

NORTHEAST UTILITIES



THE CONNECTICUT LIGHT AND POWER COMPANY
THE HARTFORD ELECTRIC LIGHT COMPANY
WESTERN MASSACHUSETTS ELECTRIC COMPANY
HOLYOKE WATER POWER COMPANY
NORTHEAST UTILITIES SERVICE COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY

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Mr. Ronald C. Haynes
Regional Administrator, Region I
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, Pennsylvania 19406

Reference: Facility Operating License No. DPR-65
Docket No. 50-336
Reportable Occurrence RO-50-336/82-09/1T-0

Dear Mr. Haynes:

This letter forwards Licensee Event Report 82-09/1T/0, required to be submitted within 14 days pursuant to Millstone Unit 2 Technical Specifications, Section 6.9.1.8.b, concerning operation of the unit with a limiting condition for operation in a less conservative condition than is established in the Technical Specifications. An additional three copies of the report are enclosed.

Yours truly,

NORTHEAST NUCLEAR ENERGY COMPANY

E. J. Mroczka
Station Superintendent
Millstone Nuclear Power Station

EJM/RWB:mo

Attachment: LER 82-09/1T-0

cc: Director, Office of Inspection and Enforcement, Washington, D. C. (40)
Director, Office of Management Information and Program Control,
Washington, D. C. (3)
U. S. Nuclear Regulatory Commission, c/o Document Management Branch,
Washington, D. C. 20555

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ATTACHMENT TO LER 82-09/01-T
NORTHEAST NUCLEAR ENERGY COMPANY
MILLSTONE NUCLEAR POWER STATION
DOCKET NO. 50-336

Event Description and Probable Consequences

Section 3.5.2 of the Technical Specifications requires two separate and independent Emergency Core Cooling System (ECCS) subsystems to be operable in Modes 1, 2, and 3 (with Pressurizer pressure greater than or equal to 1750 psia). One of the Boric Acid flowpaths listed in Section 3.5.2.d became inoperable when the motor operator failed on the common discharge valve 2-CH-514 for the Boric Acid pumps. Following this motor failure a plant trip occurred due to unrelated problems and the subsequent recovery and plant startup was made without the realization that Action Statement "a" under Section 3.5.2.d applied. Approximately 40 hours after the motor failure and during the plant startup, a review of the two sections which address boric acid flow paths, revealed differences between the two sections that were not obvious on the initial reviews at the time of the motor failure. The two sections are 3.1.2.2.a (Reactivity Control Systems) and 3.5.2.d (ECCS Subsystems). Both subsections require an operable charging pump with a flow path from a Boric Acid Storage Tank via either an operable boric acid pump or a gravity feed connection. However Section 3.5.2 required two ECCS subsystems to be operable, while Section 3.1.2.2 provided for operation with any two of three possible boron injection flow paths operable. The latter condition was met even with the failure of the motor operator, so that with the similarity in wording it appeared that both sections were satisfied and a startup was commenced. When further reviews showed the differences a plant operator was immediately stationed near the valve to provide manual opening capability if required. This operator was retained until the motor was replaced and the valve returned to normal operable status. As a result there were no probable consequences.

Cause Description and Corrective Action

The mode changes while operating under an action statement were made because of a misinterpretation of differences between two different sections of the Technical Specifications. To prevent a recurrence personnel have been briefed on the differences between the two sections and a technical specification change will be submitted to reduce possible confusion.