NRC FORM 366
(7-77)

U. S. NUCLEAR REGULATORY COMMISSION

LICENSEE EVENT REPORT

CONTROL BLOCK: ① (PLEASE PRINT OR TYPE ALL REQUIRED INFORMATION)

0 1	M E M Y P 1	②	0 0 - 0 0 0 0 0 - 0 0	③	4 1 1 1 1	④		⑤
	LICENSEE CODE		LICENSE NUMBER		LICENSE TYPE		CAT	

CON'T

0 1	REPORT SOURCE	L ⑥	0 5 0 0 0 3 0 9 ⑦	1 1 0 9 8 2 ⑧	1 2 1 4 8 2 ⑨
			DOCKET NUMBER	EVENT DATE	REPORT DATE

EVENT DESCRIPTION AND PROBABLE CONSEQUENCES ⑩

0 2 SEE ATTACHMENT

0 3

0 4

0 5

0 6

0 7

0 8

0 9	SYSTEM CODE	CAUSE CODE	CAUSE SUBCODE	COMPONENT CODE	COMP. SUBCODE	VALVE SUBCODE
	C F ⑪	X ⑫	Z ⑬	E N G I N E ⑭	Z ⑮	Z ⑯

⑰ LER/RO REPORT NUMBER

EVENT YEAR		SEQUENTIAL REPORT NO.		OCCURRENCE CODE	REPORT TYPE		REVISION NO.
8 2	—	0 3 8	/	0 3	L	—	0

ACTION TAKEN	FUTURE ACTION	EFFECT ON PLANT	SHUTDOWN METHOD	HOURS ㉒	ATTACHMENT SUBMITTED	NPRD-4 FORM SUB.	PRIME COMP. SUPPLIER	COMPONENT MANUFACTURER
X ⑱	X ⑲	Z ⑳	Z ㉑	0 0 0 0	Y ㉓	N ㉔	A ㉕	E 1 4 7 ㉖

CAUSE DESCRIPTION AND CORRECTIVE ACTIONS ㉗

1 0 SEE ATTACHMENT

1 1

1 2

1 3

1 4

	FACILITY STATUS	% POWER	OTHER STATUS ㉚	METHOD OF DISCOVERY	DISCOVERY DESCRIPTION ㉜
1 5	H ㉘	0 0 0 ㉙	NA	Z ㉛	NA

	ACTIVITY RELEASED	CONTENT OF RELEASE	AMOUNT OF ACTIVITY ㉟	LOCATION OF RELEASE ㊱
1 6	Z ㉝	Z ㉞	NA	NA

PERSONNEL EXPOSURES

	NUMBER	TYPE	DESCRIPTION ㊴
1 7	0 0 0 ㊲	Z ㊳	NA

PERSONNEL INJURIES

	NUMBER	DESCRIPTION ㊶
1 8	0 0 0 ㊵	NA

8212290306 821214
PDR ADOCK 05000309
S PDR

LOSS OF OR DAMAGE TO FACILITY ㊸

	TYPE	DESCRIPTION
1 9	Z ㊷	NA

PUBLICITY

	ISSUED	DESCRIPTION ㊺	NRC USE ONLY
2 0	N ㊹	NA	

NAME OF PREPARER R. H. Nelson
A. J. Cayia

PHONE 207/882-6321
207/623-3521

10 EVENT DESCRIPTION AND PROBABLE CONSEQUENCES

This LER is being filed because of a difference in interpretation of Technical Specification 3.0.c between Region I and the Licensee. In response to a request from Mr. Darrel G. Eisenhut of the NRC dated April 10, 1980, Maine Yankee's Technical Specifications were modified by incorporating a proposed definition for "operability" and an associated requirement regarding operability of normal and emergency power sources to equipment considered to be operable.

The NRC requested change was intended to standardize requirements that both normal and emergency power sources be available to at least one of two redundant components for both components to be considered to be "operable." The correspondence indicated that the requirement was to be applicable <u>except</u> in the Cold Shutdown or Refueling Modes.

Unfortunately, the revised Maine Yankee Technical Specification is not clear and a literal interpretation could be made that the incorporated exception does not negate the requirement but negates the latitude provided while in the Shutdown modes .

The Region has chosen to interpret the Specification in such a manner, in effect, placing more stringent electrical supply requirements on the plant during Cold Shutdown modes than during power operation.

We had always interpreted the Specification 3.0.c as requiring that only one power source be available for equipment to be considered to be operable under the shutdown conditions. We believe this is consistent with NRC approved standard Technical Specifications and the NRC's intent as outlined in the referenced letter requesting the change.

The following describes the event:

During refueling shutdown operations with 24 feet of water above the core, the P-12A RHR pump was removed from service to perform maintenance on vent valve LSI-57. The P-12B RHR pump was placed in operation to provide shutdown cooling. Technical Specification 3.8 requires that one cooling mechanism be in operation with a second mechanism operable whenever there is fuel in the reactor. In excess of 23 feet of water above the core constitutes one mechanism. Improvement modification installation work rendered the DG-1B emergency power source for P-12B inoperable.

Because of the Region's interpretation of Specification 3.0.c and at the suggestion of NRR, we completed the work under the provisions of Technical Specification 3.8 which contains remedial action allowing operation in a degraded mode for 72 hours with one cooling mechanism, and under the provisions of Technical Specification 3.12 which permits one emergency diesel out of service, with other emergency power sources operable, for seven days with the reactor critical (recognizing the reactor was substantially subcritical). Degraded mode operation ended eleven hours later when P-12A, with its emergency power source operable, was returned to service.

Later that day, the refueling cavity level was lowered to less than 23 feet above the core, resulting in a further period of degraded mode operation with the "A" RHR train cooling mechanism in operation and the "B" train operable <u>except for its emergency power source</u>. Degraded mode operation terminated 26 hours later when the DG-1B modification was completed, allowing the "B" RHR train to meet operability criteria.

No fuel movements took place during this period. Since one cooling mechanism was always operable, there was no impact on the health and safety of the public.

LER-82-038/03L-0

27 CAUSE DESCRIPTION AND CORRECTIVE ACTIONS

A need to install an emergency diesel generator improvement modification, coupled with the lack of clearly worded Technical Specification cold shutdown and refueling station service power requirements forced the licensee into remedial actions in accordance with Technical Specifications 3.8 and 3.12. In both instances, two core cooling mechanisms were continously operable. The Region interpretated the specifications to require that both normal and emergency power sources were required to be operable. However, NRR allowed the conservative use, during this refueling, of the remedial action in Technical Specification 3.12, which allows one diesel out of service for up to seven days when the reactor is critical. CE Standard Technical Specifications allow either the normal or emergency power source to be inoperable for each RHR Train. A proposed change to Technical Specification 3.0.c will be submitted to allow either the normal or emergency power source to be inoperable, without compromising operability, during Cold Shutdown, Refueling Shutdown or Refueling Operations conditions.