February 18, 2011

NRC 2011-0012
10 CFR 50.73

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

Point Beach Nuclear Plant, Unit 1
Dockets 50-266 and 50-301
License Nos. DPR-24 and DPR-27

Licensee Event Report 266/2010-004-00
Improper Controls for Breach of HELB Barrier

Enclosed is Licensee Event Report (LER) 266/2010-004-00 for Point Beach Nuclear Plant (PBNP), Units 1 and 2. This LER documents improper controls used while breaching a high energy line break (HELB) barrier. Pursuant to 10 CFR 50.73(a)(2)(ii)(B), and 10 CFR 50.73(a)(2)(v)(A) and (D), the event is reportable as an unanalyzed condition and a condition that could have prevented fulfillment of the safety function of systems that are needed to shutdown the reactor and maintain it in a safe shutdown condition or mitigate the consequences of an accident.

This submittal contains no new or revised regulatory commitments.

If you have questions or require additional information, please contact Mr. James Costedio at 920/755-7427.

Very truly yours,

NextEra Energy Point Beach, LLC

Larry Meyer
Site Vice President

Enclosure

cc: Administrator, Region III, USNRC
Project Manager, Point Beach Nuclear Plant, USNRC
Resident Inspector, Point Beach Nuclear Plant, USNRC
PSCW

NRC FORM 366 (10-2010) U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB: NO. 3150-0104 EXPIRES: 10/31/2013

LICENSEE EVENT REPORT (LER)

1. FACILITY NAME	2. DOCKET NUMBER	3. PAGE
Point Beach Nuclear Plant	05000266	1 of 3

4. TITLE
Improper Controls for Breach of HELB Barrier

5. EVENT DATE			6. LER NUMBER			7. REPORT DATE			8. OTHER FACILITIES INVOLVED	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NO.	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
									PBNP Unit 2	05000301
06	25	2010	2010	- 004 -	00	02	18	2011	FACILITY NAME	DOCKET NUMBER

9. OPERATING MODE
Unit 1 MODE 1
Unit 2 MODE 1

10. POWER LEVEL
Unit 1 100%
Unit 2 48%

11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR§: *(Check all that apply)*

☐ 20.2201(b)	☐ 20.2203(a)(3)(i)	☐ 50.73(a)(2)(i)(C)	☐ 50.73(a)(2)(vii)
☐ 20.2201(d)	☐ 20.2203(a)(3)(ii)	☐ 50.73(a)(2)(ii)(A)	☐ 50.73(a)(2)(viii)(A)
☐ 20.2203(a)(1)	☐ 20.2203(a)(4)	☒ 50.73(a)(2)(ii)(B)	☐ 50.73(a)(2)(viii)(B)
☐ 20.2203(a)(2)(i)	☐ 50.36(c)(1)(i)(A)	☐ 50.73(a)(2)(iii)	☐ 50.73(a)(2)(ix)(A)
☐ 20.2203(a)(2)(ii)	☐ 50.36(c)(1)(ii)(A)	☐ 50.73(a)(2)(iv)(A)	☐ 50.73(a)(2)(x)
☐ 20.2203(a)(2)(iii)	☐ 50.36(c)(2)	☒ 50.73(a)(2)(v)(A)	☐ 73.71(a)(4)
☐ 20.2203(a)(2)(iv)	☐ 50.46(a)(3)(ii)	☐ 50.73(a)(2)(v)(B)	☐ 73.71(a)(5)
☐ 20.2203(a)(2)(v)	☐ 50.73(a)(2)(i)(A)	☐ 50.73(a)(2)(v)(C)	☐ OTHER
☐ 20.2203(a)(2)(vi)	☐ 50.73(a)(2)(i)(B)	☒ 50.73(a)(2)(v)(D)	Specify in Abstract below or in NRC Form 366A

12. LICENSEE CONTACT FOR THIS LER

NAME	TELEPHONE NUMBER (Include Area Code)
Fritzie Flentje	920/755-7656

13. COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT

CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX

14. SUPPLEMENTAL REPORT EXPECTED		15. EXPECTED SUBMISSION DATE	MONTH	DAY	YEAR
☐ YES *(If yes, complete 15. EXPECTED SUBMISSION DATE)*	☒ NO				

ABSTRACT *(Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines)*

On June 25, 2010, the lock on the north control room door was replaced. This door is the normal access door to the control room and is a safe shutdown, security and high energy line break (HELB) barrier. The door was blocked open for 24 minutes during lock replacement. If a HELB had occurred in the turbine building during that time, it may have resulted in control room equipment being inoperable.

The site administrative procedure in place at the time of the event allowed a control room HELB door to be open for no more than 12 hours. The 12-hour time limit was not appropriate for a HELB barrier. The procedure was in the process of being revised so the door would be allowed to stay open for no more than one hour and could not be blocked open. An Operations Notebook entry was written that established interim guidance for HELB barriers pending issuance of the revised procedure. The interim action was not adequate to prevent the event. Corrective actions are complete.

This 60-day licensee event report is being submitted in accordance with the requirements of 10 CFR 50.73(a)(2)(ii)(B), as an unanalyzed condition, and 10 CFR 50.73(a)(2)(v)(A), and (D) as a condition that could have prevented fulfillment of the safety function of systems that are needed to shutdown the reactor and maintain it in a safe shutdown condition or mitigate the consequences of an accident.

NARRATIVE

Event Description:

On June 25, 2010, the lock on the north control room door [DR] was replaced. This door is the normal access door to the control room [NA] and is a safe shutdown, security, and high energy line break (HELB) barrier. The door was blocked open for 24 minutes during lock replacement.

The potential consequences of a HELB event on the blocked open control room door had not been analyzed. The blocked open door could have resulted in a loss of control room functions if a HELB event had occurred during the 24-minute period the door was open.

The procedure in place at the time of the event allowed a control room HELB door to be open for no more than 12 hours. The 12-hour time limit was not appropriate for a HELB barrier. The procedure was in the process of being revised so the door would be allowed to stay open for no more than one hour and could not be blocked open. An Operations Notebook entry was written that established interim guidance for HELB barriers pending issuance of the revised procedure. The interim action was not adequate to prevent the event.

This 60-day licensee event report is being submitted in accordance with the requirements of 10 CFR 50.73(a)(2)(ii)(B), as an unanalyzed condition, and 10 CFR 50.73(a)(2)(v)(A), and (D) as a condition that could have prevented fulfillment of the safety function of systems that are needed to shutdown the reactor and maintain it in a safe shutdown condition or mitigate the consequences of an accident. The event is classified as a safety system functional failure.

Event Analysis:

The north control room door is a HELB barrier. The door would mitigate the consequences of a potential HELB event in the turbine building by maintaining the control room operable and habitable.

Blocking this door open made the door inoperable as a HELB barrier. An inoperable HELB barrier cannot provide protection to the equipment in the room if a HELB occurs. This condition would require the equipment supported by the HELB barrier to be declared inoperable unless an evaluation was performed to determine that the equipment on the other side of the barrier would not be subject to a harsh environment.

A HELB barrier may be opened for routine ingress and egress with no effect on the HELB barrier's ability to perform its function. Since the control room door had been blocked open, the door was not open for routine ingress and egress.

Safety Significance:

During the control room door lock replacement, there was no loss of a safety-related system, structure or component. The door was blocked open for 24 minutes. The probability of a high energy line break occurring during that short time period is very low. Thus, the safety significance of the event was low. There was no impact on the health and safety of the public as a result of this event.

1. FACILITY NAME	2. DOCKET	6. LER NUMBER			3. PAGE
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Point Beach Nuclear Plant	05000266	2010	- 004	- 00	Page 3 of 3

NARRATIVE

Cause:

The cause of the event was a failure to communicate to station personnel the Operations notebook entry that established interim guidance for control of HELB barriers pending issuance of the revised plant procedure.

Corrective Actions:

The following corrective actions were taken:

- The permanent change to the site procedure that provides administrative controls associated with HELB barriers and doors was issued.
- An information sharing was conducted with Operations personnel on the proper use of Operations Notebook entries.
- Work instructions for replacement of control room door locks were revised to ensure that HELB barriers and doors are not blocked open.

Previous Occurrences:

None

Failed Components Identified:

None