



Northeast  
Nuclear Energy

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Northeast Nuclear Energy Company  
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The Northeast Utilities System

MAY 23 1996

Docket No. 50-336  
B15721

Re: 10 CFR 50.73

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

This letter forwards Licensee Event Report (LER) 96-025-00 documenting an event that occurred at Millstone Nuclear Power Station, Unit No. 2 on April 1, 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 96-025-00

cc: T. T. Martin, Region I Administrator  
P. D. Swetland, Senior Resident Inspector, Millstone Unit No. 2  
D. G. McDonald, Jr., 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: 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)

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TITLE (4)

Enclosure Building Filtration Actuation Signal/Auxiliary Exhaust Actuation Signal Interlock Not Tested  
Periodically

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
04	01	96	96	025	00	05	23	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

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)

EXPECTED  
SUBMISSION

MONTH

DAY

YEAR

YES

☒ NO

(If yes, complete EXPECTED SUBMISSION DATE).

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

On April 1, 1996 at 0850 hours, with the plant in Mode 5 at 0% power, an engineering review identified that an interlock between the Enclosure Building Filtration Actuation System (EBFAS) and the Auxiliary Exhaust Actuation System (AEAS) is not periodically tested. This EBFAS/AEAS interlock is required to be operable in Modes 1-4 to ensure that filtration and exhaust of the Enclosure Building takes precedence over filtration and exhaust of the spent fuel pool area under accident conditions. If the EBFAS/AEAS interlock does not function as designed, the Enclosure Building Filtration System (EBFS) may not be capable of fulfilling its design safety function, which includes maintaining the Enclosure Building Filtration Region (EBFR) under a measurable negative pressure of approximately 0.25 inches water gage (w.g.). Since existing Technical Specifications surveillance requirements were inadequate to demonstrate the operability of an engineered safety feature (ESF), this event is being reported pursuant to the requirements of 10 CFR 50.73 (a)(2)(i)(B). The cause of this event was a programmatic deficiency that failed to identify the surveillance testing necessary to fully demonstrate the operability of an ESF. There were no automatic or manually initiated safety systems activated as a result of this event.

The initial corrective action was to revise the plant surveillance procedure for the EBFAS to periodically test the EBFAS/AEAS interlocks for both signal trains (Facilities 1 and 2). On April 12, 1996, utilizing the revised surveillance procedure, interlocks for both signal trains were verified operable.

LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

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

I. Description of Event

On April 1, 1996 at 0850 hours, with the plant in Mode 5 at 0% power, an engineering review performed in response to Generic Letter 96-01, "Testing of Safety-Related Logic Circuits," issues identified that an interlock between the EBFAS and the AEAS is not periodically tested. This EBFAS/AEAS interlock is required to ensure that filtration and exhaust of the Enclosure Building takes precedence over filtration and exhaust of the spent fuel pool area. If an EBFAS signal is received subsequent to an AEAS signal, the EBFAS/AEAS interlock will isolate the suction path to the spent fuel pool area, by initiating closure of four dampers, 2-EB-40, 2-EB-50, 2-EB-60 and 2-EB-61. If the EBFAS/AEAS interlock does not function as designed, the Enclosure Building Filtration System (EBFS) may not be capable of fulfilling its design safety function during accident conditions, which includes maintaining the EBFR under a measurable negative pressure of approximately 0.25 inches water gage (w.g.). A reportability evaluation completed May 10, 1996 determined that this event is reportable pursuant to 10 CFR 50.73(a)(2)(i)(B), "any operation or condition prohibited by the plant's Technical Specifications."

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 was a programmatic deficiency that failed to identify the surveillance testing necessary to fully demonstrate the operability of an ESF. Consequently, existing plant surveillance test procedures did not include the functional testing of the EBFAS/AEAS interlock.

III. Analysis of Event

The EBFAS automatically actuates the EBFS. The EBFS is designed to provide a slightly negative pressure within the EBFR immediately following a loss of coolant accident (LOCA) and to reduce airborne radioactive products to the environment by filtration prior to release of air through the Unit 1 stack. The EBFAS is initiated by either pressurizer pressure signals or containment pressure signals. The AEAS actuates the Auxiliary Exhaust System (AES) mode of EBFS, to divert exhaust in the spent fuel pool region from the Main Exhaust System to the AES, which includes charcoal adsorber beds and High Efficiency Particulate Filters (HEPA). The EBFAS/AEAS (override) interlock is required to ensure that filtration and exhaust of the Enclosure Building takes precedence over filtration and exhaust of the spent fuel pool area. If an EBFAS signal is received subsequent to an AEAS signal, the EBFAS/AEAS interlock is designed to isolate the suction path to the spent fuel pool area by initiating closure of four dampers: 2-EB-40, 2-EB-50, 2-EB-60 and 2-EB-61. If these dampers are not closed, the EBFS may not be capable of fulfilling its design safety function during accident conditions, which includes maintaining the EBFR under a measurable negative pressure of approximately 0.25 inches water gage (w.g.).

Technical Specifications (TS) surveillance requirements and associated surveillance test procedures exist which independently verify the operability of the EBFAS instrumentation (TS 4.3.2.1.1, .2 .3, and .4) and the AEAS instrumentation (TS 4.9.13 and 4.3.3.1). However, Technical Specifications surveillance procedures which include periodic surveillance testing of both Facility 1 and Facility 2 EBFAS/AEAS interlocks were not in place until April 12, 1996. Consequently, it was determined that this event is reportable pursuant to 10 CFR 50.73(a)(2)(i)(B), "Any operation or condition prohibited by the plant's Technical Specifications."

LICENSEE EVENT REPORT (LER)  
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		96	-- 025	-- 00	

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

The actual and potential safety significance of this event is low, since the plant was shut down at the time of discovery and the interlock was subsequently determined by surveillance testing to be operable.

IV. Corrective Action

As the initial corrective action, plant surveillance procedure (SP-2614D) was revised to periodically test the EBFAS/AEAS interlocks for both signal trains (Facilities 1 and 2). On April 12, 1996, utilizing the surveillance procedure, the interlocks for both trains were verified operable.

A review is on-going, which includes an assessment of TS surveillance requirements to address the concerns identified in Generic Letter 96-01. This review is scheduled to be completed by September 30, 1996.

V. Additional Information

None.

Similar Events

None.

Manufacturer Data

None.