



Northeast
Nuclear Energy

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The Northeast Utilities System

Donald B. Miller Jr.,
Senior Vice President - Millstone

Re: 10CFR50.73(a)(2)(i)

November 30, 1994
MP-94-652

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 94-039-00

This letter forwards Licensee Event Report 94-039-00 required to be submitted within thirty (30) days pursuant to 10CFR50.73(a)(2)(i), any operation or condition prohibited by the plant's Technical Specifications.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

Donald B. Miller, Jr.
Senior Vice President - Millstone Station

DBM/GM ljs

Attachment: LER 94-039-00

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

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LICENSEE EVENT REPORT (LER)

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

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1) Millstone Nuclear Power Station Unit 2	DOCKET NUMBER (2) 05000336	PAGE (3) 1 OF 3
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TITLE (4)
Components Not Included in the Inservice Test Program

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 NAME	DOCKET NUMBER
10	31	94	94	039	00	11	30	94		05000
									FACILITY NAME	DOCKET NUMBER
									FACILITY NAME	DOCKET NUMBER

OPERATING MODE (9) 6	THIS REPORT IS BEING SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)										
POWER LEVEL (10) 000	20.402(b)			20.405(c)			50.73(a)(2)(iv)			73.71(b)	
	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)(vi)			OTHER	
	20.405(a)(1)(iii)			X 50.73(a)(2)(i)			50.73(a)(2)(vii)(A)			(Specify in Abstract below and in Text, NRC Form 366A)	
	20.405(a)(1)(iv)			50.73(a)(2)(ii)			50.73(a)(2)(vii)(B)				
20.405(a)(1)(v)			50.73(a)(2)(iii)			50.73(a)(2)(v)					

LICENSEE CONTACT FOR THIS LER (12)

NAME Philip J. Lutz, Nuclear Licensing	TELEPHONE NUMBER (include Area Code) (203) 440-2072
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COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS

SUPPLEMENTAL REPORT EXPECTED (14)

<input checked="" type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE)	<input type="checkbox"/> NO	EXPECTED SUBMISSION DATE (15)	MONTH 02	DAY 28	YEAR 95
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ABSTRACT (Limit to 1400 spaces, i.e., approximately 1" single-spaced typewritten lines) (16)

On October 31, 1994, at 1100 hours with the unit in mode 6 for its refueling outage, it was identified during a review of the Inservice Test (IST) Program that some components were potentially not included in the Millstone Unit 2 (MP2) IST Program. Since this program review has not been completed, a conclusive determination for their inclusion in the program has not been verified although it is expected that some will be identified as omissions from the program. For those components which are identified as omissions, the applicable tests required under Section XI of the ASME Boiler and Pressure Vessel Code would not have been performed as required by Technical Specification 4.0.5.

**LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION**

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 90.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNB-714) U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001 AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1) Millstone Nuclear Power Station Unit 2	DOCKET NUMBER (2) 05000336	LER NUMBER (6)			PAGE (3) 02 OF 03
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
		94	-- 039 --	00	

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

I. Description of Event

On October 31, 1994, at 1100 hours, with the unit in mode 6 for its refueling outage, it was identified during a review of the IST Program, that some components were potentially not included in the MP2 IST Program. Since this program review has not been completed, a conclusive determination for their inclusion in the program has not been verified although it is expected that some will be identified as omissions from the program. As the result of this condition, the subject components would not have been tested per Section XI of the ASME Boiler and Pressure Vessel Code. The initial identification of these components as potential omissions was discovered in the process of performing a review of the MP2 IST program.

As part of the MP2 IST Program review, an IST pump and valve basis document was being developed to provide a clear basis for inclusion or exclusion of all class I, II and III components subject to the requirements of ASME Section XI. The investigations associated with the development of this document identified certain components which appeared to be subject to the requirements of ASME Section XI and did not have sufficient justification to be excluded from the IST program. The work associated with the development of this basis document has not been completed and as a result it can not be conclusively stated that the subject programmatic omissions are deficiencies in the MP2 IST program.

The following are the potential IST program component omissions:

- CH-184
- CH-909, CH-910
- CS-26
- FW-38A, FW-38B
- FW-42A, FW-42B
- FW-41A, FW-41B
- IA-43
- IA-566, IA-569
- PMW-3
- RB-38, RB-40, RB-42, RB-45, RB-47, RB-49
- RC-71
- SA-22
- SI-614, SI-624, SI-634, SI-644
- SW-97A, SW-97B
- SW-178A, SW-178B, SW-178C

Since the unit was in a refueling outage at the time of identification, there were no operator actions required as a result of the subject condition. In addition, the subject condition did not involve any automatic or manual safety system actuations.

II. Cause of Event

The root cause of this condition is potentially the result of personnel error in the interpretation of the IST Program requirements during program development.

**LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION**

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 3.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO INFORMATION AND RECORDS MANAGEMENT BRANCH (MNB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001 AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1) Millstone Nuclear Power Station Unit 2	DOCKET NUMBER (2) 05000336	LER NUMBER (6)			PAGE (3) 03 OF 03
		YEAR 94	SEQUENTIAL NUMBER 039	REVISION NUMBER 00	

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

III. Analysis of Event

This condition is being conservatively reported pursuant to the requirements of 10CFR50.73(a)(2)(i) which identifies any operation or condition prohibited by the plant's Technical Specifications. MP2 Technical Specification 4.0.5 requires that inservice testing of ASME Code Class I, II, and III pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and its applicable addenda per 10CFR50.55a.

In order to assess the safety consequences of this condition, a conclusive determination of the components which must be included in the program, has to be made. As a result an assessment of the safety consequences will be submitted with the supplement to this LER once the MP2 IST program review is completed. This review will be completed prior to the unit commencing startup from the current refuel outage.

IV. Corrective Action

This condition was discovered when the unit was shutdown for its refueling outage and as a result no immediate action was required. The MP2 IST Program review will be completed to identify which components must be included in the program in accordance with ASME Section XI. When this is completed, an evaluation of the safety consequences associated with the lack of inclusion of the components from the MP2 IST Program will be performed. As required, the necessary changes to the IST program and associated procedures will be implemented. A supplement to this LER will be submitted once the IST Program review is completed.

V. Additional Information

Similar events: LER 93-022 and LER-94-038.

This condition is similar because it involves the potential omission of safety related components and/or systems from testing/inspection programs. Corrective action taken for the ISI Program (LER 93-022) and Appendix J procedures (LER 94-038) would not address discrepancies in the IST Program.

EIIS Codes

<u>System/Components</u>	<u>Code</u>
CH-184	CB-FCV
CH-909, CH-910	CB-ISV
CS-26	BE-FCV
FW-38A & FW-38B	SJ-ISV
FW-42A & FW-42B	SJ-SHV
FW-41A & FW-41B	SJ-ISV
IA-43	LD-FCV
IA-566, IA-569	LD-ISV
PMW-3	KJ-FCV
RB-38, RB-40, RB-42, RB-45, RB-47, RB-49	CC-FCV
RC-71	AB-ISV
SA-22	LF-FCV
SI-614, SI-624, SI-634, SI-644	KW-ISV
SW-97A & SW-97B	KW-FCV
SW-178A, SW-178B, & SW-178C	KW-FCV