NRC Form 366 (983)	LICENSEE EVENT REPORT (LER)							NUCLEAR REGULATORY COMMISSION APPROVED OMB NO. 3150-0104 EXPIRES 8-31-88					
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NRC Form 366A (9-63)	LICENSEE EVENT F	U.S. NUCLEAR REGULATORY COMMISSION APPROVED OMB NO. 3150-0104 EXPIRES. 8/31/88							
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I. Description of Event

On January 30, 1988, at 0820 hours, while the plant was in Mode 3, at 0% power at 560 degrees F and 2050 psig, it was determined that only one centrifugal charging pump was operable. The plant had entered Mode 3, from Mode 4, on January 29 at 1742 hours. This was a violation of Plant Technical Specification 3.5.2, which requires 2 centrifugal charging pumps to be operable while the plant is in Mode 3.

On January 30, 1988, with the "B" charging pump (3CHS*P3B) running, the plant was being cooled down. At 0820 hours the licensed operator started the "A" charging pump (3CHS*P3A) to help maintain pressurizer level during the cooldown. There was an immediate alarm on the main board for "A" oil cooler low flow. A Plant Equipment Operator (PEO) was sent to check the cooling water lineup, and he discovered that the cooling water was not aligned properly for the "A" pump. In addition to the incorrect cooling flow lineup, the PEO found that the "A" pump minimum flow relief valve was isolated. The PEO immediately restored the system to the normal configuration, according to the charging and letdown system procedure for post-maintenance system lineup. The "A" charging pump remained running while the PEO restored the system to the proper lineup. The "A" pump was inoperable for a total time of 14 hours and 38 minutes.

II. Cause Of Event

The root cause of the event was procedure inadequacy, compounded by poor communications between the members of the Operations Department. During the previous week, while the plant was in Mode 4, the "A" train charging had been aligned from the "A" charging pump to the swing "C" charging pump (3CHS*P3C) to allow for an operational readiness test on the "C" pump. After running the test, with unsatisfactory results, the "C" pump was tagged out for damage investigation, but the system was not realigned to use the "A" charging pump. In preparation for increasing the temperature above 350 degrees F (Mode 3) on January 29, two PEO's were directed to clear the danger tags concerning not having more than one pump operable with temperature less than 350 degrees F and to rack up the 4160V circuit breaker for the "A" charging pump. The on-shift Licensed Operators assumed that, since the "C" pump was tagged out, the "A" pump was available. All indications on the main board were normal; there was no change in indication caused by the aligning of the "C" pump versus the "A" pump.

The PEO's found the breaker in the swing "C" panel rather than in the "A" panel. They moved the breaker into the "A" panel and racked it up. They did not inform the control room that the breaker was not in the "A" position. Standard procedure would have the PEO's question whether or not they were disabling any equipment by moving a breaker, but in this case they knew that the "C" pump was tagged out. If the licensed operators had known that the breaker was in the "C" panel rather than in the "A" panel, they would have known that the system had not been aligned to the "A" pump. The operating procedure for the charging system has directions for aligning the "A" train for the swing "C" pump and realigning the "A" train back to the "A" pump. This alignment/realignment step in the procedure begins with the electrical alignment of the breaker. Since the breaker had not been aligned for

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FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6) PAGE (3)			36
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II. Cause of Event (Continued)

the "A" pump, there would have been no reason to expect that the accompanying mechanical alignment had been completed. The licensed operators were not using this procedure at the time. They were following the plant cooldown procedure, which did not specifically address the requirements for starting the pumps.

III. Analysis of Event

Action Statement 3.5.2 of the Plant Technical Specifications requires that with one ECCS subsystem (centrifugal charging pump, in this event) inoperable to restore the inoperable subsystem to operable status within 72 hours or be in at least hot standby within the next 6 hours and in hot shutdown within the following 6 hours. The "A" pump was inoperable for a total of 14 hours and 38 minutes, which is within the 72 hour limit.

If there had not been a need to cool the plant down, the licensed operator would not have started the "A" pump. Because only one charging pump is running for normal operations, the "A" pump could have remained inoperable until the quarterly surveillance was performed or it was required for service. Whenever the pump would have been started, however, there would have been the alarm on the main board to alert the operators that there was no cooling water flow to the charging pump. This alarm does not indicate that there is damage to the pump, but rather, serves as a prevention measure so that the operators can correct the cooling water low flow condition before the pump is damaged. The charging pump is not required to be stopped as an immediate action to this alarm. Although the pump was not operable in accordance with Technical Specification requirements, there was no compromise of public safety, since the pump was able to be run when required, with operator action, without pump damage. Discussion with the pump vendor indicates that the pump could run for at least 15 minutes in this condition before damage would occur due to lack of cooling water to the oil cooler.

This event is being submitted in accordance with 10CFR50.73(a)(2)(i), any operation or condition prohibited by the Plant's Technical Specifications, and notification was performed pursuant to 10CFR50.72(b)(2)(ii).

IV. Corrective Action

The immediate corrective action was to have a PEO investigate the cooling flow lineup to the "A" pump. When he found that there was an incorrect lineup, he corrected it per the charging and letdown system operating procedure. As an action to prevent recurrence of this event, the plant heatup procedure has been changed to require that the second pump be declared operable only after it has actually been run, rather than depend on the position of the breaker as a measure of operability. In addition, the charging and letdown system procedure has been changed to require that when one of the pumps is rendered inoperable due r switching to the other pump on the train, tags will be hung on the main board to identify the inoperable pump. This incident will be included in the licensed and non-licensed operator training programs.

NAC Form 366A (9-63)	LICENSEE EVENT F	U.S. NUCLEAR REGULATORY COMMISSION APPROVED OMB NO. 3150-0104 EXPIRES: 6/31/88				
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V. Additional Information

There have been two similar events of improper mode changes: LER 86-004 and LER 87-030. The corrective actions for these events would not have prevented the occurrence of this event since they were human error events and this event was due to procedure inadequacy.

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System Codes

Charging and Letdown System - CB Charging Pump Cooling System - CC

Component Codes

Pump - P





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P.O. BOX 270 HARTFORD, CONNECTICUT 06141-0270 (203) 665-5000

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February 29, 1988 MP-11583

Re: 10CFR50.73(a)(2)(1)

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

Reference: Facility Operating License No. NPF-49 Docket No. 50-423 Licensee Event Report 88-006-00

Gentlemen:

This latter forwards Licensee Event Report 88-006-00 required to be submitted within thirty days pursuant to 10CFR50.73(a)(2)(i), any operation or condition prohibited by the Plant's Technical Specifications.

Yours truly,

NORTHEAST NUCLEAR ENERGY COMPANY

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

In S. Klina

BY: John S. Keenan Dhit 2 Superintendent Millstone Nuclear Power Station

SES/FMM:mo

Attachment: LER 88-006-00

cc: W. T. Russell, Region I W. J. Raymond, Senior Resident Inspector