

General Offices Selden Street, Berlin Connecticut

P 0 BOX 270 HARTFORD, CONNECTICUT 06141-0270 (203: 965-5000

Re: 10CFR50.73(a)(2)(iv) 10CFR50.73(a)(2)(v) August 5, 1992 MP-92-830

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

Reference:

Facility Operating License No. DI R-65

Docket No. 50-336

Licensee Event Report 92-012-00

Gentlemen:

This letter forwards Licensee Event Report 92-012-00 required to be submitted within thirty (30) days pursuant to 10CFR50, paragraph 50.73(a)(2)(iv) and 50.73(a)(2)(v).

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

FOR: Stephen E. Scace

Vice President - Millstone Station

BY: Fred R. Dacimo

Millstone Site Services Director

SES/RJL:115

Attachment: LER 92-012-00

ec: T. T. Martin, Region I Administrator
P.D. Swetland, Senicr Resident Inspector, Millstone Unit Nos. 1, 2 and 3

G. S. Vissing, NRC Project Manager, Millstone nit No. 2

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### U.S. NUCLEAR RESULATORY COMMISSION

#### APPROVED JMB NO 3150-0104 EXF HES: 4/30/02

# LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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

# I. Description of Event

On July 6, 1992, at 0946, Milistone Unit 2 experienced an inadvertent ESF actuation which resulted in a partial Loss of Normal Power (LNP) on the Facility 1 4160 volt vital AC bus (24C). The plant was shutdown at the time, with all fuel offloaded to the Spent Fuel Pool. The LNP occurred when an Operator occurred power to the second of four ESAS sensor cabinets, while tagging out equipment in preparation for inverter replacement. This satisfied the 2 out of 4 logic needed for ESAS actuation, and a Facility Z1 load shed signal. The "A" Emergency Diesel Generator (EDG) started, came up to speed and closed in on bus 24C, but did not powe, any of the loads normally placed on to bus by the EDG Sequencer. Immediate Operator action was taken to attempt a manual start of the "A" Service Water Pump. When this proved to be unsuccessful, the Operator attempted to start the "B" Service Water Pump (swing unit, aligned to "A" header). This was also unsuccessful, so the Operator secured "A" EDG due to unavailability of cooling. Subsequent Operator action was taken to restore power to one of the sensor cabinets (Sensor Cabinet "D"). This action satisfied the logic required to remove the load shed signal, which in turn permitted restoration of power to vital bus 24C from the Reserve Station Service Transformer (RSST). Power was lost to the bus for 19 minutes. The other Vital bus, 24D, remained energit d throughout the event f: m off-site power through the Normal Station Service Transformer (NS"). Off-site power was also available from the RSST and, through a cross-tie, from Unit 1. During th, Facility 1 Outage, the Operator elected to align the Shutdown Cooling System to provide cooling to the Spent Fuel Pool. In so doing, he opened a flow path which permitted the Spent Fuel Pool to gravity drain to the Reactor Coolant System. Approximately 14 inches (10,000 gallons) of SFP water was drained.

## II Cause of Event

The Facility I Loss of Normal Power occurred as a result of deenergizing 2 (of 4) ESAS sensor cabinets while I (of 2) ESAS actuation cabinet was still energized. This is an abnormal electrical alignment, which occurred because of the planned replacement of 2 of the vital 120 volt inverters at the same time. The Plant Design Change Record (PDCR), prepared to define this modification, detailed the sequence in which the work should be accomplished. This sequence was not clearly transmitted to the personnel preparing the Automated Work Order (AWO). As a result, the consequences of targing out more than one Sensor Cabinet at a time were not adequately evaluated. The tagging guidance provided to Operations, while correct from a personnel safety aspect, created the situation which resulted in the LNP.

The root cause of the LNP was personnel error in not recognizing the consequences associated with the deenergization of two sensor cabinets, and not fully reviewing the design package associated with the inverter replacement.

The failure of the EDG to pick up the sequenced loads appears to be a possible ESAS design problem. In the abnormal electrical alignment outlined above (two ESAS sensor cabinets de-energized with one (or both) ESAS actuation cabinets energized), the load shed signal from the de-energized cabinets "locks in," the undervoltage circuit does not recognize that the EDG has energized the bus, and therefore continues to load shed the eccipment as the EDG sequencer puts the equipment on the bus. Preliminary analysis of the existing design points to the possibility that Milistone Unit 2 may not meet the design basis with respect to mingating the effects of a LOCA, while assuming a single failure. Specifically, the single failure of one DC bus will disable on train of on-site AC power and cause deenergization of two UV sensor channels, which will prohibit proper operation of the opposite train of onsite AC power to signed an accident. This aspect of the event is still under evaluation.

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## U. B. NUCLEAR REDUCATORY COMMISSION

#### APPROVED OMB NO. 0150-0104 EXPIPES: 4 "0192

# LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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

# III. Analysis of Evens

This report is being submitted pursuant to 10CFR paragraphs 50.73(a)(2)(iv) and 50.73(a)(2)(v) to describe an event that resulted in the automatic actuation of an Engineered Safety Feature and to report a condition that alone could possibly have prevented the fulfillment of the safety function of systems that are needed to mitigate the consequences of an accident. During this event, decay heat removal capability (spent fuel pool cooling) was effectively out of service for approximately 90 minutes. This resulted in a 4 degree temperature rise in the Spent Fuel Pool (88 degrees Pahrenheit to 92 degrees Fahrenheit). The safety consequence of this situation is the potential to exceed the Technical Specification limit (140 degrees Fahrenheit) and, ultimately, to reach the boiling point in the Spent Fuel Pool. Considering the time factor involved (approximately 10 hours to challenge the Technical Specification limit) and the availability of electrical power, the safety consequences were informal.

As noted above, the safety consequences of the potential ESAS design problem are still under evaluation.

# IV. Corrective Action

Immediate corrective action was taken to restore power to Facility 1 vital 4160 volt electrical bus (24C), after restoring power to Sensor Cabinet D and cleaning the undervoltage signal.

The pertinent operating procedure (OP 2384) is currently being reviewed to evaluate whether added Caution notes (or similar warnings) hight assist in precluding this type of event from occurring. Procedure changes will be implemented as indicated by the review.

Implementation of the pertinent aspects of the Performance Enhancement Program (e.g., augmentation of Plant Engineering to assignment of system engineers, and additional Operations personnel for work control/planning) will enhance pre-performance review of design change records and resolution of plant requirements to support multiple work activities in outage planning.

As noted above, the potential ESAS design resolution is still being evaluated. The findings of this evaluation, and any corrective action required as a result, will be submitted in a supplemental report.

An Independent Review Committee was also formed to investigate this event. This effort is still in progress. All recommendations from this investigation will be evaluated and appropriate action will be taken. This will be discussed in the supplementary report.

## V. Additional Information

Similar LERS: 88-002-00, 88-005-00, 75-17

## EIIS Code Identifiers

ESAS - IE-XC-C380

Inverters - EF-UJX-5250

4160 Volt Vital Busses - ER-BU-G082

APPROVED CMB NO. 3150-0108

EXPIRES I 6:30:92

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