



ties Service Company lear Energy Company

Guneral Offices Selden Street, Berlin Connecticut

P. O. BOX 270 HARTFORD, CONNECTICUT 06141-0270

Re: Facility Operating License No. NPF-49 March 24, 1992 MP-92-317

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

Reference:

Facility Operating License No. NPF-49 Docket No. 50-423 Licensee Event Report 92-005-00

Gentlemen:

This letter forwards Licensee Event Report 92-005-00 required to be submitted within thirty (30) days pursuant to Facility Operating License Section 2.F. any violations of the requirements in Section 2.C.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

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Stephen E. Scace Director, Millstone Station

SES/NDH:lis

920402022

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Attachment: LER 92-005-00

cc: T. T. Martin, Region I Administrator

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W. J. Raymond, Senior Resident Inspector, Millstone Unit Nos. 1, 2 and 3

V. L. Rooney, NRC Project Manager, Millstone Unit No. 3.

(4t No 1828873604 (F22)

NAC Form 364 (6-89)	C FORM 388 U.S. NUCLEAR REGULATORY COMMESSION 89			APPROVED OMB NO 3150-0104 EXTINES 4:00:92										
LICENSEE EVENT REPORT (LER) FACILITY NAME (1) Millistone Nuclear Power Station Unit 3			Estimated builden per response to comply with this information collection request. 50.0 Mis. Permand comments regarding burden estimate to the Records and Records Management Branch (p=550). U.S. Nuclear Regulatory Commission, Washington, DC 20165, and to the Recervoirs Reduction Project (D150-01041), Office of Management and Bucget, Washington, DC 20503.											
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At 1700 bours on February 24, 1992, with the plant at 100 percent power, at a temperature of 587 degrees Fahrenheit and a pressure of 2270 psia, it was discovered that the requirement of 2 C.(10) of the Facility Operating License was not mat. License Condition 2 C.(10) requires any changes to the Initia. Test Program described in Final Safety Analysis Report (FSAR) Section 14 made in accordance with the provisions of 10CFR50.59 be reported in accordance with 50.59(b) within one month of such change. Section 13 of the Test Objective and Summary from Test No. 71 of FSAR Table 14.2-1 stated that proper actuation, operation, reset, and response time of the power operated relief valves (PORN) will be demonstrated by simulating a high pressure signal to each valve. This test was not performed during the startup test program, and no report was made as required. The root cause of this event is a lack of communication between personnel responsible to review the changes and personnel performing the test.

ANDELITY NAME Millis Unit ERT (IT PROFESS I. De At des the Init wit cha tha wit dur 100 The req ma 11. Cas 100 The req ma		CKPIND 2008 NO 2150-0104 CKPINES 4:00:92 Estimated burder ber response to comply with this information collection request 50 0 hrs. Forward comments regarding burden estimate to the Records and Reports Management Branch (p=53). U.S. hubbar Regulatory Commission, Westington, DC 20556, and to the Reservork Reduction Project (2150-0104). Other of Management and Budoal, Washington, DC 20503.						
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At dea the limit with chain c	scription of Event							
II Cau II Cau II Cau The cha to III An The req (c) Mi des • • • • •	1700 hours on February 24, 1992, w grees Fahrenheit and a pressure of 22 Facility Operating License was not r tial Test Program described in Final 1 h the provisions of 10CFR50.59 be r ange. Section 10 of the Test Objectiv it proper actuation, operation, reset i be demonstrated by simulating a hig ring the startup test program. At that CFR50.59 and notification to the NR	with the plant at 100 p 270 psia, it was discov- met. License Condition Safety Analysis Repor- eported in accordance e and Summary from and response time of th pressure signal to e- tume, the item should C should have been m	percent priver, at a temperature of 587 rered that the requirement of 2 C (10) of n 2 C (10) requires any changes to the (FSAR) Section 14 made in accordance is with 59.59(b) within one month of the Test No. 71 of FSAR Table 14.2-1 stated the power operated tellef valves (PORV) ach valve. This test was not performed i have been deleted in accordance with nade, but this was not cone.					
II Cau The cha tha to III An The req (c) Mi des • • • • • •	e discovery was made during processi juirement. As stipulated in Section 2, ide within 24 hours to the NRC Oper	ng of a FSAR change F of the Facility Oper ations Center via the	to delete the reference to this test rating License, an initial notification was Emergency Notification System.					
The cha tha to III. An The req (c) Mi des • • • • • • •	use of Event							
III. An The req (c) Mi des • • • • • •	e root cause of this event is a lack of anges and personnel performing the to it other changes to the Initial Test Pr the NRC in accordance with License	f communication betw est. Millitone Unit 3 o ogtam were properly o Constition 2.C. (10).	een personnel responsible to review the considers this event as an isolated event in cvaluated against 10CFR50.59 and reported					
The req (c) Mi des • • • • • • • • •	alvsis of Event							
Mi des • • Exc acc pre des	is report is being submitted as require puires submittal of a written follow-up , and (e) within thirty days of the ev	ed by Section 2.F of to in accordance with t	the Facility Operating License. Section 2.F the procedures described in $10CFR50.73(b)$ ,					
• Exc acc pre	listone Unit 3 has two PORVs, 3RCS signed to perform the following functi	* PCV453A (PCV455) ons.	A) and $3RCS*PCV456$ (PCV456). They are					
• Ex: acc pre	Prevent actuation of the reactor his	th pressure trip for all	1 design transients					
Ex. act pre	Limit the RCS pressure excursion f	or some Anticipated	Transients Without Trip (ATWS) events.					
Exc acc pre des	Provide cold overpressure protectio	n (COPS) when the p	plant is sout down.					
par	cept for COPS, no credit is taken for cidents. If the PORVs fail to open du essurizer safety calves will function to sign pressure in compliance with the ailable to function during some events in of the design basis accident analysis	operation of the POI ring a high pressure to prevent RC5 pressure ASME Code. The and Mewever, the effect s for Unit 3.	RVs in the safety analysis for design basis ransient while the plant is at full power, the r from exceeding 110 percent of system alysis for ATWS assumes both PORVs are is of ATWS events are not considered as					
Th d.f ap	e PGRVs may be used for COPS. He ferent from the circulary and plant of y case, surveillance procedures are pe	wever, the circultry a inditions affected by t prformed in order to a	nd plant conditions applicable for COPS are he test which is the subject of this report. In assure COPS is operable.					

NRC Form 366A U.S. NUCLEAR B		GULATORY CONNESSION	APPROVED OME NO. 3180-0104 EXPRES: A/30-92									
LICENSEE EVENT REPORT (LER) TEXT CONTINUATION			Estimated burden per response to comply with this information pollection request 50 0 hrs. Follward comments reparating burden estimate in the Rebords and Reports Management Branch (p.630). U.S. Nublear Regulatory Commission. Washington, DC 20555, and to the Paper work Heduction Report (2)55-0106. Office of Management and Budget. Wy chington, DC 205/3									
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Although the PORV test was not performed precisely as stated in FSAR section 14, the startup test program, the continuing surveillance test program, and actual PORV operation in response to a plant trip have verified that the PORVs are capable of performing their intended design function. Testing performed during startup included functional checks of the PORV control circuits, verification that the PORV input signals were properly calibrated, and verification that the automatic controls operated in accordance with their design. PCV455A actually opened during a reactor/turbine overpressure event and prevented the pressurizer safety valves from lifting (see LER 90–030–00 for a description of the incident); except for time response, this satisfied the requirements of the deleted test. Except for time response, the intent of the deleted test was also met for PCV456 through overlap testing during the Hot Functional Testing (HET), including a matual discharge of steam to the Pressurizer Rehef Tank.

A time response test was not performed for the complete operation of the PORVs during HFT. However, surveillance procedures are performed to determine time response for the pressure transmitters, and to verify that the PORVs will open within one second when manually operated from the control room. No time response testing is performed for circulary between the pressure transmitters and the *k* ...Vs. But the time response of the intervening circult is insignificant compared to the valve stroke time. In any event, there are no time response limits imposed by design. Therefore, the startup and surveillance testing together with actual operation of a PORV when challenged have amply demonstrated that the PORVs are capable of performing their safety and non-safety related design functions.

## IV. Corrective Action

A review of PORV testing and operational history was done in order to assure the values are capable of performing their design function. A safety evaluation for deletion of the test described in Section I for FSAR Table 14.2-1 was also performed. The results of this review are described in Section III. Overlapped surveillance tests continue to provide verification that the pressure transmitters, circuitry, and safety related controls for the PORVs will function per design. The non-safety related capabilities of PCV455A were recently demonstrated as described in LER 50-030-00. PCV436 was not required during this event, so it was not challenged.

The startup test program was developed based on the requirements of FSAR Chapter 14. A deficiency system documented any test or plant problems which occurred. Each deficiency was dispositioned by plant management with respect to potential effects on plan, operation and safety. Millistone Unit 3 made seven submittals in accordance with License Condition 2 C.(10) from February 12, 1986 to July 18, 1986. The fact that the testing reported by this LER was not submitted is considered to be an isolated event.

## Additional Information

There are no previous events which are similar to the event presented in this LER. However, the investigation which identified a failure to test the PORVs as described in Section I, also uncovered the fact that some components which are required for performing a remote shudown outside the control room may not have been included in Technical Specifications. Although this is not reportable per ICCFR50.73. Millstone Unit 3 has issued a Special Report to document the omission and describe the actions which are being taken.

## EIIS CODES

## Sistems

Compensents

Reac Coolant System ----

Relief Valve --- PCV