

**North  
Atlantic**

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The Northeast Utilities System

Ted C. Feigenbaum  
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NYN- 94062

May 27, 1994

United States Nuclear Regulatory Commission  
Washington, D.C. 20555

Attention: Document Control Desk

References: (a) Facility Operating License No. NPF-86, Docket No. 50-443  
(b) North Atlantic Letter NYN-94034 dated March 31, 1994, "Licensee Event Report (LER) 94-005-00: Non-Compliance with Technical Specification Action Statement Requirements", T.C. Feigenbaum to USNRC

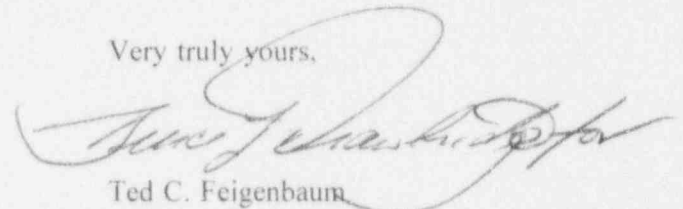
Subject: Licensee Event Report (LER) 94-005-01: "Non-Compliance with Technical Specification Action Statement Requirements"

Gentlemen:

Enclosed please find Licensee Event Report (LER) No. 94-05-01 for Seabrook Station. This submittal provides supplemental information regarding previous occurrences of the event, root cause determination, and corrective actions.

Should you require further information regarding this matter, please contact Mr. James M. Peschel, Regulatory Compliance Manager at (603) 474-9521 extension 3772.

Very truly yours,



Ted C. Feigenbaum

TCF:EWM/ewm

Enclosures: NRC Forms 366/366A

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United States Nuclear Regulatory Commission  
Attention: Document Control Desk

May 27, 1994  
Page two

cc: Mr. Thomas T. Martin  
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**LICENSEE EVENT REPORT (LER)**

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

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 (MNB 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) Seabrook Station	DOCKET NUMBER (2) 05000443	PAGE (3) 1 OF 3
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TITLE (4)  
Non-Compliance with Technical Specification Action Statement Requirements

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
03	01	94	94	05	01	05	27	94	FACILITY NAME	DOCKET NUMBER 05000
									FACILITY NAME	DOCKET NUMBER 05000

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

LICENSEE CONTACT FOR THIS LER (12)

NAME Mr. James M. Peschel, Regulatory Compliance Manager	TELEPHONE NUMBER (Include Area Code) (603) 474-9521 Ext. 3772
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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).	<input checked="" type="checkbox"/>	NO					

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

On March 1, 1994, North Atlantic Energy Service Corporation (North Atlantic) found the auxiliary sample pump for the Wide Range Gas Monitor Noble Gas Activity Monitor [VL] not running. Technical Specification Surveillance Requirement 4.3.3.10, Table 3.3-13 ACTION 35 requires continuous auxiliary sampling equipment be in service when the plant vent Wide Range Gas Monitor (WRGM) is inoperable.

North Atlantic entered Technical Specification 3.3.3.10 Action b on February 17, 1994 when the Wide Range Gas Monitor (WRGM) was taken out of service in order to implement a design modification. On March 1, 1994, lighting transformer 1-ED-X-17C, which supplies power to Lighting Panels L27 and L32, was removed from service for breaker and transformer inspections. The tagout isolation was completed on March 1, 1994 at 1008 deenergizing the WRGM auxiliary pump required by Technical Specification Action Table 3.3-13 Action 35. This condition remained undetected until 1220 that same day when a chemistry technician performing the Technical Specification LCO Surveillance identified the WRGM auxiliary sample pump not running.

There were no adverse safety consequences as a result of this event.

The root cause of this event was determined to be an inadequate descriptive name on the lighting panel schedule used to prepare the tagging order.

The immediate corrective action taken in response to WRGM auxiliary sample pump found not running was to restore power to the pump and place it back in operation. In addition, lighting panel schedule drawings will be revised and power supply circuit breakers for this monitor will be labeled to alert personnel of potential consequences of opening these breakers.

LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

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FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
Seabrook Station	05000443	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	2 OF 3
		94	05	01	

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

Description of Event

On March 1, 1994, North Atlantic Energy Service Corporation (North Atlantic) found the auxiliary sample pump for the Wide Range Gas Monitor Noble Gas Activity Monitor [VL] not running. Technical Specification Surveillance Requirement 4.3.3.10, Table 3.3-13 ACTION 35 requires continuous auxiliary sampling equipment be in service when the plant vent Wide Range Gas Monitor (WRGM) is inoperable.

Seabrook Station Technical Specification 3.3.3.10 requires the plant vent WRGM to be OPERABLE at all times. Technical Specification Surveillance Requirement 4.3.3.10 specifies that if the WRGM is inoperable the ACTIONS shown in Table 3.3-13 must be taken. Table 3.3-13 ACTIONS allow effluent releases to continue provided the following actions are taken: grab samples taken every 12 hours, continuously sample with auxiliary sampling equipment, and estimating the plant vent flow rate every 4 hours.

North Atlantic entered Technical Specification 3.3.3.10 Action b on February 17, 1994 when the Wide Range Gas Monitor (WRGM) was taken out of service in order to implement a design modification. The required Technical Specification actions associated with the inoperable WRGM were performed.

On March 1, 1994 lighting transformer 1-ED-X-17C, which supplies power to Lighting Panels L27 and L32, was removed from service for breaker and transformer inspections. During the tagout preparation and review it was not recognized that one of the lighting panel circuits supplied a receptacle that provided power to the WRGM auxiliary sample pump. The lighting panel schedule used during the tagout preparation did not adequately annotate that this receptacle was used to provide power to the WRGM auxiliary sampling pump.

The tagout isolation was completed on March 1, 1994 at 1008 deenergizing the WRGM auxiliary sample pump required by Technical Specification Action Table 3.3-13 Action 35. This condition remained undetected until 1220 that same day when a chemistry technician performing the Technical Specification LCO Surveillance identified the WRGM auxiliary sample pump not running. The Lighting Panel L27 was reenergized on March 1, 1994 at 1250, and the WRGM auxiliary sample pump was automatically started. The chemistry technician verified proper operation of the pump at 1305. This condition represents a condition prohibited by Technical Specifications as it is a failure to comply with Technical Specification ACTIONS.

Design Coordination Report (DCR) 88-12, WRGM Skid and Miscellaneous Modifications, Change Authorization 3 added a provision for a portable bench type air sampler (WRGM auxiliary sample pump). This sampler was provided to allow an independent sample from the plant vent stack in case of unavailability of the wide range gas monitors. This design change installed a portable sampler which was to be plugged into a receptacle powered from lighting panel L27. Circuit 25 was added to lighting panel L27 in this DCR and was to be the dedicated power supply for the portable sampler. The design change was also to include updating of the lighting panel schedule and mounting an equipment tag, above the receptacle, both used to indicate this circuits specific use. The lighting panel schedule was updated by labelling the circuit as "Recept. for Portable Monitor (Air Sampler) Ltg. Dwg 311465". It was subsequently determined that the equipment tag which was to be installed above the receptacle was missing or never installed.

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TEXT CONTINUATION

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Seabrook Station	05000443	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	3 OF 3
		94	05	01	

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

Safety Consequences

There were no adverse safety consequences as a result of this event. The Wide Range Gas Monitor does not perform any accident mitigation function and the event did not interfere or inhibit any safety related equipment from performing its function. In addition, the plant continuous air monitors were reviewed to insure that no abnormal radiological conditions existed during this period.

Root Cause

The root cause of this event was determined to be an inadequate descriptive name on the lighting panel schedule for circuit 25 on Lighting panel L27. Had the lighting panel schedule identified circuit 25 as being dedicated for the "WRGM auxiliary sample pump", Operations tagging personnel would have verified that this monitor was being relied upon to satisfy a Technical Specification action statement. The present description did not provide enough detail to allow the operator to properly and confidently prepare the tagging order.

Corrective Actions

The immediate corrective actions taken in response to WRGM auxiliary sample pump found not running was to restore power to the pump and place it back in operation.

1. The L27 lighting panel schedule will be revised to better describe circuit #25 as "Receptacle for WRGM auxiliary sample pump".
2. The WRGM auxiliary sample pump supply breakers, at lighting panel L27 and MCC-121, and dedicated receptacle will be labeled requiring personnel notify the control room prior to deenergizing these circuits.

Plant Conditions

At the time of this event, the plant was in Mode 1, at 100 percent power, with a Reactor Coolant System temperature of 587 degrees Fahrenheit and a pressure of 2235 psig.

Related Events

North Atlantic has reported two other instances of non-compliance with Technical Specification Action Requirements for the WRGM in Licensee Event Reports 92-001-00 and 90-002-00. A review of these similar events concluded that none of the corrective actions would have prevented this event from occurring.