

Northeast
Utilities System

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May 16, 1996

Docket No. 50-245
B15706

Re: 10CFR50.73(a)(2)(i)

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

This letter forwards supplemental Licensee Event Report (LER) 96-011-01, documenting an event that occurred at Millstone Nuclear Power Station, Unit No. 1 on December 12, 1995. This LER is submitted pursuant to 10CFR50.73(a)(2)(i).

This LER supplement corrects the event date. The event date was originally stated in block 5 of NRC Form 366, "Event Date," to be January 10, 1996, which was the date that the standby gas treatment system (SGTS) was returned to service with performance of the proper surveillance tests. The event date should have reflected the first time that secondary containment integrity was not maintained when it was required. Section III of the LER, "Analysis of Event," clearly states that secondary containment integrity was not maintained on December 12, 1995, because the SGTS was inoperable, and so the event date has been corrected.

This LER supplement also modifies the first commitment, which originally stated that Northeast Nuclear Energy Company (NNECO) would incorporate Technical Specification Clarification into the Technical Requirements Manual, in order to clarify the surveillance requirements for the SGTS. NNECO has subsequently determined that a Technical Specification bases change is a more appropriate vehicle for communicating this clarification, and so the commitment has been modified accordingly.

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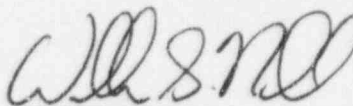
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Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

FOR: W. J. Riffer
Director - Millstone Unit No. 1



BY: W. G. Noll
Operations Manager - Millstone Unit No. 1

Attachment: LER 96-011-01

cc: T. T. Martin, Region I Administrator
T. A. Easlick, Senior Resident Inspector, Millstone Unit No. 1
J. W. Andersen, NRC Project Manager, Millstone Unit No. 1

EXPIRES 04/30/98

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 (IT
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 1

DOCKET NUMBER (2)

05000245

PAGE (3)

1 of 4

TITLE (4)

Standby Gas Treatment System and Secondary Containment Requirements Not Met

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
12	12	95	96	011	01	05	16	96	FACILITY NAME	DOCKET NUMBER
OPERATING MODE (9)		N	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5: (Check one or more) (11)							
POWER LEVEL (10)		000%	20.2201(b)		20.2203(a)(2)(v)		<input checked="" type="checkbox"/> 50.73(a)(2)(i)		50.73(a)(2)(viii)	
			20.2203(a)(1)		20.2203(a)(3)(i)		<input type="checkbox"/> 50.73(a)(2)(ii)		50.73(a)(2)(xi)	
			20.2203(a)(2)(i)		20.2203(a)(3)(ii)		<input type="checkbox"/> 50.73(a)(2)(iii)		73.71	
			20.2203(a)(2)(ii)		20.2203(a)(4)		<input type="checkbox"/> 50.73(a)(2)(iv)		OTHER	
			20.2203(a)(2)(iii)		50.36(c)(1)		<input type="checkbox"/> 50.73(a)(2)(v)		Specify in Abstract below or in NRC Form 366A	
			20.2203(a)(2)(iv)		50.36(c)(2)		<input type="checkbox"/> 50.73(a)(2)(vii)			

LICENSEE CONTACT FOR THIS LER (12)

NAME

Robert W. Walpole, Nuclear Licensing Supervisor

TELEPHONE NUMBER (Include Area Code)

(860)440-2191

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

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRCDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRCDS

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE).	<input checked="" type="checkbox"/> NO
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**EXPECTED
SUBMISSION**

MONTH DAY YEAR

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

On January 31, 1996, with the plant shutdown, the reactor in the COLD SHUTDOWN condition and all fuel assemblies in the spent fuel pool (for refueling outage 15), it was determined that the Standby Gas Treatment System (SGTS) surveillances required by the Millstone Unit No. 1 Technical Specification 4.7.B.2 to ensure SGTS operability and secondary containment integrity were not performed. The missed surveillances caused both trains of the SGTS to be administratively inoperable for a period of approximately four weeks. The failure to perform the surveillances is reportable pursuant to 10CFR50.73(a)(2)(i) as a condition prohibited by the plant's Technical Specifications.

The Technical Specifications require the SGTS system to be operable at all times when secondary containment integrity is required to be maintained. Following an evaluation, it was determined that during the four week period, activities were performed which require secondary containment. Since the SGTS was inoperable, secondary containment integrity was not maintained, and this is also reportable pursuant to 10CFR50.73(a)(2)(i) as a condition prohibited by the plant's Technical Specifications.

Since there was no fuel in the vessel at the time of the event, nor was fuel being moved within the reactor building, there were no safety consequences as a result of this event.

LICENSEE EVENT REPORT (LER)

TEXT CONTINUATION

FACILITY NAME (1) Millstone Nuclear Power Station Unit 1	DOCKET NUMBER (2) 05000245	LER NUMBER (6)			PAGE (3) 2 of 4
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
		96	-- 011 --	01	

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

I. Description of Event

On January 31, 1996, with the plant shutdown, the reactor in the COLD SHUTDOWN condition and all fuel assemblies in the spent fuel pool (for refueling outage 15), it was determined that the Standby Gas Treatment System (SGTS) surveillances required by the Millstone Unit No. 1 Technical Specification 4.7.B.2 to ensure SGTS operability and secondary containment integrity were not performed. The missed surveillances caused both trains of the SGTS to be administratively inoperable for a period of approximately four weeks. The failure to perform the surveillances is reportable pursuant to 10CFR50.73(a)(2)(i) as a condition prohibited by the plant's Technical Specifications.

The Technical Specifications require the SGTS system to be operable at all times when secondary containment integrity is required to be maintained. Following an evaluation, it was determined that during the four week period, activities were performed which require secondary containment. Since the SGTS was inoperable, secondary containment integrity was not maintained, and this is also reportable pursuant to 10CFR50.73(a)(2)(i) as a condition prohibited by the plant's Technical Specifications.

Since there was no fuel in the vessel at the time of the event, nor was fuel being moved within the reactor building, there were no safety consequences as a result of this event.

II. Cause of Event

The cause of this event is personnel error. Personnel failed to recognize that all required Technical Specification surveillances needed for SGTS operability were not performed, and therefore considered the SGTS to be operable. The SGTS is required to be operable in all reactor modes which require secondary containment integrity. Subsequently, the reactor mode switch was placed in the REFUEL condition, a plant condition where secondary containment integrity is required. However, since the SGTS should have been declared inoperable, the plant was in a condition prohibited by the Technical Specifications.

III. Analysis of Event

During refueling outage 15, with no fuel in the vessel, Technical Specification surveillances to ensure SGTS operability and secondary containment integrity were not performed. The Millstone Unit No. 1 Technical Specifications require HEPA filter and charcoal adsorber operability tests be performed on an annual basis (or after 720 hours of continuous), and following painting, fire, or chemical activities in a ventilation zone which may communicate with the system and contaminate the filters or the adsorber beds. The surveillance tests were performed on November 29, 1995, to meet the annual frequency requirement. Subsequently, on December 12, 1995, only a charcoal adsorber surveillance test was performed following the use of chemicals which could have affected the SGTS operability. The chemicals were used in conjunction with a liquid penetrant test which was performed on the reactor recirculation system welds. The failure to perform the HEPA filter surveillance test caused the SGTS to be administratively inoperable for a period of four weeks. Approximately four weeks later, on January 10, 1996, the HEPA filter surveillance was performed satisfactorily.

LICENSEE EVENT REPORT (LER)

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

Technical Specification 3.7.B.1 requires the SGTS to be operable at all times when secondary containment integrity is required. Technical Specification 3.7.C.1 further requires secondary containment integrity to be maintained during all modes of plant operation except when all of the following conditions are met:

- a. The reactor is in the COLD SHUTDOWN condition, all control rods are fully inserted, and the reactor is verified subcritical;
- b. The fuel cask or irradiated fuel is not being moved within the reactor building.

Following an evaluation, it was determined that during the four week period when the SGTS was inoperable, two activities were performed which required secondary containment integrity:

1. On December 12, 1995, at approximately 2335 hours, not all of the control rods were fully inserted due to the cycling of some control rods for retesting. This activity was performed with no fuel in the reactor vessel. There were no safety consequences as a result of this event, nor were there any safety implications for this particular event, since the control rods were not needed to maintain sub-criticality of the reactor core.
2. On December 22, 1995, at approximately 1335 hours, the reactor mode switch was placed in the REFUEL position. The reactor mode switch was returned to the COLD SHUTDOWN position in December 23, 1995. This activity was performed with no fuel in the reactor vessel. There were no safety consequences as a result of this event, nor were there any safety implications for this particular event, since all control rods were fully inserted, the reactor was verified subcritical (there was no fuel in the vessel), and neither the fuel cask nor any irradiated fuel was being moved within the reactor building.

Both of these events were performed contrary to the requirements of Technical Specification 3.7.C.1.(a). This event is reportable pursuant to 10CFR50.73(a)(2)(i)(B) as a condition prohibited by the plant's Technical Specifications. Although the events occurred during December, and the SGTS was returned to an operable status on January 10, 1996, this event was not determined to be reportable until January 31, 1996.

IV. Corrective Action

The SGTS surveillance requirements were reviewed with the personnel who determine system operability. A revision to the Technical Specification bases will be developed prior to startup for operating cycle 16 in order to clarify the surveillance requirements for the SGTS. Additionally, the procedure for operating the SGTS will be reviewed and revised prior to startup for operating cycle 16, in order to provide guidance on system operation while painting or chemical releases could adversely impact the operability of the SGTS.

V. Additional Information

None.

LICENSEE EVENT REPORT (LER)

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		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	4 of 4	
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TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

Commitments

The following are NNECO's commitments made within this letter. All other statements are for information only.

B15706-1 NNECO hereby commits to revise the Technical Specification bases prior to startup for operating cycle 16, in order to clarify the surveillance requirements for the SGTS.

B15569-2 NNECO hereby commits to review and revise the procedure for operating the SGTS prior to startup for operating cycle 16, in order to provide guidance on system operation while painting or chemical releases could adversely impact the operability of the SGTS.

Similar Events

A similar event regarding the failure to maintain secondary containment integrity was reported as Licensee Event Report (LER) 95-031-00.

Manufacturer Data

None.