NRC FORM 366
(9-77)

U S NUCLEAR REGULATORY COMMISSION

LICENSEE EVENT REPORT

UPDATE REPORT - LAST REPORT
DATE 5-03-82

CONTROL BLOCK: (1) (PLEASE PRINT OR TYPE ALL REQUIRED INFORMATION)

1 | CTMNS2 (2) | 00-00000-00 (3) | 4 1 1 1 1 (4) | (5)
LICENSEE CODE | LICENSE NUMBER | LICENSE TYPE | CAT

CON'T
REPORT SOURCE | L (6) | 05000336 (7) | 041982 (8) | 061884 (9)
DOCKET NUMBER | EVENT DATE | REPORT DATE

EVENT DESCRIPTION AND PROBABLE CONSEQUENCES (10)

During a routine startup, review of Technical Specifications Section 3.5.2.d Emergency Core Cooling System (ECCS) Subsystems revealed mode changes had occurred while operating under action statement "a" because an inoperable valve disabled a required boric acid flow path. The valve was returned to operable status and operation continued in accordance with the Technical Specifications. The total time in the action statement w[illegible] 7 hours.

SYSTEM CODE	CAUSE CODE	CAUSE SUBCODE	COMPONENT CODE	COMP SUBCODE	VALVE SUBCODE
SF (11)	A (12)	A (13)	ZZZZZZ (14)	Z (15)	Z (16)

(17) LER/RO REPORT NUMBER	EVENT YEAR	SEQUENTIAL REPORT NO	OCCURRENCE CODE	REPORT TYPE	REVISION NO
	82	009	01	X	1

ACTION TAKEN	FUTURE ACTION	EFFECT ON PLANT	SHUTDOWN METHOD	HOURS (22)	ATTACHMENT SUBMITTED	NPRD-4 FORM SUB.	PRIME COMP. SUPPLIER	COMPONENT MANUFACTURER
H (18)	Z (19)	Z (20)	Z (21)	0000	Y (23)	Y (24)	Z (25)	Z999 (26)

CAUSE DESCRIPTION AND CORRECTIVE ACTIONS (27)

The mode changes made while operating in the action statement occurred because of a misinterpretation between two similar sections, 3.5.2.d and 3.1.2.2.a. Personnel have been briefed on the differences and a technical specification change has been issued to reduce confusion.

FACILITY STATUS	% POWER	OTHER STATUS (30)	METHOD OF DISCOVERY	DISCOVERY DESCRIPTION (32)
C (28)	030 (29)	NA	Z (31)	NA

ACTIVITY RELEASED	CONTENT OF RELEASE	AMOUNT OF ACTIVITY (35)	LOCATION OF RELEASE (36)
Z (33)	Z (34)	NA	NA

PERSONNEL EXPOSURES

NUMBER	TYPE	DESCRIPTION (39)
000 (37)	Z (38)	NA

PERSONNEL INJURIES

NUMBER	DESCRIPTION (41)
000 (40)	NA

LOSS OF OR DAMAGE TO FACILITY (43)

TYPE	DESCRIPTION
Z (42)	NA

PUBLICITY

ISSUED	DESCRIPTION (45)
N (44)	NA

8407020281 840618
PDR ADOCK 05000366
S PDR

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NRC USE ONLY

NAME OF PREPARER J. G. Resetar PHONE (203) 447-1791

ATTACHMENT TO LER 82-09/01-X-1
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 which 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 has been issued to reduce possible confusion.

RTHEAST 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 • Selden Street, Berlin, Connecticut

P.O. BOX 270
HARTFORD, CONNECTICUT 06141-0270
(203) 666-6911

June 18, 1984
MP-6110

r. Thomas E. Murley
egional Administrator, Region I
. S. Nuclear Regulatory Commission
81 Park Avenue
ig of Prussia, Pennsylvania 19406

eference: Facility Operating License No. DPR-65
Docket No. 50-336
Reportable Occurrence RO 50-336/82-09/01X-1

ear Dr. Murley:

his letter forwards the update Licensee Event Report for Reportable
ccurrence 82-09/1X-1. An additional three copies of the report are
nclosed.

Yours truly,

NORTHEAST NUCLEAR ENERGY COMPANY

E. J. Mroczka
Station Superintendent
Millstone Nuclear Power Station

JM/JR:mo

ttachment: LER RO 50-336/82-09/1X-1

c: Director, Office of Inspection and Enforcement, Washington, D. C. (30)
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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