



## ATTACHMENT

Millstone Unit 2  
LER 79-27/01T-0  
Docket No. 50-336

### Event Description

During a routine plant engineering review, it was determined that a section of 4" cast iron floor drain piping passing over each of the station batteries was not supported in accordance with design drawings. The support requirements for this piping included seismic hangers to conform to the plant design criteria for the protection of safety related equipment from damage by non-safety related equipment (seismic 2/1 criteria). The results of an as-built engineering analysis demonstrated that the drain line supports would fail during a design basis seismic event, creating the potential for damage to the station batteries from the unrestrained drain piping.

A concurrent review of other equipment in the battery rooms indicated that sections of the battery exhaust fan ducting for each battery room did not adequately comply with the seismic 2/1 design criteria. A similar as-built engineering analysis demonstrated the potential for battery damage from portions of the ducting which could become unrestrained during a seismic event.

After discussions with your office, it was concluded that the potential seismic related damage to both station batteries resulted in plant operation per Technical Specification 3.0.3, since conditions were in excess of those addressed in Action Statement b of Specification 3.8.2.3. Accordingly, preparations were made to proceed to place the plant in cold shutdown within 30 hours.

### Cause Description

The cause of this occurrence was the failure to support the drain piping and ducting in accordance with original plant design documents governing the seismic 2/1 criteria. These criteria are applied in all areas of the plant containing safety related equipment, and the actions necessary include seismically supporting the non-safety related equipment, supporting it in a restraining manner to prevent the equipment impacting safety related equipment, or analysis to demonstrate that the equipment cannot damage safety related items.

Concurrent with the preparations for shutdown, the inadequately supported drain piping and duct work located in the vicinity of each battery were removed. The removal of the drain piping and duct work precluded proceeding to cold shutdown.

Permanent corrective action will be to provide properly supported drain piping in the portions running through the battery rooms, and to provide permanent ventilation ducting. This will be completed prior to the completion of the 1980 refueling outage.

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