



Northeast
Nuclear Energy

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Millstone Nuclear Power Station
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The Northeast Utilities System

MAR 07 1996

Docket No. 50-336

B15583

Re: 10 CFR 50.73

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

This letter forwards Licensee Event Report (LER) 96-006-00 documenting an event that occurred at Millstone Nuclear Power Station, Unit No. 2 on February 7, 1996. This LER is being submitted pursuant to 10 CFR 50.73(a)(2)(ii)(C) and 10 CFR 50.73(a)(2)(v)(B).

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

P. M. Richardson
Director - Millstone Unit No. 2

Attachment: LER 96-006-00

cc: T. T. Martin, Region I Administrator
P. D. Swetland, Senior Resident Inspector, Millstone Unit No. 2
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 MANDATORY
INFORMATION COLLECTION REQUEST: 500 HRS. REPORTED LESSONS
LEARNED ARE INCORPORATED INTO THE LICENSING PROCESS AND FED
BACK TO INDUSTRY. FORWARD COMMENTS REGARDING BURDEN
ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (T-
6 F33), 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)

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TITLE (4)

Service Water Pump Motor Flood Protection Not Provided as Required By Technical Specifications

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
02	07	96	96	006	00	03	07	96	FACILITY NAME	DOCKET NUMBER
OPERATING MODE (9)		1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)							
POWER LEVEL (10)		10.1%	20.2201(b)		20.2203(a)(2)(v)		50.73(a)(2)(i)		50.73(a)(2)(viii)	
			20.2203(a)(1)		20.2203(a)(3)(i)		<input checked="" type="checkbox"/> 50.73(a)(2)(ii)		50.73(a)(2)(x)	
			20.2203(a)(2)(i)		20.2203(a)(3)(ii)		50.73(a)(2)(iii)		73.71	
			20.2203(a)(2)(ii)		20.2203(a)(4)		50.73(a)(2)(iv)		OTHER	
			20.2203(a)(2)(iii)		50.35(c)(1)		<input checked="" type="checkbox"/> 50.73(a)(2)(v)		Specify in Abstract below or in NRC Form 366A	
			20.2203(a)(2)(iv)		50.35(c)(2)		50.73(a)(2)(vii)			

LICENSEE CONTACT FOR THIS LER (12)

NAME

G. P. van Noordennen, Nuclear Licensing Supervisor

TELEPHONE NUMBER (Include Area Code)

(860) 440-2084

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).	<input checked="" type="checkbox"/> NO	EXPECTED SUBMISSION	MONTH	DAY	YEAR
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ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

On February 7, 1996, at 1000 hours, with the plant in Mode 1 at 100% power, it was concluded that historical periods existed when the action requirements of Technical Specifications Section 3/4.7.5, "Flood Level," could not have been met. This occurred when both the "B" and "C" service water pumps were out of service simultaneously (i.e., when only the "A" pump was operable). During these periods, there was no method for protecting the remaining "A" service water pump against flooding, therefore, the action requirements of TS 3.7.5.1 could not have been met had flood conditions been imminent. This event is being reported pursuant to the requirements of 10 CFR 50.73 (a)(2)(ii)(C), and 10 CFR 50.73 (a)(2)(v)(B).

The apparent cause of this event was inadequate administrative controls to ensure that either the "B" or "C" service water pump would be operable during outages, if flood conditions were imminent.

The corrective action was to establish administrative controls to ensure that the "B" or "C" service water pumps are not simultaneously removed from service.

There were no automatic or manually initiated safety systems activated as a result of this event.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
		96	-- 006	00	

Millstone Nuclear Power Station Unit 2

0500336

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

I. Description of Event

On February 7, 1996, at 1000 hours, with the plant in Mode 1 at 100% power, it was concluded that historical periods existed when the action requirements of Technical Specifications (TS) Section 3/4.7.5, "Flood Level," Limiting Condition for Operation (LCO) 3.7.5.1 could not have been met. This would occur during historical periods when both the "B" and "C" service water pumps were out of service simultaneously (i.e., when only the "A" pump was operable).

TS LCO 3.7.5.1, which is applicable for "all Modes," requires that at least one operable pump be protected against flooding to a minimum of 28 feet above mean sea level if certain conditions exist. The flood protection device was designed to fit the "B" and "C" service water pumps, and due to physical obstructions, was not intended to fit the "A" service water pump. An investigation discovered that during plant outages, there have been several occasions when the "B" and "C" pumps have been simultaneously out of service, thereby resulting in a condition in which the "A" pump was the only operable pump. Even though conditions requiring flood protection did not exist during these periods, the pump motor flood protection capability required by TS Section 3.7.5 was not available.

An initial assessment of reportability was made on February 7, 1996. At that time, it was believed that this event would be reportable pursuant to 10 CFR 50.73(a)(2)(i)(B), "any operation or condition prohibited by the plant's Technical Specifications." On March 1, 1996, with the plant in Mode 5 at 0% power, a review concluded that during the times that the "A" service water pump was the only operable pump, the prerequisites required by TS LCO 3.7.5.1 had not existed, therefore the condition was not reportable pursuant to 10 CFR 50.73(a)(2)(i)(B). The review further concluded the event should be promptly reported both pursuant to 10 CFR 50.72 (b)(2)(i), "any event, found while the reactor is shutdown, that had it been found while the reactor was in operation, would have resulted in the nuclear power plant, including its principal safety barriers, being seriously degraded or being in an unanalyzed condition that significantly compromises plant safety," and pursuant to 10 CFR 50.72(b)(2)(iii)(B), "any event or condition that alone could have prevented the fulfillment of the safety function of structures or systems that are needed to remove residual heat." An immediate report of this event was made on March 1, 1996, at approximately 1730 hours.

There were no immediate operator actions required in response to this event. Additionally, there were no automatic or manually initiated safety systems activated as a result of this event.

II. Cause of Event

The cause of this event is that the original design, in not recognizing the potential for both the "B" and "C" pumps being inoperable simultaneously, never established administrative controls to ensure that one of either the "B" or "C" pumps remains operable.

A contributing cause of this event was inadequate design which did not provide flood protection for all three service water pumps. The original design did provide the "B" and "C" service water pumps with flood protection (only one operable pump requires protection). It was not recognized that during outages, to perform inspections and repairs of the common portions of the "B" service water header, it was common practice to remove the "B" and "C" pumps from service.

III. Analysis of Event

During a review of the flood protection device installation procedure it was discovered that flood protection could not be provided during periods when the "A" service water pump was the only operable pump. Additionally, there were no provisions established to ensure that either the "B," or "C" service water pump could be returned to service before weather conditions required flood protection. Subsequently, if weather conditions had developed during these periods, requiring entry into TS LCO 3.7.5.1, then the action requirements of TS 3.7.5.1 could not have been met.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
		96	-- 006	00	

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

The periods in which the "A" service water pump was the only operable pump represent a condition that was not analyzed in the design basis of the plant.

This event is being reported pursuant to the requirements of 10 CFR 50.73 (a)(2)(ii)(C), "any event or condition that resulted in the nuclear power plant being in a condition not covered by the plant's operating and emergency procedures," and pursuant to the requirements of 10 CFR 50.73 (a)(2)(v), "any event or condition that alone could have prevented the fulfillment of the safety function of structures or systems that are needed to remove residual heat."

The actual safety significance of this event is low since during the periods that the "B" and "C" pumps were out of service there existed no weather conditions requiring flood protection of the service water pumps. The potential safety significance is high if a flooding condition occurred during the periods that the "B" and "C" pumps were out of service, thus rendering the remaining "A" service water pump inoperable. This scenario would have prevented restoring a service water pump after the flood conditions subsided.

IV. Corrective Action

Administrative controls have been implemented to ensure that the "B" or "C" service water pumps are not simultaneously removed from service. Design changes to provide flood protection for the "A" service water pump, to provide more flexibility during shutdown maintenance activities, are being considered.

V. Additional InformationSimilar Events

None

Manufacturer Data

None