

LICENSEE EVENT REPORT (LER)

Estimated burden per response to comply with this information collection request: 50 0 hrs. Forward comments regarding burden estimate to the Records and Reports Management Branch (p-630), U.S. Nuclear Regulatory Commission, Washington, DC 20555, and to the Paperwork Reduction Project (3150-0104), Office of Management and Budget, Washington, DC 20503.

FACILITY NAME (1) **Millstone Nuclear Power Station Unit 1** DOCKET NUMBER (2) **0 5 0 0 0 2 4 5 1** PAGE (3) **1** OF **0 3**

TITLE (4) **EEQ Barriers Violated**

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 NAMES											
0	6	1	3	9	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	6	1	3	9	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

OPERATING MODE (9) **N** THIS REPORT IS BEING SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § (Check one or more of the following): (11)

20.402(b)	20.402(c)	50.73(a)(2)(iv)	79.71(b)
20.405(a)(1)(i)	50.36(c)(1)	<input checked="" type="checkbox"/> 50.73(a)(2)(v)	79.71(c)
20.405(a)(1)(ii)	50.36(c)(2)	50.73(a)(2)(vii)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)
20.405(a)(1)(iii)	50.73(a)(2)(i)	50.73(a)(2)(viii)(A)	
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)(ix)	

LICENSEE CONTACT FOR THIS LER (12)

NAME **Trudy S. Thull, Engineer (Ext. 5197)** TELEPHONE NUMBER **2 0 3 4 4 7 - 1 7 9 1**

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

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC

SUPPLEMENTAL REPORT EXPECTED (14)  YES (If yes, complete EXPECTED SUBMISSION DATE)  NO

EXPECTED SUBMISSION DATE (15) MONTH DAY YEAR

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

On December 23, 1989, with the plant at 100% power (530 degrees Fahrenheit and 1030 psig), the Turbine Deck to Heating and Ventilation (H&V) room double doors and Heating Ventilation Supply (HVS) 6A/B door to the Switchgear area were opened for a duration of approximately 16 hours. This was done in an attempt to correct a low temperature condition in the Switchgear area by drawing warm air from the Turbine Deck through the ventilation system to the Switchgear area. With the Switchgear area and H&V room a mild environment, and the Turbine Deck a potential harsh environment, EEQ barriers were violated. This resulted in changing the environments in the H&V room and Switchgear room to potential harsh environments. A Reportability Evaluation was initiated on May 14, 1990, to determine if a reportable condition existed.

On June 13, 1990, results of the reportability evaluation concluded blocking open the double doors between the H&V room and the Turbine Deck and the door HVS 6A/B represented a degradation between potential harsh and mild environments.

On July 20, 1990 while reviewing routine plant evolutions to determine if additional EEQ harsh-mild structural barriers are opened during these activities, it was discovered that certain activities, such as bimonthly loading of resin, from the 14'6" elevation of the Turbine Building to the 34'6" elevation of the Turbine Building, involved opening an access between a harsh and mild environment.

To preclude future breaches of EEQ potential harsh-mild structural environmental barriers (via the removal of plugs, hatches, etc.), an engineering assessment will be performed prior to opening barriers to assess system operability compliance to Technical Specifications. Instructions have been issued to all appropriate personnel on these requirements.

A plant program is in progress to identify all EEQ barriers, label all doors/hatches/plugs in EEQ potential harsh-mild structural barriers, and establish guidelines for temporarily blocking open the structural barriers. This program is expected to be implemented by June 1, 1991.

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TEXT CONTINUATION

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		9 0	0 1 1 0	0 1	0 2 OF 0 3

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

I. Description of Event

On December 23, 1989, with the plant at 100% power (530 degrees Fahrenheit and 1030 psig), the Turbine Deck to Heating and Ventilation (H&V) room double doors and Heating Ventilation Supply (HVS) 6A/B door to the Switchgear area were opened for a duration of approximately 16 hours. This was done in an attempt to correct a low temperature condition in the Switchgear area by drawing warm air from the Turbine Deck through the ventilation system to the Switchgear area. The supply dampers (HVD-6C/D) for HVS-6A/B were fully closed. Therefore, all the supply air for HVS-6A/B was being supplied from the Turbine deck. With the Switchgear area and H&V room a mild environment, and the Turbine Deck a potential harsh environment, EEQ barriers were violated.

During a NRC routine resident safety inspection conducted between December 5, 1989, and January 8, 1990, (issued February 27, 1990), the inspector investigated the battery room low temperature condition and the Licensee's actions to rectify the problem. From this NRC inspection report, the Quality Services Department issued a surveillance report to the Unit Director (March 20, 1990) identifying the potential degradation of EEQ barriers and requesting a response to the EEQ concerns. Engineering provided this response on April 25, 1990.

Subsequent to distribution of the response and ensuing detailed discussions on the operability of the affected safety related equipment, a reportability evaluation was initiated on May 14, 1990. On June 13, 1990, results of the reportability evaluation concluded blocking open the double doors between the H&V room and the Turbine Deck and the door to HVS 6A/B represented a degradation between potential harsh and mild environments.

On July 20, 1990 while reviewing routine plant evolutions to determine if additional EEQ harsh-mild structural barriers are opened during these activities, it was discovered that certain activities, such as bimonthly loading of resins from the 14'6" elevation of the Turbine Building to the 34'6" elevation of the Turbine Building, involved opening an access between a harsh and mild environment.

II. Cause of Event

Lack of formal guidance resulted in a breakdown of the EEQ barriers. Plant procedures do not exist which identify the EEQ potential harsh-mild structural barriers or that address blocking open EEQ barriers.

III. Analysis of Event

This event is being reported in accordance with 10CFR50.72(a)(2)(v) which requires the reporting of any event or condition that alone could have prevented the fulfillment of the safety related structures or systems that are needed to (A) shutdown the reactor and maintain it in a safe condition and, (B) remove residual heat.

IV. Corrective Action

A long term plant program is being developed that defines the EEQ barriers in plant documents, labels all doors/hatches/plugs in EEQ potential harsh-mild structural barriers, and establishes guidelines for temporarily blocking open the structural barriers. This program is expected to be implemented by June 1, 1991.

For the interim, all unit personnel have been directed to treat the door barriers in the same manner as Technical Specification fire doors and not left unattended. To preclude future breaches of EEQ potential harsh-mild structural environmental barriers (via the removal of plugs, hatches, etc.), an engineering assessment will be performed prior to opening barriers to assess system operability compliance to Technical Specifications. Instructions have been issued to all appropriate personnel on these requirements.

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		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
		9 0	0 1 0	0 1	0 3	OF 0 3

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

V. Additional Information

None.