

## 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

P. O. BOX 270

HARTFORD, CONNECTICUT 06141-0270

(203) 665-5000

January 6, 1993

MP-93-13

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-21  
Docket No. 50-245  
Licensee Event Report 92-27-01

Gentlemen:

This letter forwards Licensee Event Report 92-27-01. This report was previously submitted on November 30, 1992 with an incorrect event date. The event date has been revised and all technical content remains the same.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

Stephen E. Scace  
Vice President - Millstone Station

SES/HSS:ame

Attachment: LER 92-27-01

cc: T. T. Martin, Region I Administrator  
P. D. Swetland, Senior Resident Inspector, Millstone Unit Nos. 1, 2 and 3  
J. W. Andersen, NRC Acting Project Manager, Millstone Unit No. 1

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## LICENSEE EVENT REPORT (LER)

Estimated burden per response to comply with this information collection request: 60.0 hrs. Forward comments regarding burden estimate to the Records and Reports Management Branch (p-630), 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 1

DOCKET NUMBER (2) 050002451 OF 02

TITLE (4) Technical Specification Fire Penetration

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									
1	0	2	9	9	2	9	2	0	5	0	0	0	0	0	0	0	0	0

OPERATING MODE (9)		THIS REPORT IS BEING SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § (Check one or more of the following) (11)															
POWER LEVEL (10)	11010	20.402(b)				20.402(c)				50.73(a)(2)(iv)				73.71(b)			
		20.405(a)(1)(i)				50.56(c)(1)				50.73(a)(2)(iv)				73.71(c)			
		20.405(a)(1)(ii)				50.56(c)(2)				50.73(a)(2)(vi)				OTHER (Specify in Abstract below and in Text NRC Form 366A)			
		20.405(a)(1)(iii)				50.73(a)(2)(i)				50.73(a)(2)(viii)(A)							
		20.405(a)(1)(iv)				50.73(a)(2)(ii)				50.73(a)(2)(viii)(B)							
20.405(a)(1)(v)				50.73(a)(2)(iii)				50.73(a)(2)(ix)									

LICENSEE CONTACT FOR THIS LER (12)

NAME Herbert S. Searle, Engineer, Ext. 5190

TELEPHONE NUMBER  
AREA CODE 203 447-1791

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

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE) X NO

EXPECTED SUBMISSION DATE (15)

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

On October 29, 1992, at 1500 hours, with the plant operating at 100% power, it was determined, by way of an engineering evaluation, that certain historical conditions involving open/unsealed fire barrier penetrations were not reported to the NRC under an LER. This LER is required to report that the plant was operating in a condition prohibited by technical specifications prior to the discovery of these open barriers.

No safety systems were required to function as a result of this event and no safety consequences resulted from this event.

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)

DOCKET NUMBER (2)

LER NUMBER (6)

PAGE (3)

Millstone Nuclear Power Station  
Unit 1

YEAR

SEQUENTIAL  
NUMBERREVISION  
NUMBER

0 5 3 0 0 2 4 5 9 2 -- 0 2 7 -- 0 1 0 2 OF 0 2

TEXT (If more space is required, use additional NRC Form 366A-s1 (17))

I. Description of Event

On October 29, 1992, at 1500 hours, with the plant operating at 100% power, it was determined, by way of an engineering evaluation, that certain historical conditions involving open/unsealed fire barrier penetrations were not reported to the NRC under an LER. This LER is required to report that the plant was operating in a condition prohibited by technical specifications prior to the discovery of these open barriers.

No safety systems were required to function as a result of this event and no safety consequences resulted from this event.

II. Cause of Event

The cause of this event is attributed to the failure to correctly interpret reportability requirements for conditions prohibited by plant technical specifications.

NNECO's historical interpretation of the "time of discovery" of an open/unsealed fire barrier resulted in incorrect decisions concerning reportability. The "time of discovery" is discussed in a Northeast Utilities (NU) Reporting Guidance document which provides guidance on meeting the NRC regulations contained in 10CFR50.72 and 10CFR50.73. This document was developed by NU to maintain a conservative and consistent corporate philosophy in the reportability process.

Historically, fire barrier penetrations found open/unsealed have not been reported pursuant to 10CFR50.73. In the past, NNECO established "time of discovery" as the time the condition was identified. The NU reporting guidance allows this assumption only when there is no firm evidence that the fire barrier had been inoperable prior to the time that the condition was found. This assumption is typically valid when a fire barrier penetration is found with a degraded seal. An unsealed fire barrier penetration that was never sealed was inoperable before the condition was found. This condition must be reported pursuant to 10CFR50.73.

III. Analysis of Event

This event is reportable pursuant to 10CFR50.73(a)(2)(i)(B), which requires reporting of any operation or condition prohibited by technical specifications.

It has been determined that there have been one or more fire barrier penetrations that were found open in which a seal never existed. Within 1 hour of their discovery a temporary fire barrier or a continuous fire watch was established in accordance with technical specification 3.12.F.2. The fire barriers were restored to functional status within 30 days.

IV. Corrective Action

A memorandum has been distributed to all Unit personnel that are involved in reportability determinations. This memo provides clarification of the reportability requirements associated with open/unsealed fire barrier penetrations. It reinforces that Plant Incident Reports (PIR's) generated for fire barrier penetrations be reviewed for reportability by considering the "time of discovery" as defined in the NU Reporting Guidance document. It is worth noting that, subsequent to these events, NU personnel involved in reportability determinations attended training on the reportability requirements contained in 10CFR50.72 and 10CFR50.73. The NU Reporting Guidance document was specifically discussed during this training.

V. Additional Information

Previous similar events: None