

# 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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HARTFORD, CONNECTICUT 06141-0270  
(203)665-5000

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

February 12, 1992  
MP-92-171

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

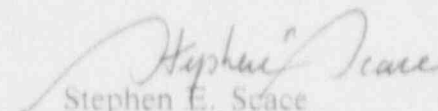
Reference: Facility Operating License No. NPF-49  
Docket No. 50-423  
Licensee Event Report 92-001-00

Gentlemen:

This letter forwards Licensee Event Report 92-001-00 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 Specification.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

  
Stephen E. Scace  
Director, Millstone Station

SES/TGM:ljs

Attachment: LER 92-001-00

cc: T. T. Martin, Region 1 Administrator  
W. J. Raymond, Senior Resident Inspector, Millstone Unit Nos. 1, 2 and 3  
V. L. Rooney, NRC Project Manager, Millstone Unit No. 3

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LICENSEE EVENT REPORT (LER)

Estimated burden per response to comply with this information collection request: 60.0 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.

FACILITY NAME (1) Millstone Nuclear Power Station Unit 3 DOCKET NUMBER (2) 0160000423 PAGE (3) 1 OF 3

TITLE (4) Leakage Monitoring Connection Containment Isolation Valves Not Locked Closed Due to Program Failure

EVENT DATE (5) MONTH DAY YEAR 01 09 92 LER NUMBER (6) SEQUENTIAL NUMBER REVISION NUMBER 001 000 REPORT DATE (7) MONTH DAY YEAR 02 12 92 OTHER FACILITIES INVOLVED (8) FACILITY NAMES 0160000000

OPERATING MODE (9) 5 THE REPORT IS BEING SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § 1.616 (Check one or more of the following) (11) 20.402(d) 20.402(e) 50.73(a)(2)(iv) 73.71(b) 20.405(a)(1)(ii) 50.73(a)(2)(iv) 73.71(c) 20.405(k)(1)(ii) 50.73(a)(2) 50.73(a)(2)(vii) OTHER (Specify in Abstract below and in Text, LAR Form 886A) 20.405(k)(1)(iii) X 50.73(a)(2)(ii) 50.73(a)(2)(viii)(A) 20.405(k)(1)(iv) 50.73(a)(2)(iii) 50.73(a)(2)(viii)(B) 20.405(k)(1)(v) 50.73(a)(2)(iii) 50.73(a)(2)(ix)

LICENSEE CONTACT FOR THE LER (12) NAME Terry G. McNatt, Senior Engineer, Ext. 5592 TELEPHONE NUMBER AREA CODE 203 447-1791

Table with 10 columns: CAUSE, SYSTEM, COMPONENT, MANUFACTURER, REPORTABLE TO NRC, CAUSE, SYSTEM, COMPONENT, MANUFACTURER, REPORTABLE TO NRC. All cells are empty.

SUPPLEMENTAL REPORT EXPECTED (14) YES (if yes, complete EXPECTED SUBMISSION DATE) NO X NO EXPECTED SUBMISSION DATE (16) MONTH DAY YEAR

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (18)

On January 13, 1992, at 0800 hours with the plant at 0% power in Mode 5 (Cold Shutdown), 93 degrees Fahrenheit and approximately 40 psia (Nitrogen float), six valves were identified which were missing locking devices. The valves were found closed but not locked as required. These valves are leakage monitoring connection (LMC) vent valves which are used to test the containment isolation valves associated with the RHR cold leg injection lines.

The root cause of the event is program failure- procedure deficiency, administrative error. The system lineups did not include the subject valves among those required to be locked closed.

As immediate corrective action the valves were locked closed and the penetration surveillances have been updated to include these valves. A change will be submitted to update the FSAR Containment Penetration Table.

LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

Estimate 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.

FACILITY NAME (1)  Millstone Nuclear Power Station Unit 3	DOCKET NUMBER (2)  0 5 0 0 0 4 2 3	LER NUMBER (3)			PAGE (3)  9 2 OF 0 3
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	

TEXT (if more space is required, use additional NRC Form 366A s) (17)

I. Description of Event

On January 13, 1992, at 0800 hours with the plant at 0% power in Mode 5 (Cold Shutdown), 93 degrees Fahrenheit and approximately 40 psia (Nitrogen float), a non-licensed operator (PEO) performing a valve lineup observed that valves 3SHLV928,930,931,937,938, and 939 had no locking devices while similarly configured valves did.

The aforementioned valves are leakage monitoring connection (LMC) test valves which are used to perform local leakrate testing of the Residual Heat Removal (RHR) cold leg injection line containment isolation valves. A management review of the inconsistency concluded that the subject valves are considered containment isolation valves and should be locked closed to ensure containment integrity. The review also concluded that the required action of Technical Specification 4.6.1.1, "Primary Containment-Containment Integrity," had not been satisfied since the valves were not locked closed and properly controlled under the administrative program. As an immediate corrective action following the discovery of this discrepancy, the valves were locked closed. All of the LMC valves were walked-down and compared to the P&IDS. All valves reviewed were found closed but not all in their required locked closed position. Of the 136 valves identified, 37 were found not locked closed, including the six identified.

II. Cause of Event

The root cause of the event is program failure- procedure deficiency, administrative error. The system lineups did not include the identified LMC valves among those required to be locked closed.

The LMC valves were not originally classified as containment isolation valves. The original containment penetration table in the Technical Specifications did not include these valves. This table was deleted from the Technical Specifications; the FSAR Containment Penetration Table, which then formed the basis for maintaining containment integrity, also did not include the LMC valves as containment isolation valves. As part of the review in response to this event, the LMC valves have been reclassified as containment isolation valves.

A thorough investigation of the position and surveillance requirements for LMC valves had never been completed because the LMC valves had not been identified as containment isolation valves. Consequently the Technical Specification surveillance requirements of 4.6.1.1 had never been applied.

III. Analysis of Event

This event is being reported in accordance with 10CFR50.73(a)(2)(i), as an operation or condition prohibited by the Technical Specifications.

Final Safety Analysis Report Section 6.2.4.1.4 "Design Requirements for Containment Isolation Barriers," states that containment isolation valves under "administrative control" are required to be locked closed. American National Standard ANSI 56.8 "Containment System Leakage Testing Requirements" Section 6.2 describes these test connections as part of the containment system barrier under administrative control. Considering these valves as containment isolation valves is consistent with 10CFR50 Appendix A Criterion 56 "Primary Containment Isolation" which also allows "administrative control" on valves of this type. The surveillance requirements for containment isolation valves are specified in Technical Specification Section 4.6.1.1. This section states that all "penetrations" not capable of being closed by automatic systems or operator actions are surveilled every 31 days except those that are locked, sealed or otherwise secured in the closed position. These valves were not locked, and since they were not surveilled on a 31 day frequency, the Technical Specification was violated.

There were no significant safety consequences due to this event. All of the valves are 3/4 inch test valves and were found closed. The LMC valves are either arranged as two valves in series or a single valve with a threaded cap downstream. These valves are independently verified closed on a valve lineup during each refueling outage following the LLRT of the containment isolation valves.

LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

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

NAME	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
Millstone No. 2 Power Station Unit 3	0   5   0   0   0   4   2   3	9   2	0   0   1	0   0	0   3	OF 0   3

TEXT: (If more space is required, use additional NRC Form 366A's) (17)

Corrective Action

In action the valves were locked closed and the penetration surveillance valves have been replaced. A change will be submitted to update the FSAR Containment April 30, 1992.

Were there any other LERs similar to this event?

EIS Code:

System:

Location: Safety Injection System-BP

Component:

Leakage Monitoring Connection-V