NRC FORM 366 (4-95)			U.S. NUCLEAR REGULATORY COMMISSION							APPROVED BY OMB NO. 3150-0104					
14 W M									EXPIRES 04/30/98						
	(See reverse for required number of digits/characters for each block)							ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS MANDATE INFORMATION COLLECTION REQUEST: 50.0 HRS. REPORTED LESS LEARNED ARE INCORPORATED INTO THE LICENSING PROCESS AND BACK TO INDUSTRY. FORWARD COMMENTS REGARDING BURDEN ESTIM TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (T-8 F U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-00 AND TO THE PAPERWORK REDUCTION PROJECT (3160-0104), OFFICE MANAGEMENT AND BUGGET, WASHINGTON, DC 20503.							
ACILITY NAM	NE (1)									DOCK	ET NUMBER (2)			PAC	(3)
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ITLE (4)											name and a set of the state		-		
Failur	e to P rdance	erform with	Period Technic	ic Surveillance cal Specificatio	e Testing on 4.9.10	for C	onta	ainmer	it Purge	e Sys	tem Conta	inment Is	olati	on Val	ves in
EVENT DATE (5)			LER NUMBER (6)					REPORT DATE (7)			OTHER	INVO	INVOLVED (8)		
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MON	итн	DAY	YEAR	FACILI	TY NAME			DOCKET NUMBER	
11	06	96	96	039	00	0	1	08	97	FACILI	TY NAME			DOCKET NUMBER	
OPERAT	TING	-	THIS RI	EPORT IS SUBMI	TTED PURS	JANT	TOT	THE REC	UIREME	NTS C	OF 10 CFR 5:	(Check one	e or m	ore) (1	1)
MODE (9) 5		5	20.2201(b)			20.2203(a)(2)(v)			T	X 50.73(a)(2)(i)		50.73(a)(2)(viii)			
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			20.2203(a)(2)(iii)			50.36(c)(1)			50.73(a)(2)(v)		2)(v)	Specify in Abstract belo or in NRC Form 366A			
			20.	20.2203(a)(2)(iv)			50.36(c)(2)			50.73(a)(2)(vii)					
And and an arrange that was to	*********		d		LICENSEE	CONT	ACT	FOR TH	IS LER (	12)			-J		
IAME	I	R. T. L	audena	t, MP2 Nuclea	ar Licensir	ng Ma	anaç	jer			TELEPHONE NUM	(860) 4	ea Code 44-5	248	
			COMPL	ETE ONE LINE FO	OR EACH CO	MPO	NENT	FAILU	RE DESC	RIBED	IN THIS REP	ORT (13)			
CAUSE	SYST	EM COM	MPONENT	MANUFACTURER	REPORTABLE TO NPRDS	1		CAUS	E SYS	STEM	COMPONENT	MANUFACI	TURER	RE	PORTABLE O NPRDS
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SUPPLEMENTAL REPORT EXPECTED (14)									EXPECTED		MONTH	T	DAY	YEAR	
YES (If yes, complete EXPECTED SUBMISSION DATE).					X	NO		5	DATE	SSION (15)					

"Containment Isolation Valve Operability Test - Shutdown," the adequacy of the testing for the containment purge system containment valve isolation function as required by Technical Specification Surveillance Requirement 4.9.10 was questioned. On December 10, 1996 as a result of continuing investigation of this condition, it was determined that testing of the containment purge valve isolation function did not meet the requirements of Technical Specifications.

The cause of this event was inadequate program design in that the test method prescribed failed to meet the Technical Specification requirements.

As a result of this event, SP-2605H has been revised to appropriately test the containment purge valve isolation function in accordance with Technical Specification 4.9.10. This procedure was satisfactorily performed on December 17, 1996 prior to entering Mode 6. Additionally, Technical Specification surveillance procedures will be reviewed to ensure compliance with Technical Specification surveillance requirements as part of the Millstone Unit No. 2 Operational Readiness Plan.

	NRC FORM 366A			U.S. NUCLEA	R REGULATO	RY COMMISSION	
•	(4-95)						
	LICENS	EE EVENT REPORT (I	.ER)				
	FACILITY NAME (1)	DOCKET		LER NUMBER	PAGE (3)		
	Millstone Nuclear Power Station Unit 2	05000336	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	2 OF 3	
			96	- 039 -	00		

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

#### I. Description of Event

On November 6, 1996 during an Operations department review of Surveillance Procedure (SP) 2605H, "Containment Isolation Valve Operability Test - Shutdown," the adequacy of the testing for the containment purge system [VA] containment valve isolation function as required by Technical Specification Surveillance Requirement 4.9.10 was questioned. On December 10, 1996 as a result of continuing investigation of this condition, it was determined that testing of the containment purge valve isolation function did not meet the requirements of Technical Specifications. At the time of discovery of this event, the unit was in Mode 5 at 0 percent power.

SP-2605H section 4.2 tested the closure function of the containment purge system containment isolation valves [ISV] by tripping one of the four bistables [RLY] in the isolation actuation circuitry and observing the closure of the containment purge system containment isolation valves. This testing did not include the circuitry from the containment radiation monitors [MON] to the bistables nor did it include the other three bistables. This method did not satisfy the requirements of Technical Specification Surveillance Requirement 4.9.10.

Surveillance Requirement 4.9.10 requires the verification of containment purge valve isolation on a high radiation signal from each of the containment radiation monitoring instrumentation channels within 72 hours prior to the start of core alterations. Other surveillance procedures test the circuitry from the containment radiation monitors to all four bistables on a monthly basis; however, these do not ensure that the testing is performed within 72 hours prior to the start of core alterations. Therefore, it is likely that this portion of the circuitry had not routinely been tested within the time frame required by the Technical Specifications.

SP-2605H has been revised to appropriately test the containment purge valve isolation function in accordance with Technical Specification 4.9.10. This procedure was satisfactorily performed on December 17, 1996 prior to entering Mode 6.

The containment purge valves isolation function is required to be operable in Modes 5 and 6; otherwise, the containment purge system containment isolation valves must be kept closed. Past testing of the containment purge valve isolation function did not satisfy the requirements of Technical Specifications. Therefore, this event is reportable in accordance with 10 CFR 50.73(a)(2)(i)(B), any operation or condition prohibited by the plant's Technical Specifications.

# II. Cause of Event

The cause of this event was inadequate program design in that the test method prescribed failed to meet the Technical Specification requirements.

# III. Analysis of Event

The containment purge system is designed to provide a method of providing fresh air to the containment. During unit operation (Modes 1, 2, 3, and 4), the containment purge system containment isolation valves are closed and electrically deactivated. In Modes 5 and 6 (cold shutdown and refueling), the containment purge isolation valves will receive an automatic closure signal if the monitored containment radiation level reaches a preset level. Two redundant particulate and gaseous monitoring systems are used to continuously monitor the containment atmosphere. A high radiation signal from any one of the four monitored channels (2 gaseous and 2 particulate) will initiate a containment isolation actuation signal which will automatically close the containment purge system containment isolation valves.

NRC FORM 366A (4-95)			U.S. NUCLEA	R REGULATOR	RY COMMISSION	
LICE	NSEE EVENT REPORT (I TEXT CONTINUATION	LER)				
FACILITY NAME (1)	DOCKET	DOCKET LER NUMBER (6) PAGE				
Millstone Nuclear Power Station Uni	t 2 05000336	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	3 OF 3	
		96	- 039			

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

Although complete testing of the containment purge valve isolation function was not performed within 72 hours prior to the start of core alterations, the complete circuitry was tested on a monthly basis by other surveillance procedures. This testing would be adequate to ensure the proper operation of the isolation function. Therefore, this condition is not considered to be safety significant.

# IV. Corrective Action

As a result of this event, the following corrective actions have been, or will be, performed.

- SP-2605H has been revised to appropriately test the containment purge valve isolation function in accordance with Technical Specification 4.9.10. This procedure was satisfactorily performed on December 17, 1996 prior to entering Mode 6.
- Technical Specification surveillance procedures will be reviewed to ensure compliance with Technical Specification surveillance requirements as part of the Millstone Unit No. 2 Operational Readiness Plan. The review will initially focus on Technical Specification surveillance procedures required for Mode 6 and defueled. Surveillance procedures required for subsequent mode changes will be reviewed prior to mode entry. (This commitment was previously sent to the NRC in the response to NOV 336/96-08-07, NNECO Commitment No. B16076-2.)

#### V. Additional Information

Previous LERs that involve deficient surveillance procedures include:

- LER 96-023-00: Failure to Perform Technical Specifications Surveillances on Certain Containment Isolation Valves
- LER-96-024-00: Response Time Testing of RPS and ESAS Failed to Include Response Time of SPEC 200 Electronics
- LER 96-025-00: Enclosure Building Filtration Actuation Signal/Auxiliary Exhaust Actuation Signal Interlock Not Tested Periodically
- LER 96-026-00: Incomplete Technical Specification Required Surveillance Valve Lineups Inside Containment
- LER 96-035-00: Failure to Perform Periodic Surveillance Testing for Interlock Function Associated with the Main Steam Isolation System Function of the Engineered Safeguards Actuation System
- LER 96-037-00 Inadequate Surveillance Procedure for Verifying Average Water Temperature at the Unit 2 Intake Structure
- LER 96-038-00: Inadequate Surveillance Procedures Used to Verify Emergency Diesel Generator Operability

Energy Industry Identification System (EIIS) codes are identified in the text as [XX].