NRC FORM 366 (4-95) 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 BUDGET, WASHINGTON, DC 20503.

LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
Millstone Nuclear Power Station Unit 3	05000423	1 of 3

TITLE (4)

Historical Event: Quarterly IST Closure Testing of Service Water System Check Valves 3SWP*705, 706, 707 and 708 Not Performed

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	27	97	97	-- 040 --	00	07	25	97	FACILITY NAME	DOCKET NUMBER

OPERATING MODE (9)	5	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)			
POWER LEVEL (10)	000	20.2201(b)	20.2203(a)(2)(v)	[X] 50.73(a)(2)(i)	50.73(a)(2)(viii)
		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)(ii)	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 or 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	TELEPHONE NUMBER (Include Area Code)
David A. Smith, MP3 Nuclear Licensing Manager	(860)437-5840

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 27, 1997, with the unit in Mode 5, a Configuration Management Program (CMP) review of historical inservice testing activities identified that four check valves in the Service Water (SW) System (3SWP*V705, 3SWP*V706, 3SWP*V707 and 3SWP*V708) had not been exercised closed quarterly during the first operating cycle, as then required by the American Society of Mechanical Engineers (ASME) Code, Section XI, required In-Service Testing (IST) Program, and relief from Code requirements had not been granted by the Nuclear Regulatory Commission. Technical Specification (TS) Surveillance Requirement 4.0.5.a required, in part, that the unit be maintained in accordance with ASME Section XI (as specified in 10 CFR 50.55a) "... except where specific written relief has been granted." Not performing this required testing is reportable pursuant to 10 CFR 50.73(a)(2)(i)(B), as an event or condition prohibited by the Technical Specifications.

The cause of this event was a programmatic or managerial deficiency where the required testing for these valves was not addressed within the IST Program. This is a historical event identified as part of the CMP review process.

There were no safety consequences from this event because the four SW System check valves, when subsequently disassembled and inspected in accordance with the approved relief, were determined to be capable of performing their required closure function.

Corrective actions implemented in response to LER 96-021-00 should reduce reoccurrence of this type of condition due to administrative controls placed in the IST Program. On January 15, 1988, following approval of the relief request for these Service Water System check valves the IST Program was brought into compliance with the requirements of 10 CFR 50.55a for these valves. No further corrective actions are required.

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

I. Description of Event

On June 27, 1997, with the unit in Mode 5, a Configuration Management Program (CMP) review of historical inservice testing activities identified that four check valves in the Service Water (SW) System (3SWP*V705, 3SWP*V706, 3SWP*V707 and 3SWP*V708) had not been exercised closed quarterly during the first operating cycle, as then required by the American Society of Mechanical Engineers (ASME) Code, Section XI, required In-Service Testing (IST) Program, and relief from the Code requirements had not been granted by the Nuclear Regulatory Commission (NRC).

The IST code of record at the time of this event was the 1983 edition of Section XI of the ASME Code. Section XI, Paragraph IWV-3522 required that check valves be exercised to the position required to fulfill their safety function at a practical frequency not longer than cold shutdown, and that those with a closure function be tested in a manner that proves that the disk travels to the seat promptly on cessation or reversal of flow. It further states that confirmation that the disk is on the seat shall be by positive means. Two of these SW System check valves (3SWP*V707 and 3SWP*V708), then determined to have both an open and closed safety function, were included in the original IST Program (Revision 0), implemented on September 23, 1985. The other two SW System check valves (3SWP*V705 and 3SWP*V706), then also determined to have both an open and closed safety function, were added in Revision 1 of the program implemented on June 20, 1986.

A search of the surveillance history did not produce any evidence that closure testing had been ever performed for these valves. A review of the as-built SW System configuration also indicated that no effective provisions ever existed for performance of a closure test of these check valves. 10 CFR 50.55a provides for relief, when justified, in these instances. A request for relief from Section XI requirements allowing the closure capability of these SW System check valves to be demonstrated by an alternate test method of disassembly and inspection, on a staggered test basis (at a refueling outage frequency), was requested by Northeast Utilities on July 10, 1987, and approved by the NRC on January 15, 1988. Therefore, during the period from initial startup until January 15, 1988, for valves 3SWP*V707 and 3SWP*V708 and, from June 20, 1986, until January 15, 1988, for valves 3SWP*V705 and 3SWP*V706, these SW check valves were not closure tested in violation of Section XI requirements as implemented for the unit.

Technical Specification (TS) Surveillance Requirement 4.0.5.a required, in part, that the unit be maintained in accordance with ASME Section XI (as specified in 10 CFR 50.55a) "... except where specific written relief has been granted by the Commission...." Not performing this Section XI required testing is reportable pursuant to 10 CFR 50.73(a)(2)(i)(B), as an event or condition prohibited by the Technical Specifications.

II. Cause of Event

The cause of this event was a programmatic or managerial deficiency where the required testing for these valves was not addressed within the IST Program. A secondary cause involved the failure to identify that testing by removing a SW train from service was not desirable (while either operating or shutdown), and failure to recognize the impracticality of performing valve closure testing in a system not configured for it.

This is a historical event identified as part of the Configuration Management Program review process.

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

III. Analysis of Event

There were no safety consequences from this event because the four Service Water System check valves, when subsequently disassembled and inspected in accordance with the approved relief, were determined to be capable of performing their required closure function.

However, this event is significant because of the programmatic failure to properly include and test components in accordance with the IST Program, which resulted in a condition prohibited by the Technical Specifications.

IV. Corrective Action

This discrepancy was initially identified during a comprehensive review of the IST Program performed during the first operating cycle, and resulted in submittal of many (among them the aforementioned) relief requests and IST Program updates. Corrective actions implemented in response to LER 96-021-00 should reduce reoccurrence of this type of condition due to administrative controls placed in the IST Program. On January 15, 1988, following approval of the relief request for these Service Water System check valves the IST Program was brought into full compliance with the requirements of 10 CFR 50.55a for these valves. No further corrective actions are required.

V. Additional Information

None

Similar Events

LERs discussing inadequate Inservice Inspection or In-Service Test control related conditions are identified below. Various elements of the Configuration Management Program are being conducted to detect design and licensing basis problems. The LERs are:

LER 93-006-00	Inadequate Surveillance of High Pressure Safety Injection Check Valves
LER 96-021-00	Components Not Included in the In-Service Test Program as a Result of Programmatic Deficiencies
LER 97-026-00	ASME Section XI Code Requirements Not Met in Scheduling and Performing Inspections on Service Water System Supports

Manufacturer Data

EIIS System Code
Essential Service Water System ..... BI
Nonessential Service Water System ..... KG

EIIS Component Code
Valve V