13109 WINSTON & STRAWN 1400 L STREET, N.W. PREDERICK H. WINSTON (1983-1996) CHICAGO OFFICE WASHINGTON, D.C. 20005-350292 JUL 16 P3:27 SILAS H. STRAWN (1891-1948) 38 WEST WACKER DRIVE CHICAGO ILLINOIS 60601 (312) 558 5600 (202) 371-5700

NICHOLAS S. REYNOLDS (202) 371-5717

July 8, 1992

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NEW YORK OFFICE 175 WATER STREET NEW YORK, NY 10038-4981 (212) 269-2530

Ivan W. Smith Chairman, Atomic Safety and Licensing Board U.S. Nuclear Regulatory Commission

Jerry R. Kline Atomic Safety and Licensing Board U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Charles N. Kelber Atomic Safety and Licensing Board U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Washington, D.C. 20555

Subj: Northeast Nuclear Energy Company (Millstone Nuclear Power Station, Unit No. 2) Docket No. 50-336-OLA

Gentlemen:

In response to the Licansing Board's June 30, 1992, Memorandum and Order, Licensee Northeast Nuclear Energy Company is providing a copy of Licensee Event Report 92-003-00.

Also, Northeast Nuclear Energy Company requests that:

Richard M. Kacich Director, Nuclear Licensing Northeast Utilities P.O. Box 270 Hartford, CT 06101

be added to the service list for this proceeding, and that all

July 8, 1992 Page 2 documents served by the parties and the Board also be served on Mr. Kacich. Sincerely, Nicholas S. Reynolds
WINSTON & STRAWN,
ATTORNEYS FOR NORTHEAST NUCLEAR ENERGY COMPANY cc: Service List

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of NORTHEAST NUCLEAR ENERGY CO. (Millstone Unit 2)

Docket No. 50-336-OLA

CERTIFICATE OF SERVICE

I hereby certify that a copy of Licensee Event Report 92-003-00 has been served by U.S. Mail, first class, on this 8th day of July, 1992, as follows:

Office of Commission Appellate Administrative Judge Adjudication U.S. Nuclear Regulatory Commission Atomic Safety and Licensing Board Washington, D.C. 20555

Administrative Judge Charles N. Kelber Atomic Safety and Licensing Board U.S. Nuclear Regulatory Commission U.S. Nuclear Regulatory Commission Washington, D.C. 20555

John T. Hull, Esq Office of the General Counsel U.S. Nuclear Regulatory Commission Wa_hington, D.C. 20555

Mary Ellen Marucci 104 Brownell Street New Haven, CT 06511

Ivan W. Smith, Chairman U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Administrative Judge Jerry R. Kline Atomic Safety and Licensing Board Washington, D.C. 20555

Richard M. Kacich Director, Nuclear Licensing Northeast Utilities P.O. Box 270 Hartford, CT 06101

Michael J. Pray, AIA 87 Blinman Street New London, CT 06320 Patricia R. Nowicki Associate Director EARTHVISION, Inc. 42 Highland Drive South Windsor, CT 06074

> NORTHEAST NUCLEAR ENERGY CO.

Nicholas Remolds
WINSTON & STRAWN,
ATTORNEYS FOR NORTHEAST NUCLEAR

ENERGY CO.

July 8, 1992

NORTHEAST UTILITIES General Offices Seiden Street Berlin Connecticut P O BOX 270 the Water Power Company heast Utilities Service Company east Nuclear Energy Company HARTFORD CONNECTICUT 06141-0270 (2031665-5000 Re: 10CFR50.73(a)(2)(ii) March 13, 1992 MP-92-268 U.S. Nuclear Regulatory Commission Document Control Desk Washington, D.C. 20555 Facility Operating License No. DPR-65 Docket No. 50-336 Licensee Event Report 92-003-00 Gentlemen:

This letter forwards Licensee Event Report 92-003-00 required to be submitted within thirty (30) days pursuant to 10CFR50.73(a)(2)(ii).

Very truly yours.

NORTHEAST NUCLEAR ENERGY COMPANY

Stephen E. Scace Director, Millstone Station

SES/RABilis

Anachment: LER 92-003-00

T. T. Martin, Region I Administrator

W. J. Raymond, Senior Resident Inspector, Millstone Unit Nos. 1, 2 and 3 G. S. Vissing, NRC Project Manager, Millstone Unit No. 2

0320208 HPP.

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Technical Specifications.

The original effective multiplication factor (Keff) calculated by ABB-CE for the Region 1 fuel storage racks for nominal dimensions, nominal spent fuel pool temperature and 4.5 weight percent enriched fuel assemblies was 0.9224 (without uncertainties). The discovered error results in an underprediction of approximately 0.04 delta Keff. Revised calculations by ABB-CE indicate that Keff is actually 0.963 for the same conditions. An investigation by ABB-CE has traced the error to two approximations used in their calculation.

NNECO is currently evaluating spent fuel storage rack design changes, additional criticality analyses (including the effects of observed boroflex degradation), and changes to the plant Technical Specifications to allow use of the Region 1 fuel storage racks.

EXPIRES 4130 42 URC Form 366A (6-69) U.S. NUCLEAR REGULATORY COMMISSION Estimated burden per response to comply with this information objection reduces 50 0 pers. Forward comments regarding burden estimate to the Records and Reports Management Branch (p-500). U.S. Nuchar Regulatory Commission, Washington, DC 20555, and to the Paperwork Reduction Project (3150-010c). Office of Management and Budget, Washington, DC 20503. LICENSEE EVENT REPORT (LER) TEXT CONTINUATION DOCKET NUMBER (2) FACILITY NAME IN EM NUMBER SECULE NOTAL YE AM N.MRER Millstone Nuclear Power Station Unit 2 01 5 | 01 01 013 13 16 9 12 01013 010 012 OF 013

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1. Description of Event

On February 10, 1992, at approximately 1130 hours. Nonheast Utilities (NU) was notified by an independent contractor that a higher than expected effective multiplication factor (keff) was calculated for the Region 1 fuel storage racks. On February 11, 1992, NU notified ABB-Combustion Engineering (ABB-CE) of the potential error in the spent fuel pool criticality analysis. On February 14, 1992, at 1415 hours, with the plant in Mode 1 at 30% power. Nonheast Nuclear Energy Company (NNECO) was notified by ABB-CE that a calculational error existed in the criticality analysis for the Region 1 spent fuel storage racks.

The Millstone 2 spent fuel storage racks were modified in May 1986, and consist of two regions:

- (a) Region 1 is designed to store up to 384 fuel assemblies with an initial enrichment of up to 4.5 weight percent U-235. Region 1 was designed to allow fuel assembly storage in every location. The Region 1 storage racks contain a neutron poison material (Boroflex), and have a nominal center-to-center pitch of 9.8 inches.
- (b) Region 2 is designed to store up to 728 fuel assemblies which have sustained at least 85% of their design burnup. Fuel assemblies are stored in a three-out-of-four array, with blocking devices installed to prevent inadvertent placement of a fuel assembly in the fourth location. The Region 2 storage racks have a nominal center-to-center pitch of 9 inches.

The original effective multiplication factor ($K_{\rm eff}$) calculated by ABB-CE for the Region 1 fuel storage racks for nominal dimensions, nominal spent fuel pool temperature and 4.5 w/o enriched fuel assemblies is 0.9224 (without uncertainties). The discovered error results in an underprediction of approximately 0.04 delta $K_{\rm eff}$. Revised calculations by ABB-CE indicate that $K_{\rm eff}$ is actually 0.963 for the same conditions. Evaluations by ABB-CE have confirmed that the Region 2 fuel storage racks are not affected by the error.

NNECO determined that this condition was reportable as a condition outside of the design basis of the plant. An immediate report was made to the NRC, and the existing reactivity condition of the spent fuel pool was verified to be in compliance with the plant Technical Specifications. All fuel movement in the spent fuel pool had previously been restricted due to the observed degradation of the neutron poison material in the Region 1 fuel storage racks. No automatic or manual safety systems were required to respond to this event.

II Cause of Event

An investigation by ABB-CE has traced the error to two approximations used in their calculation.

First, ABB-CE used the transport cross-sections as an approximation for the total cross-sections. This resulted in an overestimation of the neutron absorption in Region 1 and thus a lower calculated Keff.

Secund. ABB-CE used a geometric buckling term corresponding to a sparsely populated and unpoisoned array as an approximation of buckling in the poisoned configuration. This approximation also contributed to a lower calculated Keff in Region 1.

III. Analysis of Event

This event is being reported in accordance with 10CFR50.73(a)(2)(u)(B), which requires the reporting of any event or condition that results in the nuclear power plant being in a condition outside the design basis of the plant.

NAC Form 366A (6-89)

US HUCLEAR REGULATORY COMMISSION

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

APPROVED OMB NO 3150-0104 EXPIRES 4:30:92

Estimated burden per response to comply with this information collection request 50 0 hrs. Forward comments regarding purpoin estimate to the Records and Reports Management franch (p-530). U. 5 Two-ear Regulatory Commission. Washington, DC 20558, and to the Reportatory Reduction Project (3150-0104). Others of Management and Bugget. Washington, DC 37553.

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The safety consequence of this event is a potential uncontrolled criticality event in the spent fuel pool. Upon consideration of the following incors, a significant margin to a critical condition was always maintained and, therefore, the safety consequences of this event were minimal:

- (a) The boron concentration of the spent fuel pool is procedurally controlled at greater than 1720 ppm, and is typically maintained at greater than 2000 ppm.
- (b) All new fuel assemblies previously stored in the Region 1 fuel storage racks had been arranged in a 2 out of 4 checkerboard array.
- (c) The maximum initial enrichment of any fuel assemblies previously stored in the Region 1 fuel storage racks was less than 4 weight percent U-235, which is less than the design enrichment of 4.5 weight percent U-235
- (d) All discharged fuel assemblies previously stored in the Region 1 fuel storage racks have sustained at least one cycle of burnup.

IV. Corrective Action

1.

NECO is currently evaluating spent fuel storage rack design changes, additional criticality analyses including the effects of observed boroflex degradation), and changes to the plant Technical per fications in order to allow use of the Region 1 fuel storage racks. Proposed changes to the eech call Specifications are expected to be submitted to the NRC about April 1, 1992.

Additional Information

There were no failed components during this event.

Similar LERs:

77-23, 80-05, 83-07, \$5-01, 86-10 and 91-10

Spent Fuel Storage Racks

Manufacturer:

Combustion Engineering

Model:

Hi-Cap Spent Fuel Storage Module

Ells Code:

DB-RK-C490