## ATTACHMENT TO LER 82-09/01-X-1 NORTHEAST NUCLEAR ENERGY COMPANY MILLSTONE NUCLEAR POWER STATION DOCKET NO. 50-336

## Event Description and Probable Consequences

Section 3.5.2 of the Technical Specifications requires two separate and independent Emergency Core Cooling System (ECCS) subsystems to be operable in Modes 1, 2, and 3 (with Pressurizer pressure greater than or equal to 1750 psia). One of the Boric Acid flowpaths listed in Section 3.5.2.d became inoperable when the motor operator failed on the common discharge valve 2-CH-514 for the Boric Acid pumps. Following this motor failure a plant trip occurred due to unrelated problems and the subsequent recovery and plant startup was made without the realization that Action Statement "a" under Section 3.5.2.d applied. Approximately 40 hours after the motor failure and during the plant startup, a review of the two sections which address boric acid flow paths, revealed differences between the two sections which were not obvious on the initial reviews at the time of the motor failure. The two sections are 3.1.2.2.a (Reactivity Control Systems) and 3.5.2.d (ECCS Subsystems). Both subsections require an operable charging pump with a flow path from a Boric Acid Storage Tank via either an operable boric acid pump or a gravity feed connection. However Section 3.5.2 required two ECCS subsystems to be operable, while Section 3.1.2.2 provided for operation with any two of three possible boron injection flow paths operable. The latter condition was met even with the failure of the motor operator, so that with the similarity in wording it appeared that both sections were satisfied and a startup was commenced. When further reviews showed the differences a plant operator was immediately stationed near the valve to provide manual opening capability if required. This operator was retained until the motor was replaced and the valve returned to normal operable status. As a result there were no probable consequences.

## Cause Description and Corrective Action

The mode changes while operating under an action statement were made because of a misinterpretation of differences between two different sections of the Technical Specifications. To prevent a recurrence personnel have been briefed on the differences between the two sections and a technical specification change has been issued to reduce possible confusion.

RECEIVED STREET :

## RTHEAST UTILITIES

THE CONNECTICUT LIGHT AND POWER COMPAN WESTERN WASSACHUSETTS ELECTRIC COMPANY HOLYOME WATER POWER COMPANY NORTHEAST UTILITIES SERVICE COMPANY NORTHEAST NUCLEAR ENERGY COMPANY

General Offices . Selden Street, Berlin, Connecticut

P O. BOX 270 HARTFORD, CONNECTICUT 06141-0270 (203) 666-6911

June 18, 1984 MP-6110

r. Thomas E. Murley egional Administrator, Region I . S. Nuclear Regulatory Commission 31 Park Avenue lig of Prussia, Pennsylvania 19406

eference:

Facility Operating License No. DPR-65

Docket No. 50-336

Reportable Occurrence RO 50-336/82-09/01X-1

ear Dr. Murley:

his letter forwards the update Licensee Event Report for Reportable courrence 82-09/1X-1. An additional three copies of the report are no losed.

Yours truly,

NORTHEAST NUCLEAR ENERGY COMPANY

E. J. Mroczka Station Superintendent

Millstone Nuclear Power Station

JM/JR:mo

ttachment:

LER RO 50-336/82-09/1X-1

Director, Office of Inspection and Enforcement, Washington, D. C. (30)
Director, Office of Management Information and Program Control,
Washington, D. C. (3)
U. S. Nuclear Regulatory Commission, c/o Document Management Branch,
Washington, D. C. 20555

Il IEZZ