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

Dominion℠

JAN 1 1 2010

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

Serial No. 09-789
MPS Lic/TGC R0
Docket No. 50-336
License No. DPR-65

DOMINION NUCLEAR CONNECTICUT, INC.
MILLSTONE POWER STATION UNIT 2
LICENSEE EVENT REPORT 2009-004-00

This letter forwards Licensee Event Report (LER) 2009-004-00 documenting a condition discovered at Millstone Power Station Unit 2, on November 11, 2009. This LER is being submitted pursuant to 10 CFR 50.73(a)(2)(i)(B) as a condition prohibited by Technical Specifications.

If you have any questions or require additional information, please contact Mr. William D. Bartron at (860) 444-4301.

Sincerely,

A. J. Jordan
Site Vice President – Millstone

Attachments: 1

Commitments made in this letter: None

IE22
NRR

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

Ms. C. J. Sanders
Project Manager
U.S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Mail Stop 08B3
Rockville, MD 20852-2738

NRC Senior Resident Inspector
Millstone Power Station

ATTACHMENT

LICENSEE EVENT REPORT 2009-004-00

MILLSTONE POWER STATION UNIT 2
DOMINION NUCLEAR CONNECTICUT, INC.

NRC FORM 366 U.S. NUCLEAR REGULATORY COMMISSION
(9-2007)

APPROVED BY OMB: NO. 3150-0104 EXPIRES: 08/31/2010

Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the Records and FOIA/Privacy Service Branch (T-5 F52), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to infocollects@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 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.

LICENSEE EVENT REPORT (LER)

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

1. FACILITY NAME	2. DOCKET NUMBER	3. PAGE
Millstone Power Station - Unit 2	05000336	1 OF 3

4. TITLE

Overdue ASME Code Required Inservice Test Did Not Meet Acceptance Criteria

5. EVENT DATE			6. LER NUMBER			7. REPORT DATE			8. OTHER FACILITIES INVOLVED	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NO.	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
										05000
11	11	2009	2009	– 004 –	00	01	11	2010	FACILITY NAME	DOCKET NUMBER
										05000

9. OPERATING MODE

5

10. POWER LEVEL

000

11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: *(Check all that apply)*

☐ 20.2201(b)	☐ 20.2203(a)(3)(i)	☐ 50.73(a)(2)(i)(C)	☐ 50.73(a)(2)(vii)
☐ 20.2201(d)	☐ 20.2203(a)(3)(ii)	☐ 50.73(a)(2)(ii)(A)	☐ 50.73(a)(2)(viii)(A)
☐ 20.2203(a)(1)	☐ 20.2203(a)(4)	☐ 50.73(a)(2)(ii)(B)	☐ 50.73(a)(2)(viii)(B)
☐ 20.2203(a)(2)(i)	☐ 50.36(c)(1)(i)(A)	☐ 50.73(a)(2)(iii)	☐ 50.73(a)(2)(ix)(A)
☐ 20.2203(a)(2)(ii)	☐ 50.36(c)(1)(ii)(A)	☐ 50.73(a)(2)(iv)(A)	☐ 50.73(a)(2)(x)
☐ 20.2203(a)(2)(iii)	☐ 50.36(c)(2)	☐ 50.73(a)(2)(v)(A)	☐ 73.71(a)(4)
☐ 20.2203(a)(2)(iv)	☐ 50.46(a)(3)(ii)	☐ 50.73(a)(2)(v)(B)	☐ 73.71(a)(5)
☐ 20.2203(a)(2)(v)	☐ 50.73(a)(2)(i)(A)	☐ 50.73(a)(2)(v)(C)	☐ OTHER
☐ 20.2203(a)(2)(vi)	☒ 50.73(a)(2)(i)(B)	☐ 50.73(a)(2)(v)(D)	Specify in Abstract below or in NRC Form 366A

12. LICENSEE CONTACT FOR THIS LER

FACILITY NAME	TELEPHONE NUMBER (Include Area Code)
William D. Bartron, Supervisor Nuclear Station Licensing	860-444-4301

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	REPORTABLE TO EPIX

14. SUPPLEMENTAL REPORT EXPECTED

☐ YES (If yes, complete 15. EXPECTED SUBMISSION DATE) ☒ NO

15. EXPECTED SUBMISSION DATE

MONTH	DAY	YEAR

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

On November 11, 2009, while Millstone Power Station Unit 2 was in Mode 5 at 0% power, the operators discovered a thermal relief valve was not tested or replaced within the allowed time interval as required by the ASME OM Code Mandatory Appendix 1, paragraph I-1390, and when subsequently tested the valve failed its acceptance criteria. The relief valve is on the inlet to the 'B' containment spray pump seal cooler and was replaced with a fully operational valve approximately seven and a half months beyond the end of the current ten year test interval. This condition was determined to be of low safety significance because at no time during the period when the relief valve was considered 'failed' were plant systems configured such that the relief valve would have been required to provide its relief function, and therefore no safety systems or components were inoperable and incapable of performing their safety functions.

The cause was determined to be failure to follow procedures. The planners were briefed on the event and counseled on the need to follow station procedure requirements. The relief valve was replaced with an operational valve.

This event is reportable as an operation or condition prohibited by Technical Specification per 10 CFR 50.73 (a)(2)(i)(B).

1. Event Description

On November 11, 2009, while Millstone Power Station Unit 2 (MPS2) was in Mode 5 at 0% power, the operators discovered a thermal relief valve [RV] in the inservice test (IST) program was not tested or replaced within the allowed time interval as required by the ASME OM Code Mandatory Appendix 1, paragraph I-1390, and when subsequently tested the valve failed its acceptance criteria. The IST program requires class 2 and 3 pressure relief devices used for thermal relief be tested or replaced on a ten year interval, i.e., once per ten years. Technical Specification (TS) 4.0.5 invokes ASME Code (Code) requirements and specifically excludes Code required ISTs with frequencies greater than 2 years from the provisions of TS 4.0.2 (maximum 25% grace period). The valve was replaced approximately seven and a half months beyond the end of the current ten year test interval. The relief valve is on the inlet to the 'B' containment spray pump seal cooler [BE, P, CLR]. NUREG 1022, '*Event Reporting Guidelines, 10 CFR 50.72 and 50.73*' provides guidance that if a surveillance test is performed beyond its required scheduled date and fails, it is assumed the failure occurred at the time the test should have been performed. It is therefore assumed the valve was not capable of performing its relief function for approximately seven and a half months.

This event is reportable as an operation or condition prohibited by Technical Specifications per 10 CFR 50.73 (a)(2)(i)(B).

MPS2 is designed such that a closed cooling water system (reactor building closed cooling water {RBCCW} [CC]) is utilized to cool equipment that could be potentially contaminated (e.g., low and high pressure safety injection pumps, containment spray pumps, and shutdown heat exchangers). Where the piping configuration is such that a portion of the system could be isolated and its contents heated up, the Code requires a relief valve be installed for thermal protection of the piping.

Upon investigation it was determined that at no time during the period when the relief valve was considered 'failed' was the RBCCW system configured such that the relief valve would have been required to provide its relief function.

2. Cause

The cause of the missed IST was determined to be failure to follow procedures. The preventive maintenance (PM) program was selected as the vehicle to ensure the IST surveillance frequency requirements were met. The PM program is controlled by procedure and requires a basis for any changes to a PM frequency. The governing procedure required a preventive maintenance change request (PMCR) be generated. In this case the planner changed the required completion date on these components without initiating PMCR(s). The PMCR(s) would have provided for the review of the requested due date changes for acceptability as well as documenting the basis for the date changes.

3. Assessment of Safety Consequences

This condition was determined to be of low safety significance because at no time during the period when the relief valve was considered 'failed' was the RBCCW system configured such that the relief valve would have been required to provide its relief function, and therefore no safety systems or components were inoperable and incapable of performing their safety functions.

4. Corrective Action

The planners were briefed on the event and counseled on the need to follow station procedure requirements.

The relief valve was replaced with an operational valve. Additional corrective actions will be evaluated in accordance with the station's corrective action program.

The extent of condition review determined there are 51 thermal relief valves at MPS2. The required completion dates for these valves have been reviewed and no other issues were found. There are 56 thermal relief valves on MPS3. The test history for these valves was reviewed and all 56 valves have been tested within the last ten years.

5. Previous Occurrences

No previous similar events/conditions were identified.

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