

**North
Atlantic**

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The Northeast Utilities System

Ted C. Feigenbaum
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NYN- 94067

June 17, 1994

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

Attention: Document Control Desk

References: Facility Operating License No. NPF-86, Docket No. 50-443

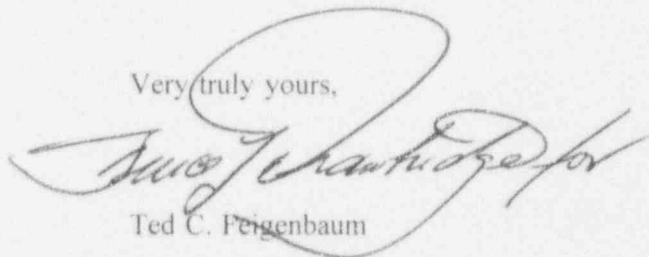
Subject: Licensee Event Report (LER) 94-08-00, "Non Compliance with Technical Specification
3.8.4.2 Action Requirements"

Gentlemen:

Enclosed is Licensee Event Report (LER) 94-08-00 for Seabrook Station. This submittal documents an event which occurred on April 25, 1994 and was determined to be reportable on May 18, 1994. This event is being reported pursuant to 10CFR50.73(a)2(i).

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:MDO

Enclosures: NRC Forms 366/366A

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United States Nuclear Regulatory Commission
Attention: Document Control Desk

June 17, 1994
Page two

cc: Mr. Thomas T. Martin
Regional Administrator
U.S. Nuclear Regulatory Commission
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King of Prussia, PA 19406

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INPO
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Atlanta, GA 30339-5957

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 (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) Seabrook Station	DOCKET NUMBER (2) 05000443	PAGE (3) 1 OF 3
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TITLE (4)
Non-compliance with Technical Specification 3.8.4.2 Action 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
04	25	94	94	-- 08 --	00	06	17	94	FACILITY NAME	DOCKET NUMBER 05000
									FACILITY NAME	DOCKET NUMBER 05000

OPERATING MODE (9) 6	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5: (Check one or more) (11)									
POWER LEVEL (10) 0	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)	<input checked="" type="checkbox"/> 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 Mr. James M. Peschel, Regulatory Compliance Mngr.	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
<input checked="" type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE).			NO		08	23	94

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

During replacement of the Nuclear Instrumentation Audio Count Rate/Timer-Scaler, North Atlantic Energy Service Corporation (North Atlantic) discovered that non-safety related Nuclear Instrumentation (NI) drawers were connected to a safety related Class 1E power panel without a Class 1E protective device. In addition, the drawers did not have the required seismic and associated circuit interaction analysis. On May 18, 1994, North Atlantic determined that this was a condition prohibited by Technical Specification 3.8.4.2, Containment Penetration Conductor Overcurrent Protective Devices and Protective Devices for Class 1E Power Sources Connected to Non-Class 1E Circuits.

Corrective actions were to install Class 1E protective devices between the non-Class 1E components and the Class 1E power panel and to perform the required analysis.

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

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	-- 08 --	00	

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

Background

Technical Specification 3.8.4.2, "Containment Penetration Conductor Overcurrent Protective Devices and Overcurrent Protective Devices for Class 1E Power Sources Connected to Non-Class 1E Circuits" requires in part that each protective device for Class 1E power sources connected to non-Class 1E circuits shall be operable.

During plant modification preparations North Atlantic Energy Service Corporation (North Atlantic) discovered that 3 non-safety related and non-qualified Nuclear Instrumentation (NI) drawers were connected to a safety related Class 1E power panel without a Class 1E protective device (i.e. fuse), to separate the non-safety and non-qualified components from the safety related power supply. Within the non-safety related drawers, Separation Group D power was supplied to an instrument whose output signal is a Separation Group A associated circuit. In addition, the existing design mounted the non-safety related drawers above safety related equipment without a seismic evaluation.

The subject NI drawers are the comparator and rate drawer, the flux deviation drawer, and the miscellaneous control and indication drawer. These nonqualified NI drawers are located in the same control panel (NI-CP-16) as Power Range NI Channel IV. The power supply to NI-CP-16 is from safety related power panel EDE-PP-1D because the power range drawers are safety related. EDE-PP-1D was evaluated to include the effects of failure of the non-safety NI drawers. The evaluation showed a coordination curve overlap which could have resulted in the loss of the power panel.

Since there were no Class 1E protective devices for the non-class 1E loads connected to the Class 1E power source, the requirement for Technical Specification 3.8.4.2 could not be met. Technical Specification 3.8.4.2, Action a.1). requires inoperable circuit protective devices to be restored to operable status within 72 hours or to deenergize the affected circuit. These requirements were not met for: the audio count rate and scaler timer drawer, the flux deviation drawer, and the comparator and rate drawer.

On May 18, 1994, during evaluation of this event, North Atlantic determined that this was a condition prohibited by Technical Specification 3.8.4.2, Containment Penetration Conductor Overcurrent Protective Devices and Protective Devices for Class 1E Power Sources Connected to Non-Class 1E Circuits.

North Atlantic has also identified other issues pertaining to associated circuits and train separation. These issues are currently being evaluated and will be discussed in a supplemental report.

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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 the condition. The loss of the power panel notwithstanding, the components and systems necessary for achieving and maintaining safe shutdown, removing residual heat, controlling the release of radioactivity, and mitigating the consequences of an accident remained capable of performing their intended safety functions. Therefore, although the condition represents a failure to meet UFSAR commitments, it does not represent a condition adverse to safety.

Root Cause

The root cause of this event is currently under investigation and will be provided to the NRC in a supplemental report. North Atlantic expects to submit this report by August 23, 1994.

Corrective Actions

1. Qualified fuses were installed to separate the power connections to the non-safety related drawers from the safety related power supply.
2. A seismic evaluation was performed. The evaluation concluded that the non-safety related drawers would not adversely affect the safety related drawer because they are mounted the same as the safety related drawers and there is a metal barrier provided between the safety and non-safety related drawers which would further limit seismic interactions.
3. Analysis was performed to accept the Separation Group D/ Separation Group A associated circuit interaction. This analysis demonstrated that a fault occurring on either separation Group D or Separation Group A associated circuit would not degrade either group.

Previous Occurrences

North Atlantic will report any previous occurrences once a root cause has been determined. At the time of the event the plant was in Mode 6.