

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-D104), 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
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TITLE (4)
Insufficient ESFAS Surveillance Testing (Generic Letter 96-01 Review)

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
03	25	97	97	-- 009 --	00	04	24	97	FACILITY NAME	DOCKET NUMBER

OPERATING MODE (9) **N**

POWER LEVEL (10) **000**

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)

20.2201(b)	20.2203(a)(2)(v)	<input checked="" type="checkbox"/>	50.73(a)(2)(ii)	50.73(a)(2)(viii)
20.2203(a)(1)	20.2203(a)(3)(ii)	<input type="checkbox"/>	50.73(a)(2)(ii)	50.73(a)(2)(x)
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 of 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 R. G. Joshi, MP2 Nuclear Licensing	TELEPHONE NUMBER (Include Area Code) (860) 440-2080
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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)				EXPECTED SUBMISSION DATE (15)		MONTH	DAY	YEAR
YES (If yes, complete EXPECTED SUBMISSION DATE).	<input checked="" type="checkbox"/>	NO						

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

On March 25, 1997, the first three of fourteen reports which review the facility's compliance with Generic Letter 96-01 for the Engineered Safety Feature Actuation System (ESFAS) were received. These reports determined that circuits within the Containment Spray Actuation System (CSAS), which is a sub-system of the ESFAS, were not being properly tested during surveillance activities. The 6N90-3 actuation modules 30 millisecond delay circuit and all circuitry after the delay circuit had not been properly tested.

The cause of this event was an inadequate program to ensure surveillance procedures fully implement Technical Specification requirements.

To correct this deficiency, the applicable surveillance procedures will be revised to incorporate the required monthly testing of the CSAS actuation modules.

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TEXT CONTINUATION

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Millstone Nuclear Power Station Unit 2	05000336	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	2 OF 3
		97	- 009 -	00	

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

I. Description of Event

On March 25, 1997, the first three of fourteen reports which review the facility's compliance with Generic Letter 96-01 for the Engineered Safety Feature Actuation System (ESFAS) were received. These reports determined that circuits within the Containment Spray Actuation System (CSAS) [BE], which is a sub-system of the ESFAS, were not being properly tested during surveillance activities. The 6N90-3 actuation modules 30 millisecond delay circuit and all ESFAS circuitry after the delay circuit had not been properly tested on a monthly basis. At the time of discovery of this event, the reactor [RCT] was defueled.

The CSAS is required to be functionally tested. The present functional test procedure utilizes two overlapping tests. One test injects a signal as close to the sensor as practicable and verifies that the bistable within the ESFAS trips. The other function test uses the Automatic Test Insertion (ATI) to test the logic between the bistable and actuation module. Both tests are performed on a monthly basis in accordance with the Technical Specifications. However, the actuation modules for the CSAS were modified in May 1995 to solve a relay race within the ESFAS system. This modification introduced a 30 millisecond time delay. Since the ATI is a 2 millisecond pulse, the ATI cannot test the time delay or the circuitry after the time delay circuit. Operational surveillances to support the bistable trip test were initiated which would have verified this circuitry. However, the containment spray pump actuation modules were not incorporated into the operational test. Therefore, monthly functional testing does not test the trip function of the containment spray pumps.

This event is being reported in accordance with 10CFR50.73(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 an inadequate program to ensure surveillance procedures fully implement Technical Specification requirements.

III. Analysis of Event

The ESFAS monitors the Nuclear Steam Supply System to affect plant equipment to start or to mitigate the consequences of an event if conditions deviate from a preset operating range. Circuitry after the actuation modules is tested during each refueling outage to verify functionality, and time response of the system. Therefore, the circuitry is tested on a refueling basis, but not on a monthly basis. The actuation modules were last tested and verified operable during the ESFAS functional test, performed on March 3, 1996 for Facility 1 and on March 26, 1996 for Facility 2.

Based on the above, this event is not considered to be safety significant.

IV. Corrective Action

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

- Operational surveillances, which verify the circuitry after the bistable, will be revised prior to entry into Mode 4 from the current outage to properly test the CSAS actuation modules.
- In the response to NOV 336/98-08-07 (NNECO Commitment No. B16076-2), Millstone Unit No. 2 committed to perform a review of Technical Specification surveillance procedures to ensure compliance with Technical Specifications surveillance requirements as part of the Operational Readiness Plan.

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TEXT CONTINUATION

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		97	009	00	

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

V. Additional Information

Similar Events

Previous similar events involving the facility review of Generic Letter 96-01:

LER 96-035 - Identified that both bistables (one for each facility) were not verified for a Main Steam Isolation (MSI) signal for the Engineered Safety Actuation Feature System. An MSI signal is sent to both bistables to ensure a single failure will not cause an actuation and the functional test did not verify both bistables, only the bistable for the facility under test.

LER 97-008 - Identified that bistable trip lights were not verified during the RPS bistable trip test. The trip lights are the only indication available to verify that the K1, K2 and K3 relays properly form the 2 out of 4 matrix for the RPS to trip the reactor.

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