



Exelon Generation®

10 CFR 50.73

NMP2L2659
November 28, 2017

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Nine Mile Point Nuclear Station, Unit 2
Renewed Facility Operating License No. NPF-69
Docket No. 50-410

Subject: NMP2 Licensee Event Report 2017-002, Secondary Containment Inoperable
Due to Wind Conditions

In accordance with the reporting requirements contained in 10 CFR 50.73(a)(2)(v)(C), please find enclosed NMP2 Licensee Event Report (LER) 2017-002, Secondary Containment Inoperable Due to Wind Conditions.

There are no regulatory commitments contained in this letter.

Should you have any questions regarding the information in this submittal, please contact Dennis M. Moore, Site Regulatory Assurance Manager, at (315) 349-5219.

Respectfully,

Robert E. Kreider Jr.
Plant Manager, Nine Mile Point Nuclear Station
Exelon Generation Company, LLC

REK/RSP

Enclosure: NMP2 Licensee Event Report 2017-002, Secondary Containment Inoperable
Due to Wind Conditions

cc: NRC Regional Administrator, Region I
NRC Resident Inspector
NRC Project Manager

TEZZ
NRK

**LICENSEE EVENT REPORT (LER)**

(See Page 2 for required number of digits/characters for each block)

(See NUREG-1022, R.3 for instruction and guidance for completing this form
<http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1022/r3/>)

Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the Information Services Branch (T-2 F43), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by e-mail to Infocollects.Resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

1. FACILITY NAME

Nine Mile Point Unit 2

2. DOCKET NUMBER

05000410

3. PAGE

1 OF 5

4. TITLE

Secondary Containment Inoperable Due to Wind Conditions

5. EVENT DATE

MONTH	DAY	YEAR
09	30	2017

6. LER NUMBER

YEAR	SEQUENTIAL NUMBER	REV NO.
2017	002	00

7. REPORT DATE

MONTH	DAY	YEAR
11	29	2017

8. OTHER FACILITIES INVOLVED

FACILITY NAME	DOCKET NUMBER
N/A	N/A

9. OPERATING MODE**11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check all that apply)**

1	<input type="checkbox"/> 20.2201(b)	<input type="checkbox"/> 20.2203(a)(3)(i)	<input type="checkbox"/> 50.73(a)(2)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)
	<input type="checkbox"/> 20.2201(d)	<input type="checkbox"/> 20.2203(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(ii)(B)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)
	<input type="checkbox"/> 20.2203(a)(1)	<input type="checkbox"/> 20.2203(a)(4)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(ix)(A)
	<input type="checkbox"/> 20.2203(a)(2)(i)	<input type="checkbox"/> 50.36(c)(1)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(iv)(A)	<input type="checkbox"/> 50.73(a)(2)(x)
100	<input type="checkbox"/> 20.2203(a)(2)(ii)	<input type="checkbox"/> 50.36(c)(1)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(v)(A)	<input type="checkbox"/> 73.71(a)(4)
	<input type="checkbox"/> 20.2203(a)(2)(iii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(v)(B)	<input type="checkbox"/> 73.71(a)(5)
	<input type="checkbox"/> 20.2203(a)(2)(iv)	<input type="checkbox"/> 50.46(a)(3)(ii)	<input checked="" type="checkbox"/> 50.73(a)(2)(v)(C)	<input type="checkbox"/> 73.77(a)(1)
	<input type="checkbox"/> 20.2203(a)(2)(v)	<input type="checkbox"/> 50.73(a)(2)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(v)(D)	<input type="checkbox"/> 73.77(a)(2)(i)
	<input type="checkbox"/> 20.2203(a)(2)(vi)	<input type="checkbox"/> 50.73(a)(2)(i)(B)	<input type="checkbox"/> 50.73(a)(2)(vii)	<input type="checkbox"/> 73.77(a)(2)(ii)
	<input type="checkbox"/> 50.73(a)(2)(i)(C)	<input type="checkbox"/> OTHER	Specify in Abstract below or in NRC Form 366A	

12. LICENSEE CONTACT FOR THIS LER**LICENSEE CONTACT**

Dennis M. Moore, Site Regulatory Assurance Manager

TELEPHONE NUMBER (Include Area Code)

(315) 349-5219

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

CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX
D	NG	N/A	N/A	N	N/A	N/A	N/A	N/A	N/A

14. SUPPLEMENTAL REPORT EXPECTED☐ YES (If yes, complete 15. EXPECTED SUBMISSION DATE) ☒ NO**15. EXPECTED SUBMISSION DATE**

MONTH	DAY	YEAR

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

On September 30, 2017 at 0134, Nine Mile Point Unit 2 declared Secondary Containment inoperable due to Secondary Containment vacuum decreasing below the technical specification limit. The condition is reportable under 10 CFR 50.72 (b)(3)(v)(C) and 10 CFR 50.73(a)(2)(v)(C) as any event or condition that could have prevented the fulfillment of the safety function of structures or systems that are needed to control the release of radioactive material. The change in Secondary Containment vacuum was the result of changing wind conditions.

Secondary Containment was declared operable at 0135 when Secondary Containment vacuum was restored to greater than 0.25 inches of vacuum water gauge.

The event described in this LER is documented in the plant's corrective action program as IR# 04057558.



LICENSEE EVENT REPORT (LER) CONTINUATION SHEET

(See NUREG-1022, R.3 for instruction and guidance for completing this form
<http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1022/r3/>)

Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the Information Services Branch (T-2 F43), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by e-mail to Infocollects.Resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

1. FACILITY NAME	2. DOCKET NUMBER	3. LER NUMBER		
Nine Mile Point Unit 2	05000410	YEAR 2017	SEQUENTIAL NUMBER - 002	REV NO. - 00

NARRATIVE

I. DESCRIPTION OF EVENT

A. PRE-EVENT PLANT CONDITIONS:

Prior to the event, Nine Mile Point Unit 2 (NMP2) was operating at 100 percent power.

B. EVENT:

On September 30th, 2017 at approximately 0130 the Unit 2 Main Control Room was notified by the building rounds operator of Reactor Building differential pressure (D/P) fluctuations observed at the local ventilation control panel. All Reactor Building fans and dampers were found in a normal configuration. Reactor building D/P readings in the control room were noted as less than .25 inches vacuum water gauge (WG) and remaining negative as compared to atmospheric pressure. Secondary Containment was declared inoperable due to exceeding the Technical Specification (TS) allowed value of .25 inches vacuum WG and TS Limiting Condition for Operation (LCO) 3.6.4.1 Condition A was entered.

One minute later Operations started Standby Gas Treatment (GTS) Train "B" per procedure. Secondary Containment vacuum was restored to greater than 0.25 inches of vacuum WG, TS LCO 3.6.4.1 Condition A was exited and Secondary Containment was declared Operable.

Nine Mile Point Unit 1 (NMP1) was unaffected by the inoperability of Secondary Containment at NMP2.

The event has been entered into the plant's corrective action program as IR# 04057558

C. INOPERABLE STRUCTURES, COMPONENTS, OR SYSTEMS THAT CONTRIBUTED TO THE EVENT:

There were no inoperable systems, structures, or components that contributed to this event.

D. DATES AND APPROXIMATE TIMES OF MAJOR OCCURRENCES AND OPERATOR ACTIONS:

The dates, times, and major occurrences and operator actions for this event are as follows. All times are 09/30/2017.

- 0130 Reactor Building Operator reports the Reactor Building D/P fluctuating at the local control panel.
- 0134 Control Room Operator observes control room indicators for Reactor Building pressure reading above -0.25 inches water gauge, Secondary Containment was declared inoperable and Technical Specification 3.6.4.1 was entered.

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

(See NUREG-1022, R.3 for instruction and guidance for completing this form
<http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1022/r3/>)

Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the Information Services Branch (T-2 F43), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by e-mail to Infocollects.Resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

1. FACILITY NAME	2. DOCKET NUMBER	3. LER NUMBER		
		YEAR	SEQUENTIAL NUMBER	REV NO.
Nine Mile Point Unit 2	05000410	2017	- 002	- 00

NARRATIVE

0135 Control Room Operator starts Standby Gas Treatment Fan per procedure, Reactor Building D/P improves to -0.45 inches water gauge.

0135 Secondary Containment was declared operable and Technical Specification 3.6.4.1 was exited

E. METHOD OF DISCOVERY:

The condition was recognized by Operations as they monitored Secondary Containment vacuum during the period of changing wind conditions.

F. SAFETY SYSTEM RESPONSES:

This event was caused by changing wind conditions. The GTS equipment performed as expected.

II. CAUSE OF EVENT:

Secondary Containment was declared inoperable because of changing wind conditions. Though the effect of high winds on normal Reactor Building ventilation was recognized in 2015, attempts to mitigate building D/P changes due to high winds did not prevent the wind conditions during this event (East to Northeast) from affecting Reactor Building D/P enough to enter Technical Specifications.

III. ANALYSIS OF THE EVENT:

The event described in this LER is reportable under 10 CFR 50.72 (b)(3)(v)(C) and 10 CFR 50.73(a)(2)(v)(C) as any event or condition that could have prevented the fulfillment of the safety function of structures or systems that are needed to control the release of radioactive material.

Analysis concluded that Secondary Containment was declared inoperable because of changing wind conditions. The effect of high wind on Reactor Building ventilation was recognized in 2015 and actions were taken attempting to mitigate building D/P changes during sustained high wind conditions. However, these actions did not prevent the wind conditions during this event from affecting Reactor Building D/P enough to enter Technical Specification required action.

TS 3.6.4.1 Condition A was entered and subsequently exited once Secondary Containment vacuum was restored to above the required TS value (required action) within the associated completion time. The Secondary Containment structural integrity, the ability to automatically isolate the non-safety related Reactor Building Ventilation System, and GTS

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

(See NUREG-1022, R.3 for instruction and guidance for completing this form
<http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1022/r3/>)

Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the Information Services Branch (T-2 F43), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by e-mail to Infocollects.Resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

1. FACILITY NAME	2. DOCKET NUMBER	3. LER NUMBER		
		YEAR	SEQUENTIAL NUMBER	REV NO.
Nine Mile Point Unit 2	05000410	2017	- 002	- 00

NARRATIVE

availability were not impacted. Secondary Containment would have continued to perform its intended safety function throughout the duration of the event.

Based on the above discussion, it is concluded that the safety significance of this event is low and the event did not pose a threat to the health and safety of the public or plant personnel.

This event does not affect the NRC Regulatory Oversight Process Indicators.

IV. CORRECTIVE ACTIONS:**A. ACTION TAKEN TO RETURN AFFECTED SYSTEMS TO PRE-EVENT NORMAL STATUS:**

Operators declared Secondary Containment inoperable and entered TS LCO 3.6.4.1 Condition A with a required action to restore Secondary Containment to operable within 4 hours. Operators placed GTS in operation and returned the Secondary Containment to pre-event status (operable).

B. ACTION TAKEN OR PLANNED TO PREVENT RECURRENCE:

One action has been completed to aid in preventing recurrence; this action changes "Building Rounds" Attachment 1 to align Reactor Building D/P bands with Reactor Building Ventilation procedure. This revision changed the range for Reactor Building D/P from -0.25 to -0.80 inches WG to -0.47 to -0.90 inches WG, providing more margin to inoperability.

Additionally, the site has submitted a license amendment request to allow for containment vacuum to be momentarily less than the required vacuum due to changes in wind conditions in accordance with TSTF-551, Revision 3 "Revise Secondary Containment Surveillance Requirements".

V. ADDITIONAL INFORMATION:**A. FAILED COMPONENTS:**

There were no failed components that contributed to this event.

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

(See NUREG-1022, R.3 for instruction and guidance for completing this form
<http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1022/r3/>)

Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the Information Services Branch (T-2 F43), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by e-mail to Infocollects.Resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOF-10202, (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

1. FACILITY NAME	2. DOCKET NUMBER	3. LER NUMBER		
		YEAR	SEQUENTIAL NUMBER	REV NO.
Nine Mile Point Unit 2	05000410	2017	- 002	- 00

NARRATIVE**B. PREVIOUS LERs ON SIMILAR EVENTS:**

NMP2 LER-2014-005, dated 05/09/2014, was submitted for Secondary Containment Inoperable due to Sustained high winds. The corrective actions following this event included revising a plant procedure to provide direction to initiate the Standby Gas Treatment System and isolate the Reactor Building during sustained high wind conditions prior to exceeding the Technical Specification (TS) D/P limit for Secondary Containment. These actions do not mitigate the change in wind conditions associated with this LER (2017-002)

NMP2 LER-2015-001, dated 03/12/2015, was submitted for Secondary Containment Inoperable due to Sustained high winds. The wind conditions of the event described within this LER differ from those captured in LER-2015-001. Actions resulting from the 2015 event have successfully mitigated the challenge posed from sustained high winds from West to East but did not prevent D/P challenges presented from the wind conditions during the event described in this LER (2017-002)

C. THE ENERGY INDUSTRY IDENTIFICATION SYSTEM (EIS) COMPONENT FUNCTION IDENTIFIER AND SYSTEM NAME OF EACH COMPONENT OR SYSTEM REFERRED TO IN THIS LER:

<u>COMPONENT</u>	<u>IEEE 803 FUNCTION IDENTIFIER</u>	<u>IEEE 805 SYSTEM IDENTIFICATION</u>
Reactor Building (BWR)	N/A	NG
Standby Gas Treatment System	N/A	BH

D. SPECIAL COMMENTS:

None