



Monticello Nuclear Generating Plant
2807 W County Road 75
Monticello, MN 55362

September 30, 2014

L-MT-14-077
10 CFR 50.73

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Monticello Nuclear Generating Plant
Docket 50-263
Renewed Facility Operating License No. DPR-22

LER 2014-009-00 "Both Emergency Filtration Trains Inoperable"

Enclosed is the Monticello Licensee Event Report (LER) 2014-009-00 concerning the inoperability of both trains of the Emergency Filtration system. This condition is reportable to the NRC in accordance with 10 CFR 50.73(a)(2)(v)(D), *Event or Condition that Could Have Prevented Fulfillment of a Safety Function*.

Summary of Commitments

This letter contains no new commitments and no revisions to existing commitments.

A handwritten signature in cursive script that reads 'Karen D. Fili'.

Karen D. Fili
Site Vice President, Monticello Nuclear Generating Plant
Northern States Power Company – Minnesota

Enclosure

cc: Regional Administrator, Region III, USNRC
Project Manager, Monticello Nuclear Generating Plant, USNRC
Resident Inspector, Monticello Nuclear Generating Plant, USNRC



LICENSEE EVENT REPORT (LER)
(See Page 2 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 FOIA, Privacy and Information Collections Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to Infocollects.Resource@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.

1. FACILITY NAME Monticello Nuclear Generating Plant	2. DOCKET NUMBER 05000-263	3. PAGE 1 OF 3
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4. TITLE
Both Emergency Filtration Trains Inoperable

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
08	05	2014	2014	009	00	09	30	2014		05000
									FACILITY NAME	DOCKET NUMBER
										05000

9. OPERATING MODE	11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check all that apply)			
1	<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)
	<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)
10. POWER LEVEL 88%	<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 type="checkbox"/> 50.73(a)(2)(v)(C)	<input type="checkbox"/> OTHER
	<input type="checkbox"/> 20.2203(a)(2)(vi)	<input type="checkbox"/> 50.73(a)(2)(i)(B)	<input checked="" type="checkbox"/> 50.73(a)(2)(v)(D)	Specify in Abstract below or in NRC Form 366A

12. LICENSEE CONTACT FOR THIS LER

LICENSEE CONTACT Carrie Fosaaen, Licensing Engineer	TELEPHONE NUMBER (Include Area Code) 763-295-1357
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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	VI	DMP	A220	Y					

14. SUPPLEMENTAL REPORT EXPECTED <input type="checkbox"/> YES (If yes, complete 15. EXPECTED SUBMISSION DATE) <input checked="" type="checkbox"/> NO	15. EXPECTED SUBMISSION DATE	MONTH	DAY	YEAR

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

On August 5, 2014, the 'A' emergency filtration train (EFT) was out of service for charcoal filter replacement work; during that time 'B' EFT was placed in service to supply fresh filtered air to the Control Room. After the 'B' EFT had run for 12 minutes, a low flow alarm occurred and the 'B' EFT fan tripped. This resulted in both trains of emergency filtration being inoperable. Technical Specification Limiting Condition for Operation (LCO) 3.7.4 was not met and as a result, LCO 3.0.3 was entered at 16:01 hours which required the plant to be in Mode 4 within 37 hours.

The 'B' EFT fan tripped because the damper actuator failed due to poor quality of vendor refurbishment. The 'B' EFT trip caused the plant to enter LCO 3.0.3 due to the legacy operating procedure that permitted Operators to start the 'B' EFT while 'A' EFT was inoperable for maintenance.

The failed actuator was subsequently replaced and post maintenance testing was satisfactorily completed. The EFT procedures will also be revised to restrict operation of the standby train while in protected status.



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

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 FOIA, Privacy and Information Collections Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to Infocollects.Resource@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.

1. FACILITY NAME	2. DOCKET	6. LER NUMBER			3. PAGE
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NARRATIVE

EVENT DESCRIPTION

At the time of event, the plant was operating in Mode 1 at approximately 88% rated thermal power.

On August 5, 2014, the 'A' train of emergency filtration (EFT) was out of service for charcoal filter [FLT] replacement work. The 'B' EFT was placed in service at 14:34 hours to supply fresh filtered air to the Control Room.

At 14:46 hours the Control Room received a low flow alarm for 'B' EFT which initiated an automatic 'B' EFT fan [FAN] trip and damper [DMP] to close which isolated the filter train. This isolation resulted in both trains of EFT being inoperable. As a result, Technical Specification 3.7.4 was not met and Limiting Condition for Operation (LCO) 3.0.3 was entered at 16:01 hours.

LCO 3.0.3 was exited following successful completion of post maintenance testing on the 'A' train of EFT at 17:07 hours. There was no addition of negative reactivity to the reactor during the time the plant was in LCO 3.0.3.

EVENT ANALYSIS

This condition is being submitted in accordance with 10 CFR 50.73(a)(2)(v)(D) "Event or Condition that Could Have Prevented Fulfillment of a Safety Function." With both emergency filter trains inoperable, Control Room habitability would not have been assured should a radiological release have occurred. The emergency filtration safety trains mitigate the consequences of an accident by assuring Control Room habitability.

As a result of both trains of EFT being inoperable concurrently, this event is considered a safety system functional failure.

SAFETY SIGNIFICANCE

The EFT system has two functions. The first function is to allow manual isolation of outside air from the Control Room and first and second floors of the EFT Building which places the system in full recirculation. The second function is to automatically isolate outside air and provide filtered/pressurizing air to the Control Room and first and second floors of the EFT Building. With both filter trains inoperable, Control Room habitability may not have been maintained during an unfiltered radioactive release. During this events' time frame, Control Room breathing air supply system was available to provide three hours of air for up to eight personnel, but was not required to be used.

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

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NARRATIVE

CAUSE

The 'B' EFT fan tripped because the damper actuator failed due to poor quality of vendor refurbishment. The damper actuator was in service (operating train) for approximately 250 hours prior to failure. Normal life expectancy for rebuilt actuators is greater than five years.

The 'B' EFT trip caused the plant to enter LCO 3.0.3 due to the legacy operating procedure that permitted Operators to start the 'B' EFT while 'A' EFT was inoperable for maintenance.

CORRECTIVE ACTION

The failed actuator was subsequently replaced and post maintenance testing was satisfactorily completed. The damper actuator has been returned to the vendor for failure analysis. Additional corrective actions may be required based on the results of those analyses.

The EFT procedures will also be revised to restrict operation of the standby train while in protected status.

PREVIOUS SIMILAR EVENTS

There were no previously similar Licensee Event Reports in the past three years.