Northeast
Nuclear Energy

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The Northeast Utilities System

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

Re: 10CFR50.73(a)(2)(i)
December 20, 1994
MP-94-675

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 94-037-00

This letter forwards Licensee Event Report 94-037-00 required to be submitted within thirty (30) days pursuant to 10CFR50.73(a)(2)(i).

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

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

DBM/SKB:dlr

Attachment: LER 94-037-00

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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NRC Form 366 (5-92) U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB NO. 3150-0104
EXPIRES: 5/31/95

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.

LICENSEE EVENT REPORT (LER)

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

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
Millstone Nuclear Power Station Unit 2	05000336	1 OF 3

TITLE (4)
Battery Charger Surveillance

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
										05000
11	20	94	94	- 037 -	00	12	20	94	FACILITY NAME	DOCKET NUMBER 05000

OPERATING MODE (9)	*	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)	
POWER LEVEL (10)	0	20.405(a)(1)(i)	X	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)(vii)		OTHER	
		20.405(a)(1)(iii)		50.73(a)(2)(i)		50.73(a)(2)(viii)(A)		(Specify in Abstract below and in Text, NRC Form 366A)	
		20.405(a)(1)(iv)		50.73(a)(2)(ii)		50.73(a)(2)(viii)(B)			
		20.405(a)(1)(v)		50.73(a)(2)(iii)		50.73(a)(2)(x)			

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER (Include Area Code)
Philip J. Lutzi, Nuclear Licensing	(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)		EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
YES (If yes, complete EXPECTED SUBMISSION DATE)	NO				

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

On November 20, 1994, with the plant in a defueled condition, during a review of surveillance, plant performance records, personnel discovered that the 18 month surveillance for the 'A' Battery Charger capacity had not been performed within its required surveillance period. Maintenance Surveillance Procedure, 2736G, "Battery Charger Capacity Test," was last performed on November 20, 1992. Technical Specification surveillance requirement 4.0.2 allows a maximum extension time not to exceed 25% of the surveillance time interval (18 months x 1.25), therefore the surveillance was required to be performed by October 3, 1994. Since the 'A' Battery Charger is scheduled for replacement during the current refueling outage and it is not required by Technical Specifications due to the current defueled condition, the 'A" Battery Charger remains available and in service.

I. Description of Event

On November 20, 1994, with the plant in a defueled condition, during a review of surveillance test performance records, plant personnel discovered that the 18 month surveillance for the 'A' Battery Charger capacity had not been performed within its required surveillance period. Maintenance surveillance procedure, 27[illegible]3, "Battery Charger Capacity Test," was last performed on November 20, 1992. Technical Specification Surveillance 4.0.2 allows a maximum extension time not to exceed 25% of the surveillance time interval (18 months x 1.25), therefore the surveillance was required to be performed by October 3, 1994.

There were no automatic or manually initiated safety system responses required to mitigate this event.

II. Cause of Event

The root cause of this event was personnel error, work organization, and planning and supervisory methods.

In August 1994, while the plant was in a forced outage to repair RCP oil leaks, the need to perform the 'A' Battery Charger Surveillance by October 3, 1994 was discussed. At that time, the date for the start of RFO12 was September 15, 1994 and the existing charger was scheduled to be replaced by a new one of an improved design. As a result, a decision was made not to perform this surveillance during the forced outage but rather to schedule the removal of the 'A' Battery Charger from service upon entry into Mode 5 during RFO12. The RFO12 outage schedule was adjusted to ensure this activity would occur.

The start of RFO12 was delayed until September 30, 1994 due to a delay in the startup from the RCP Oil Leak repair forced outage. Several days prior to the start of RFO12 an error was made in that the plan for the removal for Battery Chargers from service was changed from the out of service sequence of 'A', 'B', then 'C' to 'B', 'A', 'C'. This change was made because the swing charger ('C') could only be supplied from facility 1 and the 'A' charger workscope (i.e., replacement) would not fit within the facility 1 outage out of service window.

In accordance with internal Work Planning and Control procedures, this change to the plan was reviewed for schedule impact and shutdown risk. These reviews were completed satisfactorily, but contrary to the requirement, no review took place with respect to Technical Specification Surveillance Frequency. Subsequently during RFO12, the plant staff (i.e. the Maintenance Department) also failed to recognize that the 'A' Battery Charger was in service as the operable charger and that it was past its surveillance due date.

III. Analysis of Event

This event is being reported pursuant to the requirements of 10CFR50.73(a)(2)(i), a condition prohibited by the plant's Technical Specifications. In accordance with Technical Specification 4.0.2, each surveillance requirement shall be performed within the specified time interval with a maximum allowable interval not to exceed 25% of the surveillance time interval.

Technical Specification 3.8.2.4 requires that at least one Battery Charger be operable in Modes 5 and 6. Contrary to this requirement, from October 11, 1994 until November 7, 1994, when the plant entered an undefined Mode due to the core being fully offloaded, the 'A' Battery Charger was inservice as the operable charger. During this time, the 'B' charger was available, although not operable in accordance with Technical Specifications since the associated Diesel Generator was inoperable, from October 17, 1994 thru November 4, 1994.

The safety consequences were minimal based on continued acceptable performance of the 'A' Charger. It should be noted that in this mode, core offloaded, no technical specification requirements exist which require an operable charger. However, the 'A' charger remains in service and the 'B' is available and has successfully passed its surveillance testing.

IV. Corrective Action

As stated above, the 'A' Battery Charger remains in service until its replacement during the current refueling outage. Upon replacement, the 'A' charger will be tested in accordance with Maintenance Procedure 2736G, "Battery Charger Capacity Test", thus satisfying its 18 month surveillance requirement.

To prevent recurrence:

The plant staff reviewed the due dates for other 18 month surveillances which were previously scheduled to ensure their surveillance intervals remain valid.

The work planning and control and maintenance personnel involved in this event have been counseled with respect to the need to review surveillance intervals when making changes to the plan.

V. Additional Information

Similar Event LERs 94-036, 94-013, 93-014, 92-011, 91-006, 91-007, 90-020, 84-007 were associated with missed surveillances.

This event is associated with the above list because it was also a missed surveillance. This event is unique in that it arose from a change in outage planning and the review process for such changes failed to detect the problem.

EIIS Code

Battery Charger EJ-BYC