**NORTHEAST UTILITIES**
The Connecticut Light And Power Company
Western Massachusetts Electric Company
Holyoke Water Power Company
Northeast Utilities Service Company
Northeast Nuclear Energy Company

General Offices · Selden Street, Berlin Connecticut

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Re: 10CFR50.73(a)(2)(i)
February 5, 1991
MP-91-112

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

Reference: Facility Operating License No. DPR-65
Docket No. 50-336
Licensee Event Report 90-004-01

Gentlemen:

This letter forwards update Licensee Event Report 90-004-01 required to be submitted pursuant to 50.73(a)(2)(i) and in response to the Notice of Violation, Inspection Report 50-336/90-1.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

Stephen E. Scace
Director, Millstone Station

SES/JMB:mo

Attachment: LER 90-004-01

cc: T. T. Martin, Region I Administrator
W. J. Raymond, Senior Resident Inspector, Millstone Unit Nos. 1, 2 and 3
G. S. Vissing, NRC Project Manager, Millstone Unit No. 2

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NRC Form 366 (6-89)

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO. 3150-0104
EXPIRES: 4/30/92

Estimated burden per response to comply with this information collection request: 50.0 hrs. Forward comments regarding burden estimate to the Records and Reports Management Branch (P-530), U.S. Nuclear Regulatory Commission, Washington, DC 20555, and to the Paperwork Reduction Project (3150-0104), Office of Management and Budget, Washington, DC 20503.

# LICENSEE EVENT REPORT (LER)

| FACILITY NAME (1) | DOCKET NUMBER (2) | PAGE (3) |
|---|---|---|
| Millstone Nuclear Power Station Unit 2 | 0 5 0 0 0 3 3 6 | 1 OF 0 2 |

TITLE (4)

Control Room Ventilation Technical Specification Violation

| 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 NAMES | |
| 0 2 | 2 8 | 9 0 | 9 0 | 0 0 4 | | 0 1 | 0 2 | 0 5 | 9 1 | | 0 5 0 0 0 |
| | | | | | | | | | | | 0 5 0 0 0 |

| OPERATING MODE (9) | | THIS REPORT IS BEING SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11) | | | |
|---|---|---|---|---|---|
| | 6 | 20.402(b) | 20.402(c) | 50.73(a)(2)(iv) | 73.71(b) |
| POWER LEVEL (10) | 0 0 0 | 20.405(a)(1)(i) | 50.36(c)(1) | 50.73(a)(2)(v) | 73.71(c) |
| | | 20.405(a)(1)(ii) | 50.36(c)(2) | 50.73(a)(2)(vii) | OTHER (Specify in Abstract below and in Text, NRC Form 366A) |
| | | 20.405(a)(1)(iii) | X 50.73(a)(2)(i) | 50.73(a)(2)(viii)(A) | |
| | | 20.405(a)(1)(iv) | 50.73(a)(2)(ii) | 50.73(a)(2)(viii)(B) | |
| | | 20.405(a)(1)(v) | 50.73(a)(2)(iii) | 50.73(a)(2)(x) | |

LICENSEE CONTACT FOR THIS LER (12)

| NAME | TELEPHONE NUMBER |
|---|---|
| | AREA CODE |
| Joseph M. Bergin, Ext. 5352 | 2 0 3 4 4 7 - 1 7 9 1 |

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

| CAUSE | SYSTEM | COMPONENT | MANUFAC-TURER | REPORTABLE TO NPRDS | | CAUSE | SYSTEM | COMPONENT | MANUFAC-TURER | REPORTABLE TO NPRDS | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | | | | | | | | |
| | | | | | | | | | | | |

| SUPPLEMENTAL REPORT EXPECTED (14) | | EXPECTED SUBMISSION DATE (15) | MONTH | DAY | YEAR |
|---|---|---|---|---|---|
| YES (If yes, complete EXPECTED SUBMISSION DATE) | X NO | | | | |

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


On February 28, 1991 with the Unit in Mode 6, Refueling, it was determined that the Unit was not satisfying Technical Specification 3.7.6.1, for Control Room Air Conditioning, (CRAC). This Specification requires that two independent emergency ventilation systems be OPERABLE, while in modes 5 or 6. With one emergency ventilation system inoperable, restore the inoperable system to operable status within 7 days or initiate and maintain the operable control room emergency air clean up system in the recirculation mode. The definition of OPERABILITY requires an Emergency Diesel Generator to be available. After seven days of performing Maintenance on the Emergency Diesel Generator for the "A" facility the "B" CRAC was placed in the recirculation mode of operation, on February 27 at 22:26 hours. Two hours later on February 28 at 00:25 hours, the "B" CRAC was taken out of the recirculation mode of operation and placed in normal until 16:31 hours on February 28. The CRAC was taken out of recirculation on the basis of Technical Specification 3.05 which states that when a system is declared inoperable solely because of its emergency or normal power supply being inoperable, it may be considered operable if the normal or emergency power supply is operable and all redundant systems are operable. After approximately 16 hours of operation with the CRAC in the normal mode it was determined that Technical Specification 3.05 did not apply for Mode 5 or 6 and the CRAC was placed in the recirculation mode. A Technical Specification change has been processed to eliminate the requirement for placing the operable CRAC in recirculation mode when the other facility is inoperable due only to its associated Emergency Diesel Generator being inoperable. There are no safety implications as a result of this incident.

I. Description of Event

On February 28, 1989 at 16:00 hours, with the Unit in mode 6, Refueling at 79 degrees, it was determined that the Unit had operated outside of the Technical Specifications for Control Room Air Conditioning System for 16 hours. During the course of normal scheduled maintenance the "A" Emergency Diesel Generator was removed from service. This activity is allowed per the Unit's Technical Specification 3.8.1.2.

After seven days of performing maintenance on the "A Facility" Emergency Diesel Generator, the "B" CRAC was placed in the recirculation mode of operation, on February 27 at 22:26 hours, per the requirements of Technical Specification 3.7.6.1. Two hours later on February 28 at 00:25 hours, the "B" CRAC was taken out of the recirculation mode of operation and left in normal until 16:31 hours on February 28. The CRAC was taken out of recirculation on the basis of Technical Specification 3.05 which states that when a system is declared inoperable solely because its emergency or normal power supply is inoperable, it may be considered operable if the normal or emergency power supply is operable and all redundant systems are operable. After approximately 16 hours of operation with the CRAC in the normal mode it was determined that Technical Specification 3.05 did not apply for Mode 5 or 6 and the CRAC was placed in the recirculation mode.

II. Cause of Event

The root cause of this event is an inconsistency in the Technical Specifications. During Unit operation in Modes 5 and 6, Technical Specification 3.7.6.1 requires both trains of the Control Room Air Conditioning system be OPERABLE. The definition of OPERABILITY requires all support equipment required to make a component or system OPERABLE, shall also be OPERABLE. Per Technical Specification 3.8.1.2 one Diesel Generator can be removed from service in modes 5 and 6. This action will place the Unit in Technical Specification Action Statement 3.7.6.1 a. per the definition of operability.

III. Analysis of Event

This event is being reported pursuant to the requirements of 10 CFR 50.73(a)(2)(i). There are no safety consequences as a result of this event. There were no safety systems out of service as a result of this event. This report is being submitted at this time in response to the requirements of the Notice of Violation Inspection Report 50-336/90-1.

IV. Corrective Action

A Technical Specification Change Request has been approved, which eliminates the requirement for the operability of the Emergency Diesel Generator to support the operability of the affected train of Control Room Air Conditioning while in modes 5 & 6.

V. Additional Information

There were no failed components during this event

Similar LERs: None