Northeast
Nuclear Energy

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Millstone Nuclear Power Station
Northeast Nuclear Energy Company
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The Northeast Utilities System

Donald B. Miller Jr.,
Senior Vice President - Millstone

Re: 10CFR50.73
May 2, 1994
MP-94-298

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

Reference: Facility Operating License No. DPR-65
Docket No. 50-336
Licensee E ent Report 94-006-00

Gentlemen:

This letter forwards Licensee Event Report 94-006-00 required to be submitted within thirty (30) days pursuant to 10CFR50.73(a)(2)(i).

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

Donald B. Miller, Jr.
Senior Vice President - Millstone Station

DBM/SJS:dlr

Attachment: LER 94-006-00

cc: T. T. Martin, Region I Administrator
P. D. Swetland, Senior Resident Inspector, Millstone Unit Nos. 1, 2 and 3
G. S. Vissing, NRC Project Manager, Millstone Unit No. 2

100046

Cert # P516 640 363

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NRC Form 366 (5-92) U.S. NUCLEAR REGULATORY COMMISSION

LICENSEE EVENT REPORT (LER)

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

APPROVED BY OMB NO. 3150-0104
EXPIRES: 5/31/95

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
Millstone Nuclear Power Station Unit 2	05000336	1 OF 3

TITLE (4)
Entered L-30A to Grease Motor Bearings of F32A

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
										05000
04	07	94	94	- 006 -	00	05	02	94	FACILITY NAME	DOCKET NUMBER 05000

OPERATING MODE (9)	1	THIS REPORT IS BEING SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)			
POWER LEVEL (10)	100	20.402(b)	20.405(c)	50.73(a)(2)(iv)	73.71(b)
		20.405(a)(1)(i)	50.36(c)(1)	50.73(a)(2)(v)	73.71(c)
		20.405(a)(1)(ii)	50.36(c)(2)	50.73(a)(2)(vii)	OTHER
		20.405(a)(1)(iii)	X 50.73(a)(2)(i)	50.73(a)(2)(viii)(A)	(Specify in Abstract below and in Text, NRC Form 366A)
		20.405(a)(1)(iv)	50.73(a)(2)(ii)	50.73(a)(2)(viii)(B)	
		20.405(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(x)	

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER (Include Area Code)
Philip J. Lutzi, Site Licensing	(203) 444-1791 Ext. 6585

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

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS

SUPPLEMENTAL REPORT EXPECTED (14)			EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
	YES (If yes, complete EXPECTED SUBMISSION DATE)	X NO				

ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

At 1100 on April 7, 1994, with the plant in MODE 1, it was determined that the plant did not meet the requirements of LCO 3.7.6.1, requiring two independent control room emergency ventilation systems. As a result, Technical Specification 3.0.3 was entered. The unit was in Technical Specification Action Statement (TSAS) 3.7.6.1 for maintenance to be performed on the "A" Control Room Air Conditioning (CRAC) System Filter Fan (F32A). The "A" and "B" CRAC Filter Fans share a common suction plenum. Opening either filter housing door effectively breaches the Control Room Air Conditioning Filtration boundary rendering both trains of CRAC INOPERABLE. The filter housing door was opened to perform maintenance without a dedicated operator as required by plant procedures. The unit logged out of Technical Specification 3.0.3 at 1110, April 7, 1994.

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Millstone Nuclear Power Station Unit 2	05000336	94	- 006 -	00	02 OF 03

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

I. Description of Event

At 1100 on April 7, 1994, with the plant in MODE 1, it was determined that the plant did not meet the requirements of LCO 3.7.6.1, requiring two independent control room emergency ventilation systems. As a result, Technical Specification 3.0.3 was entered.

The control room air conditioning system consists of two full capacity, independent air handling and mechanical refrigeration subsystems. Each subsystem is provided with a bypass through the control room filtration system (CRFS) consisting of particulate, HEPA and charcoal filters (L30A/L30B) and filter fans (F32A/F32B). The unit was in Technical Specification Action Statement (TSAS) 3.7.6.1 for maintenance to be perform on the "A" Control Room Air Conditioning (CRAC) System Filter Fan (F32A). The "A" and "B" CRAC filter fans are enclosed within a separate filter housing (L30A/L30B) that share a common suction plenum. Opening either filter housing door effectively breaches the CRAC filtration boundary and results in both trains of CRAC being INOPERABLE.

At the time of the event, the Operations Department had authorized a work order to grease "A" CRAC Filter Fan (F32A) motor bearings (Facility 1). The Automated Work Order contained a CAUTION: "Do Not Open Ductwork Under This AWO." The technicians working the job noted the caution but felt that opening the filter housing door did not constitute opening ductwork. The plant operator obtained the key to the filter housing (L30A) and opened the locked closed door to allow the technicians to perform their task. The plant operator returned to the control room and notified the Senior Control Operator (SCO) in charge of Work Control. No provision was established to shut the housing door by utilizing a dedicated operator. At that time, the SCO concluded that with the door open, both trains of Control Room Air Conditioning were INOPERABLE due to a common suction plenum. The plant operator was immediately sent back to the work site to close the filter door. By this time the technicians had finished their task and the door was closed. The plant operator locked the door access. The total elapsed time which the door was open was determined to be ten minutes or less. Ten minutes is the time allowed by procedure for a dedicated operator to ensure that the door is closed in the event of an accident requiring the CRAC System to automatically align to the recirculation mode.

There were no automatic or manual safety system actuations as a result of this event.

II. Cause of Event

The root cause of this event was inadequate work organization and planning which resulted in a misunderstanding of the requirements of a dedicated operator in attendance. Although the unit has provisions for operator in attendance to address the need for system maintenance, this requirement was inadvertently omitted during "A" filter fan maintenance.

III. Analysis of Event

This report is being submitted pursuant to the requirements of 10CFR50.73(a)(2)(i)(B), "Any operation or condition prohibited by the plant's Technical Specification." There were no safety consequences resulting from this event since the filter housing door was closed within the amount of time, 10 minutes, assumed in the system analysis for the manual initiation of CRAC recirculation mode (FSAR 9.9.10.4.1).

IV. Corrective Action

Operations Procedure OP 2315A has been revised to describe the opening of ventilation doors or covers affecting control room ventilation system. Work orders for maintenance on these systems have been modified to required a dedicated operator in attendance for system maintenance.

V. Additional Information

EIIS Codes

VI (Control Room Air Conditioning System)

Similar LERs: NONE