



**Northeast
Nuclear Energy**

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The Northeast Utilities System

APR 10 1996

Docket No. 50-336
B15657

Re: 10 CFR 50.73

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

This letter forwards Licensee Event Report (LER) 96-014-00 documenting an event that occurred at Millstone Nuclear Power Station, Unit No. 2 on March 11, 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

Attachment: LER 96-014-00

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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NRC FORM 366 (4-95)			U.S. NUCLEAR REGULATORY COMMISSION			APPROVED BY OMB NO. 3150-0104 EXPIRES 04/30/98 <small>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 (IT-5 F23), 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.</small>				
<h2 style="margin: 0;">LICENSEE EVENT REPORT (LER)</h2> <p style="margin: 0;">(See reverse for required number of digits/characters for each block)</p>										
FACILITY NAME (1) <div style="text-align: center;">Millstone Nuclear Power Station Unit 2</div>						DOCKET NUMBER (2) <div style="text-align: center;">05000336</div>		PAGE (3) <div style="text-align: center;">1 of 5</div>		
TITLE (4) <div style="text-align: center;">Weekly Technical Specification Surveillances Missed Due To Scheduling Error</div>										
EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
03	11	96	96	014	00	04	10	96	FACILITY NAME	DOCKET NUMBER
OPERATING MODE (9)		5	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)							
POWER LEVEL (10)		0%	20.2201(b)		20.2203(a)(2)(v)		<input checked="" type="checkbox"/> 50.73(a)(2)(i)		50.73(a)(2)(viii)	
			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 <div style="text-align: center;">G. P. van Noordennn, Nuclear Licensing Supervisor</div>						TELEPHONE NUMBER (include Area Code) <div style="text-align: center;">(860)440-2084</div>				
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)						EXPECTED SUBMISSION		MONTH	DAY	YEAR
<input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE).						<input checked="" type="checkbox"/> NO				
ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)										
<p>On March 11,1996 at 1200 hours, with the plant in Mode 5 at 0% power, a review of the daily work plan identified that procedure SP 2614A-3 "Weekly Checks in Modes 5 or 6 or when Defueled" had not been performed as required by the Millstone Unit No. 2 Technical Specification surveillance requirements. Surveillance Procedure SP 2614A-3 ensures verification of various Technical Specification surveillance requirements on a weekly basis when operating in Modes 5 or 6 or when Defueled.</p> <p>During a review of surveillances not required to be performed during this mid-cycle outage, work planning personnel inadvertently deleted surveillance procedure SP 2614A-3 from the work to be performed on March 4,1996. SP 2614A-3 was listed among a group of Reactor Building Closed Cooling Water System (RBCCW) surveillances which were only required to be performed in Operating Modes 1 through 4. Since these surveillances were not required while in Mode 5, the entire list of 7 surveillance's was deleted from the work plan schedule. Consequently SP 2614A-3 was not performed because it was not listed on the work planning surveillance schedule that was being utilized by Operations shift personnel.</p> <p>This event is being reported pursuant to the requirements of 10CFR50.73(a)(2)(i) "Any deviation from the plants Technical Specifications".</p> <p>There were no major operator actions, automatic or manually initiated safety responses resulting from this event.</p>										

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

I. Description of Event

On March 11, 1996 at 1200 hours, with the plant in Mode 5 at 0% power, a review of the daily work plan identified that procedure SP 2614A-3 "Weekly Checks in Modes 5 or 6 or when Defueled" had not been performed as required by the Millstone Unit No. 2 Technical Specification surveillance requirements. Surveillance Procedure SP 2614A-3 ensures verification of various Technical Specification surveillance requirements on a weekly basis when operating in Modes 5 or 6 or when Defueled.

There were no major operator actions, automatic or manually initiated safety responses resulting from this event.

II. Cause of Event

The cause of this event was determined to be two fold;

- i.) Personnel error with respect to scheduling and;
- ii.) Programmatic issues with respect to tracking schedules.

Surveillance Procedure SP 2614A-3 was incorrectly deleted from the work planning schedule as an indirect result of performing a shutdown risk, Probabilistic Risk Analysis (PRA) review of surveillance procedures not requiring implementation while operating in Mode 5.

On a twice daily basis, operating shift personnel were being provided with a copy of the outage work planning schedule. This schedule includes Technical Specification required surveillances to be performed by the operating shift. Consequently, since SP 2614A-3 had been deleted from the work schedule as described above, shift personnel did not perform the surveillance on March 4, 1996.

Contributing to this event is the fact that the review of the surveillance schedule was not completed in a timely manner, and that the weekly surveillance was not identified as approaching its scheduled "drop dead" date. Weekly surveillances have a grace period of 1 day and 18 hours per Technical Specification 4.0.2. which allows the surveillance frequency to be extended by 25% for performance of the surveillance before the applicable equipment becomes inoperable.

The individual responsible for reviewing the Operations Department surveillances was involved in resolving other technical issues for over 2 days, and consequently, did not review the status of completed surveillance's. A second review of completed surveillances is normally performed by the Assistant Operations Manager, who was on vacation that week. The Operations department reviewer identified that SP 2614A-3 had not been "turned in" and initiated a search. On March 11, 1996, it was determined that surveillance procedure, SP 2614A-3 had been incorrectly deleted from the work planning schedule and that it had not been performed.

The practice of the Work Planning Surveillance Planner was to check for surveillance completion once a week, at the end of the week. This allowed a weekly surveillance which was scheduled for Monday to become delinquent.

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III. Analysis of Event

This event is being reported pursuant to the requirements of 10CFR50.73(a)(2)(i) "Any deviation from the plants Technical Specification"

This event is not considered significant due to the fact that Operations shift personnel routinely verify the various parameters required by the Technical Specifications Surveillance Requirements referenced in SP 2614A-3 using other Operating Procedures. The applicable Technical Specifications surveillance requirements and applicable modes of operation are listed and described below. Operations Department personnel compared these surveillance requirements with other surveillances performed by Operations shift personnel and determined that all plant conditions required by the surveillances had been actually checked.

Technical Specification surveillance requirement 4.8.2.2: This surveillance states that the specified AC buses shall be determined to be Operable and energized from normal AC sources at least once per 7 days by verifying correct breaker alignment and indicated power availability. This includes one 4160 volt emergency bus, one 480 volt emergency load center and two 120 volt AC vital buses. (Modes of Applicability 3,4 and 5)

Technical Specification surveillance requirement 4.8.2.4.1: This surveillance states that a 125 volt DC bus shall be determined to be Operable and energized at least once per 7 days by verifying correct breaker alignment and indicated power availability. This includes one 125 VDC bus and one 125 volt battery bank and at least 400 ampere charging capacity supplying the bus. (Modes of Applicability 5 and 6).

Technical Specification surveillance requirement 4.9.11: This surveillance states that reactor vessel water levels must be checked prior to fuel movement and every 7 days thereafter (Applicable during movement of fuel within the reactor pressure vessel. This surveillance requirement is not applicable to current plant conditions).

Technical Specification surveillance requirement 4.9.12: This surveillance states that Spent Fuel Pool (SFP) water levels must be checked every 7 days to be at its minimum depth of 23 feet of water over the top of irradiated fuel assemblies. (Applicable whenever irradiated fuel assemblies are in storage pool).

IV. Corrective Action

The immediate corrective action necessary to address the missed Technical Specification surveillance was to implement the requirements of Surveillance Procedure SP 2614A-3.

- a. In response to the specific problem identified in this report, Operations management instituted a number of measures to ensure that this type of problem would not recur:
 - Resources have been assigned to the Operations Department to manage the Technical Specification surveillance tracking program until an Operations Assistant is hired to perform this function. This includes monitoring completion of surveillances and development of improved controls for the surveillance scheduling and tracking process.
 - Operations Work Control assigned two individuals to provide 24 hour, five days a week coverage to monitor surveillance completion. This coverage was provided until the Engineer described above was trained on the scheduling and tracking process. This coverage continued from March 12, 1996 through

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March 29, 1996.

- b. Operations Department Instruction, (ODI) 2-OPS-9.03, "Scheduling Tracking and Review of Technical Specification Surveillances," was implemented on March 29, 1996 according to a corrective actions plan for previously missed Technical Specification surveillances. This ODI provides the following guidance:

- Scheduling Technical Specification surveillances.
- Tracking the performance of Technical Specification surveillances.
- Reviewing completed Technical Specification surveillances.
- Verifying the completion of Technical Specification Surveillances prior to Mode changes.

The ODI reinstituted a manual checklist to be used by Operations shift personnel as an additional check beyond the work planning schedule and the database surveillance list to track completion of surveillances. The manual checklist provides more user friendly lists of required surveillances to the Unit Supervisor.

- c. The Nuclear Operations Standards Group action plan to address Technical Specification surveillance scheduling and tracking issues was initiated. This action plan was initially described in the recommendations section to a root cause evaluation performed during the development of the response to the December, 1995 Notice of Violation for ineffective corrective actions and missed Technical Specification surveillances. An individual has been assigned to coordinate activities across all 3 Millstone units to ensure that the new requirements in WC-9, "Station Surveillance Program," are implemented in a timely and effective manner.
- d. Work Planning & Outage Management (WP&OM) instituted the following actions in response to this event:
- The Surveillance Planner was assigned to attend the morning planning meeting, and will receive updates from Operations for the previous days routine surveillances.
 - The Surveillance Planner was assigned to report daily on surveillance's past their due date and in the grace period for Operations, Maintenance and Technical Support. The surveillance planner will not be responsible for the remaining department surveillance's, such as I&C or Chemistry, until the end of April.

V. Additional Information

With respect to implementing the mid cycle outage schedule, it is noted that the database is designed to accommodate mode changes in that all surveillance's are assigned a minimum and maximum mode for required performance. The planner or clerk can change the mode in the program when plant mode changes occur and only those surveillance's that are required for that mode show on the schedule. This impact should be the same for any type of shutdown. The main impact comes from having to manually input data into the work planning schedule.

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New requirements to schedule and monitor Technical Specification surveillances are being implemented across the station. This is being done under the cognizance of a coordinator working out of the Nuclear Operational Standards Group. As new initiatives are put into place, they will be evaluated for effectiveness.

Similar Events

This event is a repeat of other problems related to missed Technical Specification surveillances. These problems have been documented in a number of LERs and in two Notices of Violation (NOV) as identified below

LER 95-016
LER 95-017
LER 95-036
LER 95-004-00
LER 95-036-00

R.W.Cooper letter to J.F. Opeka, "Notice of Violation, NRC combined Inspection 50-245/95-02; 50-336/95-02; 50-423/95-02 and Notice of Violation" dated March 8, 1995

R.W. Cooper letter to R.E. Busch, "NRC Combined Inspection 50-245/95-38; 50-336/95-38; 50-423/95-38 and Notice of Violation" dated December 18, 1995

The response to the December 1995 NOV as documented in letter from F.R. Dacimo to the NRC dated February 15, 1996 provides corrective actions that were not fully implemented at the time of this event. A schedule had been developed in which the three Millstone units would be implementing a new revision to procedure, WC-9, "Station Surveillance Program," in the second quarter, 1996.

Manufacturer Data

None