



Northeast  
Nuclear Energy

Rope Ferry Rd. (Route 156), Waterford, CT 06385

Millstone Nuclear Power Station  
Northeast Nuclear Energy Company  
P.O. Box 128  
Waterford, CT 06385-0128  
(203) 444-4300  
Fax (203) 444-4277

The Northeast Utilities System

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

Re: 10CFR50.73(a)(2)(i)(B)

August 22, 1995

MP-95-261

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 95-030-00

This letter forwards Licensee Event Report 95-030-00 required to be submitted within thirty (30) days pursuant to 10CFR50.73(a)(2)(i)(B).

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

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

DBM/RT:ljs

Attachment: LER 95-030-00

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

250010

9508280098 950822  
PDR ADOCK 05000336  
S PDR

## 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 (MNBE 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 3

TITLE (4)

Violation of Technical Specification 3.0.4 During Reactor Plant Heatup

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
06	28	95	95	030	00	08	22	95		
OPERATING MODE (9)		4		THIS REPORT IS BEING SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)						
POWER LEVEL (10)		000		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 Text, 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)(x)		

## 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 NPDOS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDOS

## SUPPLEMENTAL REPORT EXPECTED (14)

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

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

On July 28, 1995, at 0423 hours with the Plant in Mode 4, RCS temperature at 200°F and RCS pressure at 368 psig, Technical Specification 3.0.4, which provides limitations on changing Modes, was violated. The action required by Technical Specification LCO 3.4.9.1, "Pressure/Temperature Limits" was not completed prior to the Plant changing Modes, during an RCS heatup. Although the Operating crew at the time of the event believed the actions required by Technical Specification LCO 3.4.9.1 had been completed, the formal engineering evaluation required had not been completed prior to the Plant changing Modes.

This is being reported pursuant to the requirements of 10CFR50.73(a)(2)(i)(B), "Any operation or condition prohibited by the plant's Technical Specifications."

Corrective actions in the form of procedure changes and Operations Department briefings have been implemented to prevent the heatup rate limits of Technical Specification 3.4.9.1, or other Technical Specification limits from being challenged, such that Technical Specification 3.0.4 will not be violated under similar circumstances.

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 (MNEB 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	95	-- 030 --	00	02 OF 03

**TEXT** (If more space is required, use additional copies of NRC Form 366A) (17)**I. Description of Event**

On July 28, 1995, at 0423 hours with the Plant in Mode 4 with RCS temperature at 200°F and pressure at 368 psig. Technical Specification 3.0.4 was violated, since, the action required by Technical Specification LCO 3.4.9.1 was not completed prior to the Plant changing Modes, during an RCS heatup. The event occurred when the RCS average temperature exceeded 200°F, entering Mode 4, while one of the actions required by Technical Specification LCO 3.4.9.1 was not yet complete.

Prior to the event, the Plant had initiated heatup from cold shutdown. The primary to secondary temperature differential was of a sufficient magnitude that when RCPs were started for the heatup, a thermal transient occurred causing the Technical Specification 3.4.9.1, 50°F/hour heatup rate limit to be exceeded. The actions required when this LCO is violated are:

- (1) Restoration of temperature and/or pressure within the limit within 30 minutes;
- (2) Perform an engineering evaluation to determine the effects of the out-of-limit condition on the structural integrity of the RCS;
- (3) Determine that the RCS remains acceptable for continued operation or

be in HOT STANDBY within the next 6 hours and reduce the RCS Tavg and pressure to less than 200°F and 500 psia, respectively, within the next 30 hours.

Efforts to meet the requirements of the action statement were initiated. The temperature and pressure were restored to within the limits within 30 minutes. A formal engineering evaluation to determine the effects of the out-of-limit condition was initiated during the event. Additionally, a verbal engineering evaluation with the determination that the RCS was acceptable for continued operation was given by a technical expert. The shift was advised to continue the heatup until Plant temperature could be stabilized at approximately 230°F with the Atmospheric Dump Valves open, as the best course of action to place the Plant in a safe condition. The Operating shift believed that the intent of the action statement was met, and that entry into Mode 4 was justified by compliance with Technical Specifications and good engineering practice to place the Plant in a safe condition. However, the formal engineering evaluation was not completed until after the Plant entered Mode 4.

Technical Specification 3.0.4 prohibits entry into an OPERATIONAL MODE whenever an LCO is not met or its associated ACTION is not satisfied, if that action includes a reactor shutdown within the required time interval. With the formal engineering evaluation not yet complete, the actions required by Technical Specification LCO 3.4.9.1 were not completed prior to the Mode change, in violation of Technical Specification 3.0.4.

There were no safety systems which were automatically or manually actuated during this event.

**II. Cause of Event**

Based on a technical evaluation by a stress analysis expert at the time of the event, training and Operator judgement of Plant conditions, the Operating crew had decided that continuing the heatup was the best course of action to place the Plant in a safe condition. The Plant entered Mode 4 when the heatup was allowed to continue to the point where the RCS average temperature exceeded 200°F. Although the Operating crew believed they had completed the actions required by Technical Specification LCO 3.4.9.1, the formal engineering evaluation had not been completed prior to reaching 200°F. Accordingly, the Mode change took place while the Plant was still in an ACTION statement.

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)	DOCKET NUMBER (2)	LER NUMBER (5)			PAGE (3)
Millstone Nuclear Power Station Unit 2	05000336	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	03 OF 03
		95	— 030 —	00	

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

III. Analysis of Event

This event is reported pursuant to the requirements of 10CFR50.73(a)(2)(i)(B), "Any operation or condition prohibited by the plant's Technical Specifications." Technical Specification 3.0.4 was violated, since, the Plant was in an ACTION statement when entry into another OPERATIONAL MODE (Mode 4) took place.

IV. Corrective Action

Corrective actions in the form of procedure changes and Operations Department briefings have been implemented to prevent the heatup rate limits of Technical Specification 3.4.3.1, or other Technical Specification limits from being challenged, such that Technical Specification 3.0.4 will not be violated under similar circumstances in the future.

V. Additional Information

Similar LERs: There are no similar LERs that deal with violation of Technical Specification 3.0.4.