

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 4
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TITLE (4)
Violation of Technical Specification 4.0.5, ASME Section XI Surveillance Requirements

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
06	19	97	97	-- 024 --	00	07	21	97	FACILITY NAME	DOCKET NUMBER

OPERATING MODE (9) N	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5: (Check one or more) (11)									
	20.2201(b)	20.2203(a)(2)(v)	X	50.73(a)(2)(i)	50.73(a)(2)(viii)					
POWER LEVEL (10) 000	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)(iii)		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 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. G. Joshi, MP2 Nuclear Licensing Manager						TELEPHONE NUMBER (Include Area Code) (860) 440-2080				

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).	X	NO					

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

On June 19, 1997, during a review of the Snubber InService Inspection (ISI) Program, it was determined that repair/replacement plans which were required for snubber replacement and rotation from Quality Assurance (QA) spares were not performed during the Second Ten Year Interval. The Millstone Unit 2 (MP2) Second Ten Year Interval (1986-1996) Section XI, ISI Program was prepared to meet the requirements of ASME Section XI, 1980 Edition, Winter 1981 Addenda (80W81 Code). The review found that Article IWA-7000, which provides requirements for repair/replacement plan preparation should have been used, even though snubbers are not mentioned specifically. The requirements of the 80W81 Code and repair/replacement plans for snubber replacement and rotation from QA spares were misunderstood and a relief request had not been prepared. ASME Code Case N-508-1 allows the option to use previously installed snubbers from warehouse stock without the preparation of a repair/replacement plan provided certain requirements are met, but it is currently not approved for MP2 use.

The cause of this condition was a misinterpretation and wrong assumption concerning the ASME Section XI requirements for snubber repair/replacement plans.

To correct this condition, the appropriate procedure will be revised, prior to entering Mode 4 from the current outage, to address snubber repair/replacement plans. A request for approval to use ASME Code Case N-508-1 was included with the Third Ten Year Interval ISI Program submittal of July 2, 1996.

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

I. Description of Event

Technical Specification (TS) 4.0.5 Specifies that the Surveillance Requirements for InService Inspection (ISI) and testing of ASME Code Class 1, 2, and 3 components shall be met. It requires that inservice inspection of components and inservice testing of pumps and valves to be performed in accordance with ASME Section XI requirements, except where specific written relief has been granted by the NRC.

On June 19, 1997, during a review of the Snubber [SNB] ISI Program, it was determined that repair/replacement plans which were required for snubber replacement and rotation from Quality Assurance (QA) spares during the Second Ten Year Interval were not performed. The Millstone Point Unit 2 (MP2) Third Ten Year Interval (1997-2007) ASME Section XI, ISI Program, is based on the requirements of the 1989 Edition of the ASME Section XI Code (89 Code). Article IWF-5000 of the 89 Code provides the ISI Requirements for snubbers. MP2 has made a request for NRC approval to use preservice and inservice examinations and tests for snubbers as described in the TS, rather than using Article IWF-5000 of the 89 Code. This relief is for visual examinations and functional testing of snubbers, but does not address repair or replacement. However, the review led to the conclusion that Article IWF-5400, which requires repair/replacement plans for snubber replacement and rotation from QA spares, still applies. This conclusion initiated a review of the MP2 Second Ten Year Interval (1986-1996) Section XI, ISI Program for snubbers. At the time of discovery, the unit was defueled.

The MP2 Second Ten Year Interval (1986-1996) Section XI, ISI Program was prepared to meet the requirements of ASME Section XI 1980 Edition, Winter 1981 Addenda (80W81 Code). On April 17, 1989, MP2 received NRC approval to use the inservice inspection and testing program for snubbers as described in the TS rather than using Article IWF-5000 of the 80W81 Code. The review found that Article IWA-7000, which provides requirements for repair/replacement plan preparation should have been used, even though snubbers are not mentioned specifically. MP2 misunderstood the requirements of the 80W81 Code and repair/replacement plans for snubber replacement and rotation from QA spares were not prepared.

Surveillance Requirement 4.0.5 of the TS requires inservice inspection and testing of ASME Code Class 1, 2, and 3 components be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda, except where specific written relief has been granted by the NRC. Since no relief had been granted concerning snubber repair/replacement and rotation from QA spares, this requirement was violated.

This condition is being reported pursuant to 10 CFR 50.73(a)(2)(i)(B), any condition prohibited by the plant's Technical Specifications.

II. Cause of Event

The cause of this condition was a misinterpretation and wrong assumption concerning the ASME Section XI requirements for snubber repair/replacement plans.

III. Analysis of Event

An ASME repair/replacement plan for a snubber is a document which records the snubber identification, location, the system in which it is used, applicable code, an evaluation of the reason for repair/replacement, failure cause and the work control document governing repair/replacement. It also provides a comparison of the original component and new component manufacturer, material specifications, drawings, and other technical data, and reconciliation of any differences. It lists any inspection hold points and provides for QA and Authorized Nuclear

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Inspector/Authorized Nuclear Inservice Inspector (ANI/ANIi) review and approval. ASME Code Case N-508-1 allows the option, for the purpose of snubber testing, to use previously installed snubbers from warehouse stock without the preparation of a Section XI repair/replacement plan provided certain requirements of the Code Case are met. A request for approval to use of this Code Case has been filed for the Third Ten Year Interval, but it is currently not approved for MP2 use.

The MP2 Second Ten Year Interval (1986-1996) ISI Section XI Program was prepared to meet the requirements of the 80W81 Code. MP2 has received the NRC approval to use inservice inspection and testing program for snubbers as described in the TS rather than using the 80W81 Code, Article IWF-5000, which provides Inservice Test Requirements for snubbers. No specific requirements for repairs and replacements are stated in Article IWF-5000. Article IWF-4000 "Repair Procedures" was in the course of preparation at the time the second ten year program was being prepared, and there was no article IWF-7000 to provide guidance on replacement requirements. In the absence of Article IWF-7000 in the 80W81 Code, the Article IWA-7000 should have been used. Article IWA-7000 provides requirements for repair/replacement plan preparation, even though snubbers are not mentioned specifically in this article. MP2 misunderstood the requirements of the 80W81 Code, and as a result repair/replacement plans for snubber replacement and rotation from QA spares were not prepared.

A review of MP2 Snubber functional testing from the 1994 and 1996 outages identified 7 snubbers from the 1994 outage and 18 snubbers from the 1996 outage that were replaced with identical snubbers from QA spares. MP2 maintains all TS and warehouse spare snubbers as QA Category 1 (Cat. 1). A sample of work orders for replaced snubbers has been reviewed to verify QA requirements were met. Based on the MP2 practice of replacing snubbers with identical QA Cat 1 spares, generation of historical Section XI documentation is not required. Omission of Section XI repair/replacement plans for snubbers which were replaced with identical QA Cat. 1 components violates ASME Section XI documentation requirements. However, the remaining QA qualifications and technical requirements were in full compliance with the ASME Section XI design requirements, and were therefore equally capable of performing the required safety function. Therefore, these snubbers are operable and this condition is not safety significant.

IV. Corrective Action

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

1. The appropriate procedure will be revised, prior to entering Mode 4 from the current outage, to address snubber repair/replacement plans.
2. A request for approval to use ASME Code Case N-508-1 was included with the Third Ten Year Interval ISI Program submittal of July 2, 1996.

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V. Additional Information

Similar Events

The following are similar events involving ASME Section XI ISI program deficiencies:

- LER 91-005: Several ASME Section XI Class 2 piping welds had never been performed because they had not been included in the Inservice inspection program. Relief from the performance of these examinations had not been requested. The missed examinations were scheduled for the next cold shutdown. Changes to the ISI program were initiated.
- LER 93-010: ASME Section XI Post Work Leakage Test on a valve was not included in the Repair/Replacement Plan. As a result the leakage test that was performed did not use a qualified inspector. Upon discovery the valve was retested using the ASME leak test, and the qualified inspector, and completed the required documentation.
- LER 93-022: Hangers associated with the Auxiliary Feedwater Suction Lines hangers were omitted from the ASME Section XI ISI Program. An inspection of the hangers determined they were operable. An independent review of the ISI program discovered one additional portion of the main steam piping had been omitted. The missing hangers were added to the ISI program.
- LER 94-039: Several components were potentially omitted from the ASME Section XI Inservice Test Program. Clear criteria for inclusion in the ISI program were developed. Of the 31 suspect components, it was determined that 1 valve needed to be added to the ISI program.

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