



Northeast
Utilities System

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June 14, 1996

Docket No. 50-423
B15758

Re: 10CFR 50.73(a)(2)(i)(B)

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

This letter forwards Licensee Event Report 96-014-00, documenting a condition that was discovered at Millstone Unit No. 3 on May 16, 1996. This LER is submitted pursuant to 10CFR50.73(a)(2)(i)(B).

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



M. H. Brothers
Unit Director, Millstone Unit No. 3

180016

Attachment: LER 96-014-00

cc: T. T. Martin, Region I Administrator
A. C. Cerne, Senior Resident Inspector, Millstone Unit No. 3
V. L. Rooney, NRC Project Manager, Millstone Unit No. 3

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ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS MANDATORY INFORMATION COLLECTION REQUEST: 90.0 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.

LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

FACILITY NAME (1)

Millstone Nuclear Power Station Unit 3

DOCKET NUMBER (2)

05000423

PAGE (3)

1 of 3

TITLE (4)

Technical Specification Surveillances for Emergency Diesel Generators,
Misinterpretation and Programmatic Weakness

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
05	16	96	96	014	00	06	14	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)		000	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

William J. Temple, Nuclear Licensing Supervisor

TELEPHONE NUMBER (Include Area Code)

(860)437-5904

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

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

On May 16, 1996, with the plant in Mode 5 at 0-percent power, it was determined that several Technical Specification (TS) surveillances for the Emergency Diesel Generators (EDGs) had been performed during operation, versus shutdown, contrary to the requirements of Surveillance 4.8.1.2.g. Upon discovery of the historical noncompliance, the EDGs were declared inoperable May 16, 1996, and the plant complied with TS Action requirements. As immediate action, a list of surveillances was performed while shutdown, and the B EDG was declared operable May 17, 1996. The A EDG remained inoperable for other reasons. It was subsequently determined on May 23, 1996, that an additional surveillance was required for both EDGs. After completing all required surveillances the A EDG was declared operable on May 25, 1996, and the B EDG was declared operable May 26, 1996.

The historical noncompliance was caused by a misinterpretation of the "shutdown" stipulation. It was believed that performance of the surveillance while operating satisfied the shutdown requirement. The cause of overlooking the additional surveillance when taking immediate action was determined to be a programmatic weakness.

The event had no safety significance. Performing the surveillances during plant operation had no affect on the ability to perform the surveillances or the ability of the EDGs to perform their safety function. The surveillances had been successfully completed within required intervals. The only affect was compliance with a stipulation to do the surveillances during shutdown.

As corrective action the surveillances were performed during shutdown. Future surveillances are scheduled for shutdown conditions. A proposed Technical Specification change has been submitted to delete the shutdown stipulation. The EDG surveillances were reviewed for shutdown limitations to ensure no similar misinterpretations existed.

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TEXT CONTINUATION

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Millstone Nuclear Power Station Unit 3	05000423	96	--	014	--	00
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TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

I. Description of Event

On May 16, 1996, with the plant in Mode 5 at 0-percent power, it was determined that several Technical Specification (TS) surveillances for both Emergency Diesel Generators (EDGs) had been performed during operation versus "shutdown," contrary to the surveillance requirement. The surveillances must be completed once per 18 months during shutdown, in accordance with Surveillance 4.8.1.1.2.g. Instead, the past surveillances were performed during plant operation.

Upon discovery of the historical noncompliance, the EDGs were declared inoperable on May 16, 1996, and the plant complied with TS Action requirements. As immediate action, a list of surveillances was performed on the B EDG while shutdown, and it was declared operable on May 17, 1996. The A EDG remained inoperable for other reasons. It was subsequently determined on May 23, 1996, that an additional surveillance was required for both EDGs while shutdown. After completing all required surveillances the A EDG was declared operable on May 25, 1996, and the B EDG was declared operable on May 26, 1996.

II. Cause of Event

The cause of the historical noncompliance was determined to be a programmatic misinterpretation of the "shutdown" stipulation. Personnel in several departments that were involved in scheduling and performing surveillances did not recognize or interpret that the surveillances called for the plant to be shut down, because they had been successfully performed while operating and did not have an affect on plant operation. It was believed that performance of the surveillances while operating satisfied the shutdown requirement. The cause of overlooking one additional surveillance when taking action to declare operability was determined to be a programmatic weakness. Personnel in the departments involved did not fully consider or obtain the surveillance scheduling services of the Work Planning group while working to declare operability.

III. Analysis of Event

The event is reported as a condition prohibited by Technical Specifications pursuant to 10CFR50.73(a)(2)(i)(B).

The event had no safety significance. Performing the surveillances during plant operation had no affect on the ability to complete the surveillances or the ability of the EDGs to perform their safety function. The surveillances had been successfully completed within the required intervals. The only affect was compliance with the Technical Specification surveillance stipulation to perform the surveillances during shutdown.

IV. Corrective Action

As corrective action, the surveillances were performed during shutdown. Future surveillances are scheduled for shutdown conditions. A proposed Technical Specification change has been submitted to delete the shutdown stipulation, so that future surveillances may be conducted on-line. The EDG surveillances and other surveillances whose shutdown limitations were proposed to be deleted, were reviewed to ensure no similar misinterpretations existed. A memo was issued to all Unit 3 managers, emphasizing the need to utilize the surveillance scheduling resources of the Work Planning group in surveillance scheduling matters.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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Millstone Nuclear Power Station Unit 3

05000423

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

V. Additional InformationSimilar Events

LER 94-013-00, "Main Steam Isolation Valves and Turbine Driven Auxiliary Feedwater Pump, Inadequate Technical Specifications for Mode Change." This LER involved historical occasions when the plant misinterpreted Technical Specification surveillances that were required to be performed for operability of equipment, prior to entering Modes 4 and 3 during startup.

LER 96-004-00, "Auxiliary Feedwater Isolation Valves Noncompliance with Technical Specifications." This LER involved historical occasions when the plant misinterpreted a surveillance requirement. The plant had incorrectly used a Technical Specification surveillance requirement to take exception to a Limiting Condition for Operation, when shutting the Auxiliary Feedwater pump discharge valves, at less than 10-percent power.

Manufacturer Data

Not applicable.