



**Northeast
Nuclear Energy**

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The Northeast Utilities System

NOV 22 1999

Docket No. 50-336
B17926

Re: 10 CFR 50.73(a)(2)(iv)

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Millstone Nuclear Power Station Unit No. 2
Licensee Event Report 99-015-00
Unanticipated Reactor Protection System Trip Signal Generation On
Low Steam Generator Level

This letter forwards Licensee Event Report (LER) 99-015-00 (Attachment 2), documenting an event that was determined reportable at Millstone Unit No. 2 on October 21, 1999.

This event occurred on September 19, 1999 and was initially reported on September 19, 1999, pursuant to 10 CFR 50.72(b)(2)(ii), as an event or condition that resulted in an automatic actuation of any Engineered Safety Feature (ESF), including the RPS. Upon further review by the plant staff, it was concluded that this particular event did not meet the prompt reporting criteria guidance provided in NUREG-1022 and as a result the notification was subsequently retracted on September 28, 1999.

The NRC senior resident inspector later questioned the rationale used as the basis for the retraction. As a result, the basis for the retraction was revisited by plant engineering and licensing personnel. From this latter review, it was determined that the guidance provided in the NUREG was ambiguous and somewhat contradictory as to what constituted a reportable Engineered Safety Features (ESF) actuation. Specifically, the associated Statements of Considerations states that actuations that need not be reported are those initiated for reasons other than to mitigate the consequences of an event...." indicating an intent to require reporting actuations of features that mitigate the consequences of significant events. In addition, NUREG 1022 distinguishes between signals and actuations and discusses this distinction throughout Section 3.3.2. In part, this guidance states: "Valid ESF actuations are

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those actuations that result from "valid signals" or from intentional manual initiation, unless it is part of a preplanned test. Valid signals are those signals that are initiated in response to actual plant conditions or parameters satisfying the requirements for ESF initiation." As reported with this LER, the ESF signal was a valid signal which resulted due to actual plant conditions and the signal was not expected due to the incorrect band/range specified in the operating procedure in use. However, the plant was in a stable condition, the ESF was not needed to mitigate the consequences of the event, no ESF component changed state and operator action was not required to mitigate an event. However, as a result of our re-review of this issue, a decision was made on October 21, 1999 to reverse the previous retraction based on a recognition of the intent of the rule. Consequently, the event that occurred on September 19, 1999 is being reported pursuant to 10 CFR 50.73(1)(2)(iv).

NNECO believes it has employed a conservative reporting philosophy at Millstone since the restart of the units. This situation of initially reporting, then gathering of more facts and comparing them to available guidance is an example of this philosophy. Unfortunately, when criteria is not sufficiently clear it is possible to misapply the guidance available. Lessons learned are being studied for incorporation into our internal reporting guidance and/or training.

Northeast Nuclear Energy Company's (NNECO) commitments in response to this event are contained within Attachment 1 to this letter.

Should you have any questions regarding this submittal, please contact Mr. R. G. Joshi at (860) 447-2080.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY


C. J. Schwarz
Station Director

Attachment: 1) List of Commitments in Response to LER 99-015-00
2) LER 99-015-00

cc: H. J. Miller, Region I Administrator
R. B. Eaton, NRC Senior Project Manager, Millstone Unit No. 2
D. P. Beaulieu, Senior Resident Inspector, Millstone Unit No. 2

RWF:rf

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Attachment 1

Millstone Nuclear Power Station, Unit No. 2

List of Regulatory Commitments

November 1999

List of Regulatory Commitments

The following table identifies those actions committed to by NNECO in this document.

Number	Commitment	Due
B17926.01	Applicable operating procedures will be revised to identify pre-planned Engineered Safety Feature (ESF) and Reactor Protection System (RPS) trips.	April 18, 2000
B17926.02	Implementation of Technical Specifications Amendments 226 and 232 will be reviewed to ensure that setpoint changes have been incorporated and accounted for in the guidance for parameter control within the applicable procedures.	February 15, 2000