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Millstone Nuclear Power Station Northeast Nuclear Energy Company P.O. Box 128 Waterford, CT 06385-0128 (860) 447-1791 Fax (860) 444-4277

The Northeast Utilities System MAR | 6 2000

> Docket No. 50-336 B18031

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

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

## Millstone Nuclear Power Station, Unit No. 2 Licensee Event Report 2000-005-00 Failure to Assure Containment Integrity for Certain Locked or Sealed Valves Located Inside Containment Prior to Entering Mode 4 from Cold Shutdown

This letter forwards Licensee Event Report (LER) 2000-005-00, documenting a condition that occurred at Millstone Nuclear Power Station, Unit No. 2, on February 16, 2000. This LER is being submitted pursuant to 10 CFR 50.73(a)(2)(i)(B).

The Northeast Nuclear Energy Company (NNECO) regulatory commitments contained in this letter are located in Attachment 1.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

Station Director

Attachments (2): List of Regulatory Commitments LER 2000-005-00

H. J. Miller, Region I Administrator CC: J. I. Zimmerman, NRC Project Manager, Millstone Unit No. 2

D. P. Beaulieu, Senior Resident Inspector, Millstone Unit No. 2

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Attachment 1

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Millstone Nuclear Power Station, Unit No. 2

List of Regulatory Commitments

March 2000

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## List of Regulatory Commitments

The following table identifies actions committed to by NNECO in this document.

Number	Commitment	Due
	Appropriate Operations department personnel were briefed on the specifics of this condition.	Complete
B18031-01	The plant's heat-up procedure will be revised to ensure compliance with Technical Specification Surveillance Requirement 4.6.1.1(a).	May 26, 2000

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Attachment 2

Millstone Nuclear Power Station, Unit No. 2

LER 2000-005-00

March 2000

NRC FOR (6-1998)	RM 366				U.S. NL	ICLEAR	REG	ULATORY	COMN	IISSION			APPRO	OVED BY OMB EXPIRES 06/3	NO. 31 30/200	50-0104 1	1		
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Failu Ente	ure to <i>i</i> ering M	Assure lode 4 t	Conta from (	ainme Cold :	ent Integrity fo Shutdown	or Cert	ain	Locked	or Se	aled Va	lves	Loc	ated In	side Conta	ainme	ent Pr	ior to		
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02	16	2000 2000 005 00			· · · ·	03	16	2000	FACILITY NAME				DOCKET NUMBER						
OPERA	TING		THIS	S REPO	ORT IS SUBMITTI	ed Purs	UAN	т то тн	E REQU	IREMEN	TS OF	10	CFR §: ((	Check one or	more	) (11)			
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POW	ER			20.22	03(a)(1)			20.2203	(a)(3)(i)				50.73(a)(	2)(ii)		50.73(	a)(2)(x)		
LEVEL	(10)	000		20.22	03(a)(2)(i)			20.2203	(a){3)(ii	)			50.73(a){	2)(iii)		73.71			
				20.22	03(a){2}(ii)			20.2203	(a)(4)				50.73(a)(	2)(IV)	<u> </u>	OTHER	i .		
				20.22	03(a)(2)(iii)			50.36(c)	$\frac{(1)}{(2)}$				50.73(a)(	2)(V)	Spec	ify in Al NRC Fo	ostract below orm 366A		
				20.22	03(a)(2)(iv)			50.36(C)			2		50.73(a)(	Z)(VII)	<b></b>				
	R.	Joshi,	MP2	Actin	ng Regulatory TE ONE LINE FOI	Compl R EACH	lian cov	ce Supe	rvisor FAILUF	RE DESCH	RIBED	IN T	HIS REPO	(860) 44 DRT (13)	10-20	080			
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On F Surv perfe Mod	Februa veillanc ormanc le 4 on	ry 22, 2 e Requ ce of thi Februa	000, ireme s sur iry 16	during ent (S veillar , 2000	g preparations R) 4.6.1.1(a) h nce may have 0, at 0857 hou	to con which v been ii irs.	iduc verifi nap	t the ne ies prim propriati	xt sch ary co ely cre	eduled ntainme edited w	perfo ent in /hen	orma iteg the	ance of rity, it wa unit trar	Technical as discove nsitioned fr	Spec ered t form M	ification hat th Aode s	on (TS) e last 5 to		
It wa certa the with days	as later ain cor SR doe in the p s, it wa	reveal tainme s requi previous s deterr	ed tha nt per re tha s 92 d mined	at SR netrati at thes lays. I that	4.6.1.1(a) was ions located in se penetration Since these of containment in	s last c n conta s be ve containn ntegrity	ond inm erifie men v hae	iucted of ent are l ed close it penetr d not be	n Janu not red d prior ations en as	ary 20, quired to to ente had no sured d	2000 o be ering ot bee uring	0 wi sur Mo en v the	ith the u veilled u de 4 froi verified c e Februa	nit in Mode Inder SR 4 Im Mode 5 Slosed duri Ary 16, 200	e 1. .6.1. if not ng th 00 Mc	In this 1(a) a : perfo e pas ode ch	Mode, Ithough Irmed t 92 Iange:		
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٨٩٩	orracti	vo optic		nnron	riata Onaratia	ne dor	ortr	nont no	reonna	Jwore	hriofa	ad c	on the er	necifics of	thic c	onditi	ion and		

As corrective actions, appropriate Operations department personnel were briefed on the specifics of this condition and prior to May 26, 2000, the plant's heat-up procedure will be revised to ensure compliance with Technical Specification Surveillance Requirement 4.6.1.1(a).

RC F 95)	ORM 366A			U.S. NUCLE	AR REGULATC	RY COMMIS
-,		T REPORT (I	ER)			
	TEXT CON FACILITY NAME (1)		1		(6)	PAGE (3)
	Millstone Nuclear Power Station Unit 2	05000336	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	2 OF 4
			2000	005	00	
T (	If more space is required, use additional copies of NRC Form 366A) (	17)				
	Description of Event					
	On February 22, 2000, during preparations to conduct th (TS) Surveillance Requirement (SR) 4.6.1.1(a) which ve the last performance of this surveillance may have been Mode 5 to Mode 4 on February 16, 2000, at 0857 hours.	e next schedule rifies primary cc inappropriately	ed perfo intainme crediteo	rmance of Te ent integrity, i d when the ur	echnical Spe t was discov nit transition	cification vered that ed from
	Specifically, SR 4.6.1.1(a) requires that while in Modes 1 capable of being closed by OPERABLE containment aut every thirty-one (31) days. Prior to the February 16, 200 prior performance of SR 4.6.1.1(a) was valid and still in e	through 4, all p omatic isolation 0 Mode change effect since it wa	enetrat valves e, Opera as last c	ions** (double [V], be verifie ations person onducted wit	e asterisk) [ d closed at nel conclude hin the past	PEN] not least once ed that the 31 days.
	It was later revealed that SR 4.6.1.1(a) was last conduct mode, certain containment penetrations had not been su verification of certain valves, blind flanges, and deactivat are locked, sealed, or otherwise secured in the closed pe penetrations be verified closed prior to entering Mode 4 two (92) days. Evidence to support that this latter contin February 16, 2000, could not be located.	ed on January 2 irveilled since S ted automatic va osition. Howeve from Mode 5 if r gency had beer	20, 2000 R 4.6.1. alves loc er, the S not perform n perform	) with the unit 1(a)** (doubl cated inside the R does requi ormed within to med, prior to	in Mode 1. e asterisk) e he containm re that these the previous entering Mo	In this excludes ent which e certain ninety- de 4 on
	Since these containment penetrations had not been verific containment integrity had not been assured during the F condition is being reported pursuant to 10 CFR 50.73(a) plant's Technical Specifications.	fied closed in the ebruary 16, 200 (2)(i)(B), as any	e past 9 0 Mode operati	2 days, it wa change. Co on or conditic	s determine nsequently, on prohibited	d that this I by the
•	Cause of Event					
	The root cause of this condition was determined to be a was insufficient information to cue the user that the Mode surveillance is still current.	deficiency in the e needs to be co	e plant's onsidere	heat-up proc ed in determir	edure such	that there r the
	A contributing cause was the inadequate work practice of periodicity requirements. This resulted in tunnel vision in performance valid were not appropriately considered.	f signing-off on which all of the	mode 4 factors	surveillances that make a	s based sole previous su	ely on rveillance
I.	Analysis of Event					
	Validating primary containment integrity ensures that the atmosphere will be restricted to those leakage paths and This restriction, in conjunction with the leakage rate limitathe limits of 10CFR100 during accident conditions.	release of radio associated leal ation, will limit th	oactive r k rates a le site b	materials fron assumed in th oundary radia	n the contain ne accident a ation doses	nment analyses. to within
	In this instance, SR 4.6.1.1(a) is somewhat unique in tha applicability only in operating Modes 1 through 4, this pa logic however is sound since during periods of cold shute secured penetrations located in containment may be serprior to plant heat-up (Mode 4 and higher).	t although the T rticular surveilla down there is a viced which crea	S Limiti nce con potentia ates the	ng Condition tains a Mode I where locke need to verif	for Operatic 5 continger d or otherw y that they a	on notes ncy. The ise are closed

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4-95)	JIN JOOA				U.S. NUCLE			
		LICENSEE EV	ENT REPORT (I	.ER)				
		TEXT C	ONTINUATION					
		FACILITY NAME (1)	DOCKET			(6)	PAGE (3	
	Millsto	ne Nuclear Power Station Unit 2	05000336	YEAR	AR SEQUENTIAL REV NUMBER NU		3 OF 4	
				2000	005	00		
	The unit op and then co re-entered I properly see	erated approximately 3 days under the mi oled down to Mode 5 on February 19, 200 Mode 5, SR 4.6.1.1(a) was successfully co cured prior to the February 16, 2000 Mode	ssed SR, i.e., the u 00 (at 1539 hours) ompleted which co e change. Conseq	init ente to repa nfirmed uently,	ered Mode 4, ir a leaking va that these va this condition	transitioned lve. After t lves had be is consider	l to Mode 3 the unit had een red to be of	
IV.	Corrective A	Action						
	As a result	of this condition, the following actions have	e been, or will be p	erforme	ed:			
	1. Арр	ropriate Operations department personne	I were briefed on th	ne spec	ifics of this co	ndition.		
	2. Prio Spe	r to May 26, 2000, the plant's heat-up pro- cification Surveillance Requirement 4.6.1.	cedure will be revis 1(a).	ed to e	nsure complia	ance with T	echnical	
	In addition, Action Prog	other corrective actions related to this cor ram.	ndition are being ac	ldresse	d via the Mills	tone Corre	ctive	
V.	Additional Ir	nformation						
	Similar Eve	nts						
	As noted in 4.6.1.1(a) a to the TS ur performed a	the similar events, certain valves inside c s a result of being omitted from the survei ntil after November 19, 1997 (NRC Amenc as a result of these two similar events, wo	ontainment had no llance checklist. S dment No. 210 app uld not have preve	t been s ince the roval da nted this	surveilled in a SR double a ate), the corre s current cond	ccordance sterisk was ctive action dition from o	with SR not added ns occurring.	
	LER 96-026	5: On May 3, 1996, at approximately 1 review of the Technical Specification TS section 4.6.1.1.a, "Containment least once per 31 days, that a verific of being closed by OPERABLE cont during accident conditions, "are clos secured in their positions"Certain not included during the conduct of th requirements of 10 CFR 50.73(a)(2) of the TS that resulted in operating p The manual valves identified which their proper position. Corrective action informing operators that the practice unacceptable.	945 hours with the ns (TS) it was disc Integrity," were not cation be performe tainment automatic sed by valves, blind valves which are s he surveillances. T )(i)(B). The cause practices that were had not been inclu- tions taken included e of entering "N/A"	plant in overed met. 1 d to ens isolatio d flange ubject t This eve of this e not con ded in t l a shift for certa	n mode 5 at 0 that the surve S surveillanc sure that all po n valves and s or deactivat o this surveilland ont was report event was an insistent with t his surveilland briefing by th ain valves on	% power, d illance required to e 4.6.1.1.a enetrations, required to red automat ance requir ance requir ance requir historical in he TS require ce were ver e operation the valve lin	luring a uirements o requires, a , not capable b be closed tic valves ement were to the terpretation irements. rified to be i s manager neups is	
	LER 96-023	B: On April 25, 1996 at 1520 hours, with	th the plant in Mod	e 5 at 0	% power, an i	internal auc	lit at hain a	

LER 96-023: On April 25, 1996 at 1520 hours, with the plant in Mode 5 at 0% power, an internal audit discovered that several valves located within containment isolation boundaries were not being inspected to verify they were in the closed position. This monthly check demonstrates containment integrity and is required to be performed at least once per 31 days, in accordance

	INT REPORT (I	LER)				
				(6)		
	DUCKET	YEAR	SEQUENTIAL NUMBER	ER NUMBER (0)		
Millstone Nuclear Power Station Unit 2	05000336	2000	) 005 00		4 Ur 4	
T (If more space is required, use additional copies of NRC Form 366A,	/ (17)	I				
with the requirements of Technical S pursuant to the requirements of 10 C the plant's Technical Specifications.' periodic valve position verification we 4.1.2.1a and b, 4.1.2.2b, 4.5.2a.7, 4 event was failure to properly incorpor plant surveillance procedures. The with the TS were subsequently inspe- line-ups which fulfill TS required valve have been completed to add the mis	Specifications (TS) CFR50.73(a)(2)(i)( ' As corrective act ere reviewed and 5.3.1, 4.7.1.2a.5, orate Technical Sp isolation valves th ected and verified ve position verifica asing valves to the	section B), "Any ion, oth deficier 4.7.3.1 ecificat at had r to be in tions w approp	4.6.1.1.a. T y operation of er TS surveill cies identified a.5 and 4.7.4. on surveilland to been insp the closed p ere reviewed. riate forms.	his event w condition p ances whic d for TS sec 1a.5. The ce requirem ected in acc osition. Oth Procedure	ras reported prohibited by h require ctions: cause of this nents into cordance ner valve changes	
nergy Industry Identification System (EIIS) codes are ider	ntified in the text a	s [XX].				
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