

# NORTHEAST UTILITIES



The Connecticut Light and Power Company  
Western Massachusetts Electric Company  
Holyoke Water Power Company  
Northeast Utilities Service Company  
Northeast Nuclear Energy Company

General Offices: Selden Street, Berlin, Connecticut

P.O. BOX 270  
HARTFORD, CONNECTICUT 06141-0270  
(203) 665-5000

February 5, 1993  
MP-93-134

Re: 10CFR50.73(a)(2)(i)(B)

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

Reference: Facility Operating License No. DPR-65  
Docket No. 50-336  
Licensee Event Report 93-002-00

Gentlemen:

This letter forwards Licensee Event Report 93-002-00 required to be submitted within thirty (30) days pursuant to 10CFR50.73(a)(2)(i)(B). "Any operation or condition prohibited by the plant's Technical Specification," specifically a technical specification action statement was not logged into when the plant entered mode 3 and the required actions were not performed.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

FOR: Stephen E. Scace  
Vice President - Millstone Station

BY: Fred R. Dacimo  
Millstone Site Services Director

SES/SLS:ljs

Attachment: LER 93-002-00

cc: T. T. Martin, Region 1 Administrator  
P. D. Swetland, Senior Resident Inspector, Millstone Unit Nos. 1, 2 and 3  
G. S. Vissing, NRC Project Manager, Millstone Unit No. 2

*Cent No  
P67145055A  
IF22  
11*

180044  
9302180087 930205  
PDR ADCK 05000336  
S PDR

NRC Form 366 (6-89)		U.S. NUCLEAR REGULATORY COMMISSION		APPROVED OMB NO. 3150-0104 EXPIRES: 4/30/92 Estimated burden per response to comply with this information collection request: 50.0 hrs. Forward comments regarding burden estimate to the Records and Reports Management Branch (p-530), U.S. Nuclear Regulatory Commission, Washington, DC 20555, and to the Paperwork Reduction Project (3150-0104), Office of Management and Budget, Washington, DC 20503.			
<b>LICENSEE EVENT REPORT (LER)</b>							
FACILITY NAME (1) Millstone Nuclear Power Station Unit 2				DOCKET NUMBER (2) 0 5 0 0 0 3 3 6 1		PAGE (3) 1 OF 0 3	
TITLE (4) Failure to Enter Technical Specification Action Statement							
EVENT DATE (5)		LER NUMBER (6)		REPORT DATE (7)		OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY
0 1	0 7	9 3	9 3	0 0 2	0 0	0 2	0 5
						0 5 0 0 0 0 0 0	
						0 5 0 0 0 0 0 0	
OPERATING MODE (9) 3		THIS REPORT IS BEING SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5. (Check one or more of the following) (11)					
POWER LEVEL (10) 0 0 1 0		20.402(b)		20.402(c)		50.73(a)(2)(iv)	
		20.405(a)(1)(i)		50.36(c)(1)		50.73(a)(2)(v)	
		20.405(a)(1)(ii)		50.36(c)(2)		50.73(a)(2)(vii)	
		20.405(a)(1)(iii)		50.73(a)(2)(i)		50.73(a)(2)(viii)(A)	
		20.405(a)(1)(iv)		50.73(a)(2)(ii)		50.73(a)(2)(viii)(B)	
		20.405(a)(1)(v)		50.73(a)(2)(iii)		50.73(a)(2)(ix)	
				50.73(a)(2)(vi)		73.71(b)	
						73.71(c)	
						OTHER (Specify in Abstract below and in Text, NRC Form 366A)	
LICENSEE CONTACT FOR THIS LER (12)							
NAME Stephen L. Stadnick, Senior Engineer, Ext. 4427				TELEPHONE NUMBER			
				AREA CODE 2 0 3 4 4 7 - 1 7 9 1			
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)							
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC	CAUSE	SYSTEM	COMPONENT
SUPPLEMENTAL REPORT EXPECTED (14)						EXPECTED SUBMISSION DATE (15)	
<input checked="" type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE)						MONTH DAY YEAR 0 8 0 1 9 2	
NO							
ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16) On January 7, 1993, the plant entered Mode 3 at 0031. At approximately 1300, it was determined that Limiting Condition for Operation (LCO), "Accident Monitoring" para. 3.3.3.8 a. action 2 and action 3 had not been entered upon entry into Mode 3. The required data for these 2 action statements was taken immediately and the previous shifts' data was obtained from the process computer. By 1430, the scheduled surveillance procedures were completed, the instruments were determined operable and the unit logged out of the LCO Action Statement. This LER is submitted because the data, required by the Action Statement, was not taken within the required 12 hour time period.							

LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

Estimated burden per response to comply with this information collection request: 60.0 hrs. Forward comments regarding burden estimate to the Records and Reports Management Branch (p-530), U.S. Nuclear Regulatory Commission, Washington, DC 20555, and to the Paperwork Reduction Project (3150-0104), Office of Management and Budget, Washington, DC 20503.

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
Millstone Nuclear Power Station Unit 2	0 5 0 0 0 3 3 6 9 3	---	0 0 2	0 0	0 2	OF 0 3

TEXT (If more space is required, use additional NRC Form 306A's) (17)

I. Description of Event

On January 7, 1993, the plant entered Mode 3 at 0031. At approximately 1300, it was determined that Limiting Condition for Operation (LCO), "Accident Monitoring" para. 3.3.3.8a, action 2 and action 3 had not been entered upon entry into Mode 3. The plant was in the process of starting up after an extensive refueling outage. The plant was in Mode 4 and was making preparations to change to Mode 3. The I&C department had planned to have operations log into applicable Actions Statements for equipment that could not have its surveillances completed until specific plant conditions existed. A memo containing this plan of action was provided to the Operations department on 1/6/93. Operations changed Modes and did not log into the applicable LCO Action Statements.

Table 3.3-11 requires accident monitoring instrumentation to be operable in modes 1, 2, and 3. PORV and Safety Valve Acoustic Valve Monitor, and RCS Subcooled/Superheat Instrumentation was not operable when the plant entered mode 3 on 1/7/93 at 0031 due to the fact that surveillance procedures SP 2407B and SP 2410A can not be completed until the plant is stable at normal operating temperature, pressure and flow which is beyond the entry into mode 3. This condition is permitted by para. 3.0.4 of the Technical Specifications as long as the appropriate actions are complied with.

This condition was not detected until 1300 on 1/7/93. At that time the Technical Specification Action Statement 3.3.3.8a, actions 2 and 3 were entered and complied with until 1431. At that time, the surveillance procedures were completed, as scheduled, and the instrumentation was declared operable.

II. Cause of Event

The cause of this event is a program failure involving an incomplete application of a change in philosophy concerning a change to technical specifications. Two I&C surveillances cannot be completed until normal operating temperature and pressure are established. Past practice has been to complete the surveillance as soon as plant conditions permit. Technical Specification para. 3.0.4 permits the plant to change modes with inoperable equipment as long as the appropriate actions are complied with, the actions do not have a specific time limit and do not require a plant shutdown.

III. Analysis of Event

This LER is submitted in accordance with 10CFR50.73(a)(2)(i)(B), any operation or condition prohibited by the plant's Technical Specifications. Data required to be taken by action 2 and 3 of technical specification para. 3.3.3.8a, was not taken within the required time period. The data was taken approximately 1 hour after the 12 hour time period had ended. At that time the Subcooling/Superheat margin was calculated and quench tank temperature, level, pressure, and discharge pipe temperature data was obtained for the previous 12 hour period using the plant process computer. The safety significance of this event is minimal since the actions were complied with in a short period of time and all instrumentation was functional and in service while waiting to satisfy the plant conditions required by the surveillance procedure.

IV. Corrective Action

Surveillances will be reviewed to determine if plant conditions can be modified to allow surveillance testing to be completed prior to Mode changes. Additionally, this event will be reviewed by all licensed operators and management personnel.

LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

Estimated burden per response to comply with this information collection request: 50.0 hrs. Forward comments regarding burden estimate to the Records and Reports Management Branch (p-530), U.S. Nuclear Regulatory Commission, Washington, DC 20555, 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)  0 5 0 0 0 3 3 6 9 3	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			

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

V. Additional Information

There were no failed components

ELIS CODES:

IP-XI-BO15 for Acoustic Valve Monitoring System

IP-XI-E250 for RCS Subcooled/Superheat Instrumentation

Similar LERS 85-007, 92-004