

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)

Inadequate Surveillance Procedure for Verifying Motor Circuit Breaker Position in Accordance with Technical Specification Requirements 4.1.2.3.2, 4.1.2.3.3, and 4.4.1.4

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	96	96	-- 040 --	00	01	13	97	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)		000	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

R. T. Laudenat, MP2 Nuclear Licensing Manager

TELEPHONE NUMBER (Include Area Code)

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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)

YES

(If yes, complete EXPECTED SUBMISSION DATE).

X NO

EXPECTED SUBMISSION DATE (15)

MONTH

DAY

YEAR

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

On December 12, 1996, it was identified that surveillance procedure (SP) 2619A, "Control Room Shift Checks," did not adequately satisfy the requirements of Technical Specification (TS) Surveillance Requirements 4.1.2.3.2, 4.1.2.3.3, and 4.4.1.4 for verifying motor circuit breaker position. This discrepancy was identified during an investigation of a concern from a NRC inspection. SP 2619A was used to remotely verify within the Control Room the motor circuit breaker position. It was determined that remote verification was insufficient and that local verification was necessary in order to meet the surveillance requirements of the TS.

The cause of the event was failure to properly incorporate Technical Specification surveillance requirements into plant surveillance procedures.

Upon identification of this event plant surveillance procedures were revised to perform local verification of the motor circuit breakers positions. 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.

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TEXT CONTINUATION

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		96	040	00	

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

I. Description of Event

On December 12, 1996, it was identified that surveillance procedure (SP) 2619A, "Control Room Shift Checks," did not adequately satisfy the requirements of Technical Specification (TS) Surveillance Requirements 4.1.2.3.2, 4.1.2.3.3 and 4.4.1.4 for verifying motor circuit breaker [52] position. This discrepancy was identified during an investigation of a concern from a NRC inspection. At the time of discovery of this event, the unit was in Mode 5 at 0 percent power.

The surveillance requirements state the following:

TS 4.1.2.3.2 requires that for Modes 5 and 6, all charging pumps [CB] not intended to be capable of injecting shall be demonstrated inoperable at least once per 12 hours by verifying that the motor circuit breakers are in the open position.

TS 4.1.2.3.3 requires that for Modes 5 and 6, all High Pressure Safety Injection (HPSI) [BQ] pumps not intended to be capable of injecting shall be demonstrated inoperable at least once per 12 hours by either verifying that the motor circuit breakers have been disconnected from their power supply circuits, or by shutting and tagging the discharge valve with the key lock on the control panel.

TS 4.4.1.4 requires that for Mode 5, two Reactor Coolant Pumps (RCPs) [AB] shall be demonstrated inoperable at least once per 12 hours by verifying that the motor circuit breakers have been disconnected from their electrical power supply circuits.

Surveillance Procedure SP 2619A, was used to remotely verify within the Control Room the associated motor circuit breaker position of the pumps by utilizing a combination of control board extinguished indicating lights and an administrative control. The administrative control encompassed the installation of a Shift Manager red tag (controlled by procedure WC-2, "Tagging") on the control board switches to verify the breaker is racked down (disconnected from its power supply circuits) for the RCPs and HPSI pumps, or in the open position for the charging pumps. It was determined that remote verification was insufficient and that local verification was necessary in order to meet the surveillance requirements in the TS.

Plant surveillance procedures were revised to require local verification of motor circuit breaker position to satisfy the TS requirements. These changes were implemented on December 12, 1996.

Past performance of SP 2619A did not satisfy the surveillance requirements of Technical Specifications. Therefore, this event is reportable under 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 the event was failure to properly incorporate Technical Specification surveillance requirements into plant surveillance procedures.

III. Analysis of Event

Technical Specification Surveillance Requirements TS 4.1.2.3.2, 4.1.2.3.3 and 4.4.1.4 are intended to ensure that a Reactor Coolant System (RCS) low temperature overpressurization (LTOP) event does not occur. The required periodic surveillance of the motor circuit breaker position during Modes 5 and 6 ensures that there is no power supplied to the associated pumps, thereby preventing inadvertent pump starts.

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Considering that the Technical Specifications surveillance requirements do not provide a specific method to determine acceptable verification of circuit breaker position, the use of local verification to satisfy the procedural acceptance criteria, as opposed to remote verification, is the correct method and provides additional confirmation that the surveillance requirements are satisfied.

Although compliance with the Technical Specification Surveillance requirements were not met prior to the identification of this event, the bases for the Technical Specification requirement were met by ensuring that administrative controls were in place (tags on the control switches) and the control board light indication was verified. Therefore, this event is not safety significant.

IV. Corrective Action

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

1. Upon identification of this event, plant surveillance procedures were revised to perform local verification of the motor circuit breakers positions.
2. 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
- LER 96-039-00: Failure to Perform Periodic Surveillance Testing for Containment Purge System Containment Isolation Valves in Accordance with Technical Specification 4.9.10

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