

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



Dominion™

JUN 9 2006

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

Serial No. 06-477
MPS Lic/GJC R0
Docket No. 50-336
License No. DPR-65

DOMINION NUCLEAR CONNECTICUT, INC.
MILLSTONE POWER STATION UNIT 2
LICENSEE EVENT REPORT 2006-004-00,
FAILURE TO ENTER THE TECHNICAL SPECIFICATION
ACTION STATEMENT FOR INOPERABLE REACTOR
PROTECTION SYSTEM TRIPS

This letter forwards Licensee Event Report (LER) 2006-004-00, documenting a historical incident that was determined to be reportable at Millstone Power Station Unit 2, on April 13, 2006. This LER is being submitted pursuant to 10 CFR 50.73(a)(2)(i)(B), as operation in a condition prohibited by the Technical Specifications.

If you have any questions or require additional information, please contact Mr. David W. Dodson at (860) 447-1791, extension 2346.

Very truly yours,


J. Alan Price
Site Vice President - Millstone

JE22

Attachments: 1

Commitments made in this letter: None.

cc: U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406-1415

Mr. V. Nerses
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U.S. Nuclear Regulatory Commission
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Mr. S. M. Schneider
NRC Senior Resident Inspector
Millstone Power Station

Attachment 1

Licensee Event Report 2006-004-00,
Failure to Enter the Technical Specification Action
Statement for Inoperable Reactor Protection System Trips

Millstone Power Station Unit 2
Dominion Nuclear Connecticut, Inc. (DNC)

NRC FORM 366 (6-2004)		U.S. NUCLEAR REGULATORY COMMISSION		APPROVED BY OMB NO. 3150-0104		EXPIRES 06/30/2007		
LICENSEE EVENT REPORT (LER) (See reverse for required number of digits/characters for each block)								
1. FACILITY NAME Millstone Power Station - Unit 2				2. DOCKET NUMBER 05000336		3. PAGE 1 OF 3		
4. TITLE Failure to Enter the Technical Specification Action Statement for Inoperable Reactor Protection System Trips								
5. EVENT DATE			6. LER NUMBER		7. REPORT DATE		8. OTHER FACILITIES INVOLVED	
MO	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NO.	MO	DAY	YEAR
04	13	2006	2006 - 004 - 00			06	09	2006
						FACILITY NAME		DOCKET NUMBER 05000
						FACILITY NAME		DOCKET NUMBER 05000
9. OPERATING MODE		1		11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check all that apply)				
				20.2201(b)		20.2203(a)(3)(ii)		50.73(a)(2)(ii)(B)
				20.2201(d)		20.2203(a)(4)		50.73(a)(2)(iii)
				20.2203(a)(1)		50.36(c)(1)(i)(A)		50.73(a)(2)(iv)(A)
				20.2203(a)(2)(i)		50.36(c)(1)(ii)(A)		50.73(a)(2)(v)(A)
				20.2203(a)(2)(ii)		50.36(c)(2)		50.73(a)(2)(v)(B)
				20.2203(a)(2)(iii)		50.46(a)(3)(ii)		50.73(a)(2)(v)(C)
				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)
Specify in Abstract below or In NRC Form 366A								
12. LICENSEE CONTACT FOR THIS LER								
NAME David W. Dodson, Supervisor Nuclear Station Licensing						TELEPHONE NUMBER (Include Area Code) 860-447-1791		
13. COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT								
CAUSE	SYSTEM	COMPONENT	MANU- FACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANU- FACTURER
14. SUPPLEMENTAL REPORT EXPECTED						15. EXPECTED		
<input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE).						<input checked="" type="checkbox"/> NO		
						SUBMISSION DATE		
						MONTH		
						DAY		
						YEAR		
16. ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines)								
<p>During the course of an NRC inspection activity, a concern was raised regarding compliance with Technical Specification Limiting Condition for Operation (TS LCO) 3.3.1.1, which requires that, "as a minimum, the reactor protective (RPS) instrumentation channels and bypasses of table 3.3-1 shall be OPERABLE." Historically, Wide Range Nuclear Instrumentation (WRNI) channels were removed from service at power without declaring the associated channel of Thermal Margin/Low Power (TM/LP), Reactor Coolant System (RCS) Low - Flow, and Reactor Power Level - High inoperable. With the WRNI input inoperable, the associated automatic bypass reset function for the affected channel is also inoperable.</p> <p>It was identified that this condition occurred multiple times over the last three years, and for a duration that exceeded the allowed outage time and shutdown time of the associated TSAS.</p> <p>On this basis the condition is reportable pursuant to 10 CFR 50.73(a)(2)(i)(B), as operation in a condition prohibited by the Technical Specifications.</p> <p>The cause was determined to be a weakness in licensed operator knowledge of the relationship between the WRNIs and the RPS Automatic Bypass Removal functions.</p> <p>There were no safety consequences associated with this event.</p>								

LICENSEE EVENT REPORT (LER)

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		2006	-- 004	-- 00	

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

1. Background

For MPS Unit 2, the Reactor Protection System (RPS) [JC] consists of 4 separate channels each containing a bistable trip unit for the following parameters:

- Reactor Power Level – High
- Reactor Coolant Flow – Low
- Pressurizer Pressure – High
- Containment Pressure – High
- Steam Generator Pressure – Low
- Steam Generator Water Level – Low
- Local Power Density – High
- Thermal Margin/Low Pressure (TM/LP)
- Loss of Turbine – Hydraulic Fluid Pressure – Low

The TM/LP, and the Reactor Coolant System (RCS) [AB] Low Flow reactor trips, and the ΔT input to the Reactor Power Level – High reactor trip may be bypassed if reactor power, as determined by the Wide Range Nuclear Instrumentation (WRNI), is less than 5% rated thermal power. Above this power level the ability to bypass these trips/inputs is automatically removed.

While the WRNIs are not specifically required by TS to be operable in Modes 1, and 2, they provide input to the automatic bypass defeat function for the TM/LP, RCS Low Flow, and Reactor Power Level – High RPS trips. These trips are required in Modes 1 and 2. TS LCO 3.3.1.1 requires that, "as a minimum, the reactor protective (RPS) instrumentation channels and bypasses of table 3.3-1 shall be OPERABLE." If a WRNI channel is removed from service, the automatic removal of the TM/LP, RCS Low Flow, and Reactor Power Level – High bypass is also lost for that channel.

2. Event Description

Technical Specification Action Statement (TSAS) 3.3.1.1 Action 2 requires that with the number of operable channels one less than the total number of channels, "operation may continue" provided the inoperable channel is placed in either the bypassed or tripped condition within 1 hour. Failure to place the channel in bypass or trip would require entry into TSAS 3.0.3 to facilitate a shutdown of the unit.

A review of the maintenance history for the last three years indicated that on several occasions (10) the WRNI channels were calibrated in Mode 1. During this maintenance activity the TM/LP, RCS Low Flow, and Reactor Power Level – High reactor trips were not placed in the bypassed or tripped condition per TSAS 3.3.1.1 Action 2, and TSAS 3.0.3 was not entered. In each of these instances the duration of the maintenance activity exceeded the time allowed by TSAS for completion of the required actions. On this basis the condition is reportable pursuant to 10 CFR 50.73(a)(2)(i)(B), as operation in a condition prohibited by the Technical Specifications.

3. Cause

The cause was determined to be a weakness in licensed operator knowledge of the relationship between the WRNIs and the RPS Automatic Bypass Defeat function in that although the WRNIs are not specifically required by TS to be operable in Modes 1, and 2, they provide input to the automatic bypass defeat function for the TM/LP, RCS Low Flow, and Reactor Power Level – High RPS trips. These trips are required in Modes 1 and 2.

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

4. Assessment of Safety Consequences

In order to bypass the TM/LP, RCS Low Flow, and Reactor Power Level – High reactor trips, the reactor must be < 5% reactor thermal power and the Zero Mode Bypass Switch must be in the bypass position. During the calibration of the WRNIs the Zero Mode Bypass Switch is in the normal (off) position, therefore, the TM/LP, RCS Low Flow, and Reactor Power Level – High reactor trips were always available. Accordingly, there are no safety consequences associated with this event.

5. Corrective Action

The actions to prevent recurrence include training the Operators on this incident, revision of appropriate station procedures to address this incident, and evaluating the need for a TS change.

Additionally a Night Order has been issued instructing the operators to declare the TM/LP, RCS Low Flow, and Reactor Power Level – High reactor trips inoperable for the affected channel and enter TSAS 3.3.1.1. Action 2, when the associated WRNIs are inoperable.

Additional corrective actions are being taken in accordance with the station's corrective action program.

6. Previous Occurrences

No previous similar events/conditions were identified.

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