NRC FORM (4-95)	366	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 BUGGET, WASHINGTON, CC 20503							
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FACILITY NAME (3)								DOCKET NUMBER (2) PAGE (3)								
Millstone Nuclear Power Station Unit							nit 3				050004	23	23 1 of 4			
TITLE (4)	ack of	f Verba	itim Co and Bat	mpliance tery Cha	wit	h Technica	al Specifi	ication	Survei	illance	e Requirem	ients for 1	25 V	olt Batter	ies	
EVENT	DATE	(5)	1	LER NUN	BER	(6)	REPO	RT DAT	E (7)	T	OTHER	FACILITIES	INVOL	VED (8)		
MONTH	DAY	YEAR	YEAR	SEQUENT NUMP	R	REVISION	MONTH	DAY	YEAR	FACIL	TY NAME	-	DOCKET NUMBER			
01	04	97	97	001	T	00	02	03	97	FACILI	TY NAME		DOCKET NUMBER			
OPERAT	ING		THIS R	EPORT IS S	UBM	ITTED PURSI	UANT TO	THE REG	UIREM	ENTS	OF 10 CFR 1:	(Check one	or mo	ore) (11)		
MODE (9) 5			20.2201(b)				20.2203	(a)(2)(v)		50.73(a)(2)(i) 50.73(a)(2)(vin)						
POWER			20.2203(a)(1)				20.2203	(a)(3)(i)		-	50.73(a)((2)(ii)	50.73(a)(2)(x)			
LEVEL (10)	000	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)(2)(iii) 20.2203(a)(2)(iii)				20.2203(a)(4) 50.36(c)(1)				50.73(a)(2)(iv) 50.73(a)(2)(v)			OTHER Specify in Abstract below		
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							50.36(c)	(2)		50.73(a)(2)(vii)			or in NHC Form 366A			
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NAME	J.	M. Pes	schel, M	MP3 Nucl	ear	Licensing I	Manager				TELEPHONE NUM	BER (Include Are (860)43	87-58	40		
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CAUSE	SYST	EM CON	APONENT	MANUFACT	URER	TO NPRDS	E	CAUS	SE SY	SYSTEM COMPONENT MAN		MANUFACT	MANUFACTURER R		TO NPRDS	
		SUPP	LEMENT	AL REPORT	EXP	ECTED (14)			_	EXPE	CTED	MONTH		DAY	YEAR	
YES (If yes,	comple	ete EXPE	CTED SI	UBMISSION	DAT	E).)]	SUBM	SSION					

On January 4, 1997, with the plant in Mode 5, it was identified that 125 volt battery surveillance testing was being performed in a manner that was not in verbatim compliance with the Technical Specifications (TS). Similarly, on January 9, 1997, with the plant in Mode 5, it was identified that 125 volt battery charger surveillance testing was being performed in a manner that was not in verbatim compliance with the TS. These conditions were determined to be reportable pursuant to 10CFR50.73(a)(2)(i), as an event or condition prohibited by the Technical Specifications.

While the surveillance testing performed may have been more accurate or more conservative than the verbatim requirements of the specifications involved, this event is significant in that it identifies further examples of a lack of verbatim compliance with TS requirements. These conditions were identified as the result of a heightened awareness of the potential for additional lack of verbatim TS compliance such as those described in previous Licensee Event Reports, LER 96-038-00, and LER 96-048-00.

Corrective actions included immediate revision and performance of the battery and battery charger surveillance testing procedure requirements to effect verbatim TS compliance with the TS. Additionally, a review of the affected TS will be conducted for potential wording changes to ensure clarity, followed by the development and submittal of any resultant amendment request.

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I. Description of Event

On. January 4, 1997, with the plant in Mode ^a vas identified that 125 volt battery surveillance testing was being performed in a manner that was not in verbating compliance with the Technical Specifications (TS) 4.8.2.1.b.3. Accordingly, previously performed surveillances were not acceptable, the 125 volt batteries should have been declared inoperable and the appropriate Limiting Condition for Operation (LCO) should have been entered. Since these actions were not performed, it was determined that this condition was reportable pursuant to 10C. R50.73(a)(2)(i), as any operation or condition prohibited by the Technical Specifications (TS).

Technical Specification 6.8.2.1.b.3 requires that, to demonstrate operability of the 125 volt batteries every 92 days, the average of six (6) connected battery cells' electrolyte temperatures be verified to be greater than 60°F. Obtaining the electrolyte temperatures of all (60) connected cells and averaging them was perceived as a more accurate and conservative validation of battery capabilities and, therefore, was believed to satisfy the TS testing requirement.

Similarly, on January 9, 1997, with the plant in Mode 5, it was identified that 125 volt battery charger surveillance testing was being performed in a manner that was not in verbatim compliance with TS4.8.2.1.c.4. Accordingly, previously performed surveillances were not acceptable, the 125 volt battery chargers should have been declared inoperable and the appropriate Limiting Condition for Operation (LCO) should have been entered. Since these actions were not performed, it was determined that this condition was reportable pursuant to 10CFR50.73(a)(2)(i), as any operation or condition prohibited by the (TS).

Technical Specification 4.8.2.1.c.4 requires that, to demonstrate operability of the 125 vdc battery chargers every 18 months, the battery chargers each supply at least the current specified in TS Table 4.8-2b at 125 vdc for at least 24 hours. The actual surveillance testing was performed such that the specified current flow was supplied for at least 24 hours, but at a higher voltage than the TS required 125 volts. The surveillance was performed at, or above, the TS minimum float (operating) voltage of 129 vdc. Since testing at a voltage higher than 125vdc demonstrated greater charger capability than the TS required, this testing was considered as conservatively within the TS requirement. Testing a prove, the TS minimum float voltage also eliminated making the battery bub inoperable during the testing; this was posidered an additional conservatism that enhanced compliance with the TS requirements.

II. Cause of Event

The operation in a condition prohibited in the Technical Specifications (TS) was the result of a misconception that performing surveillances under conditions "more conservative than", or "meeting the intent of", a specific TS requirement was acceptable for compliance. A causal factor in this lack of understanding was that management expectations and guidance regarding literal compliance withTS were neither clear nor adequately communicated throughout the organization.

III. Analysis of Event

While the surveillance testing performed may have been more accurate or more conservative than meeting the verbatim requirements of the specifications in the distribution of the second tions would not have resulted in a loss of safety function and did not involve operation outside the design basis of the plant. They were identified as the result of a heightened awareness of the potential for additional lack of verbatim TS compliance such as those described in previous Licensec Event Reports, LER 96-038-00, and LER 96-048-00.

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4-Ap)	LICENSEE	EVENT REPORT (LER)				
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IV. <u>Corrective</u>	Action						
The following co	rrective action was taken:						
The battery the TS.	and battery charger surveillance testing	g procedures were revi	sed to	effect ver	batir	n compliand	ce with
The plant end demonstrate	ntered the appropriate TS ACTION state equipment operability.	tements and performed	the re	quired ve	rbati	m testing to	>
The following co	rrective actions will be taken:						
 As described on complian 	d in LERs 96-038-00 and 96-048-00, th ce with Technical Specifications by Ma	e Unit Director will pro- rch 31, 1997.	vide the	e unit staf	fwiti	h his expec	tations
A review of t	he affected TS will be conducted for po	otential changes to ens	ure cla	rity by Ma	arch	15, 1997_	
 Identification amendment 	of any needed clarification or enhance request by September 30, 1997.	ement of the subject TS	S will be	e followed	l by t	he submitte	al of an
V. Additional	Information						
None							
Similar Eve	nts						
LER 96-038-00	"Violation of Technical Specifications Pumps"	sPer-ining to High Pre	ssure S	afety Inje	ctior	& Charging	<u>a System</u>
	At 1800 on October 10, 1996, with the Technical Specification remuirement Charging (CHS) system pumps had and 4. Technical Specifications 3.1. CHS pumps that are required to be Mode 4 at 350 degrees Fahrenheit, transition band for removing pumps transition is made from Mode 3 to M changed modes and placed the platentry. These conditions occurred a Technical Specifications rather than	the plant in Mode 5, pla t for operability of High not historically been in 2.4, 3.5.2 and 3.5.3 sp operable or inoperable The Technical Specifi from service or restori Mode 4 or Mode 4 to Mo int in the configuration in is a result of conducting pensuring compliance	ecify di ecify di ecify di e at the ications ing ther ode 3. required g opera with the	onnel de ire Safety ng transi fferent co transition do not p n to oper The plan d by the r tions to n e Technic	term inje tions politions politions able that heet al St	ined that the oction (SIH) between M nations of S at from Mod le a temper status as the historically mode after to the intent opecifications	e and lodes 3 ilH and le 3 to ature ne the mode f the s.

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LICENSEE EVENT REPORT (LER)

TEXT CONTINUATION

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The corrective actions associated with this LER have not been fully implemented at this time. Implementation of these actions will aid in preventing recurrences similar to those being reported.

LER 96-048-00

"Failure To Complete Technical Specification Required Testing Of CHS Pump While Shutdown"

On December 2, 1996, with the plant in Mode 5, it was determined that a portion of the Technical Specification surveillance which tests the load shed function for both Emergency Diesel Generators (EDGs) had not been performed in accordance with Technical Specification Surveillance 4.8.1.1.2.g.6. This surveillance is required to be completed once per 18 months during shutdown. Contract to this, the surveillances which tested the load shed for both trains of Charging (CHS) syste. A pumps and re-energization feature for portions of the CHS system were performed during plant operation. The cause was determined to be a lack of verbatim compliance with the Technical Specifications. Contributing to this were ineffective corrective actions to identify "shutdown" surveillances, and incomplete up dating of the Master Surveillance Test Control List (MSTCL) data base.

The safety significance of this event was minimal in that the mode in which the surveillances were performed had no physical affect of the ability of complete the surveillances or the ability of the EDGs to perform their safety function. As immediate corrective action, the EDGs were declared inoperable and the load shed surveillances were performed during shutdown prior to restoring the EDGs to operable status.

Manufacturer Data

EIIS System Code

Not Applicable