NRC Form 366 (9-83)	U.S. NUCLEAR REGULATORY COMMISSION APPROVED OMB NO. 3150-0104 EXPIRES: 8/31/88												
FACILITY NAME (1)	Millstone Nuclear	Power Station Unit			CKET NUMBER								
Feedwater C	coolant Injection (F	WCI) Testin Adequa	су										
EVENT DATE (5)	LER NUMBER	OTHER FA	HER FACILITIES INVOLVED (B)										
MONTH DAY YEAR	YEAR SEQUENTIAL NUMBER	REVISION MONTH DAY	YEAR	FACILITY NAMES		0   5   0   0   0							
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OPERATING	THIS REPORT IS BEING	SUBMITTED PURSUANT TO	THE REQUIREMEN	NTS OF 10 OFR §	(Check one o	or more of the following) (11							
MODE (9)	20.402(b)	20.402(c)		50.73(a)(2)(iv)		73.71(b)							
POWER	20.405(a)(1)(i)	50.36(c)(1)		50.73(a)(2)(v)		73.71(c)							
LEVEL 1 0 0	20.405(a)(1)(ii)	50.36(c)(2)		50.73.(a)(2)(vii)		OTHER (Specify in Abstract below and in							
	20.405(a)(1)(iii)	X 50.73(a)(2)(i)		50.73(a)(2)(viii)(	A)	Text. NRC Form 366A)							
	20.405(a)(1)(iv)	50.73(a)(2)(ii)		50.73(a)(2)(viii)(	B)								
	20.405(a)(1)(iv)	50.73(a)(2)(iii	)	50.73(a)(2)(x)									
		LICENSEE CONT	ACT FOR THIS LER	(12)									
NAME					AREA CODE	ELEPHONE NUMBER							
Edward J.	Lindsay, Senior Er	ngineer, X4192				4   4   7   -   1   7   9							
	COMPLETE ONE L	INE FOR EACH COMPONEN	T FAILURE DESCRIE	BED IN THIS REPO	ORT (13)								
CAUSE SYSTEM COM	MANUFAC-	REPORTABLE TO NPROS	CAUSE SYSTEM	COMPONENT	MANUFAC- TURER	REPORTABLE TO NPADS							
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ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten (ines) (16)

YES If yes complete EXPECTED SUBMISSION DATE

On February 2, 1989, at 1415 hours, while at 100 percent power (530 degrees Fahrenheit, 1030 psig), it was concluded that Technical Specification 4.5.c.1.b concerning FWCI (Feedwater Coolant Injection System) surveillance testing had not been met. Technical Specification 4.5.c.1.b requires a simulated automatic test of "FWCI sub-systems" be performed each regaing outage. SP 628.1, "Integrated Simulated Automatic Actuation Test of FWCI, Core Spray. CI, Diesel and Gas Turbine" tests the startup of the above systems by their respective emergency power supply. During the test the FWCI sub-system is tested with the FWCI selector switch selected to either the "A" or "B" feedwater train. Consequently a portion of the selection circuitry remained untested for the unselected feedwater string. Root cause of this event was the interpretation of the term FWCI sub-systems used in Technical Specification 4.5. Upon determination of this event the FWCI selector switch was selected to the tested feedwater string. There were no consequences to plant operation from this event. This event is considered reportable under 10CFR50.73(a) (2) (i) (b).

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U.S. NUCLEAR REGULATORY COMMISSION APPROVED OMB NO. 3150-0104 EXPIRES: 8/31/88

# LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1)	DO	DOCKET NUMBER (2)		T	LER NUMBER (6)								PAGE (3)										
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TEXT (If more space is required, use additional NRC Form 366A s) (17)

#### Description of Event

On February 2, 1989, at 1415 hours, while at 100 percent power (530 degrees Fahrenheit, 1030 psig), it was concluded that Technical Specification 4.5.c.1.b concerning FWCI surveillance testing had not been met. Technical Specification 4.5.c.1.b requires a simulated automatic test of FWCI sub-systems be performed each refueling outage. SP 628.1, "Integrated Simulated Automatic Actuation Test of FWCI, Core Spray, LPCI, Diesel and Gas Turbine" tests the startup of the above systems by their respective emergency power supply. During the test the "FWCI sub-system" is tested with the FWCI selector switch selected to either the "A" or "B" feedwater train. Technical Specifications require that "FWCI sub-systems" be tested each refueling outage. Consequently a portion of the selection circuitry remained untested for the unselected feedwater string.

#### II. Cause of Event

The cause of this event involved the interpretation of the term FWCI sub-systems used in Technical Specifications. It was originally felt that the term FWCI sub-system referred to the FWCI system as a sub-system of ECCS. This interpretation is supported in the Millstone Unit 1 UFSAR and General Electric design specifications. Inherent redundancy is not a design requirement of the FWCI system. The auto blow down system provides a redundant function in the event the FWCI system should fail to operate. The FWCI system is essentially a single flow path system with some redundant components. Two complete independent sub-systems do not exist as implied by Technical Specifications. A selector switch allows the operator to choose which feedwater string would auto start with initiation signals present. SP 628.1, "Integrated FWCI Simulated Automatic Actuation Test of FWCI, Core Spray, LPCI, Diesel and Gas Turbine" tested only the selected feedwater string and therefore not all redundant components were being tested during each refueling outage. It was originally felt that this surveillance fulfilled Technical Specification Requirements for a simulated automatic actuation test. However, after evaluation it was concluded that since only one feedwater string was being tested during each refueling outage that the intent of Technical Specifications was not being met.

### III. Analysis of Event

This event is considered reportable under 10CFR50.73(a)(2)(i)(b).

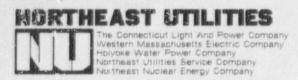
Since the feedwater system is in continual service, there is inherent reliability that the system would perform as designed when required. Many of the components not tested under SP 628.1 were tested during individual component calibration or operability was proven through continual system operation. Only a small portion of the selection circuitry remained untested and would only affect system auto-start capability. In the event that the FWCI system failed to operate, the Automatic Pressure Relief System would provide a redundant function as designed. Since identification of this event, only the tested feedwater string has been considered capable of meeting FWCI Technical Specification requirements. There were no safety consequences from this event.

## IV. Corrective Action

A new surveillance procedure will be created and changes made to existing procedures to functionally test the selection circuitry omitted by SP 628.1.

#### V. Additional Information

There were no previous similar events.



General Offices Selden Street, Berlin Connecticut

P.O.BOX 270 HARTFORD, CONNECTICUT 06414-0270 (203)665-5000

March 1, 1989 MP-12818

Re: 10CFR50.73(a)(2)(i)(b)

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

Reference:

Facility Operating License No. DPR-21

Docket No. 50-245

Licensee Event Report 89-002-00

Gentlemen:

This letter forwards Licensee Event Report 89-002-00 required to be submitted within thirty (30) days pursuant to the requirements of 10CFR50.73(a)(2)(i)(b).

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

Stephen Scace
Station Superintendent
Millstone Nuclear Power Station

SES/EJL:mo

Attachment: LER 89-002-00

cc: W. T. Russell, Region I

W. J. Raymond, Senior Resident Inspector

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