

**Northeast
Nuclear Energy**

Rope Ferry Rd. (Route 156), Waterford, CT 06385

Millstone Nuclear Power Station
Northeast Nuclear Energy Company
P.O. Box 128
Waterford, CT 06385-0128
(203) 444-4300
Fax (203) 440-2105

The Northeast Utilities System

Donald B. Miller Jr.
Senior Vice President - Millstone

Re: 10CFR50.73(a)
December 28, 1995
MP-95-373

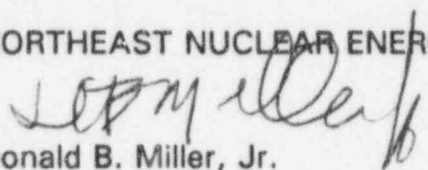
U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

Reference: Facility Operating License No. DPR-65
Docket No. 50-336
Licensee Event Report 95-044-00

This letter forwards Licensee Event Report 95-044-00 required to be submitted within thirty (30) days pursuant to 10CFR50.73(a).

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY


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

DBM/PJL:ktg

Attachment: LER 95-044-00

cc: T. T. Martin, Region I Administrator
G. S. Vissing, NRC Project Manager, Millstone Unit No. 2
P. D. Swetland, Senior Resident Inspector, Millstone Unit Nos. 1, 2,
and 3

9601030055 951228
PDR ADDCK 05000336
S PDR

020087



LICENSEE EVENT REPORT (LER)

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

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 (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 3
--	--	--------------------------------------	---------------------------

TITLE (4)
Surveillance Period for Containment Air Lock Testing Exceeded - 25% Extension Not Allowed

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	
11	29	95	95	-- 044 --	00	12	28	95	FACILITY NAME	DOCKET NUMBER	
OPERATING MODE (9)		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)									
1		20.2201(b)				20.2203(a)(2)(v)			<input checked="" type="checkbox"/> 50.73(a)(2)(i)		50.73(a)(2)(viii)
POWER LEVEL (10)		100%									
		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 Philip J. Lutzi, Nuclear Licensing	TELEPHONE NUMBER (Include Area Code) (860) 440-2072
---	---

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

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NFRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NFRDS

SUPPLEMENTAL REPORT EXPECTED (14)				EXPECTED SUBMISSION DATE (15)		MONTH	DAY	YEAR
YES (If yes, complete EXPECTED SUBMISSION DATE).				<input checked="" type="checkbox"/> NO				

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

On November 29, 1995, at 1330 hrs, with the plant in Mode 1, at 100% power, it was determined that the requirements of Technical Specification Section 4.0.2, which allow a maximum "extension not to exceed 25% of the surveillance time interval," do not apply to Technical Specification Section 4.6.1.3, "Containment Air Locks." An investigation reveals that air lock surveillances have been performed beyond the required time interval, having utilized the 25% extension.

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

Corrective actions consist of a change to the Technical Specifications, revising the surveillance procedures for the air lock tests, changing the surveillance scheduling database, briefing Operations personnel on these requirements, and processing a change to the Technical Requirements Manual to clarify when Surveillance Requirement 4.0.2 is applicable

There were no automatic or manually initiated safety responses resulting from this event.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
		95	-- 044	-- 00	
Millstone Nuclear Power Station Unit No. 2	05000336				2 OF 3

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

I. Description of Event

On November 29, 1995 at 1330 hrs, with the plant in Mode 1 at 100% power, it was determined that the time interval for performance of the Containment Personnel Air Lock Surveillance Tests per Technical Specification 4.6.1.3 does not allow the standard 25% extension specified in Technical Specification 4.0.2. The requirement to not allow the standard 25% extension was implemented in 1992 when technical specification changes were processed to comply with changes to 10CFR50, Appendix J, requirements. The license amendment approved on April 8, 1992, for Surveillance Requirement 4.6.1.3 failed to note that Surveillance Requirement 4.0.2 does not apply. On November 29, 1995, engineering, while performing reviews to assess the recent revision (October 1995) to 10CFR50, Appendix J, Option B, discovered that Surveillance Requirement 4.0.2 does not apply to Technical Specification Section 4.6.1.2 "Containment Leakage," and that the criterion for conformance with Surveillance 4.6.1.2 requires testing of the air locks in accordance with Surveillance 4.6.1.3. Therefore, it was concluded that Technical Specification 4.0.2 does not apply to Section 4.6.1.3.

Subsequent to identifying the deficiency in Surveillance Requirement 4.6.1.3, a review of historical records revealed that surveillances associated with this technical specification have been performed beyond the required time interval as a result of the plant utilizing the 25% extension. The test of the air lock has been performed beyond the six month interval one time since implementation of the license amendment which resulted in eliminating the 25% extension. Additionally, the review identified that the surveillances for the air lock gaskets have also been performed beyond the 72 hour time requirement but within the 25% extension.

II. Cause of Event

The cause of this event is a lack of clarity in Technical Specifications leading to a non-conservative implementation of Surveillance Requirement 4.6.1.3. The criterion of not allowing the use of Surveillance Requirement 4.0.2 should have been clearly located within the surveillance being performed (i.e., Surveillance Requirement 4.6.1.3) and also reflected in the surveillance procedure.

III. Analysis of Event

This event is being reported pursuant to requirements of 10CFR50.72(a)(2)(i)(B), reporting of any operation or condition prohibited by the plant's Technical Specifications. There were no safety consequences resulting from this event. A review of the air lock surveillance required by the Technical Specifications determined that the tests were performed with satisfactory results, and that only surveillance time interval requirements were exceeded.

IV. Corrective Action

- A change to the Technical Requirements Manual will be implemented to clarify when Surveillance Requirement 4.0.2 is applicable. This change will be implemented by February 1996.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

FACILITY NAME (1) Millstone Nuclear Power Station Unit No. 2	DOCKET NUMBER (2) 05000336	LER NUMBER (6)			PAGE (3) 3 OF 3
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
		95	-- 044	-- 00	

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

IV. Corrective Action (continued)

- Immediate action was taken to ensure the next scheduled air lock surveillance was performed without crediting the 25% extension. These actions included revising surveillance procedure SP 2604E and SP2604F for the air lock tests, modifying the surveillance scheduling database and briefing Operations personnel.
- Technical Specification changes are currently being evaluated to implement 10CFR50, Appendix J, Option B. During this process, changes will be implemented to ensure 10CFR50, Appendix J time interval requirements are clearly defined. The proposed license amendment is scheduled to be submitted by February 1996.

V. Additional Information

Similar Events: None

EIS Codes: None