

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
HARTFORD, CONNECTICUT 06141-0270
(203)665-5000
April 28, 1993
MP-93-344

Re: 10CFR50.73(a)(2)(v)(D)

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

Reference: Facility Operating License No. DPR-65
Docket No. 50-336
Licensee Event Report 93-007-00

Gentlemen:

This letter forwards Licensee Event Report 93-007-00 required to be submitted within thirty (30) days pursuant to 10CFR 50.73(a)(2)(v)(D), any event or condition that alone could have prevented the fulfillment of the safety function of structures or systems that are needed to mitigate the consequences of an accident.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

FOR: Stephen E. Scace
Vice President - Millstone Station

BY: Fred R. Dacimo
Millstone Unit 3 Director

SES/RWB:bjo

Attachment: LER 93-007-00

cc: T. T. Martin, Region I Administrator
P. D. Sweetland, Senior Resident Inspector, Millstone Unit Nos. 1, 2 and 3
G. S. Vissing, NRC Project Manager, Millstone Unit No. 2

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LICENSEE EVENT REPORT (LER)

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.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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-630), U.S. Nuclear Regulatory Commission, Washington, DC 20555, and to the Paperwork Reduction Project (3150-0104), Office of Management and Budget, Washington, DC 20503.

FACILITY NAME (1) Millstone Nuclear Power Station Unit 2	DOCKET NUMBER (2) 0 5 0 0 0 3 3 6 9 3 -	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
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TEXT (If more space is required, use additional NRC Form 366A's) (17)

I. Description of Event

On March 29, 1993 at 1350 hours with the plant at 100% power and normal operation, the determination was made that the paralleling of an emergency diesel generator with the grid while the other diesel generator is not operable is unsatisfactory. Synchronizing the only operable diesel generator with the grid, makes that diesel generator susceptible to faults on the grid that can disable the diesel generator.

Technical Specification section 3.8.1.1 requires the operable diesel generator to be started, within one hour and at least once per eight (8) hours thereafter, when the other diesel generator is inoperable. The requirement of loading (parallel to grid) the diesel generator each time it was started was added to support vendor recommendations. The vendor recommendation was made as a general good practice to avoid buildup of residue in exhaust ports, that could create a fire hazard.

The immediate cause was a failure to review the potential impact of performing equipment surveillance tests on the operability of the tested equipment. The method of discovery was review of the Technical Specification section 3.8.1.1 and comparison with other units corresponding specification. No other systems or secondary functions were affected by this event. No operator actions were required, and no automatic or manually initiated safety functions were required, as result of this event.

II. Cause of Event

Evaluation of the governing Technical specification, section 3.8.1.1, action "a", shows that the unit has been using an overly conservative interpretation of the intent of this action statement. When performing the operability verification, the minimum diesel generator (DG) requirement is only to verify the DG can reach required speed and voltage in the specified start time, with no requirement to actually parallel and load the engine. The loading of the engine was additionally performed to satisfy engine vendor concerns about residual fuel and lube oil that could buildup and create potential hazards for the engine if not burned off on a loaded run.

The root cause the failure to recognize the potential impact of the additional diesel generator loading recommendations.

III. Analysis of Event

This event is being reported pursuant to the requirements of 50.73(a)(2)(v)(D), which requires the reporting of any event or condition that alone could have prevented the fulfillment of the safety function of structures or systems that are needed to mitigate the consequences of an accident. This was determined to be a reportable event, based on the review of the potential impact of the practice of operating a diesel generator (DG) in parallel with the grid, or operating both diesel generators at the same time in parallel with the grid. Synchronizing the operable DG with the grid, makes that DG susceptible to faults on the grid that can disable the DG, and for either case leave the unit with no operable DG's. This condition would create a potential loss of safety function i.e., that at least one DG would not always be available to respond to a loss of normal power (LNP) or LNP with loss of coolant accident (LOCA) condition, to power safety equipment.

There were no actual safety consequences of this event since there were no grid fault conditions. This event identifies the potential that could be created for a failure of the only operable DG if a grid fault were to occur.

IV. Corrective Action

To avoid this potential situation, the scheduling of DG surveillance runs has been changed. Changes to the general operating procedure OP 2346A, and the associated surveillance procedures SP 2613A and SP 2613B, have been made to prohibit the paralleling of the only operable diesel generator to the offsite power grid.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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

In addition, the evaluation of the governing Technical Specification, section 3.8.1.1, action "a", shows that the unit has been using an overly conservative interpretation of the intent of this action statement. When performing the operability verification, the minimum DG requirement is only to verify the DG can reach required speed and voltage in the specified start time, with no requirement to actually parallel and load the engine. The loading of the engine was additionally performed to satisfy engine vendor concerns about residual fuel and lube oil that could buildup and create potential hazards for the engine if not burned off on a loaded run.

As a result of this event, the most recent discussions with the engine vendor show that unloaded runs can be performed, on a limited basis, with no concern.

In addition, a change to the Technical Specification section 3.8.1.1, Action Statement will be submitted. Reviews are planned for an evaluation of any potential impact on the operability of equipment due to the performance of surveillance testing on that equipment.

V. Additional Information

Similar LER's: none

There were no failed components associated with this event.

EHS Code Identifiers

1. ESAS - JE-XC-C560
2. 4160 Volt Vital Buses - EB-BV-6082
3. 4160 Volt Vital Breaker - EB-BKR-6080
4. Emergency Diesel Generator - ER-D6-F010