

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 (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)

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TITLE (4)

Discrepancies Found in Various Technical Specification Required Valve Lineups.

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
04	25	96	96	-- 023 --	01	01	15	97	FACILITY NAME	DOCKET NUMBER
OPERATING MODE (9)		5	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)		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. Laudonat, MP2 Nuclear Licensing Manager

TELEPHONE NUMBER (Include Area Code)

(860) 444-5248

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

On April 25, 1996 at 1520 hours, with the plant in mode 5 at 0% power, an internal audit discovered that several valves located within containment isolation boundaries were not being inspected to verify they were in the closed position. This monthly check demonstrates containment integrity and is required to be performed at least once per 31 days, in accordance with the requirements of Technical Specifications (TS) section 4.6.1.1.a. 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." As corrective action, other TS surveillances which require periodic valve position verification were reviewed and deficiencies identified for TS sections: 4.1.2.1a & b, 4.1.2.2b, 4.5.2a.7, 4.5.3.1, 4.7.1.2a.5, 4.7.3.1a.5, and 4.7.4.1a.5.

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

The isolation valves that had not been inspected in accordance with the TS were subsequently inspected and verified to be in the closed position. Other valve line-ups which fulfill TS required valve position verifications were reviewed. Procedure changes have been completed to add the missing valves to the appropriate forms.

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

I. Description of Event:

On April 25, 1996 at 1520 hours, with the plant in mode 5 at 0% power, an internal audit discovered that several valves located within containment isolation boundaries were not being inspected to verify they were in the closed position. This monthly check demonstrates containment integrity and is required to be performed at least once per 31 days, in accordance with the requirements of TS section 4.6.1.1.a.

As part of the corrective action, other TS surveillances were reviewed to identify those surveillances which require periodic verification of valve positions. The applicable surveillance procedure valve line-ups which fulfill the other surveillance requirements were reviewed to verify that all required valves were included. Discrepancies were identified in 13 of the 16 valve lineups. The valve line-ups which had discrepancies were associated with TS Surveillances: 4.1.2.1a & b, 4.1.2.2b, 4.5.2a.7, 4.5.3.1, 4.7.1.2a.5, 4.7.3.1a.5, and 4.7.4.1a.5.

II. Cause of Event:

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

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." Valves required to maintain containment integrity and safety system valve alignment were not verified and documented to be in the proper position in accordance with the requirements of TS. The following TS sections were reviewed: 4.6.1.1.a, 4.6.2.1a.6, 4.1.2.1a & b, 4.1.2.2b, 4.5.2a.7, 4.5.3.1, 4.7.1.2a.5, 4.7.3.1a.5 and 4.7.4.1a.5.

The initial containment isolation valve procedural discrepancies identified in this event were discovered by an internal audit team tasked with reviewing TS compliance. The Final Safety Analysis Report (FSAR) table 5.2-11 lists containment structure isolation valve information. The audit found that some valves listed in the FSAR table, were not listed on the monthly surveillance procedure (OPS Form 2605A-1) and, therefore, operators were not verifying the valves were in the closed position.

The containment isolation valves in the initial investigation, which were determined to be required for the surveillance procedure, are 3/4 inch and smaller vent and drain valves, a 2 inch isolation valve (2-CH-517) located on the pressurizer auxiliary spray line, and two 8 inch main steam line atmospheric dump valves (MS-190 A & B). The 31 day surveillance was not performed on these valves, however, an inspection was performed to verify these valves are closed. Additionally, the investigation determined that all but two 3/8" drain valves were previously inspected as required by other surveillance procedures, however, not within a 31 day cycle. The actual and potential safety significance of this event is low since subsequent to the event the valves were verified to be closed.

The other system valves discovered in the subsequent reviews included thirty nine 3/4 inch vent, drain and instrument root valves. In addition, there were 28 process flow valves, most were service water (SW) valves used to valve the Reactor Building Closed Cooling Water (RBCCW), Turbine Building Closed Cooling Water (TBCCW), Diesel Generators, or chiller heat exchangers into and out of service and are aligned in system operating procedures. Other SW valves aligned lube water to the circulating water pumps. The remaining valves

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provide condensate make-up to the RBCCW surge tank. Misalignment of these process flow valves would be detected by changes in the operating parameters in the affected systems.

IV. Corrective Action:

The isolation valves that had not been inspected in accordance with the TS were subsequently inspected and verified to be in the closed position.

Procedure changes to add the missing valves to the deficient surveillance procedure valve line-ups have been completed and approved.

Site procedures "Administration of Millstone Procedures and Forms" and "Developing and Revising Millstone Procedures and Forms" have been revised to provide improved guidance in the areas of Design Basis document and TS compliance.

A shift briefing has been provided to inform operations personnel of this issue and the need to comply with the above procedural guidance and to maintain verbatim compliance with TS requirements.

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:

## EIS Codes:

EK: Diesel Generators  
KW: Service Water  
KB: Turbine Building Closed Cooling Water  
CC: Reactor Building Closed Cooling Water  
SB: Main Steam  
CB: Pressurizer Auxiliary Spray

Similar Events:

Similar LERs that involve deficient surveillance procedures include:

- LER 96-023-00 Failure to Perform Technical Specification 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 Actuation Signal Interlock Not Tested Periodically

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- 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 Procedure 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

Manufacturer Data:

None