

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

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(203)665-5000

February 9, 1990
MP-90-149

Re: 10CFR50.73(a)(2)(i)(B)

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

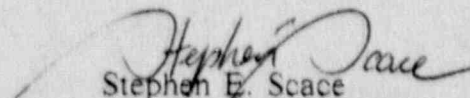
Reference: Facility Operating License No. DPR-65
Docket No. 50-336
Licensee Event Report 90-001-00

Gentlemen:

This letter forwards Licensee Event Report 90-001-00 required to be submitted within thirty (30) days pursuant to 10CFR50.73(a)(i)(B).

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY


Stephen E. Scace
Director, Millstone Station

SES/RWB:mo

Attachment: LER 90-001-00

cc: W. T. Russell, Region I Administrator
W. J. Raymond, Senior Resident Inspector, Millstone Unit Nos. 1, 2 and 3
G. S. Vissing, NRC Project Manager, Millstone Unit No. 2

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LICENSEE EVENT REPORT (LER)

Estimated burden per response to comply with this information collection request: 50.0 hrs. Forward comments regarding burden estimate to the Records and Reports Management Branch (P-530), U.S. Nuclear Regulatory Commission, Washington, DC 20555, and to the Paperwork Reduction Project (3150-0106), Office of Management and Budget, Washington, DC 20503.

FACILITY NAME (1) **Millstone Nuclear Power Station Unit 2** DOCKET NUMBER (2) **0 5 0 0 0 3 3 5 1 OF 0 3** PAGE (3)

TITLE (4) **Fire Protection Suppression/Detection Surveillance Missed**

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													
0	1	1	0	9	0	9	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0

OPERATING MODE (9) **1** THIS REPORT IS BEING SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § (Check one or more of the following) (11)

20.402(b)	<input type="checkbox"/>	20.402(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 (Specify in Abstract below and in Text, NRC Form 366A)	
20.405(a)(1)(iii)	<input checked="" type="checkbox"/>	50.73(a)(2)(i)	<input type="checkbox"/>	50.73(a)(2)(viii)(A)	<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)(ix)	<input type="checkbox"/>		

LICENSEE CONTACT FOR THIS LER (12)

NAME **Ralph W. Bates, Engineering Supvr., Ext. 5410** TELEPHONE NUMBER **2 0 3 4 4 7 - 1 7 9 1**

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC
A	I	C	P 4 3 5	N					

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE) NO

EXPECTED SUBMISSION DATE (15) MONTH DAY YEAR

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

On January 10, 1990 at 0745 hours, with the plant at 100% power and normal operation, a review of a Technical Specification change request to the fire protection sections noted that the surveillances specified in the existing Technical Specifications for two listed areas were not being performed. The fire suppression Technical Specification surveillance procedures had been revised to delete the removed smoke detectors and add the testing of the new suppression systems for these areas. The Technical Specifications had not been revised to reflect the plant changes. This was considered to be a condition prohibited by the plant's Technical Specifications, since the surveillance requirement listed in the LCO was not performed. There were no safety consequences because the areas in question were protected at all times by the new systems installed to satisfy Appendix "R" requirements. The old detectors were removed during the 1987 and 1988 refueling outages, and no change to the Technical Specifications was generated due an administrative oversight. The new systems were installed in accordance with approved designs that were found acceptable by the NRC in subsequent reviews. Since full protection for the areas in question was provided, no other actions are required, with the exception of the submittal of the required Technical Specification changes.

**LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION**

Estimated burden per response to comply with this information collection request: 50 (0 hrs. Forward comments regarding burden estimate to the Records and Reports Management Branch (p-530), U.S. Nuclear Regulatory Commission, Washington, DC 20555, 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) 0 5 0 0 0 3 3 6 9 0	LER NUMBER (6)			PAGE (3) 0 2 OF 0 3
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
		9 0	0 0 1	0 0	

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

I. Description of Event

On January 10, 1990 at 0745 hours, with the plant at 100% power and normal operation, a review of a Technical Specification change request to the fire protection sections noted that the surveillances specified in the existing Technical Specifications for two listed areas were not being performed. The fire suppression Technical Specification surveillance procedures had been revised to delete the removed smoke detectors and add the testing of the new suppression systems for these areas. The Technical Specifications had not been revised to reflect the plant changes. This was considered to be a condition prohibited by the plant's Technical Specifications, since the surveillance requirement listed in the LCO was not performed. There were no safety consequences because the areas in question were protected at all times by the new systems installed to satisfy Appendix "R" requirements. The old detectors were removed during the 1987 and 1988 refueling outages, and no change to the Technical Specifications was generated due an administrative oversight. The new systems were installed in accordance with approved designs that were found acceptable by the NRC in subsequent reviews. Since full protection for the areas in question was provided, no other actions are required, with the exception of the submittal of the required Technical Specification changes. There were no operator actions or automatic safety system responses required by this event.

II. Cause of Event

The root cause of the event is personnel error. The omission occurred during the planning and scheduling of events that were part of the modifications to the plant fire protection systems to meet the Appendix "R" requirements. The normal sequence for a known change to a system addressed in the Technical Specifications is to change the Technical Specification requirement such that it becomes effective when the new system will be placed in service. In this case, the oversight occurred because fire protection is essentially required to be in service at all times with appropriate compensatory action taken in case of a component or system failure or inoperability. During the transition between the old and new systems, the appropriate compensatory measures (fire watches and backup suppression systems) were in effect to assure the operability of the equipment within the areas. Following the completion of work the surveillances on the new systems were started and the old systems surveillances were never resumed because the items to be checked (smoke detectors) had been removed. The requirement to perform the old surveillances was overlooked because the new surveillances had taken their place through approved plant procedure revisions.

III. Analysis of Event

This report is being submitted pursuant to the requirements of 10 CFR 50.73(a)(2)(i)(B), "Any operation or condition prohibited by the plants Technical Specifications". There were no safety consequences resulting from this event since the areas in question were protected at all times by operable fire suppression systems as demonstrated by the surveillances performed under procedures SP 2618D and SP 2412, on the new systems. The new systems were found to be acceptable to the NRC in a post installation audit. Due to the scheduling of the implementation of the new fire suppression systems to meet the Appendix "R" requirement deadlines, the requirement to update the technical specifications before the changes actually occurred, was inadvertently overlooked. During the transition period between the old and new systems, the appropriate compensatory measures consisting of fire watches and backup suppression systems (fire hoses) were in effect to assure the operability of the equipment within the areas.

IV. Corrective Action

The missed surveillances were noted during the review of the Technical Specification change package being made to consolidate and update the fire protection sections of the Technical Specifications. Since the areas in question are properly protected by the new systems and the surveillances being performed demonstrate the operability of the new systems, no other action is required, with the exception of the submittal of the required Technical Specification changes. The estimated schedule for submission of the required changes to the Technical Specifications is March 31, 1990.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

Estimated burden per response to comply with this information collection request: 50.0 hrs. Forward comments regarding burden estimate to the Records and Reports Management Branch (p-530), U. S. Nuclear Regulatory Commission, Washington, DC 20555, 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) 0 5 0 0 0 3 3 6 9 0	LER NUMBER (6)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
			0 0 1 1	0 0	0 3	OF 0 3

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

V. Additional Information

Similar LERs: None

EIIS: IC (Fire Detection System)

In addition, it is expected that plans to follow the NRC recommendation for removal of fire protection items from the Technical Specifications when implemented would prevent a recurrence of the events as reported herein. This is based on the fact that the report identifies requirements not being performed that were listed in the Technical Specifications for specific smoke detectors for specific areas. Because these specific areas were being protected from fire concerns by new systems and the new systems were being verified as operable under new or revised procedures, the omission was only of an administrative nature, and removal of the administrative requirements from the Technical Specifications will prevent a recurrence of this nature.