



**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  
(860) 444-4300  
Fax (860) 444-4277

The Northeast Utilities System

MAR 13 1996

Docket No. 50-336  
B15582

Re: 10 CFR 50.73

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

This letter forwards Licensee Event Report (LER) 96-005-00 documenting an event that occurred at Millstone Nuclear Power Station, Unit No. 2 on February 12, 1996. This LER is being submitted pursuant to 10 CFR 50.73(a)(2)(i).

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

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

250064

Attachment: LER 96-005-00

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

9603250344 960313  
PDR ADDCK 05000336  
S PDR

IF 22  
11

## 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: 50.0 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)

1 of 3

TITLE (4)

Failure to Enter the Technical Specification Action Statement during Maintenance and Inservice Testing

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	12	96	96	005	00	03	13	96	FACILITY NAME	DOCKET NUMBER
THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5: (Check one or more) (11)										
OPERATING MODE (9)		1	20.2201(b)			20.2203(a)(2)(v)			<input checked="" type="checkbox"/> 50.73(a)(2)(i)	50.73(a)(2)(viii)
POWER LEVEL (10)		100%	20.2203(a)(1)			20.2203(a)(3)(i)			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)			50.36(c)(1)			50.73(a)(2)(v)	Specify in Abstract below or in NRC Form 366A
			20.2203(a)(2)(iv)			50.36(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 NPDs	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDs

## SUPPLEMENTAL REPORT EXPECTED (14)

☐ YES  
(If yes, complete EXPECTED SUBMISSION DATE).☒ NOEXPECTED  
SUBMISSION

MONTH DAY YEAR

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

On February 12, 1996, at 1115 hours, with the plant in Mode 1, at 100% power, it was discovered that a plant equipment operator was improperly utilized to replace the automatic backwash function of the service water strainer backwash system. The backwash system is a support system necessary to maintain the operability of the service water system (SWS). Hence, the use of a dedicated operator to replace the automatic function could only be implemented through the use of an approved procedure; otherwise the applicable Technical Specification Action Statement needs to be entered. This event is reported pursuant to 10CFR50.73(a)(2)(i)(B), "any operation or condition prohibited by the plant's Technical Specifications."

The cause of the event was a programmatic failure to recognize that the automatic strainer backwash function is a support system necessary to maintain the operability of the SWS and the subsequent failure to utilize a dedicated operator in accordance with an approved procedure.

The corrective action revises appropriate procedures to recognize and reinforce that the automatic backwash function is a support system necessary for SWS operability.

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) Millstone Nuclear Power Station Unit 2	DOCKET NUMBER (2) 05000336	LER NUMBER (6)				PAGE (3) 2 of 3
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
		96	-- 005 --	00		

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

I. Description of Event

On February 12, 1996, at 1115 hours, with the plant in Mode 1, at 100% power, it was discovered that a plant equipment operator was improperly utilized to replace the automatic backwash function of the service water strainer backwash system during the replacement of an isolation valve on the strainer backwash. The backwash system is a support system necessary to maintain the operability of the service water system (SWS). Therefore, the use of a dedicated operator to replace the automatic function could only be implemented through the use of an approved procedure; otherwise the appropriate Technical Specification Action Statement (TSAS) needs to be entered. In addition to this discovery, it is recognized that there have also been historical occurrences where the use of a dedicated operator was not properly implemented to replace the automatic strainer backwash function.

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 the event was a programmatic failure to recognize that the automatic strainer backwash function is a support system necessary to maintain the operability of the SWS and the subsequent failure to utilize a dedicated operator in accordance with an approved procedure.

The failure to enter the applicable TSAS when performing either maintenance or testing on the strainers backwash function was discovered to be a procedural deficiency. Specifically, an investigation of the event revealed that in accordance with the surveillance procedures, when inservice testing of each SWS pump is performed the SWS strainer control switch is turned to OFF (which isolates the backwash function to a strainer) and does not direct entry into the applicable TSAS or does not require that a dedicated operator be assigned to maintain operability.

III. Analysis of Event

The use of an operator to maintain equipment operable in lieu of entering the applicable TSAS is prohibited except when such use is specifically approved by procedure in accordance with the guidance provided COP 200.1 (Conduct of Operations) and DC-2 (Generic Overview of Procedures and Forms Used at Millstone Station).

During the performance of maintenance on the strainer backwash system or SWS pump surveillance, a plant equipment operator is used to replace the automatic backwash function of the SWS strainers. The operator was available to manually initiate the backwash function in the event that high differential pressure developed across a SWS strainer. Contrary to the requirements for a dedicated operator, the operator did not utilize an approved procedure for the dedicated operator action. Without an approved procedure, the TSAS associated with LCO 3.7.4.1 should have been entered. This action was not taken.

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

The actual and potential safety significance of this event is low since this event was a failure to properly implement the administrative requirements for the use of a dedicated operator. During the maintenance and surveillance evolutions, operations personnel were either locally available or could be dispatched in a timely manner to perform a manual strainer backwash if a high differential pressure developed.

LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

FACILITY NAME (1) Millstone Nuclear Power Station Unit 2	DOCKET NUMBER (2) 05000336	LER NUMBER (6)			PAGE (3) 3 of 3
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
		96	-- 005 --	00	

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

IV. Corrective Action

The Surveillance Procedures for inservice testing SWS pump operability (SP2612A and SP2612B) have been revised to direct that the applicable TSAS be entered prior to placing the SWS strainer control switch to OFF. This revision reinforces that the automatic backwash function is a support system necessary for SWS operability.

V. Additional Information

An Event Review Team (ERT) is investigating the generic issues associated with the programmatic failure to fully consider the affect on SWS operability when the SWS strainer backwash function is degraded or otherwise unavailable. At the completion of their investigation, the ERT will issue a report that will include appropriate recommendations regarding any further corrective actions. A copy of the ERT report will be available for the NRC Resident Inspectors to review.

Similar Events

LER 96-002-00

LER 96-003-00

Manufacturer Data

None