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JUN 16 2015

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

Serial No. 15-287
MPS Lic/LES R0
Docket No. 50-336
License No. DPR-65

DOMINION NUCLEAR CONNECTICUT, INC.
MILLSTONE POWER STATION UNIT 2
LICENSEE EVENT REPORT 2015-001-00
HISTORICAL OIL LEAKAGE FROM "C" RBCCW PUMP BEARINGS CHALLENGED
MEETING MISSION TIME

This letter forwards Licensee Event Report (LER) 2015-001-00 documenting an event at Millstone Power Station Unit 2 on April 17, 2015. This LER is being submitted pursuant to 10 CFR 50.73(a)(2)(i)(B).

If you have any questions or require additional information, please contact Mr. Thomas G. Cleary at (860) 447-1791 x3232.

Sincerely,

John R. Daugherty
Site Vice President – Millstone

Attachments: 1

Commitments made in this letter: None

LE22
NRK

cc: U.S. Nuclear Regulatory Commission
Region I
2100 Renaissance Blvd, Suite 100
King of Prussia, PA 19406-2713

R. V. Guzman
NRC Project Manager Millstone Units 2 and 3
U. S. Nuclear Regulatory Commission
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Rockville, MD 20852-2738

NRC Senior Resident Inspector
Millstone Power Station

ATTACHMENT

LICENSEE EVENT REPORT 2015-001-00
HISTORICAL OIL LEAKAGE FROM THE "C" RBCCW PUMP BEARINGS
CHALLENGED MEETING MISSION TIME

**MILLSTONE POWER STATION UNIT 2
DOMINION NUCLEAR CONNECTICUT, INC.**

(See Page 2 for required number of digits/characters for each block)

Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the FOIA, Privacy and Information Collections Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by Internet e-mail to Infocollections.Resource@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 an 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.

1. FACILITY NAME	2. DOCKET NUMBER	3. PAGE
Millstone Power Station Unit 2	05000336	1 OF 3

Historical Oil Leakage from “C” RBCCW Pump Bearings Challenged Meeting Mission Time

5. EVENT DATE			6. LER NUMBER			7. REPORT DATE			8. OTHER FACILITIES INVOLVED	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NO.	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
04	17	2015	2015 - 001 - 00			06	16	2015	FACILITY NAME	DOCKET NUMBER 05000

9. OPERATING MODE	11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check all that apply)			
1	<input type="checkbox"/> 20.2201(b)	<input type="checkbox"/> 20.2203(a)(3)(i)	<input type="checkbox"/> 50.73(a)(2)(i)(C)	<input type="checkbox"/> 50.73(a)(2)(vii)
	<input type="checkbox"/> 20.2201(d)	<input type="checkbox"/> 20.2203(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)
	<input type="checkbox"/> 20.2203(a)(1)	<input type="checkbox"/> 20.2203(a)(4)	<input type="checkbox"/> 50.73(a)(2)(ii)(B)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)
	<input type="checkbox"/> 20.2203(a)(2)(i)	<input type="checkbox"/> 50.36(c)(1)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(ix)(A)
10. POWER LEVEL	<input type="checkbox"/> 20.2203(a)(2)(ii)	<input type="checkbox"/> 50.36(c)(1)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(iv)(A)	<input type="checkbox"/> 50.73(a)(2)(x)
	<input type="checkbox"/> 20.2203(a)(2)(iii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(v)(A)	<input type="checkbox"/> 73.71(a)(4)
	<input type="checkbox"/> 20.2203(a)(2)(iv)	<input type="checkbox"/> 50.46(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(v)(B)	<input type="checkbox"/> 73.71(a)(5)
	<input type="checkbox"/> 20.2203(a)(2)(v)	<input type="checkbox"/> 50.73(a)(2)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(v)(C)	<input type="checkbox"/> OTHER
	<input type="checkbox"/> 20.2203(a)(2)(vi)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)(B)	<input type="checkbox"/> 50.73(a)(2)(v)(D)	Specify in Abstract below or in NRC Form 366A

12. LICENSEE CONTACT FOR THIS LER

LICENSEE CONTACT	TELEPHONE NUMBER <i>(Include Area Code)</i>
Thomas G. Cleary, Supervisor Nuclear Station Licensing	(860) 444-3232

13. COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT

CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX

14. SUPPLEMENTAL REPORT EXPECTED <input type="checkbox"/> YES (If yes, complete 15. EXPECTED SUBMISSION DATE) <input checked="" type="checkbox"/> NO	15. EXPECTED SUBMISSION DATE	MONTH	DAY	YEAR

ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines)

On April 17, 2015, with Millstone Power Station Unit 2 (MPS2) at 100% power and in operating MODE 1, the Nuclear Regulatory Commission questioned the historic operability of Millstone Power Station Unit 2's (MPS2) "C" Reactor Building Closed Cooling Water (RBCCW) pump because several condition reports had reported the need to frequently add oil to the pump's outboard bearing bubbler between November 2014 and early April 2015. Upon further review, Dominion concluded that operability could not be assured since there may not have been sufficient oil to meet mission time requirements at all times with no compensatory measures in place. Plant Technical Specification 3.7.3.1 "Reactor Building Closed Cooling Water System" requires two reactor building closed cooling water loops shall be operable. Since there were periods of time that plant operators were crediting the "C" RBCCW pump for one of the two required reactor building closed cooling water loops, and operability could not be assured at all times, Dominion is reporting this event pursuant to 10 CFR 50.73(a)(2)(i)(B), as a condition that was prohibited by the plant's Technical Specifications.

The cause of the event was that Administrative procedure OP-AA-102, Operability Determination, Attachment 1 contained guidance that allowed that oil leaks would not require an operability determination under certain conditions. Procedure OP-AA-102 has been revised to specify that any time a pump's mission time cannot be met due to oil leakage, the pump should be declared inoperable.

**LICENSEE EVENT REPORT (LER)
CONTINUATION SHEET**

Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the FOIA, Privacy and Information Collections Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to Infocollects.Resource@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 an 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.

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Millstone Power Station Unit 2	05000336	YEAR	SEQUENTIAL NUMBER	REV NO.	2 OF 3
		2015	- 001	- 00	

NARRATIVE**1. EVENT DESCRIPTION:**

On April 17, 2015, with Millstone Power Station Unit 2 (MPS2) at 100% power and in operating MODE 1, the Nuclear Regulatory Commission questioned the historic operability of Millstone Power Station Unit 2's (MPS2) "C" Reactor Building Closed Cooling Water (RBCCW) pump because several condition reports had reported the need to frequently add oil to the pump's outboard bearing bubbler between November 2014 and early April 2015. Upon further review, Dominion concluded that operability could not be assured since there may not have been sufficient oil to meet mission time requirements at all times with no compensatory measures in place. Plant Technical Specification 3.7.3.1 "Reactor Building Closed Cooling Water System" requires two reactor building closed cooling water loops shall be operable. Since there were periods of time that plant operators were crediting the "C" RBCCW pump for one of the two required reactor building closed cooling water loops, and operability could not be assured at all times, Dominion is reporting this event pursuant to 10 CFR 50.73(a)(2)(i)(B), as a condition that was prohibited by the plant's Technical Specifications.

BACKGROUND:

Technical Specification 3.7.3.1 requires two RBCCW loops to be OPERABLE at all times in MODES 1, 2, 3 and 4. Each loop consists of one RBCCW pump, a heat exchanger, and associated piping and valves. The two RBCCW loops are redundant of each other to the degree that each has separate controls and power supplies and the operation of one does not depend on the other. In the event of a design basis accident, one RBCCW loop is required to provide the minimum heat removal capability assumed in the safety analysis for the systems to which it supplies cooling water. To ensure this requirement is met, two RBCCW loops must be OPERABLE, and independent to the extent necessary to ensure that a single failure will not result in the unavailability. If two RBCCW loops cannot be restored to OPERABLE STATUS within 72 hours, then the unit must be placed in COLD SHUTDOWN within 30 hours. In order to meet the necessary safety functions, each of the two RBCCW loops must be available to meet a required 30 day mission time following a design basis accident.

2. CAUSE:

The cause of the event was that administrative procedure OP-AA-102, Operability Determination, Attachment 1 contained guidance that allowed that oil leaks would not require an operability determination under certain conditions even if mission time was challenged.

3. ASSESSMENT OF SAFETY CONSEQUENCES:

The safety consequences of the event were low. An extent of condition review was performed by Engineering, which found that there was an additional period besides the period the NRC questioned in 2014 and 2015, from July 2013 through December 2013 when there was oil leakage which occurred from the "C" RBCCW pump's inboard bearing and challenged mission time. Further investigations by Operations determined that two other RBCCW pumps ("A" and "B" pumps) were available at all times to meet the Technical Specification requirements when oil leaks challenged the

LICENSEE EVENT REPORT (LER)
CONTINUATION SHEET

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NARRATIVE

"C" RBCCW pump's mission time, except during a 118 hour period between 0120 on September 22, 2013 and 2339 on September 26, 2013, when only one RBCCW loop was available to perform the required safety functions of the RBCCW system, because the "B" RBCCW pump was removed from service for planned maintenance. Only one RBCCW loop is required to meet the system's safety function, and the "A" RBCCW pump was available in that period of time to meet the safety functions.

4. CORRECTIVE ACTION:

Procedure OP-AA-102 has been revised to specify that any time a pump's mission time cannot be met due to oil leakage, the pump should be declared inoperable due to a degraded or non-conforming condition.

Additional corrective actions are being taken in accordance with the station's corrective action program.

5. PREVIOUS OCCURRENCES:

- None

6. Energy Industry Identification System (EIIIS) codes:

- Pump – P
- RBCCW – CC