

# 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 - 546.1 Street, Berlin Connecticut

P. O. BOX 270  
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Re: 10CFR50.73(a)(2)(i)  
May 1, 1992  
MP-2-461

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 92-010-00


Gentlemen:

This letter forwards Licensee Event Report 92-010-00 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

FOR: Stephen E. Scace  
Director, Millstone Station

  
BY: Carl H. Clement  
Millstone Unit 3 Director

SES/RJM:ljs

Attachment: LER 92-010-00

cc: T. T. Martin, Region I 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: 50.0 hrs. Forward comments regarding burden estimate to the Records and Reports Management Branch (p-630), 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) **050004** PAGE (3) **1 OF 3**

TITLE **Improper Filter Rerests After Painting or Welding Due to Failure to Properly Identify Situational Surveillance**

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 NAMES		
04	01	92	92	010	00	05	01	92	050000		

OPERATING MODE (9) **1**

THIS REPORT IS BEING SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § (Check one or more of the following) (11):

<input type="checkbox"/> 20.402(b)	<input type="checkbox"/> 20.402(c)	<input type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> 73.71(b)
<input type="checkbox"/> 20.405(a)(1)(i)	<input type="checkbox"/> 50.36(c)(1)	<input type="checkbox"/> 50.73(a)(2)(v)	<input type="checkbox"/> 73.71(c)
<input type="checkbox"/> 20.405(a)(1)(ii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(vi)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)
<input type="checkbox"/> 20.405(a)(1)(iii)	<input checked="" type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(vii)(A)	
<input type="checkbox"/> 20.405(a)(1)(iv)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(vii)(B)	
<input type="checkbox"/> 20.405(a)(1)(v)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(ix)	

LICENSEE CONTACT FOR THIS LER (12)

NAME **Robert J. McDonald, Engineer, Ext. 4742** TELEPHONE NUMBER **203 447-1791**

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13):

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPPDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPPDS

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE)  NO

EXPECTED SUBMISSION DATE (15) MONTH **04** DAY **01** YEAR **92**

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16):

On April 1, 1992, with the plant in Mode 1, at 100% power, it was discovered that some surveillance requirements were not being met in terms of testing of atmosphere cleanup filter units potentially affected by construction/maintenance activities. Subsequent to the performance of an activity which could have adversely affected a filter unit, the Technical Specifications require that the following tests be performed: 1) in-place penetration or bypass leakage, 2) charcoal sample, and 3) system flow rate. The in-place penetration or bypass leakage and system flow rate tests have not been performed as required following recent maintenance activities.

The cause of the event is a failure to identify the required surveillance procedures to be performed following painting, fire or chemical release in a zone communicating with the filter system.

Immediate corrective action was to verify that the required surveillance tests have since been performed on filtration units that were exposed to painting, fire, or chemical release. To prevent recurrence the applicable operating and surveillance procedures will be revised to provide amplified direction as to the required surveillance tests following painting, fire or chemical release in a zone communicating with an atmosphere cleanup filter system.

LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

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)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Millstone Nuclear Power Station Unit 3	05000423	92	010	00	02 OF 03

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

I. Description of Event

On April 1, 1992, it was discovered that filter surveillance test procedures were not being performed consistently after painting and/or welding. These surveillances involved the Auxiliary Building and Supplementary Leakage Collection and Release System (SLCRS) Filtration Units. The Technical Specifications require that the filtration units be surveilled: (a) at least once per 18 months, (b) after structural maintenance on the filter or charcoal housings or (c) after painting, fire, or chemical release in any ventilation zone communicating with these systems. The specific surveillance requirements following painting, fire, or chemical release are as follows: 1) in-place penetration and bypass leakage test, 2) charcoal sample test, and 3) system flow rate test. An investigation into past painting, fire, or chemical release events uncovered five documented incidents. In all cases the charcoal sample tests were performed to verify charcoal penetration was within the acceptance criteria. The flow tests are performed on a continual 30 day surveillance schedule. The in-place penetration and bypass tests were not performed until the next scheduled surveillance which in the worst case was approximately one year later. This is interpreted as a violation of the intent of the subject Technical Specifications.

II. Cause of Event

The root cause of this event is a failure to identify the proper surveillance test requirements following painting, fire, or chemical release in an area communicating with the subject filtration units. At some point in time, following one of these activities, it became common practice to perform only the charcoal sample test. The retest requirements were not specified in the filter system operating procedure. This single test did not meet the surveillance requirements as stated in the Technical Specifications.

III. Analysis of Event

The event is being reported in accordance with 10CFR50.73(a)(2)(i), as a condition prohibited by the plant's Technical Specifications. The Technical Specifications for the Auxiliary Building and SLCRS Filtration Systems require surveillance tests be performed after painting, fire or chemical release in a zone which communicates with the filter unit. The surveillance tests required are filter bypass and penetration tests, system flow tests and charcoal sample tests. A review of past activities showed that not all required surveillances were performed as a direct result of painting, fire, or chemical release. Although subsequent surveillance tests showed the filter units met all applicable acceptance criteria, the intent of the Technical Specifications is interpreted to require a more timely performance of the surveillance requirements.

These surveillance tests are performed to ensure the reliability of the filter units after they have been exposed to potentially harmful environments. The results of these tests can be used to trend the performance of the filters and determine the effect of specific adverse exposures on the life expectancy of the filter unit components.

An investigation was undertaken to determine which filter units were affected by the discontinuity in required surveillance testing. The identified filter units were then verified to have been satisfactorily tested in subsequent surveillance tests. The flow test is part of the monthly surveillance test and the bypass/penetration test is performed every 18 months for these filter units.

In all cases the acceptance criteria of subsequent surveillance tests was met and the filter units were operable at all times. Therefore, this event posed no significant safety consequences.

IV. Corrective Action

As immediate corrective action, the affected filter units were verified to have passed the required surveillance tests since the painting, fire or chemical release was identified after the most recent exposure.

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.

FACILITY NAME (1)  Millstone Nuclear Power Station Unit 3	DOCKET NUMBER (2)  0   5   0   0   0   4   2   3	LER NUMBER (6)			PAGE (3)	
		YEAR 9   2	SEQUENTIAL NUMBER 0   1   0	REVISION NUMBER 0   0	0   3	OF 0   3

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

To prevent recurrence of this event, the Operations Department will revise the applicable operating and surveillance procedures to amplify the surveillance requirements in the event of painting, fire or chemical release which may affect the filter units. In addition the Operations Department personnel responsible for implementation of the surveillance program have been sensitized to these surveillance requirements. Further guidance is also being provided to the shift supervisors to track these items on the Shift Turnover Log.

V. Additional Information

Licensee Event Reports submitted which discuss related events are as follows:

<u>LER Number</u>	<u>Title</u>
87-042-01	Missed Intermediate Range/Power Range Surveillance Due to Procedural Inadequacy
89-015-00	Inoperable Emergency AC Distribution--480 VAC Load Center Cross-Tied Due to Personnel Error
91-013-00	Inoperable B Train Emergency Diesel Generator Due to Inadequate Requirements Review

LER 87-042-01 discusses an event where it was discovered that a surveillance test to measure detector plateau curves of Intermediate Range and Power Range Neutron Detectors had not been performed. The root cause was inadequate administrative review of the surveillance procedures. Corrective action was to review Technical Specification requirements and the corresponding surveillance procedures to ensure full implementation. A review of the applicable Technical Specifications for this event determined that the surveillances fully implement the requirements.

LER 89-015-00 documents an event where an Emergency Load Center was not in its normal alignment and did not meet the requirements of the Technical Specifications. The root cause was inadequate review of the plant electrical lineup to ensure Technical

Specification requirements were met. corrective action was to revise the applicable procedures to delineate the required electrical plant lineup conditions.

LER 91-013-00 discusses an event where a maintenance valve lineup on the Emergency Diesel Generator air start system caused only one air receiver to be available to start the engine. The root cause of this event was improper work practices in that a senior licensed operator failed to verify the Technical Specification requirements. corrective action was to counsel the operator involved and reemphasize the requirements to refer to the Technical Specifications with all operations personnel.

These events are sufficiently different in root cause so that their corrective actions would not have prevented this event.

EIIS CODES

<u>Systems</u>	<u>Components</u>
Auxiliary Building Filter System-VF	Filter-FLT
Supplementary Leakage Collection and Release System-BD	