Northeast
Nuclear Energy

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The Northeast Utilities System

JUN -3 1996

Docket No. 50-336
B15733

Re: 10 CFR 50.73

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

This letter forwards Licensee Event Report (LER) 96-026-00 documenting an event that occurred at Millstone Nuclear Power Station, Unit No. 2 on May 3, 1996. This LER is being submitted pursuant to 10 CFR 50.73(a)(2)(i).

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

For: P. M. Richardson
Director - Millstone Unit No. 2

By: M. L. Wilson
Manager - Operations
Millstone Unit No. 2

Attachment: LER 96-026-00

cc: T. T. Martin, Region I Administrator
P. D. Swetland, Senior Resident Inspector, Millstone Unit No. 2
D. G. McDonald, Jr., NRC Project Manager, Millstone Unit No. 2

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

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 (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

LICENSEE EVENT REPORT (LER)

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

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TITLE (4)

Incomplete Technical Specification Required Surveillance - Valve Lineups Inside Containment

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
05	03	96	96	026	00	06	03	96	FACILITY NAME	DOCKET NUMBER

OPERATING MODE (9)	5	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)			
POWER LEVEL (10)	0	20.2201(b)	20.2203(a)(2)(v)	[X] 50.73(a)(2)(i)	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)
G. P. van Noordennen, Nuclear Licensing Supervisor	(860)440-2084

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	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 May 3, 1996, at approximately 1945 hours with the plant in mode 5 at 0% power, during a review of the Technical Specifications (TS) it was discovered that the suveillance requirements of TS section 4.6.1.1.a, "Containment Integrity," were not met. TS surveillance 4.6.1.1.a requires, at least once per 31 days, that a verification be performed to ensure that all penetrations, not capable of being closed by OPERABLE containment automatic isolation valves and required to be closed during accident conditions, "are closed by valves, blind flanges or deactivated automatic valves secured in their positions..." Certain valves which are subject to this surveillance requirement were not included during the conduct of the surveillances. This event is being reported pursuant to the requirements of 10 CFR 50.73(a)(2)(i)(B).

The cause of this event was an historical interpretation of the TS that resulted in operating practices that were not consistent with the TS requirements. The manual valves identified which had not been included in this surveillance were verified to be in their proper position. Corrective actions taken included a shift briefing by the operations manager informing operators that the practice of entering "N/A" for certain valves on the valve lineups is unacceptable.

There were no automatic or manually initiated safety systems actuated as a result of this event.

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

I. Description of Event

On May 3, 1996, at approximately 1945 hours with the plant in mode 5 at 0% power, during a review of the Technical Specifications (TS) it was discovered that the suveillance requirements of TS section 4.6.1.1.a, "Containment Integrity," were not met. TS surveillance 4.6.1.1.a requires, at least once per 31 days, that a verification be performed to ensure that all penetrations, not capable of being closed by OPERABLE containment automatic isolation valves and required to be closed during accident conditions, "are closed by valves, blind flanges or deactivated automatic valves secured in their positions..." Certain valves which are subject to this surveillance requirement were not included during the conduct of the surveillances.

Subsequent to the initial discovery, it was also determined that TS surveillance requirement 4.5.2.a.7, "Emergency Core Cooling Systems," (ECCS) and 4.7.3.1.a.5, "Reactor Building Closed Cooling Water System," (RBCCWS) were not met. TS surveillance 4.5.2.a.7 requires, at least once per 31 days, the verification of "the correct position for each manual valve not locked, sealed or otherwise secured in position." TS surveillance 4.7.3.1.a.5 requires, at least once per 31 days, the verification of the "correct position of all valves servicing safety related equipment that are not locked, sealed or otherwise secured in position."

There were no automatic or manually initiated safety systems actuated as a result of this event. Additionally, no operator actions were taken in response to this event.

II. Cause of Event

The cause of this event was an historical interpretation of the TS that resulted in operating practices that were not consistent with the TS requirements.

III. Analysis of Event

This event is being reported pursuant to the requirements of 10 CFR 50.73(a)(2)(i)(B), "Any operation or condition prohibited by the plant's Technical Specifications."

The suveillance requirements of TS sections 4.6.1.1.a, 4.5.2.a.7, and 4.7.3.1.a.5 were not performed during the operating period prior to this event, therefore, the TS requirements were not met. An investigation has concluded that the components for which surveillances were not performed are manually operated valves. In order to meet the TS requirements, these valves are listed in operations procedures (e.g., Operation (OPS) Forms 2611D-2, 2611C-2, 2601B-1, and 2605A-1) that are utilized to perform the 31 day surveillances that verify valve position. It was discovered that operating practice was to complete the OPS forms, on which it was noted that the requrements were not applicable for those valves located inside containment during plant operation. This was documented on the forms by writing "N/A" in the space for initialing the proper valve position.

TS surveillance 4.6.1.1.a, "Containment Integrity," requires, at least once per 31 days, that a verification be performed to ensure that all penetrations, not capable of being closed by OPERABLE containment automatic isolation valves and required to be closed during accident conditions, "are closed by valves, blind flanges or deactivated automatic valves secured in their positions." FSAR section 5.2.8.4.2, "Containment Isolation System - Tests and Inspections," states, "The containment isolation valves located outside the containment are accessible for maintenance and inspection during normal plant operation. The isolation valves located within

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

containment are accessible during normal plant shutdown for maintenance and inspection." The operating practices leading to the omission of these valves were supported by an interpretation of the FSAR description that indicated that manual containment isolation valves located inside containment need only be inspected during plant shutdowns. The FSAR interpretation was subsequently utilized, during operation, as the basis for exempting from the 31 day TS surveillance those valves located inside containment. The investigation concluded there is no exemption described in the bases of the TS, therefore, the operating practice is not acceptable.

The surveillance requirements for TS sections 4.5.2.a.7, and 4.7.3.1.a.5 require verifying the correct position of valves that are "not locked, sealed or otherwise secured in position." It was operations practice to consider the valves located inside containment to be exempt from the 31 day surveillance, since the containment personnel hatch was locked and sealed. Although the valves were not individually sealed, they were considered "otherwise secured," and they were, therefore, not verified in position.

The significance of this event is low since prior to plant operation, while changing from mode 5 to mode 4, operators verify the correct position of the containment integrity valves and the correct position of ECCS and RBCCWS valves, and then secure the containment building. After the containment is secured, access inside is restricted and administratively controlled. Additionally, subsequent to this event the valves identified as having not been tested were verified to be in their proper position.

IV. Corrective Action

The manual valves identified which had not been included in these surveillances were verified to be in their proper position.

Corrective actions taken included a shift briefing from the operations manager informing operators that the practice of entering "N/A" for certain valves on the valve lineups is unacceptable and that the practice had resulted in not fulfilling TS surveillance requirements.

In response to Generic Letter 91-08, which provides guidance for removal of component lists from the TS, a license amendment request was submitted to the NRC Staff on January 22, 1996. The proposed change will modify TS surveillance 3.6.1.1 to be consistent with the FSAR section 5.2.8.4.2. The proposed change will require that the valve positions be verified prior to changing from mode 5 to 4, but will not require visual verification while at power.

Those valves required to be verified by TS 4.5.2.7 and 4.7.3.1 will either be sealed in position, verified in the correct position per current TS requirements, or a TS change will be processed to exempt the valves.

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V. Additional Information

Similar Events

An incomplete Technical Specification surveillance was documented in Millstone Unit No. 2 LER 94-028, submitted October 17, 1994. LER 94-028 reported that three TS surveillance tests were not performed for 69 of 91 containment isolation penetrations within the time interval specified in TS section 4.6.1.2.d due to the historical practice of assuming the 24 month LLRT surveillance interval to begin after all LLRTs were completed rather than scheduling each individually.

Manufacturer Data

None.