

Northeast
Nuclear Energy

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Millstone Nuclear Power Station
Northeast Nuclear Energy Company
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The Northeast Utilities System

Donald B. Miller Jr.,
Senior Vice President - Millstone

Re: 10CFR50.73(a)(2)(i)
October 17, 1994
MP-94-590

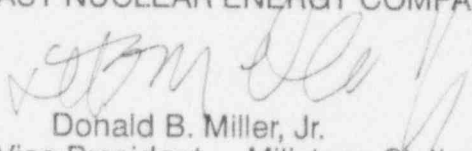
U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

Reference: Facility Operating License No. DPR-65
Docket No. 50-336
Licensee Event Report 94-028-00

This letter forwards Licensee Event Report 94-028-00 required to be submitted within thirty (30) days pursuant to 10CFR50.73(a)(2)(i), any operation or condition prohibited by the plant's Technical Specifications.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY


Donald B. Miller, Jr.
Senior Vice President - Millstone Station

DBM/GM:ljs

Attachment: LER 94-028-00

cc: T. T. Martin, Region I Administrator
P. D. Swetland, 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)

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

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION
COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING
BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT
BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION,
WASHINGTON, DC 20555-0001, 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)

05000336

PAGE (3)

1 OF 4

TITLE (4)

Technical Specification Surveillance Not Performed Within Required Time Interval

EVENT DATE (5)			LER NUMBER (6)		REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)		
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
09	23	94	94	028	00	10	17	94	FACILITY NAME	DOCKET NUMBER
										05000
									FACILITY NAME	DOCKET NUMBER
										05000

OPERATING MODE (9) 1

POWER LEVEL (10) 100

THIS REPORT IS BEING SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)

20.402(b)	20.405(c)	50.73(a)(2)(iv)	73.71(b)
20.405(a)(1)(i)	50.36(c)(1)	50.73(a)(2)(v)	73.71(c)
20.405(a)(1)(ii)	50.36(c)(2)	50.73(a)(2)(vi)	OTHER
20.405(a)(1)(iii)	X 50.73(a)(2)(i)	50.73(a)(2)(vii)(A)	(Specify in Abstract below and in Tax. NRC Form 366A)
20.405(a)(1)(iv)	50.73(a)(2)(ii)	50.73(a)(2)(vii)(B)	
20.405(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(ix)	

LICENSEE CONTACT FOR THIS LER (12)

NAME

Philip J. Lutz, Nuclear Licensing

TELEPHONE NUMBER (Include Area Code)

(203) 440-2072

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

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE)	NO	EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
	X				

ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

On September 23, 1994, at 1105 hours, with the unit in Mode 1 at 100% power, it was discovered that surveillance procedures SP 2605C, "Containment Leak Test, Type B," SP 2605D, "Containment Leak Test, Type C," and SP 2605E, "Containment Personnel Air Lock Leak Test," were not performed for 69 of 91 containment isolation penetrations within the time interval specified in Technical Specification 4.6.1.2.d. These three procedures verify individual and combined leakages for all containment isolation valves (CIVs) and Type B penetrations are maintained within Technical Specification and Appendix J limits. Local leak rate tests (LLRTs) are required to be performed at intervals no greater than 24 months from the previous test.

The cause of the missed surveillances was due to the historical practice of assuming that the 24 month LLRT surveillance interval began after all LLRTs were completed from the current refuel outage. Corrective action will involve identifying a separate due date for each Appendix J CIV and Type B penetration in the surveillance tracking program and documenting an interpretation of Appendix J Technical Specification requirements.

EXPIRES: 5/31/95

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 INFORMATION AND RECORDS MANAGEMENT
BRANCH (MNB 7714), U.S. NUCLEAR REGULATORY COMMISSION,
WASHINGTON, DC 20555-0001 AND TO THE PAPERWORK REDUCTION
PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET,
WASHINGTON, DC 20503.

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)		PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER
Millstone Nuclear Power Station Unit 2	05000336	94	— 028 —	00
				02 OF 04

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

I. Description of Event

On September 23, 1994, at 1105 hours, with the unit in Mode 1 at 100% power, it was discovered that surveillance procedures SP 2605C, "Containment Leak Test, Type B," SP 2605D, "Containment Leak Test, Type C," and SP 2605E, "Containment Personnel Air Lock Leak Test," were not performed for 69 of 91 containment isolation penetrations within the time interval specified in Technical Specification 4.6.1.2.d. These three procedures verify individual and combined leakage for all containment isolation valves (CIVs) and Type B penetrations are maintained within Technical Specification and Appendix J limits. Local leak rate tests are required to be performed at intervals no greater than 24 months from the previous test.

During an Engineering review of the previous refuel outage LLRT data, it was identified that 48 of 51 type "B" penetrations and 21 of 40 type "C" penetrations were last tested between June 3, 1992, and September 1, 1992. Initially there was a question with regard to the start time for the 24 month window where LLRT surveillances are required to be completed. It was determined that each valve was required to be tested within 24 months of the previous test.

In accordance with Technical Specification surveillance requirement 4.0.2, the unit had 24 hours to complete all missed surveillances prior to entering Action Statements for Limiting Conditions for Operations 3.6.1.1 and 3.6.1.2. Since all LLRT surveillances could not be completed, NRC enforcement discretion and an Appendix J exemption request were pursued. On September 24, 1994, the NRC staff verbally granted NNECO's request for enforcement discretion. In letters dated September 26, 1994, NNECO submitted an emergency license amendment request, enforcement discretion and exemption request from 10CFR50, Appendix J, Type B and C surveillance requirements.

There were no operator actions required as a result of this condition. Additionally, the condition involved no automatic or manually initiated safety system actuations.

II. Cause of Event

The cause of this condition was the non-conservative historical interpretation of Technical Specification surveillance requirements pertaining to Appendix J, Type B and C tests.

The tracking mechanism that existed for the LLRT surveillance was the Operations Department Surveillance Tracking Program. This program utilizes computerized and manual tracking mechanisms which provide updating of a master surveillance list when Technical Specification surveillances are completed. After each LLRT was performed, a separate surveillance form was completed with the test date identified on the Master Surveillance List. However, since all CIVs were grouped together for defining LLRT surveillance requirements, the Master Surveillance List did not specify individual CIVs and was not updated during previous refuel outages after each LLRT. The LLRT surveillance requirement due date was determined based on the last LLRT performed during the refuel outage.

III. Analysis of Event

This event is being reported pursuant to the requirements of 10CFR50.73(a)(2)(i), which identifies any operation or condition prohibited by the plant's Technical Specifications. Technical Specification 4.6.1.2d, requires that type B and type C tests shall be conducted at P_a (54 psig) at intervals no greater than 24 months, except for tests involving air locks.

EXPIRES: 5/31/95

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 INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, 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) 05000336	LER NUMBER (6)			PAGE (3)
		YEAR 94	SEQUENTIAL NUMBER — 028 —	REVISION NUMBER 00	03 OF 04

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

The leaktight integrity was considered to be maintained for all the containment isolation penetrations, based on past performance. Additionally all CIVs were operable. The As-Left maximum pathway LLRT results for the 1990 and 1992 refuel outages were 0.04 La and 0.016 La, respectively. These values are significantly below the Technical Specification and Appendix J limit of 0.6 La. Past LLRT results have shown that administrative leakage limits were exceeded for only two CIVs during the 1990 refuel outage and for only four CIVs during the 1992 refuel outage. Administrative leakage limits are small fractions of the maximum allowable leakage and are used to monitor valve degradation. Of the six CIVs which exceeded administrative limits, all had been tested within 24 months of their last LLRT during the previous refuel outage. Of the CIVs that had exceeded their 24 month surveillance, all were within their administrative limit for at least the last two As-Found LLRTs. Based on the above, there were no safety consequences which resulted from this condition.

A review of past refuel outages and LLRT test intervals identified that for the first eleven outages, the 24 month surveillance requirement could have been exceeded for refuel outages 5, 6 and 11. This possibility was conservatively determined assuming CIVs and Type B penetrations were tested at the beginning of one outage and at the end of the following outage. From this review, it is considered highly unlikely that any CIV or Type B penetration had previously exceeded a 24 month interval between LLRTs and in all cases the unit was shutdown for the refueling outage prior to the end of any 24 month interval.

IV. Corrective Action

Upon discovery of the missed surveillances, the unit had only one week of operation remaining prior to shutdown for refuel outage 12. LLRT data was reviewed which determined that 69 of 91 containment isolation penetrations exceeded the 24 month interval and would require a unit shutdown to complete. As a result, an Emergency License Amendment Request, enforcement discretion and an Appendix J exemption request were docketed. Past LLRT surveillance intervals were reviewed to determine the extent of this condition.

The following actions should prevent recurrence:

- 1) Operations Department Instruction, 2-OPS-9.03, "Scheduling and Verification of Performance of Technical Specification Requirement Surveillances," will be revised to identify that each CIV and Type B penetration has a separate surveillance due date.
- 2) Separate due dates for each Appendix J CIV and Type B penetration were incorporated in the Operations Department Computerized Surveillance Tracking Program and the hardcopy tracking program. Due dates are based on the previous test date of an accepted surveillance.
- 3) A surveillance overdue flag, 90 days prior to due date, was incorporated for LLRTs based on the first LLRT (test date of accepted surveillance) completed during the previous refuel outage. This flag will be generated on the computerized surveillance tracking program.
- 4) Appendix J related Technical Specifications will be reviewed and an interpretation of each part documented in the Technical Requirements Manual.
- 5) An Engineering Department lead who will provide technical support for all aspects of the Appendix J requirements will be assigned.

EXPIRES: 5/31/95

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 60.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, 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) 05000336	LER NUMBER (6)			PAGE (3) 04 OF 04
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		94	-- 028 --	00	

TEXT (If more space is required, use additional copies of NRC Form 366A) (17)**V. Additional Information**

There were no failed components in this event.

Similar Events: LERs 94-013, 93-014, 93-001, 92-001, 91-006, 91-007, 90-020, 84-007, 84-008

These LERs are similar in that a Technical Specification surveillance was not completed within the required surveillance period. The 25% allowed extension applied to the referenced LERs but not to this condition. For this condition the required surveillance period for Type B and C LLRTs was unknowingly exceeded since the start date for the surveillance period was incorrectly assumed to begin after all LLRTs were completed from the previous refuel and not after each test. Therefore the corrective actions implemented for the more recent LERs would not have indicated the LLRT surveillance was exceeded.