

NORTHEAST UTILITIES



The Connecticut Light And Power Company
Western Massachusetts Electric Company
Holyoke Water Power Company
Northeast Utilities Service Company
Northeast Nuclear Energy Company

General Offices • Seiden Street, Berlin Connecticut

P.O. BOX 270

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(203)665-5000

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

August 17, 1989

MP-13415

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 89-017-00

Gentlemen:

This letter forwards Licensee Event Report 89-017-00 required to be submitted within thirty (30) days pursuant to 10CFR50.73(a)(2)(i), any operation or condition prohibited by the Plant's Technical Specifications.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

A handwritten signature in cursive script, reading 'Stephen E. Scace'.

Stephen E. Scace
Station Superintendent
Millstone Nuclear Power Station

SES/FMM:tjp

Attachment: LER 89-017-00

cc: W. T. Russell, Region I Administrator
D. H. Jaffe, NRC Project Manager, Millstone Unit No. 3
W. J. Raymond, Senior Resident Inspector, Millstone Unit Nos. 1, 2 and 3

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NRC Form 366 (6-89)				U. S. NUCLEAR REGULATORY COMMISSION <div style="text-align: right;"> APPROVED OMB NO. 3150-0104 EXPIRES: 4/30/92 <small>Estimated burden per response to comply with this information collection request: 50.0 hrs. Forward comments regarding burden estimate to the Records and Reports Management Branch (p-530), U. S. Nuclear Regulatory Commission, Washington, DC 20555, and to the Paperwork Reduction Project (3150-0104), Office of Management and Budget, Washington, DC 20503.</small> </div>						
LICENSEE EVENT REPORT (LER)										
FACILITY NAME (1) Millstone Nuclear Power Station Unit 3						DOCKET NUMBER (2) 0 5 0 0 0 4 2 3		PAGE (3) 1 OF 0 3		
TITLE (4) Non Compliance With Action Statement Due to Inadequate Administrative Guidance										
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	
0 7	1 8	8 9	8 9	0 1 7	0 0	0 8	1 7	8 9	0 5 0 0 0 0	
OPERATING MODE (9)			THIS REPORT IS BEING SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following): (11)							
1			20.402(b)		20.402(c)		50.73(a)(2)(iv)		73.71(b)	
POWER LEVEL (10)			20.405(a)(1)(i)		50.36(c)(1)		50.73(a)(2)(v)		73.71(c)	
0 9 7			20.405(a)(1)(ii)		50.36(c)(2)		50.73(a)(2)(vii)		OTHER (Specify in Abstract below and in Text, NRC Form 366A)	
			20.405(a)(1)(iii)		X 50.73(a)(2)(i)		50.73(a)(2)(viii)(A)			
			20.405(a)(1)(iv)		50.73(a)(2)(ii)		50.73(a)(2)(vii)(B)			
			20.405(a)(1)(iv)		50.73(a)(2)(iii)		50.73(a)(2)(x)			
LICENSEE CONTACT FOR THIS LER (12)										
NAME Frances M. Marshall, Engineer, x5400						TELEPHONE NUMBER AREA CODE 2 0 3 4 4 7 - 1 7 9 1				
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)										
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPPDS		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPPDS
SUPPLEMENTAL REPORT EXPECTED (14)						EXPECTED SUBMISSION DATE (15)		MONTH DAY YEAR		
<input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE)						<input checked="" type="checkbox"/> NO				
ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)										
<p>On July 18, 1989, at 0902 hours, while operating in Mode 1 at 97% power, 2250 psia and 585 degrees, the Shift Supervisor (SS) determined that a motor-operated isolation valve for the Containment Recirculation Spray header had been inoperable for 27 hours.</p> <p>On July 17, at 0618 hours, a licensed operator (CO) while performing the quarterly valve stroke surveillance test, placed the hand switch in the CLOSE position. Dual position indication was observed at the control board. The CO and the SS reviewed the plant Technical Specifications, and determined that the valve was operable in the OPEN (accident) position. The new shift of operators on the day shift of July 18, made the determination that the valve was inoperable as a containment isolation valve. The required Technical Specification action had not been performed.</p> <p>The root cause of the event was inadequate administrative guidance on the definition of containment isolation valves. This led to a misinterpretation of the Technical Specifications and the FSAR by the Operators and the operations department management.</p> <p>The immediate action was to test the valve to ensure that it was fully shut, fulfilling its containment isolation function. The valve limit switches were adjusted, retested and the valve declared operable. Interim guidance on containment isolation valves was provided. Final guidance will be included in permanent plant procedures by February 28, 1990.</p>										

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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FACILITY NAME (1)

DOCKET NUMBER (2)

LER NUMBER (6)

PAGE (3)

Millstone Nuclear Power Station
Unit 3

YEAR

SEQUENTIAL
NUMBERREVISION
NUMBER

0 5 0 0 0 4 2 3 8 9 - 0 1 7 - 0 0 0 2 OF 0 3

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

I. Description of Event

On July 18, 1989, at 0902 hours, while operating in Mode 1 at 97% power, 2250 psia and 585 degrees Fahrenheit, the operating Shift Supervisor (SS) determined that one of the motor-operated containment isolation valves for the Containment Recirculation Spray (RSS) header, 3RSS*MOV20D, had not been fully operable for 27 hours.

On July 17, at 0618 hours, a licensed control operator (CO) performed the quarterly valve stroke surveillance test. As part of the test, the CO placed the hand switch on the main control board in the CLOSE position. Dual (intermediate) position indication was observed at the main control board valve position indicator. The CO opened the valve with the hand switch, then unsuccessfully tried two more times to close the valve. The CO and the SS reviewed the plant Technical Specifications and determined that the valve was operable, i.e., capable of performing its normal system and accident functions, while in the OPEN position. Therefore the valve was left in the OPEN position. At the shift turnover, the incident was discussed with the Operations department management, and it was concluded that the valve was operable, after re-reviewing the Final Safety Analysis Report (FSAR) and the Technical Specifications. A new shift of operators reporting to the day shift on July 18, made the determination that the valve was inoperable. Reasonable assurance that the valve could provide containment (boundary) isolation was not available. The determination was made with concurrence from the Operations Department management.

At the time it was determined that the valve was inoperable for containment isolation, the Technical Specification Limiting Condition for Operation (LCO) time limit had been exceeded. The requirement, per Technical Specification 3.6.3, is that an inoperable containment isolation valve be made operable within 4 hours. The valve hand switch was placed in CLOSE and by 1340 hours on July 18, the valve was air-tested and determined to be fully shut. In the CLOSE position, the valve would automatically open if required in an accident condition.

II. Cause of Event

The root cause of the event was inadequate administrative guidance on the definition of containment isolation valves which led to a misinterpretation of the Technical Specifications and the FSAR on the part of the operators and the operations department management.

The FSAR Table did not clearly indicate the containment isolation valves. Specifically, 3RSS*MOV20D is open during normal and accident conditions. It does not receive a Containment isolation (automatic closure) signal. This led Operations Department personnel to incorrectly conclude that it was not a containment isolation valve per LCO 3.6.3.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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FACILITY NAME (1) Millstone Nuclear Power Station Unit 3	DOCKET NUMBER (2) 0 5 0 0 0 4 2 3	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		8 9	0 1 7	0 0	0 3	OF	0 3

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

III. Analysis of Event

This event is reportable under 10CFR50.73(a)(2)(i), any condition prohibited by the Plant's Technical Specifications. Technical Specification 3.6.3 requires that any inoperable containment isolation valve be restored to operable status within 4 hours.

The air test on the valve showed the as found condition of the valve to be fully closed (i.e., shut). The valve was capable of performing its containment isolation function had a passive failure of the associated RSS piping occurred. The ability of the valve to (open and) perform its normal system, and accident functions on a containment depressurization, was maintained throughout the event. Therefore the event had no adverse safety consequences.

IV. Corrective Action

The immediate corrective action was to log into LCO 3.6.3, and to close 3RSS*MOV20D, using the main control board hand switch. The power supply to the valve was de-energized. The dual indication problem still existed, but the valve was air-tester' to ensure that it was fully shut and that the containment isolation function was met. The power supply was then energized and the valve was declared operable to perform both its containment isolation and accident functions.

Subsequently, the limit switches on the valve were adjusted and the valve was satisfactorily retested. The stroke time test was performed to verify that the valve position indication on the main control board was correct, and that the valve stroked within the required time. Another air test was performed to verify that the valve closed completely when the hand switch was turned to CLOSE.

As action to prevent recurrence, interim guidance was provided indicating that all valves listed in FSAR Table 6.2-65 are containment isolation valves. Final guidance will be included in permanent plant procedures by February 28, 1990.

V. Additional Information

There have been no similar events with the same root cause and sequence of events within the past two years.

EHS CodesSystem

Containment Recirculation Spray - BE

Component

Isolation Valve ISV