

Dominion Nuclear Connecticut, Inc.
Millstone Power Station
Rope Ferry Road
Waterford, CT 06385



JUL 18 2002

Docket No. 50-336
B18688

RE: 10 CFR 50.73(a)(2)(i)(B)

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

Millstone Nuclear Power Station, Unit No. 2
Licensee Event Report 2002-003-00
Failure to Comply With Technical Specification Action Statement
for One Diesel Generator Inoperable

This letter forwards Licensee Event Report (LER) 2002-003-00, documenting a condition that was discovered at Millstone Unit No. 2 on May 22, 2002. This LER is being submitted pursuant to 10 CFR 50.73(a)(2)(i)(B).

There are no regulatory commitments contained within this letter.

Should you have any questions regarding this submittal, please contact Mr. David W. Dodson at (860) 447-1791, extension 2346.

Very truly yours,

DOMINION NUCLEAR CONNECTICUT, INC.



J. Alan Price
Site Vice President - Millstone

Attachment (1): LER 2002-003-00

cc: H.J. Miller, Region I Administrator
R.B. Ennis, NRC Senior Project Manager, Millstone Unit No. 2
NRC Senior Resident Inspector, Millstone Unit No. 2

ILS

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Attachment 1

Millstone Nuclear Power Station, Unit No. 2

LER 2002-003-00

Estimated burden per response to comply with this mandatory information collection request: 50 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the Records Management Branch (T-6 E6), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to bjs1@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 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.

LICENSEE EVENT REPORT (LER)

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

| | | |
|--|--------------------------------------|---------------------------|
| FACILITY NAME (1) Millstone Nuclear Power Station - Unit 2 | DOCKET NUMBER (2) 05000336 | PAGE (3) 1 OF 3 |
|--|--------------------------------------|---------------------------|

TITLE (4)
Failure to Comply With Technical Specification Action Statement for One Diesel Generator Inoperable

| EVENT DATE (5) | | | LER NUMBER (6) | | | REPORT DATE (7) | | | OTHER FACILITIES INVOLVED (8) | |
|----------------|-----|------|----------------|-------------------|---------|-----------------|-----|------|-------------------------------|------------------------|
| MO | DAY | YEAR | YEAR | SEQUENTIAL NUMBER | REV NO. | MO | DAY | YEAR | FACILITY NAME | DOCKET NUMBER |
| 05 | 22 | 2002 | 2002 | - 003 | - 00 | 07 | 18 | 2002 | FACILITY NAME | DOCKET NUMBER 05000 |
| | | | | | | | | | FACILITY NAME | DOCKET NUMBER 05000 |

| | | | | | | |
|---------------------------|-----|---|---|--------------------|----------------------|---|
| OPERATING MODE (9) | 1 | THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check all that apply) (11) | | | | |
| | | 20.2201(b) | | 20.2203(a)(3)(ii) | 50.73(a)(2)(ii)(B) | 50.73(a)(2)(ix)(A) |
| POWER LEVEL (10) | 100 | 20.2201(d) | | 20.2203(a)(4) | 50.73(a)(2)(iii) | 50.73(a)(2)(x) |
| | | 20.2203(a)(1) | | 50.36(c)(1)(i)(A) | 50.73(a)(2)(iv)(A) | 73.71(a)(4) |
| | | 20.2203(a)(2)(i) | | 50.36(c)(1)(ii)(A) | 50.73(a)(2)(v)(A) | 73.71(a)(5) |
| | | 20.2203(a)(2)(ii) | | 50.36(c)(2) | 50.73(a)(2)(v)(B) | OTHER |
| | | 20.2203(a)(2)(iii) | | 50.46(a)(3)(ii) | 50.73(a)(2)(v)(C) | Specify in Abstract below or in NRC Form 366A |
| | | 20.2203(a)(2)(iv) | | 50.73(a)(2)(i)(A) | 50.73(a)(2)(v)(D) | |
| | | 20.2203(a)(2)(v) | X | 50.73(a)(2)(i)(B) | 50.73(a)(2)(vii) | |
| | | 20.2203(a)(2)(vi) | | 50.73(a)(2)(i)(C) | 50.73(a)(2)(viii)(A) | |
| | | 20.2203(a)(3)(i) | | 50.73(a)(2)(ii)(A) | 50.73(a)(2)(viii)(B) | |

| | |
|---|--|
| LICENSEE CONTACT FOR THIS LER (12) | |
| NAME David W. Dodson, Supervisor-Licensing | TELEPHONE NUMBER (Include Area Code) 860-447-1791 |

| 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 |
| | | | | | | | | | |

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|---|--|-------|-----|--------------------------------------|--|--|
| SUPPLEMENTAL REPORT EXPECTED (14) | | | | EXPECTED SUBMISSION DATE (15) | | |
| <input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE). | <input checked="" type="checkbox"/> NO | MONTH | DAY | YEAR | | |

ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines)(16)

On May 22, 2002, with the Unit in Mode 1 at 100% power and one emergency diesel generator (EDG) inoperable due to planned EDG testing, Operations personnel failed to perform verification of offsite power sources within one hour as required by Technical Specification (TS) 3.8.1.1, action b.1. The action to verify offsite power sources is met by completion of surveillance requirement 4.8.1.1.1 which calls for verification of correct breaker alignment and indicated power available for each required offsite circuit.

This human error was caused by an inadequate procedure design. Although the surveillance procedure requires the user to determine the applicability of TS 3.8.1.1, there is no specific step or sign-off to ensure that the action statement is met. The corrective action to prevent recurrence is to revise the monthly EDG surveillance procedures to provide an action step to complete the one hour offsite circuit TS action statement before proceeding further with the procedure. Personnel involved in the event were counseled.

Upon discovery of this condition, approximately three and three quarter hours into the diesel testing, appropriate action was taken to complete the missed verification activity required by TS 3.8.1.1, action b.1, and the required offsite power sources were determined to be available. Off-site power sources remained available at all times during the EDG testing.

LICENSEE EVENT REPORT (LER)

| FACILITY NAME (1) | DOCKET (2) | LER NUMBER (6) | | | PAGE (3) |
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| Millstone Nuclear Power Station - Unit 2 | 05000336 | YEAR | SEQUENTIAL NUMBER | REVISION NUMBER | 2 OF 3 |
| | | 2002 | -- 003 | -- 00 | |

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

1. Event Description

On May 22, 2002, with the Unit in Mode 1 at 100% power and one emergency diesel generator (EDG) [DG] [EK] inoperable due to planned EDG testing, Operations personnel failed to perform verification of offsite power sources within one hour as required by Technical Specification (TS) 3.8.1.1, action b.1. The action to verify offsite power sources is met by completion of surveillance requirement 4.8.1.1.1 which calls for verification of correct breaker alignment and indicated power available for each required offsite circuit.

At 10:14 on May 22, 2002, the "A" EDG was declared inoperable in order to perform a pre-planned slow start operability test (TS Surveillance Requirement 4.8.1.1.1). The control operator performing the diesel slow start operability test had reviewed the Technical Specifications and the associated procedure for the verification of offsite power circuits, which contained the guidance for the one-hour requirement, during the pre-job brief. Once the operability test was begun, the operator's focus was on component manipulation and the verification of offsite power sources did not occur within the required timeframe. Approximately three and three quarter hours into the EDG test, the error was realized and late verification of offsite circuits was successfully completed and accepted by the Control Room at 14:01 (3 hours and 47 minutes from when "A" EDG was declared inoperable).

This condition is being reported in accordance with 10 CFR 50.73(a)(2)(i)(B), any operation or condition prohibited by the plant's Technical Specifications.

2. Cause

This human error was caused by an inadequate procedure design. Although the surveillance procedure requires the user to determine the applicability of TS 3.8.1.1 and sign off that this has been completed, there is no specific step or sign-off to ensure that the TS action statement is met. Additionally, a contributing cause of this event was poor work practice. Although the control operator determined that the offsite circuit verification was applicable, the decision was made to continue with the EDG procedure instead of stopping to perform the circuit verification.

3. Assessment of Safety Consequences

TS 3.8.1.1.b requires two separate and independent diesel generators be operable in Modes 1 through 4. When one diesel generator is inoperable, TS 3.8.1.1, action b.1, requires verification of offsite circuits within one hour and every eight hours thereafter. This verification activity was not completed until three hours and 47 minutes after the "A" EDG was inoperable; however, when the required surveillance was performed, the offsite sources were determined to be available. Off-site power sources remained available at all times during the EDG testing.

This condition is considered to be of low safety significance and a loss of safety function for the AC electrical power sources did not occur.

4. Corrective Action

Upon discovery of this condition, appropriate action was taken to complete the missed verification activity required by TS 3.8.1.1, action.b.1, and the required offsite power sources were determined to be available. To prevent recurrence, the monthly EDG surveillance procedure has been revised to provide an action step to complete the one hour offsite circuit TS action statement before proceeding further with the procedure. Personnel involved in the event were counseled.

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|--|------------|----------------|----------------------|--------------------|----------|
| Millstone Nuclear Power Station - Unit 2 | 05000336 | YEAR | SEQUENTIAL NUMBER | REVISION NUMBER | 3 OF 3 |
| | | 2002 | -- 003 -- | 00 | |

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

5. Previous Occurrences

LER 2000-015-00: "Millstone Nuclear Power Station, Unit No. 2, Licensee Event Report 2000-015-00, Failure to Comply With Technical Specification Action Statement for One Diesel Generator Inoperable, " dated November 20, 2000.

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