MO DAY YEAR 04 17 2001		<b>OTHER FACILITIES INVOLVED (8)</b> FACILITY NAME DOCKET NUMBER 05000 FACILITY NAME DOCKET NUMBER 05000							
<b>OPERATING MODE (9)</b> N	20.2201(b) 20.2203(a)(3)(ii) 50.73(a)(2)(ii)(B) 50.73(a)(2)(ix)(A)								
<b>POWER LEVEL (10)</b> 100	20.2201(d) 20.2203(a)(4) 50.73(a)(2)(iii) 50.73(a)(2)(x)								
	20.2203(a)(1) 50.36(c)(1)(i)(A) 50.73(a)(2)(iv)(A) 73.71(a)(4)								
	20.2203(a)(2)(i) 50.36(c)(1)(ii)(A) 50.73(a)(2)(v)(A) 73.71(a)(5)								
	20.2203(a)(2)(ii) 50.36(c)(2) 50.73(a)(2)(v)(B) OTHER								
	20.2203(a)(2)(iii) 50.46(a)(3)(ii) 50.73(a)(2)(v)(C) Specify in Abstract below or in								
	20.2203(a)(2)(iv) 50.73(a)(2)(i)(A) 50.73(a)(2)(v)(D) NRC Form 366A								
	20.2203(a)(2)(v) X 50.73(a)(2)(i)(B)								
	20.2203(a)(2)(vi) 50.73(a)(2)(i)(C)								
	20.2203(a)(3)(i) 50.73(a)(2)(ii)(A) 50.73(a)(2)(viii)(B)								
<b>LICENSEE CONTACT FOR THIS LER (12)</b>									
<b>NAME</b> Sam Shirey		<b>TELEPHONE NUMBER (Include Area Code)</b> (763) 295-1449							
<b>COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)</b>									
CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX
<b>SUPPLEMENTAL REPORT EXPECTED (14)</b>						<b>EXPECTED SUBMISSION DATE (15)</b>			
YES (If yes, complete EXPECTED SUBMISSION DATE).						MONTH DAY YEAR			
X NO									
<b>ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)</b> During review of an operations manual change, the system engineer recognized space heaters for the Combustible Gas Control (CGC) System recombiner reaction chamber and the recombiner blower motor had not been tested as required by plant Technical Specifications. It was concluded this condition does not meet the requirements of the Technical Specification 4.7.E.1.b which is to perform a resistance to ground test on all heater electrical circuits.									

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TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

Description

On February 16, 2001, while operating at 100% power and during review of an operations manual change, the system engineer recognized space heaters<sup>1</sup> for the Combustible Gas Control (CGC)<sup>2</sup> System recombiner<sup>3</sup> reaction chamber and the recombiner blower<sup>4</sup> motor<sup>5</sup> had not been tested as required by plant Technical Specifications.

Both trains of CGC Systems were declared inoperable on February 16, 2001 due to a failure to comply with the surveillance requirements of Technical Specification 4.7.E.1.b to perform a resistance to ground test on all heater electrical circuits. A 30-day LCO was entered per Technical Specification 3.7.E.3.

This check had been performed, as specified, for the recombiner main heater circuits, but not for the space heaters in the recombiner enclosure or in the blower motor.

The primary purpose of the space heaters is to prevent excessive moisture buildup in these components. The space heaters are not required for operability, however, they should have been tested based on the Technical Specification requirement (i.e. "all heaters").

Failure to perform the resistance to ground checks of the space heaters did not affect CGC functionality based on the following:

A trickle heater "power on" light on the recombiner provided assurance the space heaters were operating properly.

Cyclic megger checks of the CGC recombiner main heaters and blower motors have shown acceptable results. This demonstrates no excessive degradation of these components.

Semi-annual and cyclic surveillance tests of the CGC Systems have not shown a problem with these components.

The heater circuit resistance to ground surveillance procedures were revised to include the space heaters and were issued on February 22, 2001. These procedures were successfully run on February 23, 2001. Both trains of CGC were declared operable, and the 30-day LCO was exited.

<sup>1</sup> EIS Component Code: EHTR  
<sup>2</sup> EIS System Code: BB  
<sup>3</sup> EIS Component Code: RCB  
<sup>4</sup> EIS Component Code: BLO  
<sup>5</sup> EIS Component Code: MO

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Event Analysis

Analysis of Reportability

This event was determined to be reportable as a condition prohibited by the Technical Specifications in accordance with 10 CFR 50.73(a)(2)(i)(B). Technical Surveillance requirement 4.7.E.1.b requires performance of a resistance to ground test on all heater electrical circuits. Contrary to this, only the safety related primary heater elements had been tested.

Safety Significance

The safety significance to this event was low. The safety related primary recombiner heater elements had been tested as required. The space heaters for the recombiner reaction chamber and for the recombiner blower motor had not been tested. At time of discovery, indicator lights on the CGC system control panel indicated the heaters were operating properly. The surveillance test procedures were revised to include the additional heaters, and were successfully run. This event had no impact on the health and safety of the public.

Cause

The cause of this event is a failure to realize that the supporting surveillance procedures did not meet the Technical Specification requirements. The condition is due to a lack of awareness and is cognitive in nature.

Corrective Actions

The heater circuit resistance to ground surveillance procedures were revised to include the space heaters and were issued on February 22, 2001. These procedures were successfully run on February 23, 2001. Both trains of CGC were declared operable at 1539, and the 30-day LCO was exited.

This event and the lessons learned will be the subject of training for the MNGP Engineering Technical staff.

Failed Component Identification

None

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Similar Events

Monticello LER 92-005: Failure to Complete Control Rod Drive Surveillance Caused by Inadequate Administrative Controls

Monticello LER 96-013: Failure to Comply with Tech Spec Requirement to Verify that the Control Room Ventilation System Maintains a Positive Pressure with Respect to Adjacent Area

Monticello LER 2000-014: Missed Standby Liquid Control System (SLC) Test