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)(B)

November 3, 1995
MP-95-326

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 95-039-00

This letter forwards Licensee Event Report 95-0039-00 required to be submitted within thirty (30) days pursuant to 10CFR50.73(a)(2)(i)(B).

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

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

DBM/PHC:clc

Attachment: LER 95-039-00

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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NRC Form 366 (4-95) U.S. NUCLEAR REGULATORY COMMISSION

LICENSEE EVENT REPORT (LER)

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

APPROVED BY OMB NO. 3150-0104
EXPIRES: 04/30/98

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS MANDATORY INFORMATION COLLECTION REQUEST: 50.0 HRS. REPORTED LESSONS LEARNED ARE INCORPORATED INTO THE LICENSING PROCESS AND FED BACK TO INDUSTRY. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (T-6 F33), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
Millstone Nuclear Power Station Unit 2	05000336	1 OF 3

TITLE (4)
Service Water Pump Performance Surveillance Requirements are Less Stringent than Tech Specs

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
										05000
10	10	95	95	- 039 -	00	11	03	95	FACILITY NAME	DOCKET NUMBER 05000

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%	20.2201(b)	20.2203(a)(2)(iv)	X 50.73(a)(2)(i)(B)	50.73(a)(2)(viii)
		20.2203(a)(1)	20.2203(a)(3)(i)	50.73(a)(2)(ii)	50.73(a)(2)(x)
		20.2203(a)(2)(i)	20.2203(a)(3)(ii)	50.73(a)(2)(iii)	73.71
		20.2203(a)(2)(ii)	20.2203(a)(4)	50.73(a)(2)(iv)	OTHER
		20.2203(a)(2)(iii)	50.36(c)(1)	50.73(a)(2)(v)	Specify in Abstract below or in NRC Form 366A
		20.2203(a)(2)(iv)	50.36(c)(2)	50.73(a)(2)(vii)	

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER (Include Area Code)
Philip J. Lutzi, Nuclear Licensing	(203) 440-2072

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)

	YES (If yes, complete EXPECTED SUBMISSION DATE)	X	NO	EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR

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

On October 10, 1995 at 1130 hours, with the plant operating in Mode 1 at 100% reactor power, it was determined that the surveillance procedure used to verify Technical Specification 3.7.4.1 was incorrect. Technical Specification 3.7.4.1 requires verification that each Service Water pump develops at least 93% of the discharge pressure for the applicable flow rate. The surveillance procedure included a degraded pump curve annotated to indicate that it was adjusted to 93% of the design curve. In fact, this curve is nonconservative, representing approximately 90% of the design curve. The same curve, entitled "Service Water Pump Technical Specification Required Performance Curve," was also included in the FSAR.

An immediate review of the most recent surveillance test results confirmed that all of the affected pumps met the Technical Specification requirements. Further review of previous surveillance test results identified several instances where the pump met FSAR Figure 9.7-4 requirements, but did not develop at least 93% of the required discharge pressure, as required by Technical Specification 4.7.4.1.a.2.

The root cause of this event was personnel error which resulted in inadequate preparation and review of surveillance procedures to ensure Technical Specification requirements are met. The error was traced to the original issue of the procedure, and was carried forward through subsequent procedure revisions.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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Millstone Nuclear Power Station Unit 2	05000336	95	– 039 –	00	02 OF 03

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

I. Description of Event

On October 10, 1995 at 1130 hours, with the plant operating in Mode 1, at 100% reactor power, it was determined that Service Water pump surveillance procedures SP 2612A and SP 2612B were not consistent with Technical Specification 3.7.4.1 requirements. The Technical Specification requires verification that the Service Water pumps develop at least 93% of the discharge pressure for the applicable flow rate. The surveillance procedures contained degraded pump curves annotated as "93% of design curve." In fact, the curves were nonconservative, representing approximately 90% of the design curve. Further review also revealed that the same curve was included in FSAR Figure 9.7-4, "Service Water Pump Technical Specification Required Performance Curve."

Upon discovery, a review was performed which verified that the most recent surveillances met the Technical Specification requirement. Further review has identified several instances where the surveillance test met the FSAR curve, but would not have met the Technical Specification requirement. These items are considered test anomalies due to instrument inaccuracies, and are not indicative of pump performance trends. In order to reduce the likelihood of future instrument error, more accurate pressure indicators will be installed at the pump discharges.

There were no operator actions required as a result of this event. There were no automatic or manually initiated safety system responses as a result of this event.

II. Cause of Event

The cause of the event was personnel error which resulted in inadequate preparation and review of surveillance procedures to ensure Technical Specification requirements are met. A review of the original pump surveillance procedure, which was written in 1975, indicates that the curve was based on "90% of the design curve," rather than the 93% performance curve specified in Technical Specifications. The same curve was carried forward in each subsequent procedure revision. In 1994, the curve was added to the FSAR; the error was not detected at that time.

III. Analysis of Event

This event is reportable under 10CFR50.73(a)(2)(i)(B), "Any Operation or Condition Prohibited By the Plant's Technical Specifications."

The review of surveillance tests identified several instances where the pumps met FSAR Figure 9.7-4 requirements, but did not develop at least 93% of the required discharge pressure as required by Technical Specification 4.7.4.1.a.2.

The MP2 Service Water system flow analysis was performed using the degraded (90%) pump curve. Therefore, the existing analysis confirms that the Service Water system would perform its design function as long as the pump performance met the surveillance procedure requirement.

The degraded pump curves used in the surveillance procedures were added to the FSAR as Figure 9.7-4 during recent (1994) FSAR revisions.

IV. Corrective Action

After identifying that the degraded pump curves used in the surveillance procedures and shown in the FSAR were incorrect, a review was performed which confirmed that the most recent Service Water test results met the Technical Specification requirements.

A review of similar Technical Specification requirements identified that the RBCCW pump surveillance curve had similar errors. A review of the RBCCW surveillance test data confirmed that the RBCCW pump performance has in fact always met the Technical Specification requirement.

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

Corrective Action (Cont'd.)

The RBCCW and Service Water pump surveillance procedures have been revised to reflect the Technical Specification requirement.

FSAR Figure 9.7-4 will be revised in the next annual update to reflect the Technical Specification requirement.

V. Additional Information

Similar LERs: None

EIIS Code Identifiers for Referenced Components:

Service Water System: BI-CLR-000

Reactor Building Closed Cooling Water System: CC-CLR-000