



**Northeast  
Nuclear Energy**

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The Northeast Utilities System

**JUN 30 2000**

**Docket No. 50-336**  
**B18151**

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 2000-009-00  
Entry Into an Operational Mode While in the LCO 3.6.5.2 Action Statement  
Is a Violation of Technical Specification 3.0.4

This letter forwards Licensee Event Report (LER) 2000-009-00, documenting a condition that occurred at Millstone Nuclear Power Station, Unit No. 2, on June 1, 2000. This LER is being submitted pursuant to 10 CFR 50.73(a)(2)(i).

Northeast Nuclear Energy Company (NNECO) commitments made within this letter are located in Attachment 1.

Very truly yours,

**NORTHEAST NUCLEAR ENERGY COMPANY**

  
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C. J. Schwarz  
Station Director

Attachments (2): List of Regulatory Commitments  
LER 2000-009-00

cc: H. J. Miller, Region I Administrator  
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

Millstone Nuclear Power Station, Unit No. 2

List of Regulatory Commitments

List of Regulatory Commitments

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

Number	Commitments	Due
B18151-01	Appropriate Operations personnel will be briefed on proper door breach protocol.	August 15, 2000
B18151-02	Enhancements will be made to applicable sections of the station work control procedure to address this condition.	September 30, 2000

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Attachment 2

Millstone Nuclear Power Station, Unit No. 2

LER 2000-009-00

**LICENSEE EVENT REPORT (LER)**

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

Estimated burden per response to comply with this mandatory information collection request: 50 hrs. Reported lessons learned are incorporated into the licensing process and fed back to industry. Forward comments regarding burden estimate to the Records Management Branch (T-6 F33), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, and to the Paperwork Reduction Project (3150-0104), Office of Management and Budget, Washington, DC 20503. If 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.

FACILITY NAME (1) <b>Millstone Nuclear Power Station Unit 2</b>		DOCKET NUMBER (2) <b>05000336</b>	PAGE (3) <b>1 OF 4</b>
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TITLE (4)  
**Entry into an operational mode while in the LCO 3.6.5.2 Action Statement is a violation of Technical Specification 3.0.4**

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 NAME	DOCKET NUMBER
06	01	2000	2000	-- 009 --	00	06	30	2000	FACILITY NAME	DOCKET NUMBER
OPERATING MODE (9)		2	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)							
POWER LEVEL (10)		000	20.2201(b)			20.2203(a)(2)(v)			X 50.73(a)(2)(i)	50.73(a)(2)(viii)
			20.2203(a)(1)			20.2203(a)(3)(i)			50.73(a)(2)(ii)	50.73(a)(2)(x)
			20.2203(a)(2)(i)			20.2203(a)(3)(ii)			50.73(a)(2)(iii)	73.71
			20.2203(a)(2)(ii)			20.2203(a)(4)			50.73(a)(2)(iv)	OTHER
			20.2203(a)(2)(iii)			50.36(c)(1)			50.73(a)(2)(v)	Specify in Abstract below or in NRC Form 366A
			20.2203(a)(2)(iv)			50.36(c)(2)			50.73(a)(2)(vii)	

LICENSEE CONTACT FOR THIS LER (12)

NAME <b>R. Joshi, MP2 Acting Regulatory Compliance Supervisor</b>	TELEPHONE NUMBER (Include Area Code) <b>(860) 440-2080</b>
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COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE).	X NO	EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
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ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

On May 31, 2000, at 1300 hours, with the unit in Mode 2 at 0 percent power, two (2) exterior doors located in an Auxiliary Building stairwell were blocked open for ventilation purposes in support of painting activities. These doors are part of the Enclosure Building Filtration System (EBFS) boundary and while opened, resulted in an untested EBFS boundary configuration. As a result, the EBFS boundary integrity was compromised and the Action Statement for Technical Specification (TS) Limiting Condition for Operation (LCO) 3.6.5.2 should have been entered but was not. On May 31, 2000, at 1434 hours, the unit entered Mode 3 from Mode 2 in order to troubleshoot control element assembly drive system problems. On June 1, 2000, at 0459 hours, a TS 3.0.4 violation occurred when the unit reentered Mode 2 from Mode 3 while the LCO Action Statement was in effect. This condition existed for approximately twenty-one (21) hours before EBFS boundary integrity was restored on June 1, 2000, at 0953 hours.

The root cause of this condition is attributed to inadequate interface among organizations. Specifically, the work order to paint the stairwell was incomplete in that it did not contain necessary details with regards to EBFS ventilation pathway considerations, or that stairwell doors may need to be blocked open during the performance of the work. This inadequacy was neither identified nor questioned during the work order review and approval processes and the painting was allowed to be added and performed late in the outage schedule without appropriate consideration given to the pending unit mode changes. As corrective actions, a briefing will be conducted for appropriate Operations personnel and enhancements made to applicable sections of the station work control procedure to address this condition.

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

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		2000	-- 009 --	00	

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

**I. Description of Event**

On May 31, 2000, at 1300 hours, with the unit in Mode 2 at 0 percent power, two (2) exterior doors [DR] (#205-14-002 and #208-38-00) located in an Auxiliary Building [NF] stairwell were blocked open for ventilation purposes in support of painting activities. These doors are part of the Enclosure Building Filtration System (EBFS) [VA] boundary and while opened, resulted in an untested EBFS boundary configuration. As a result, the EBFS boundary integrity was compromised and the Action Statement for Technical Specification (TS) Limiting Condition for Operation (LCO) 3.6.5.2 should have been entered but was not. On May 31, 2000, at 1434 hours, the unit entered Mode 3 from Mode 2 in order to troubleshoot control element assembly drive system [AA] problems. On June 1, 2000, at 0459 hours, a TS 3.0.4 violation occurred when the unit reentered Mode 2 from Mode 3 while the LCO Action Statement was in effect. This condition existed for approximately twenty-one (21) hours before EBFS boundary integrity was restored on June 1, 2000, at 0953 hours.

The Action Statement for LCO 3.6.5.2 (applicable in operating Modes 1 through 4), states that, "With the Enclosure Building inoperable, restore the Enclosure Building to OPERABLE status with 24 hours or be in COLD SHUTDOWN within the next 36 hours." Technical Specification 3.0.4 states that, "Entry into an OPERATIONAL MODE or other specified condition shall not be made when the conditions for the Limiting Condition for Operation are not met and the associated ACTION requires a shutdown if they are not met within a specified time interval. Entry into an OPERATIONAL MODE or specified condition may be made in accordance with ACTION requirements when conformance to them permits continued operations of the facility for an unlimited period of time. This provision shall not prevent passage through or to OPERATIONAL MODES as required to comply with ACTION requirements." Since LCO 3.6.5.2 action statement contains a shutdown requirement and does not contain a disclaimer which would allow Mode changes while in the LCO, TS 3.0.4 was applicable in this instance.

Although the unit did not properly log into the LCO 3.6.5.2 action statement when required, there was inadvertent compliance with the action statement since EBFS boundary integrity was restored within the 24-hour action statement requirement. However, when the unit changed modes on June 1, 2000, a violation of TS 3.0.4 occurred which is reportable in accordance with 10 CFR 50.73(a)(2)(i)(B), as an operation or condition prohibited by the plant's Technical Specifications.

**II. Cause of Event**

The root cause of this condition is attributed to inadequate interface among organizations. Specifically, the work order to paint the stairwell was incomplete in that it did not contain necessary details with regards to EBFS ventilation pathway considerations, or that stairwell doors may need to be blocked open during the performance of the work. This inadequacy was neither identified nor questioned during the work order review and approval processes and the painting was allowed to be included and performed late in the outage schedule while the unit was preparing to exit the refueling outage.

Prior to conducting the work the painters were instructed by the plant equipment operator to contact the control room to request permission prior to blocking open any doors (for ventilation purposes) in the stairwell area. The control room personnel on shift at the time did not exhibit a "questioning attitude" by not verifying door attributes prior to allowing them to be blocked open (Note: Operational Procedures were available to the control room which identifies these doors as part of the EBFS boundary and specifies TS requirements should a EBFS boundary door become inoperable).

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

III. Analysis of Event

As stated in the Bases section for LCO 3.6.5.2, the operability of the Enclosure Building Filtration System (EBFS) ensures that the releases of radioactive materials from the primary containment atmosphere will be restricted to those leakage paths and associated leak rates assumed in the accident analyses. This restriction, in conjunction with operation of the EBFS will limit the site boundary radiation doses to within the limits of 10CFR100 during accident conditions. Similarly, the Bases for TS 3.0.4 states that the purpose of this specification is to ensure that facility operation is not initiated or that higher modes of operation are not entered when corrective action is being taken to obtain compliance with a specification by restoring equipment to operable status or parameters to specified limits.

Of the two (2) doors in question, #205-14-002 is the boundary between the Auxiliary Building stairwell to the 14-foot, 6-inch elevation general area and #205-38-001 is the boundary between the Auxiliary Building stairwell and the Spent Fuel Pool area. There were no safety consequences as a result of this condition since at no time was there a direct opening to the environment nor challenges to the EBFS safety function during the time period the doors were blocked-open. Additionally, the EBFS boundary integrity was restored within the 24-hour requirement specified in the LCO 3.6.5.2 Action Statement. Consequently, this condition is not safety significant.

IV. Corrective Action

As a result of this condition, the following actions have been or will be performed:

1. The doors were closed and the enclosure building filtration integrity was restored (complete).
2. Prior to August 15, 2000, appropriate Operations personnel will be briefed on proper door breach protocol.
3. By September 30, 2000, enhancements will be made to applicable sections of the station work control procedure to address this condition.

In addition, other corrective actions are being addressed via the Millstone Corrective Action Program.

V. Additional Information

Similar Events

The following conditions involving past TS 3.0.4 violations were identified.

LER 1995-030: On July 28, 1995, at 0423 hours with the Plant in Mode 4, RCS temperature at 200°F and RCS pressure at 368 psig, Technical Specification 3.0.4, which provides limitations on changing Modes, was violated. The action required by Technical Specification LCO 3.4.9.1, "Pressure/Temperature Limits" was not completed prior to the Plant changing Modes, during an RCS heat up. Although the Operating crew at the time of the event believed the actions required by Technical Specification LCO 3.4.9.1 had been completed, the formal engineering evaluation required had not been completed prior to the Plant changing Modes. Corrective actions in the form of procedure changes and Operations Department briefings have been implemented to prevent the heat up rate limits of Technical Specification 3.4.9.1, or other Technical Specification limits from being challenged, such that Technical Specification 3.0.4 would not be violated under similar circumstances.

**LICENSEE EVENT REPORT (LER)**  
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		2000	-- 009	-- 00	

**TEXT** (If more space is required, use additional copies of NRC Form 366A) (17)

LER 1996-001: On January 4, 1996 at 1815 hours, with the plant in Mode 1 at 100% power, an engineering review identified that the Reactor Coolant System (RCS) heat up rate requirements of Technical Specification 3.4.9.1(a) were not satisfied during an RCS heat up on December 17, 1995. The RCS heat up rate was determined to be 72°F in a one hour period, which was in excess of the Technical Specification limit of 50°F per hour, and the action statement requirement to perform an engineering evaluation of the structural integrity of the RCS and its acceptability for continued operation was not performed until January 4, 1996. LCO 3.0.4 was violated when the plant continued to change modes to full power operation while not having met the actions of LCO 3.4.9.1(a). An Event Review Team was established to review the circumstances concerning this event, and to review the adequacy of the corrective actions from the July 1995 RCS heat up event. Planned corrective actions include changes to the plant operating procedures, changes to the plant heat-up/cool-down monitoring computer program, and operator training concerning this event and the July 1995 RCS heat up event.

Energy Industry Identification System (EIIIS) codes are identified in the text as [XX].