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MAR 29 2013

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

Serial No. 13-203  
MPS Lic/GJC R0  
Docket No. 50-423  
License No. DPR-49

**DOMINION NUCLEAR CONNECTICUT, INC.**  
**MILLSTONE POWER STATION UNIT 3**  
**LICENSEE EVENT REPORT 2013-002-00**  
**SECONDARY CONTAINMENT BOUNDARY BREACH**  
**COULD HAVE PREVENTED SAFETY FUNCTION**

This letter forwards Licensee Event Report (LER) 2013-002-00 documenting a condition discovered at Millstone Power Station Unit 3 on January 28, 2013. This LER is being submitted pursuant to 10 CFR 50.73(a)(2)(v)(C) as an event or condition that could have prevented the fulfillment of the safety function of structures or systems that are needed to control the release of radioactive material, and 10 CFR 50.73(a)(2)(i)(B) as any operation or condition which was prohibited by the plant's Technical Specifications.

If you have any questions or require additional information, please contact Mr. William D. Bartron at (860) 444-4301.

Sincerely,

Stephen E. Scace  
Site Vice President – Millstone

Attachments: 1

Commitments made in this letter: None

IE22  
MRL

cc: U.S. Nuclear Regulatory Commission  
Region I  
2100 Renaissance Blvd, Suite 100  
King of Prussia, PA 19406-2713

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Project Manager - Millstone Power Station  
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NRC Senior Resident Inspector  
Millstone Power Station

Serial No. 13-203  
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Licensee Event Report 2013-002-00

**ATTACHMENT**

**LICENSEE EVENT REPORT 2013-002-00**  
**SECONDARY CONTAINMENT BOUNDARY BREACH**  
**COULD HAVE PREVENTED SAFETY FUNCTION**

**MILLSTONE POWER STATION UNIT 3**  
**DOMINION NUCLEAR CONNECTICUT, INC.**

**LICENSEE EVENT REPORT (LER)**

(See reverse for required number of digits/characters for each block)

Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the Records and FOIA/Privacy Service Branch (T-5 F52) U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to [infocollect@nrc.gov](mailto:infocollect@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 an 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 information collection.

<b>1. FACILITY NAME</b> Millstone Power Station – Unit 3	<b>2. DOCKET NUMBER</b> 05000423	<b>3. PAGE</b> 1 OF 3
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**4. TITLE**  
Secondary Containment Boundary Breach Could Have Prevented Safety Function

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
01	28	2013	2013	002-00		xx	xx	2013		05000

<b>9. OPERATING MODE</b>  1	<b>11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check all that apply)</b>									
	<input type="checkbox"/> 20.2201(b)	<input type="checkbox"/> 20.2203(a)(3)(i)	<input type="checkbox"/> 50.73(a)(2)(i)(C)	<input type="checkbox"/> 50.73(a)(2)(vii)						
<b>10. POWER LEVEL</b>  100	<input type="checkbox"/> 20.2201(d)	<input type="checkbox"/> 20.2203(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)						
	<input type="checkbox"/> 20.2203(a)(1)	<input type="checkbox"/> 20.2203(a)(4)	<input type="checkbox"/> 50.73(a)(2)(ii)(B)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)						
	<input type="checkbox"/> 20.2203(a)(2)(i)	<input type="checkbox"/> 50.36(c)(1)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(ix)(A)						
	<input type="checkbox"/> 20.2203(a)(2)(ii)	<input type="checkbox"/> 50.36(c)(1)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(iv)(A)	<input type="checkbox"/> 50.73(a)(2)(x)						
	<input type="checkbox"/> 20.2203(a)(2)(iii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(v)(A)	<input type="checkbox"/> 73.71(a)(4)						
	<input type="checkbox"/> 20.2203(a)(2)(iv)	<input type="checkbox"/> 50.46(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(v)(B)	<input type="checkbox"/> 73.71(a)(5)						
	<input type="checkbox"/> 20.2203(a)(2)(v)	<input type="checkbox"/> 50.73(a)(2)(i)(A)	<input checked="" type="checkbox"/> 50.73(a)(2)(v)(C)	<input type="checkbox"/> OTHER						
	<input type="checkbox"/> 20.2203(a)(2)(vi)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)(B)	<input type="checkbox"/> 50.73(a)(2)(v)(D)							

Specify in Abstract below or in NRC Form 366A

**12. LICENSEE CONTACT FOR THIS LER**

<b>FACILITY NAME</b> William D. Bartron, Supervisor Nuclear Station Licensing	<b>TELEPHONE NUMBER (Include Area Code)</b> 860-444-4301
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**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

<b>14. SUPPLEMENTAL REPORT EXPECTED</b> <input type="checkbox"/> YES (If yes, complete 15. EXPECTED SUBMISSION DATE) <input checked="" type="checkbox"/> NO	<b>15. EXPECTED SUBMISSION DATE</b> MONTH: _____ DAY: _____ YEAR: _____
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**ABSTRACT** (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines)

On January 28, 2013 with Millstone Power Station Unit 3 (MPS3) in MODE 1 at 100% power, engineering completed a maintenance rule evaluation of a previously identified condition where a roll-up door in the auxiliary building at MPS3 was found not fully closed after a security test. The door was open approximately 3/8 of an inch. This door is a secondary containment boundary, specifically a supplemental leak collection release system boundary. Engineering concluded the partially open roll-up door exceeded any available margin from the previous surveillance drawdown test. Additionally, during the investigation it was determined the door had been in the partially open condition in excess of the plant's Technical Specification Action Statement (TSAS) allowed outage time.

The direct cause of the event was the door had not been fully closed after completion of security testing. Upon discovery the door was unlocked, fully closed and relocked. The testing procedure has been changed to test the door without requiring the door to be opened. Additional corrective actions are being taken in accordance with the station's corrective action program.

This condition is being reported under 10 CFR 50.73(a)(2)(v)(C) as an event or condition that could have prevented the fulfillment of the safety function of structures or systems that are needed to control the release of radioactive material. Additionally, since the secondary containment boundary was not re-established within the requirements of the TSAS (24 hours) this it is also being reported under 10 CFR 50.73(a)(2)(i)(B) as any operation or condition which was prohibited by the plant's Technical Specifications.

**LICENSEE EVENT REPORT (LER)  
CONTINUATION SHEET**

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**NARRATIVE**

**1. EVENT DESCRIPTION**

On November 21, 2012, a roll-up door in the auxiliary building at Millstone Power Station Unit 3 (MPS3) was found not fully closed after a security test. The door was open approximately 3/8 of an inch. Upon discovery, the operators entered Technical Specification Action Statement (TSAS) 3.6.6.2. The door was unlocked, fully closed and relocked. At the time the door was found open, the operators assessed this as a single opening and determined there was no loss of safety function. Therefore, this event was determined not reportable. This condition was entered into the station's corrective action program. Engineering was assigned to perform a maintenance rule evaluation for this condition. On January 28, 2013, with MPS3 in MODE 1 at 100% power, engineering completed a maintenance rule evaluation of the condition where the roll-up door in the auxiliary building at MPS3 was found not fully closed after a security test. The total size of the opening under the door was determined to be approximately 27 square inches. In addition to being a security boundary, this door is also a secondary containment boundary, specifically a supplemental leak collection release system (SLCRS) boundary. Engineering concluded the partially open roll-up door exceeded any available margin from the previous surveillance drawdown test. This condition is being reported under 10 CFR 50.73(a)(2)(v)(C) as an event or condition that could have prevented the fulfillment of the safety function of structures or systems that are needed to control the release of radioactive material.

During the investigation, it was determined the door had been in the partially open condition in excess of the plant's Technical Specification Action Statement (TSAS) allowed outage time, most likely the result of testing activities performed by security. It was determined the door had most likely been in the partially open condition from 0157 hours on November 17 through 1251 hours on November 21, 2012, for a total of 4 days, 9 hours, and 12 minutes.

Since the secondary containment boundary was not re-established within the requirements of the TSAS (24 hours), this condition is also being reported under 10 CFR 50.73(a)(2)(i)(B) as an operation or condition which was prohibited by the plant's Technical Specifications.

**Background Information:**

The secondary containment is comprised of the containment enclosure building, engineered safety features building (partial), auxiliary building, main steam valve building (partial), and hydrogen recombiner building (partial). Together with the associated SLCRS, they mitigate the radiological consequences of postulated accidents for MPS3.

The SLCRS consists of two exhaust fans, each supplied from a separate emergency bus, two filter banks, and associated ductwork and dampers.

All SLCRS boundaries are established by use of low leakage doors (weather stripped), sealed building joints, sealed piping, conduit cable and ductwork penetrations, and boundary isolation dampers for ventilation systems. Therefore, containment leakage is contained in these areas until filtered by the SLCRS and the auxiliary building ventilation system filtration subsystem.

**2. CAUSE**

The direct cause of the event was the door had not been fully closed after completion of security testing. Upon discovery the door was unlocked, fully closed and relocked. The testing procedure has been changed to test the door without requiring the door to be opened. Additional corrective actions are being taken in accordance with the station's corrective action program.

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**NARRATIVE**

**3. ASSESSMENT OF SAFETY CONSEQUENCES**

The safety consequences associated with the breach of secondary containment via the auxiliary building roll-up door is considered low. The purpose of secondary containment is to restrict leakage paths and associated leak rates of radioactive materials from the primary containment atmosphere. The auxiliary building roll-up door not being fully closed resulted in a secondary containment breach. The limiting scenario associated with an event is considered to be a design basis loss of coolant accident. The secondary containment in-leakage associated with this secondary containment breach was assessed. With the secondary containment breach, the ability of one train of SLCRS to draw a sufficient negative pressure in secondary containment could not be assured. However, since both trains of SLCRS were available, adequate SLCRS flow was available to compensate for the increased flow into the secondary containment supplied through the breach of secondary containment. This condition most likely existed for less than five days.

**4. CORRECTIVE ACTION**

Upon discovery the door was closed. Since this type of door requires a particular configuration that is beyond normal testing for a security door, the testing procedure has been changed to test the door without requiring the door to be opened. Additional corrective actions are being taken in accordance with the station's corrective action program.

**5. PREVIOUS OCCURRENCES**

MPS3 LER 2010-003-00, Secondary Containment Rendered Inoperable Due to Misaligned Dampers

**6. Energy Industry Identification System (EIS) codes**

- Auxiliary Building – NF
- SLCRS – VF, VG, VH
- Door – DR