

NORTHEAST 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: Seiden Street, Berlin Connecticut

P. O. BOX 270
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Re: 10CFR50.73(a)(2)(i)(B)
March 16, 1992
MP-92-275

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

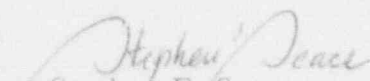
Reference: Facility Operating License No. DPR-65
Docket No. 50-336
Licensee Event Report 92-007-00

Gentlemen:

This letter forwards Licensee Event Report 92-0 required to be submitted within thirty (30) days pursuant to 10CFR50.73(a)(2)(i)(B).

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY


Stephen E. Scace
Director, Millstone Station

SES/EF:tp

Attachment: LER 92-007-00

cc: T. T. Martin, Region I Administrator
W. J. Raymond, 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)

Estimated burden per response to comply with this information collection request: 50-0 hrs. Forward comments regarding burden estimate to the Records and Reports Management Branch (p-530), U.S. Nuclear Regulatory Commission, Washington, DC 20555, 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)

0 5 0 0 0 3 3 6 1 OF 0 2

PAGE (3)

TITLE (4)

Reactor Coolant Gross Activity Surveillance Non-Compliance

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 NAMES										
0	2	1	9	9	2	9	2	0	5	0	0	0	0	0	0	0	0	0	0
OPERATING MODE (9)										THIS REPORT IS BEING SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § (Check one or more of the following) (11)									
POWER LEVEL (10)										OTHER (Specify in Abstract below and in Text, NRC Form 366A)									
1										20.402(b)									
11010										20.405(a)(1)(i)									
										20.405(a)(1)(ii)									
										20.405(a)(1)(iii)									
										20.405(a)(1)(iv)									
										20.405(a)(1)(v)									
										20.402(c)									
										50.36(c)(1)									
										50.36(c)(2)									
										50.73(a)(2)(i)									
										50.73(a)(2)(ii)									
										50.73(a)(2)(iii)									
										50.73(a)(2)(iv)									
										50.73(a)(2)(v)									
										50.73(a)(2)(vi)									
										50.73(a)(2)(vii)									
										50.73(a)(2)(viii)									
										50.73(a)(2)(ix)									
										50.73(a)(2)(x)									

LICENSEE CONTACT FOR THIS LER (12)

NAME

Edwin R. Foster, Ext. 4416

TELEPHONE NUMBER

AREA CODE

2 0 3 4 4 7 - 1 7 9 1

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

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC
D	A	B		N					

SUPPLEMENTAL REPORT EXPECTED (14)

YES (if yes, complete EXPECTED SUBMISSION DATE)	NO	EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
<input type="checkbox"/>	<input checked="" type="checkbox"/>				

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

On February 19, 1992 at 1300 hours, while the plant was at 100% power, a reportability evaluation concluded that the Unit 2 Reactor Coolant Gross Activity surveillance completed prior to January 3, 1992, failed to satisfy the Technical Specification surveillance requirements. Prior to this date this surveillance procedure did not require activity from both the liquid and gaseous phases of the reactor coolant sample to be included when comparing measured activity against the 100/E-bar acceptance criteria.

Corrective action was immediately initiated when the problem was recognized. The Surveillance Procedure on Reactor Coolant Gross Activity, was changed to include the fission gases and tritium in the acceptance criteria determination. This brought the surveillance in compliance with the LCO and safety analyses. Additionally the plant performed a review of all associated data since 1984. Based on this review, the unit has never approached the 100/E-bar limit of Technical Specifications. No automatic or manual safety systems were required to respond to this event.

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 Records and Reports Management Branch (p-630), U. S. Nuclear Regulatory Commission, Washington, DC 20555, and to the Paperwork Reduction Project (3150-0104), Office of Management and Budget, Washington, DC 20503.

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (3)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
Millstone Nuclear Power Station Unit 2	0 5 0 0 0 3 3 6 9 2	—	0 0 7	0 0	0 2	OF 0 2

TEXT (if more space is required, use additional NRC Form 366A's) (37)

I. Description of Event

On February 19, 1992 at 1300 hours, while the plant was at 100% power, a Reportability Evaluation concluded that the Unit 2 Reactor Coolant Gross Activity surveillances completed prior to January 3, 1992, failed to satisfy the Technical Specification surveillance requirements. The evaluation stated that the intent of the Technical Specification Surveillance was not met, and therefore the event is reportable.

Design basis radiological dose calculations which do not involve fuel failures use Technical Specification primary coolant activity limits as the source term. The purpose of the Technical Specification limits is to ensure that the source terms do not exceed the calculation's assumptions. The intent of the 100/E-bar limit is to limit the noble gas activity. Therefore activity from noble gases must be included in the surveillance.

To complete the surveillance a pressurized primary coolant sample is drawn. When the sample is depressurized, a liquid phase and a gaseous phase result. Both are analyzed. The liquid phase is analyzed for activity from radio-iodines, fission and activation particulates, and some dissolved noble gases. The liquid is also separately analyzed for tritium. The gaseous phase, or flashed gas, is analyzed for noble gas activity.

Although the unit has been performing all the required analyses at the required frequency, neither the flashed gas activity nor the tritium activity were included with the total liquid activity when measured activity was compared against the 100/E-bar uCi/gm acceptance criteria. This was not in compliance with the intent of the Technical Specifications, which is to limit noble gas activity.

II. Cause of Event

The root cause of this event was procedural inadequacy. By misinterpreting the term 'Gross Activity' to mean Gross Degassed Activity, and omitting the requirement for gaseous activity results from the procedure, the intent of the Technical Specification was not met.

III. Analysis of Event

This report is submitted pursuant to the requirements of 10CFR50.73(a)(2)(i)(B), "An operation prohibited by the plant's Technical Specifications." There were no safety consequence resulting from this event. As determined by the review of associated historical data the 100/E-bar limit was never approached. The surveillance has fully met the intent of Technical Specifications since the problem was identified.

IV. Corrective Action

The Unit 2 Reactor Coolant Gross Activity Surveillance, SP 2831, was immediately changed to include fission gases and tritium activities in the acceptance criteria determination. This ensured that present and future surveillances will comply with the LCO and safety analysis.

V. Additional Information

There were no failed components during this event.

Similar LERs: LER 92-002-00, "Non-Compliance With Technical Specification Surveillance."

EIIS Codes: AB - Reactor Coolant System