

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) **Millstone Nuclear Power Station Unit 2** DOCKET NUMBER (2) **0 5 0 0 0 3 3 6 1 OF 0 2** PAGE (3)

TITLE (4) **Inconsistency Between Safety Analysis and Technical Specifications**

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 NAMES		DOCKET NUMBER (S)			
1	0	0	6	8	6	8	6	8	6	0	5	0	0	0
				0	1	0				0	5	0	0	0

OPERATING MODE (9) **6** THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § (Check one or more of the following) (11)

POWER LEVEL (10) <b>0 0 0</b>	20.402(b)	20.405(a)	50.73(a)(2)(iv)	73.71(b)
	20.405(a)(1)(i)	50.36(a)(1)	50.73(a)(2)(iv)	73.71(a)
	20.405(a)(1)(ii)	50.36(a)(2)	50.73(a)(2)(iv)	OTHER (Specify in Abstract below and in Text NRC Form 366A)
	20.405(a)(1)(iii)	50.73(a)(2)(i)	50.73(a)(2)(iv)(A)	
	20.405(a)(1)(iv)	50.73(a)(2)(ii)	50.73(a)(2)(iv)(B)	
	20.405(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(iv)	

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER
<b>Robert A. Borchert, Reactor Engineer X4418</b>	<b>2 0 3 4 4 7 - 1 7 9 1</b>

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPROS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPROS

SUPPLEMENTAL REPORT EXPECTED (14)

YES ( ) NO (  )

EXPECTED SUBMISSION DATE (15)

MONTH	DAY	YEAR

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

While in Mode 6 on October 6, 1986 at 0815 an investigation identified an inconsistency between the number of reactor coolant pumps required to be operating in Modes 3, 4 and 5, and the assumptions used in the Safety Analysis for the CEA withdrawal from subcritical accident.

The Safety Analysis for the CEA withdrawal from subcritical accident does not explicitly consider Mode 3, 4 and 5 events based on the assumption that the Hot Zero Power results bound these operating modes. Therefore, the Safety Analysis for this accident assumes that all four reactor coolant pumps are operating, which is inconsistent with the Technical Specification requirements for Modes 3, 4 and 5. In addition, plant procedures do not allow the operation of all four reactor coolant pumps below 500 degrees F due to core uplift considerations.

Administrative controls were installed to ensure that the Control Element Drive Mechanisms are de-energized when less than four reactor coolant pumps are operating. In addition, Westinghouse has reperformed the safety analysis for the CEA withdrawal from subcritical accident to support a change to the Technical Specifications. This change to the Millstone Unit 2 Technical Specifications was approved by the NRC on April 21, 1987 as Amendment No. 116.

Similar LER's: 85-01, 83-07, 80-05, 77-23 and 76-35.

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		0 1 0	0 1 0	0 1 0	0 2	OF	0 2

TEXT (if more space is required, use additional NRC Form 388A's) (17)

I. Description of Event

While in Mode 6 on October 6, 1986 at 0815 an investigation by the Northeast Utilities Service Company and Westinghouse identified an inconsistency between the number of reactor coolant pumps required to be operating in Modes 3, 4 and 5, and the assumptions used in the Safety Analysis for the CEA withdrawal from subcritical accident.

There were no major operator actions or automatic or manually initiated safety responses resulting from this event.

II. Cause of Event

The cause of the inconsistency between the Safety Analysis and the Technical Specifications was the assumption that the Hot Zero Power results for the CEA withdrawal from subcritical accident bounded Modes 3, 4 and 5. At Hot Zero Power, all four reactor coolant pumps are required to be operating, while in Mode 3 only one reactor coolant pump is required to be operating and in Modes 4 and 5 as little as one shutdown cooling loop is required to be operating. In addition, in Mode 3 at below 500 degrees F, plant procedures do not allow for the operation of all four reactor coolant pumps due to core uplift considerations.

III. Analysis of Event

This event is being reported pursuant to 10CFR50.73(a)(2)(ii)(B) to describe an event that results in the nuclear power plant being in a condition that was outside the design basis of the plant. This classification was chosen since the plant has been operated in Modes 3, 4 and 5 with less than four reactor coolant pumps operating and the reactor trip circuit breakers closed.

The safety implication of the inconsistency between the Safety Analysis assumptions and the Technical Specification requirements for pump operability in Modes 3, 4 and 5 is that the design basis limit for DNBR (minimum DNBR >1.3) could be violated in the event of a CEA withdrawal from subcritical accident.

IV. Corrective Action

Administrative Controls were installed to ensure that the Control Element Drive Mechanisms are de-energized with less than four reactor coolant pumps operating, thereby eliminating the potential for a CEA withdrawal accident for Modes 3 (when less than four reactor coolant pumps are operating), 4 and 5. In addition, Westinghouse has reperformed the safety analysis for the CEA withdrawal from subcritical accident to support a change to the Technical Specifications. This change to the Millstone Unit 2 Technical Specifications was approved by the NRC on April 21, 1987 as Amendment No. 116. Westinghouse has also reviewed the Steamline Break and CEA Ejection accident analyses for Modes 3, 4 and 5, and has determined that the Hot Zero Power results for these accidents do bound Modes 3, 4 and 5.

V. Additional Information

There were no failed components associated with this occurrence. Similar LER's: 85-01, 83-07, 80-05, 77-23 and 76-35.

# NORTHEAST UTILITIES



THE CONNECTICUT LIGHT AND POWER COMPANY  
WESTERN MASSACHUSETTS ELECTRIC COMPANY  
HOLYOKE WATER POWER COMPANY  
NORTHEAST UTILITIES SERVICE COMPANY  
NORTHEAST NUCLEAR ENERGY COMPANY

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February 10, 1988  
MP-11504

U. S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, D. C. 20555

Reference: Facility Operating License No. DPR-65  
Docket No. 50-336  
Reportable Occurrence RO 50-336/86-010-01


Gentlemen:

This letter forwards the update Licensee Event Report 86-010-01 concerning an event or condition wherein the plant operated in a condition that was outside the design basis of the plant. This report is submitted to reflect completion of the corrective action.

Yours truly,

NORTHEAST NUCLEAR ENERGY COMPANY

FOR: Stephen E. Scace  
Station Superintendent  
Millstone Nuclear Power Station

  
BY: Carl H. Clement  
Unit 3 Superintendent  
Millstone Nuclear Power Station

SES/RAB:mo

Attachment: LER 86-010-01

cc: W. T. Russell, Region 1  
W. J. Raymond, Sr. Resident Inspector

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