



Northeast
Nuclear Energy

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Northeast Nuclear Energy Company
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The Northeast Utilities System
Donald B. Miller Jr.,
Senior Vice President - Millstone

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

October 5, 1995
MP-95-302

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 95-035-00

This letter forwards Licensee Event Report 95-035-00 required to be submitted within thirty (30) days pursuant to 10CFR50.73(a)(2)(i).

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

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

DBM/FJD:ljs

Attachment: LER 95-035-00

cc: T. T. Martin, Region I Administrator
P. D. Swetland, Senior Resident Inspector, Millstone Unit Nos. 1, 2, and 3
G. S. Wissing, 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 (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	PAGE (3) 1 OF 4
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TITLE (4)
Misinterpretation of Technical Specification Surveillance Requirements for A.C. Systems

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
09	06	95	95	035	00	10	05	95		
									FACILITY NAME	DOCKET NUMBER
									FACILITY NAME	DOCKET NUMBER

OPERATING MODE (9) 1	THIS REPORT IS BEING SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)										
POWER LEVEL (10) 100	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)(c)					

LICENSEE CONTACT FOR THIS LER (12)

NAME Philip J. Lutzi, 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)				EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
YES (If yes, complete EXPECTED SUBMISSION DATE)	X	NO					

ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

On September 6, 1995 at 1230 hours, with the plant in mode 1 at 100% power, it was discovered that existing surveillance procedures did not adequately demonstrate the operability of A.C. electrical power sources required by Technical Specification 3/4.8.1, "A.C. Sources."

The root cause of this event was the plant's interpretation of Technical Specification 3.8.1.1 prior to a recent clarification.

Procedure changes have been implemented that provide verification of the circuits from the switchyard to the onsite electrical distribution system in accordance with Technical Specifications.

This event is reportable pursuant to 10CFR50.73(a)(2)(i)(B), any operation or condition prohibited by the plant's Technical Specifications.

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

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 30.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE 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) 02 OF 04
		YEAR 95	SEQUENTIAL NUMBER - 035 -	REVISION NUMBER 00	

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

I. Description of Event

On September 6, 1995 at 1230 hours, with the plant in mode 1 at 100% power, it was discovered that existing surveillance procedures did not adequately demonstrate the operability of A.C. electrical power sources required by Technical Specification 3/4.8.1, "A.C. Sources." A recent technical specification clarification for Technical Specification 3.8.1.1 has determined that the two physically independent circuits between the offsite transmission network and the switchyard include the station safeguards buses (24C and 24D), via the Unit 2 Reserve Station Service Transformer (RSST) and bus 24G, and station bus 24E, via the Unit 1 RSST and bus 14H (Refer to diagram on page 4). This interpretation is consistent with General Design Criterion 17 of Appendix "A" to 10CFR50 and section 8.1.1 of the Millstone Unit 2 Final Safety Analysis Report (FSAR). Prior to this interpretation, the plant satisfied Technical Specification 3.8.1.1 by verifying at least two of the four 345 KV transmission lines that tie the switchyard to the grid were in service with their switchyard breakers closed, via Operating Procedure Form 2619A-1, Control Room Shift Checks. Since this procedure did not include verifications for circuit breaker alignments from the switchyard to the onsite electrical distribution system (station buses), and based on the recent technical specification clarification, the plant had not performed the surveillance activities necessary to adequately satisfy the requirements of Technical Specification 3/4.8.1.1.

Once this problem was discovered, an Adverse Condition Report (ACR) was initiated which noted that the existing surveillance procedures for Technical Specification 3.8.1.1 were incorrect. The cause of this adverse condition was due to a previous misinterpretation of the Limiting Condition of Operation requirement. As a result of this ACR, procedure changes were initiated to provide the verifications required (circuit breaker position and voltage) to demonstrate the operability of the circuits from the switchyard to the onsite electrical distribution system. These procedure changes require a daily record for the operability status of power transfer from the Unit 2 RSST to buses 24C and 24D (preferred offsite supply, automatic) and power transfer from bus 14H to bus 24E (alternate offsite supply from Unit 1 manual).

There were no automatic or manually initiated safety system actuations during this event.

II. Cause of Event

The root cause of this event is personnel error in the interpretation of Technical Specification 3.8.1.1 prior to its recent clarification. Technical Specification 3.8.1.1 states that, in addition to the two separate and independent diesel generators, "two physically independent circuits between the offsite transmission network and the switchyard" shall be operable as a minimum. Operability was demonstrated by a daily record of the position of the 345 KV line breakers and voltage.

III. Analysis of Event

This event is being reported pursuant to 10CFR50.73(a)(2)(i)(B), any operation or condition prohibited by the plant's Technical specifications.

For the preferred offsite power supply, the existing surveillance procedure for Technical Specification 3.8.1.1 did not provide the circuit breaker and voltage verifications necessary to adequately demonstrate the operability of the preferred supply from the switchyard to the onsite electrical distribution system. However, control room indication and alarms have provided the operator with information on the availability of the preferred offsite supply. A control room annunciator will alarm when the normally closed feeder circuit breaker is open.

For the alternate offsite power supply, the existing surveillance procedure did not provide the circuit breaker and voltage verifications necessary to adequately demonstrate its operability. However, control room indication and a Unit 1 operating procedure have provided the operator with information on the availability of the alternate offsite supply. A note in the Unit 1 operating procedure states that "Unit 2 should not require power from bus 14H prior to proceeding" when de-energizing the 14H bus.

**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 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.

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

Prior to 1987 the Unit 1 RSST was bussed directly to bus 24F (14H) and any work at the Unit 1 RSST would have required the de-energization of this bus and subsequent loss of the Unit 2 alternate supply. A high level of importance was not established for bus 14H until 1987 when it was used to meet the requirements of 10CFR50, Appendix R. Therefore, the potential existed for Unit 2 to lose its alternate offsite power supply via bus 14H, particularly prior to 1987.

The safety consequence of operating the plant without the alternate offsite power supply (bus 14H) was minimal. Safety analyses do not credit bus 14H for short term accident mitigation. The Unit 2 RSST and the Emergency Diesel Generators are used to supply power to the vital 4160 volt busses.

IV. Corrective Action

Plant procedures have been revised to record the following, in addition to the position of the 345 KV line breakers and voltage:

1. Operability status of power transfer from Unit 2 RSST to buses 24C and 24D (preferred offsite supply).
2. Operability status of power transfer from bus 14H to bus 24E (alternate offsite supply).

Also, a change has been made to Millstone Unit 1 procedure OP 341 to explicitly require contacting the Unit 2 control room whenever bus 14H is to be de-energized.

V. Additional Information

Similar LERs: None

ELIS Codes

- 345 KV Switchyard: FK
- 345 KV Breakers: FK
- 4160V Switchgear: EA-SWGR
- 4160V Breakers: EA-VACB
- RSST #2: EA-XFMR
- RSST #1: EA-XFMR
- Emergency Diesel Generators EK-DG

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 (MNRB 7114), 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.

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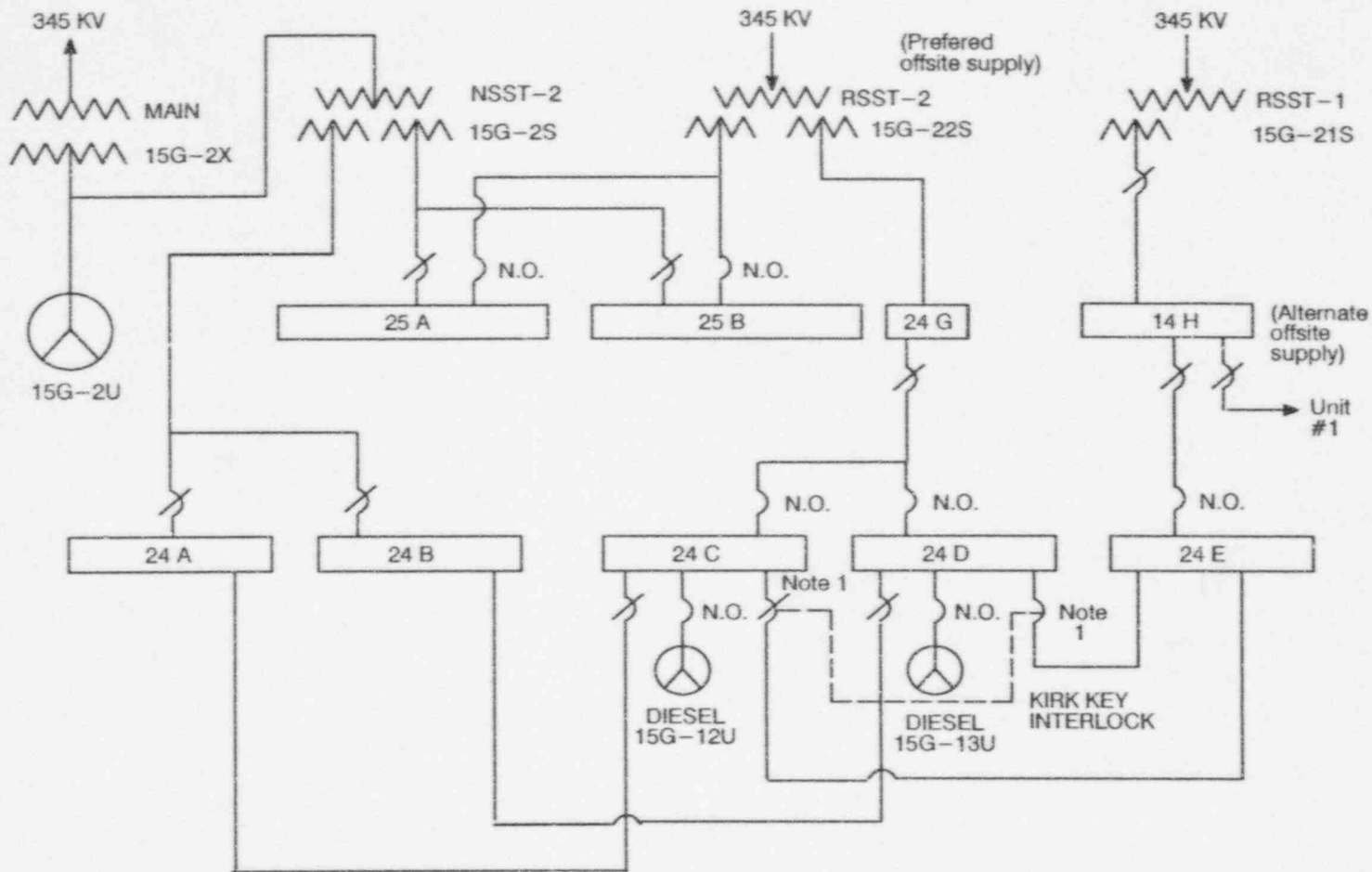
Millstone Nuclear Power Station
Unit 2

05000336

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

SIMPLIFIED MILLSTONE UNIT 2 SINGLE LINE DIAGRAM



Note 1:
For normal operation the 24D or 24C
circuit breaker shall be closed.