

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Millstone Point Unit 2	DOCKET NUMBER (2) 0 5 0 0 0 3 3 6	PAGE (3) 1 OF 0 3
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TITLE (4)
Missed Fire Protection System Surveillance and Fire Barrier Violation

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 None		DOCKET NUMBER(S)																																																
0 6	1 5	8 4	8 4	0 0 8	0 0	0 7	1 3	8 4			0 5 0 0 0																																																
<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td>OPERATING MODE (9)</td> <td>1</td> <td colspan="10">THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § (Check one or more of the following) (11)</td> </tr> <tr> <td>POWER LEVEL (10)</td> <td>1 0 0</td> <td>20.402(b)</td> <td>20.406(c)</td> <td>50.73(a)(2)(iv)</td> <td>73.71(b)</td> </tr> <tr> <td></td> <td></td> <td>20.406(a)(1)(i)</td> <td>50.38(c)(1)</td> <td>X 50.73(a)(2)(v)</td> <td>73.71(c)</td> </tr> <tr> <td></td> <td></td> <td>20.406(a)(1)(ii)</td> <td>50.38(c)(2)</td> <td>50.73(a)(2)(vii)</td> <td>OTHER (Specify in Abstract below and in Text, NRC Form 366A)</td> </tr> <tr> <td></td> <td></td> <td>20.406(a)(1)(iii)</td> <td>X 50.73(a)(2)(i)</td> <td>50.73(a)(2)(viii)(A)</td> <td></td> </tr> <tr> <td></td> <td></td> <td>20.406(a)(1)(iv)</td> <td>50.73(a)(2)(ii)</td> <td>50.73(a)(2)(viii)(B)</td> <td></td> </tr> <tr> <td></td> <td></td> <td>20.406(a)(1)(v)</td> <td>50.73(a)(2)(iii)</td> <td>50.73(a)(2)(ix)</td> <td></td> </tr> </table>												OPERATING MODE (9)	1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § (Check one or more of the following) (11)										POWER LEVEL (10)	1 0 0	20.402(b)	20.406(c)	50.73(a)(2)(iv)	73.71(b)			20.406(a)(1)(i)	50.38(c)(1)	X 50.73(a)(2)(v)	73.71(c)			20.406(a)(1)(ii)	50.38(c)(2)	50.73(a)(2)(vii)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)			20.406(a)(1)(iii)	X 50.73(a)(2)(i)	50.73(a)(2)(viii)(A)				20.406(a)(1)(iv)	50.73(a)(2)(ii)	50.73(a)(2)(viii)(B)				20.406(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(ix)	
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LICENSEE CONTACT FOR THIS LER (12)

NAME Gary E. Komosky, Unit Engineer	TELEPHONE NUMBER AREA CODE: 2 0 3 4 4 7 - 1 7 9 1
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COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDOS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDOS
E	I C	D E T	P 4 3 5	N					
B	W H	D R N	0 0 0 0	N					

SUPPLEMENTAL REPORT EXPECTED (14)

<input checked="" type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE)	<input type="checkbox"/> NO	EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
			0 7	3 1	8 5

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

During an unannounced NRC audit, two problems were discovered:

- 1) The documentation for a semi-annual fire detection system instrumentation surveillance for November 1983 could not be found. Investigation showed that the surveillance was probably performed but no written proof could be found. After confirming the surveillance was missing, the May 1984 surveillance was reviewed and found complete with no discrepancies. This surveillance was considered proof that the fire detection system was operable and plant safety was not jeopardized. Procedures were changed to prevent recurrence.
- 2) A breach in the fire barrier in the D.C. switchgear room was identified. A fiberglass drain pipe did not have a fire rating and the penetrations were not fire sealed; this condition did not provide a 3 hour barrier between redundant safety related areas. As a temporary solution, the pipe was cut at the walls and the penetrations were fire sealed. The pipe will be replaced during the next refuel outage. Corresponding procedures were changed to compensate for the loss of the drain pipe. All plant design changes presently consider fire protection effects as part of the change process.

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1) Millstone Point Unit 2	DOCKET NUMBER (2) 05000336	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		84	008	00	02	OF	03

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

On June 6, 1984, with the plant at 100% power, an unannounced NRC audit was conducted in conjunction with the yearly ANI fire equipment inspection. This audit discovered two problem areas; 1) the documentation for the Fire Detection Instrumentation channel functional test surveillance (Surveillance No. 2618C-1) was not available for November 1983 and, 2) there existed a breach in the fire barrier between the D.C. Switchgear rooms. An explanation of each is as follows:

- 1) Fire detection instrumentation test surveillance - the surveillance consists of testing smoke and heat detectors and verifying the corresponding alarm is received. This is a semi-annual test required by Unit 2 Technical Specifications, section 4.3.3.7.1.

An intensive search of the surveillance records and the control room log book was conducted; in addition, several of the Shift Supervisors were interviewed. The Shift Supervisors recall having personnel perform this surveillance and the Assistant Operations Supervisor remembers signing the completed form but no written evidence could be found to prove that the surveillance was performed. Therefore, it is assumed that it was not completed. This search also discovered that this surveillance was not listed in the Unit 2 Master Surveillance list for modes 5 and 6; it should be noted that there are two Master Surveillance lists, one for when the plant is in modes 1 thru 4 and the other for modes 5 and 6, the list for modes 1 thru 4 did have this surveillance listed. These Master Surveillance lists define what surveillances must be performed as required by the Technical Specifications and when they have to be performed. In addition, they provide a check list for insuring that the required surveillances have been performed when follow-up reviews are conducted.

When it became evident that the November 1983 surveillance was missing, the May 1984 surveillance was reviewed and was found complete without any discrepancies. The May 1984 surveillance was considered proof that the Fire Detection system was operable and that plant safety was not jeopardized.

In order to prevent recurrence, the Master Surveillance lists were reviewed and updated to include the Fire Detection system surveillance for modes 5 and 6. In addition, the master list was verified to reflect all other required surveillances.

- 2) D.C. Switchgear room fire barrier breach - this fire barrier breach consisted of a fiberglass pipe running through the two safety related D.C. Switchgear rooms that did not have a fire rating and the penetration in the fire area walls were not sealed. This condition provided a path between the rooms in the event of a fire. Both conditions do not meet the requirements of the Fire Hazard Analysis (FHA) by providing a 3 hour barrier between redundant safety related areas.

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		8 4	- 0 0 8	- 0 0	0 3	OF 0 3	

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

Upon confirmation of the breach, the plant was operated in accordance with Technical Specification 3.7.10a; a fire watch was posted and as a temporary solution, the fiberglass pipe was cut at each fire area penetration and fire sealed.

The pipe run in question is a drain line from the floor drains from the nearby cable vault. Cutting and sealing the drain line has rendered the cable vault drains inoperable. To compensate for this situation, the applicable fire protection procedures were changed so that if a fire alarm is received from the cable vault, an operator shall open the door to the vault in order to drain the water from the sprinkler system.

This drain pipe was changed from cast iron to fiberglass during the 1980 refuel outage because the cast iron pipe was not seismically supported and thus had the potential to fall on the plant's 125 volt D.C. batteries.

At the time this change was made no fire protection review was made of the installation. Since then, a Fire Protection Engineering group has been formed and they are responsible for reviewing all plant design changes which are identified as having potential fire protection concerns. All design changes are evaluated to determine if this potential exists. This evaluation should prevent future occurrences as described above.

As a permanent solution, the fiberglass drain pipe will be replaced with a seismically supported fire retardant pipe during the next refuel outage.

- Similar LERS: 1) 78-25, 81-35, 81-45, 82-20, 82-34, 83-2, and 84-7.
2) 79-27 and 80-35.

NORTHEAST UTILITIES



THE CONNECTICUT LIGHT AND POWER COMPANY
WESTERN MASSACHUSETTS ELECTRIC COMPANY
HOLYOKE WATER POWER COMPANY
NORTHEAST UTILITIES SERVICE COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY

General Offices • Selden Street, Berlin, Connecticut

P.O. BOX 270
HARTFORD, CONNECTICUT 06141-0270
(203) 666-6911

July 13, 1984
MP-6197

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

Reference: Facility Operating License No. DPR-65
Docket No. 50-336
Reportable Occurrence RO 50-336/84-008-00

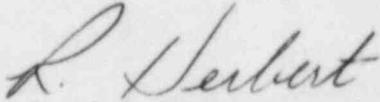
Gentlemen:

This letter forwards the Licensee Event Report 84-008-00 required to be submitted within thirty days pursuant to paragraphs 50.73(a)(2)(i) (B), and 50.73(a)(2)(vi), a condition prohibited by the plant's Technical Specifications and a condition that could have prevented fulfillment of the safety function of a system.

Yours truly,

NORTHEAST NUCLEAR ENERGY COMPANY

FOR: Edward J. Mroccka
Station Superintendent
Millstone Nuclear Power Station


BY: Richard J. Herbert
Station Services Superintendent
Millstone Nuclear Power Station

EJM/GK:mo

Attachment: LER RO 50-336/84-008-00

cc: Dr. T. E. Murley, Region I

JE22
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