



**Northeast
Nuclear Energy**

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The Northeast Utilities System

FEB - 1 1999

Docket No. 50-336

B17655

Re: 10 CFR 50.73(a)(2)(i)

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

Millstone Nuclear Power Station Unit No. 2
Licensee Event Report 99-001-00
Failure to Perform Required Surveillance on Fire Door

This letter forwards Licensee Event Report (LER) 99-001-00, documenting an event that was discovered at Millstone Nuclear Power Station, Unit No. 2, on January 6, 1999. This LER is being submitted pursuant to 10 CFR 50.73(a)(2)(i). There are no regulatory commitments contained within this letter.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

J. A. Price
Director - Millstone Unit No. 2

Attachments: 1. LER 99-001-01

cc: H. J. Miller, Region I Administrator
S. Dembek, NRC Project Manager, Millstone Unit No. 2
D. P. Beaulieu, Senior Resident Inspector, Millstone Unit No. 2
E. V. Imbro, Director, Millstone ICAVP Inspections

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Attachment 1

Millstone Nuclear Power Station, Unit No. 2

LER 99-001-00

February 1999

EXPIRES 04/30/99

LICENSEE EVENT REPORT (LER)

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

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS MANDATORY INFORMATION COLLECTION REQUEST: 50.0 HRS. REPORTED LESSONS LEARNED ARE INCORPORATED INTO THE LICENSING PROCESS AND FED BACK TO INDUSTRY. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (T-6 F33), 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) Millstone Nuclear Power Station Unit 2		DOCKET NUMBER (2) 05000336	PAGE (3) 1 OF 3
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TITLE (4)
Failure to Perform Required Surveillance on Fire Door

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
01	06	99	99	-- 001 --	00	02	01	99	FACILITY NAME	DOCKET NUMBER

OPERATING MODE (9) 6	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5: (Check one or more) (11)										
	20.2201(b)			20.2203(a)(2)(v)			X	50.73(a)(2)(i)		50.73(a)(2)(viii)	
POWER LEVEL (10) 000	20.2203(a)(1)			20.2203(a)(3)(i)			X	50.73(a)(2)(ii)		50.73(a)(2)(x)	
	20.2203(a)(2)(i)			20.2203(a)(3)(ii)				50.73(a)(2)(iii)		73.71	
	20.2203(a)(2)(ii)			20.2203(a)(4)				50.73(a)(2)(iv)		OTHER	
	20.2203(a)(2)(iii)			50.36(c)(1)				50.73(a)(2)(v)		Specify in Abstract below in NRC Form 366A	
	20.2203(a)(2)(iv)			50.36(c)(2)				50.73(a)(2)(vii)			

LICENSEE CONTACT FOR THIS LER (12)

NAME R. G. Joshi, MP2 Regulatory Compliance Manager	TELEPHONE NUMBER (Include Area Code) (860) 440-2080
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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).	X NO							

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

On January 6, 1999, it was discovered that one of the rated fire doors in the barrier between Unit 2 Turbine Building and Unit 1 Access Control Area consisted of a 3-hour rated roll-up fire door that has not been properly surveilled as required in the Unit 2 Technical Specifications. The door is located in the southeast corner of the 14'-6" elevation and is a 3-hour rated roll-up fire door. The station fire protection program identifies this door as satisfying the Technical Requirements Manual requirement for a fire door in this barrier. There is a double door on the Unit 1 side of the opening that is improperly labeled. The double door is only rated for 1½ hours. As a result of mislabeling the Unit 1 door, surveillances were performed on the 1½ hour fire door, and not performed on the 3-hour rated Unit 2 roll-up door. The 3-hour rated roll-up door has been abandoned in place and has not been maintained operable.

The cause of the condition was that the double door on the Unit 1 side of the opening was improperly labeled due to a historical lack of configuration control. As a result of mislabeling the Unit 1 door, surveillances under the plant procedure were performed on the Unit 1 door instead of the Unit 2 roll-up door.

Compensatory measures were implemented by establishing fire watches as required by the Unit 2 Technical Requirements Manual and a design change will replace the door with a 3-hour rated fire door. Past configuration management problems will continue to be addressed as found.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

FACILITY NAME (1)	DOCKET	LER NUMBER (6)			PAGE (3)
Millstone Nuclear Power Station Unit 2	05000336	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	2 OF 3
		99	-- 001 --	00	

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

I. Description of Event

On January 6, 1999, it was discovered that one of the rated fire doors [IC] in the barrier between U2 Turbine Building and Unit 1 Access Control Area consisted of a 3-hour rated roll-up fire door that has not been properly surveilled as required in the Unit 2 Technical Specifications.

The door is located in the southeast corner of the 14'-6" elevation and is a 3-hour rated roll-up fire door. The station fire protection program identifies this door as satisfying the Technical Requirements Manual (TRM) requirement for a fire door in this barrier. The double door on the Unit 1 side of the opening is improperly labeled. The double door is only rated for 1½ hours. As a result of mislabeling the Unit 1 door, surveillances were performed on the 1½ hour fire door, and not performed on the 3-hour rated Unit 2 roll-up door. The 3-hour roll-up door has been abandoned in place and has not been maintained operable.

This condition is deemed reportable because a surveillance test required by the Technical Specifications was not performed at the required interval. On November 3, 1995, these Technical Specification surveillance requirements were moved into the TRM and are no longer required by the Technical Specifications for Unit 2. Consequently this condition is reportable on a historical basis for the time frame the Technical Specification requirement was in effect (<11-3-95).

This condition is being reported in accordance with 10 CFR 50.73(a)(2)(i)(B), any operation or condition prohibited by the plant's Technical Specifications.

II. Cause of Event

The cause of the condition was that the double door on the Unit 1 side of the opening was improperly labeled. The double door is only rated for 1½ hours. As a result of mislabeling the Unit 1 door, surveillances have not been performed on the 3-hour rated Unit 2 roll-up door and the roll-up door has not been maintained operable. The door surveillances performed on the 1½ door assured that it was a functional fire door with a lesser rating. The mislabeling of the door can be attributed to historical instances of loss of configuration control at Millstone Unit 2, which has been documented in previous Licensee Event Reports.

III. Analysis of Event

The 3-hour rated roll-up fire door is located in a fire barrier which separates Unit 2 Turbine Building from the Unit 1 Access Control Area corridor. This barrier is required to be maintained by commitments to 10 CFR 50, Appendix R, and to Appendix A to Branch Technical Position 9.5-1.

The fire loading in the Unit 2 Turbine Building is considered low with a fire severity of approximately 42 minutes. The combustible loading in the Unit 1 Access Control Area corridor is considered low with a fire severity of approximately 3 minutes.

Safe shutdown equipment located in this area consists of a back feed power supply cable which is exposed in the Unit 2 Turbine Building and is located in a tunnel under the Unit 1 Access Control Area corridor. The cable is not required for safe shutdown for fires located in the area of the roll-up door. In addition, the floor of the Unit 1 corridor is a 12 inch concrete slab which would protect the cable from a fire in the corridor.

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TEXT CONTINUATION

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		99	001	00	

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

The surveillance of the roll-up fire door was to assure that it remained functional and would automatically close in the event of a fire. The closure of the door would be initiated by melting fusible links that keep the operating mechanism engaged. The release of the fusible link would disengage the operating mechanism and a closure spring would push the door in the closed direction. As the weight of the door came off from the roll, a counterbalance spring would prevent the door from slamming so hard that it might cause the door to buckle and create openings through which hot gases and smoke could pass.

Failure to conduct the required surveillance may have resulted in a condition where the closure and counterbalance springs would lose tension. It is likely that the door would still have operated because some tension would remain in the closure spring to start the door moving, and the weight of the door would continue to accelerate the door closed as it came off of the coil. Even if the door had buckled from a hard closure, there was a second set of personnel doors in the opening which are fire rated for 1½ hours. This would have been sufficient to prevent the spread of fire through this barrier with a maximum expected fire severity of only 42 minutes.

Although compliance with the Technical Specification Surveillance requirement was not met, the intent of the Technical Specification requirement was met by ensuring that fire would not conceivably spread between Unit 1 and Unit 2 through this door way. Therefore, this condition was not safety significant.

IV. Corrective Action

This condition will be dispositioned via the Millstone corrective action program.

As a result of this condition, the following actions have been performed.

1. A fire watch was posted and will be maintained consistent with the current Technical Requirements Manual for Unit 2.
2. A design change is in process to replace the 1½ hour fire door with a 3-hour rated fire door.
3. Corrective actions associated with regaining configuration control are ongoing.

V. Additional Information

Similar Events

LER 95-026-00 Missed Fire Door Surveillance. For this LER, the door involved was labeled, but not on the list of fire doors to be surveilled.

Energy Industry Identification System (EIIIS) codes are identified in the text as [XX].