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From: David Silk  
To: Jamie Benjamin; Max Schneider; Paul Krohn; Silas Kennedy  
Date: 4/18/05 12:05PM  
Subject: Re: Millstone Alert

Upon closer investigation, BA2 is applicable and therefore the Alert was appropriate. I was mistaken in that I thought that the barrier table reference (3rd page of the EALs) fed into BA2. BA2 is a stand alone EAL. This particular event (steam break outside of containment) is usually not a classifiable event at other sites which have the NUMARC EAL. I apologize for the confusion.

>>> Max Schneider 04/18/05 11:24AM >>>  
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What revision of the Millstone EALs are you looking at? I have Rev 001-03 dated 11/26/03. In this EAL the words, "unisolable steam line break outside containment", appear in the barrier failure column under Steam Line Break (BA2).

I agree that this review (what EAL was entered, why, etc), will be part of a follow-up NRC inspection effort (likely a SIT). Its probably best if you provide your insights to this team when it is established. If they decide not to do a SIT, then the residents can follow-up your concerns with the licensee.

Thanks, Max.

>>> David Silk 04/18/05 11:08AM >>>

- 1) There is no phrase "unisolable steam line break outside containment" in their EALs.
- 2) The only time a nonisolable steam break plays into the EALs is when it is concurrent with a SGTR or SGTL.
- 3) If they did meet the criteria for a Containment barrier breach, then according to their flow/logic path it would only be an Unusual Event (Delta-one).

I left a message with the EP manager (Patti Luckey) to get their take on how they were scoring this declaration in PI-space and how they thought the declaration process went in general. I did not indicate that I was questioning their call so as not to interfere with their "critique" process.

>>> Max Schneider 04/18/05 10:21AM >>>  
Basis?

>>> David Silk 04/18/05 09:33AM >>>

Thanks for the info. However, based upon my assessment of the facts and their EALs, it appears that the Alert declaration was unfounded.

>>> Max Schneider 04/18/05 09:20AM >>>  
Dave,

The declaration was from the Unit 3 EAL table under Barrier Failure for Steam Line Break (BA2) for an unisolable steam line break outside containment. The SM declared this at 0842 (event initiated at 0829) when a "B" MSSV did not reclose after lifting (it also apparently lifted about 40# below its setpoint).

Max.

>>> David Silk 04/18/05 09:14AM >>>

I just found out about the event this morning. While reviewing the event notification and listening to the info at the morning meeting, I do not understand the basis for the Alert declaration. The stated reason by

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the licensee in the EN was that there was a failure on at least one MSSV to reclose. There is no such EAL criteria in their scheme (Rev 31, 12/04). Aside from a judgement call, I find no reason for making any emergency declaration due to a secondary steam release.

I have not seen or heard of a specific EAL number ascribed to the Alert declaration. Has anyone heard of one? Thanks.

**CC:** Felicia Hinson; Nancy McNamara; Neil Perry; Raymond Lorson; Wayne Lanning