

Dominion Nuclear Connecticut, Inc.
Millstone Power Station
Rope Ferry Road
Waterford, CT 06385



Dominion™

SEP 20 2005

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

Serial No. 05-421A
MPS Lic/WDB R0
Docket No. 50-336
License No. DPR-65

DOMINION NUCLEAR CONNECTICUT, INC.
MILLSTONE POWER STATION UNIT 2
LICENSEE EVENT REPORT 2005-003-01
NON-COMPLIANCE WITH TECHNICAL SPECIFICATIONS DUE
TO INSTALLATION OF UNQUALIFIED TEST EQUIPMENT

This letter forwards Licensee Event Report (LER) 2005-003-01. This is revision 1 to LER 2005-003-00, which documented an event on May 19, 2005 at Millstone Power Station, Unit 2 that was determined reportable. Revision 0 of the LER was submitted on July 15, 2005, pursuant to 10 CFR 50.73(a)(2)(i)(B) as a condition prohibited by the plant's Technical Specifications.

If you have any questions or require additional information, please contact Mr. David W. Dodson at (860) 447-1791, extension 2346.

Very truly yours,


J. Alan Price
Site Vice President - Millstone

Attachments: (1)

Commitments made in this letter: None.

IE22

cc: U.S. Nuclear Regulatory Commission
Region I
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Mr. S. M. Schneider
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Millstone Power Station

Serial No. 05-421A
LER 05000336/2005-003-01

Attachment 1

**Millstone Power Station Unit 2
LER 2005-003-01**

**Millstone Power Station Unit 2
Dominion Nuclear Connecticut, Inc. (DNC)**

NRC FORM 366 (7-2001)		U.S. NUCLEAR REGULATORY COMMISSION		APPROVED BY OMB NO. 3150-0104 EXPIRES 7-31-2004 Estimated burden per response to comply with this mandatory information collection request: 50 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the Records Management Branch (T-6 E6), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to bj1@nrc.gov , and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202 (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.			
LICENSEE EVENT REPORT (LER) (See reverse for required number of digits/characters for each block)							
FACILITY NAME (1) Millstone Power Station - Unit 2			DOCKET NUMBER (2) 05000336		PAGE (3) 1 OF 3		
TITLE (4) Non-Compliance With Technical specifications Due to Installation of Unqualified Test Equipment							
EVENT DATE (5)			LER NUMBER (6)		REPORT DATE (7)		
MO	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NO.		
05	19	2005	2005 - 003 - 01		09	20 2005	
			OTHER FACILITIES INVOLVED (8)				
			FACILITY NAME DOCKET NUMBER 05000				
			FACILITY NAME DOCKET NUMBER 05000				
OPERATING MODE (9)		1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check all that apply) (11)				
			20.2201(b)		20.2203(a)(3)(ii)	50.73(a)(2)(ii)(B) 50.73(a)(2)(ix)(A)	
			20.2201(d)		20.2203(a)(4)	50.73(a)(2)(iii) 50.73(a)(2)(x)	
		100	20.2203(a)(1)		50.36(c)(1)(i)(A)	50.73(a)(2)(iv)(A) 73.71(a)(4)	
			20.2203(a)(2)(i)		50.36(c)(1)(iii)(A)	50.73(a)(2)(v)(A) 73.71(a)(5)	
			20.2203(a)(2)(ii)		50.36(c)(2)	50.73(a)(2)(v)(B) OTHER	
			20.2203(a)(2)(iii)		50.46(a)(3)(ii)	50.73(a)(2)(v)(C) Specify in Abstract below or in NRC Form 366A	
			20.2203(a)(2)(iv)		50.73(a)(2)(i)(A)	50.73(a)(2)(v)(D)	
			20.2203(a)(2)(v) X		50.73(a)(2)(i)(B)	50.73(a)(2)(vii)	
			20.2203(a)(2)(vi)		50.73(a)(2)(i)(C)	50.73(a)(2)(viii)(A)	
			20.2203(a)(3)(i)		50.73(a)(2)(ii)(A)	50.73(a)(2)(viii)(B)	
LICENSEE CONTACT FOR THIS LER (12)							
NAME David W. Dodson, Supervisor Nuclear Station Licensing					TELEPHONE NUMBER (Include Area Code) 860-447-1791, x2346		
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)							
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	
SUPPLEMENTAL REPORT EXPECTED (14)					EXPECTED SUBMISSION DATE (15)		
<input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE).					<input checked="" type="checkbox"/> NO		
MONTH DAY YEAR							
ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)							
<p>On May 18, 2005, with the plant in mode 1 at 29% power, a non-safety related test instrument was discovered installed and connected across the voltage sensing potential transformer of the Millstone Power Station Unit 2 (MPS 2) "B" emergency diesel generator (EDG)[EK]. The subject test instrument is used while testing an inoperable EDG. The subject test equipment is not provided with a qualified isolation device used to provide the necessary separation from the safety related equipment. If the subject test equipment or associated leads shorted or grounded due to a failure or seismic event, it may have caused the subject potential transformer to fail rendering the "B" EDG inoperable. Although the test equipment was still installed, the "B" EDG was (incorrectly) declared operable while in Mode 5 at 2144 on May 13, 2005 following completion of testing.</p> <p>TS 3.0.4 requires that entry into an operational mode or another specified condition shall not be made when the conditions for the limiting conditions for operation are not met and the associated action requires a shutdown if they are not met within a specified time interval. The "B" EDG is required to be operable by Technical Specification (TS) 3.8.8.1 during modes 1, 2, 3, and 4. MPS 2 entered mode 4 at 1504 on May 15, 2005, with the "B" EDG inoperable due to the installed unqualified test equipment.</p> <p>The subject test instrument was subsequently removed.</p> <p>Since the TS requirement was not met, this is a condition prohibited by the TS and is reportable pursuant to 10 CFR 50.73(a)(2)(i)(B).</p>							

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)	DOCKET (2)	LER NUMBER (6)			PAGE (3)
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		2005	-- 003 --	01	

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

1. Event Description

On May 18, 2005, with the plant in mode 1 at 29% power, a non-safety related test instrument was discovered installed and connected across the voltage sensing potential transformer of the Millstone Power Station Unit 2 (MPS 2) "B" emergency diesel generator (EDG)[EK]. The subject test instrument is used while testing an inoperable EDG. The subject test equipment is not provided with a qualified isolation device used to provide the necessary separation from the safety related equipment. If the subject test equipment or associated leads shorted or grounded due to a failure or seismic event, it may have caused the subject potential transformer to fail rendering the "B" EDG inoperable. Although the test equipment was still installed, the "B" EDG was (incorrectly) declared operable while in Mode 5 at 2144 on May 13, 2005 following completion of testing.

TS 3.0.4 requires that entry into an operational mode or another specified condition shall not be made when the conditions for the limiting conditions for operation are not met and the associated action requires a shutdown if they are not met within a specified time interval. The "B" EDG is required to be operable by Technical Specification (TS) 3.8.8.1 during modes 1, 2, 3, and 4. MPS 2 entered mode 4 at 1504 on May 15, 2005, with the "B" EDG inoperable due to the installed unqualified test equipment.

The subject test instrument was subsequently removed.

Since the TS requirement was not met, this is a condition prohibited by the TS and is reportable pursuant to 10 CFR 50.73(a)(2)(i)(B).

Additional consequential non-compliance with TS was also noted as a result of being in modes 1, 2, 3, or 4 without recognizing that the "B" EDG was inoperable. Affected TSs were TS 3.8.1.1 Actions b.1, b.2, and b.3, and TS Surveillance Requirements 4.0.5, 4.8.1.1.1, 4.8.1.1.2.a.2, 4.4.9.3.1.a., and 3.0.5.

2. Cause

The cause of this event was determined to be human error. The test instrument was not removed from the "B" EDG because the Night Shift Work Control Reactor Operator (WCRO) was not aware of this responsibility to have the instrument removed, due to an inadequate turnover with the Day Shift WCRO.

3. Assessment of Safety Consequences

There were no adverse consequences as a result of this event. This event is significant because either a failure of the test equipment or a seismic event may have adversely affected the ability of the "B" EDG to operate if required. During the period that the test equipment was installed, the "B" EDG was capable of operation. The "B" EDG was successfully exercised on May 13, 2005, after the test equipment was installed. The potential that the test equipment could physically interact with other safety related equipment was also reviewed. Using the seismic hazard curve for Millstone in NUREG-1488, the probability of a seismic event capable of causing a loss of offsite power during a 5 day period is relatively low, estimated to be less than 6E-6. When crediting the availability of the redundant EDG diesel, the risk of core damage is less than 6E-8, which would be characterized as green in the NRC Significance Determination Process (SDP).

The operability of A.C. sources (including EDGs) ensures that sufficient power is available to supply the safety related equipment required for safe shutdown of the facility, and to mitigate accidents within the facility. Although the "B" EDG should have been considered inoperable, in accordance with the TS requirements, the "B" EDG was available and capable of performing its function. Additionally, procedures exist (and operators are trained) that provide the necessary guidance to mitigate accidents with less than the minimum required A.C. sources and distribution systems. Therefore, the safety consequences and implications of this event were minimal.

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		2005	-- 003 --	01	

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

4. Corrective Action

An investigation was conducted and appropriate corrective actions are being addressed in accordance with the Millstone Corrective Action Program.

The corrective actions to prevent recurrence of this condition were determined to be:

- The Dominion Nuclear Operations Standard, DNOS 0306, "Shift Turnover," will be reinforced with the Operations department and monitored via the station work observation program,
- The appropriate MPS 2 EDG Operations Forms will be revised to include test equipment restoration.

The corrective actions associated with this condition are being addressed in accordance with the Millstone Corrective Action Program.

5. Previous Occurrences

No previous similar events/conditions were identified at MPS.

Energy Industry Identification System (EIS) codes are identified in the text as [XX].