



Northeast  
Utilities System

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December 9, 1996

Docket No. 50-336  
B15981

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

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

This letter forwards Licensee Event Report (LER) 96-034-00, documenting an event that occurred at Millstone Nuclear Power Station, Unit No. 2 on October 4, 1996. This LER is being submitted pursuant to 10 CFR 50.73(a)(2)(i).

The following are NNECO's commitments made within this letter. All other statements made within this letter are for information only.

- B15981-01: A Technical Specification revision will be initiated to remove the instrument accuracy requirements of Table 3.3-8. This revision will be submitted to the NRC by December 20, 1996.
- B15981-02: The meteorological instrumentation accuracy requirements and criteria will be clarified and appropriate requirements will be placed in an administrative document consistent with industry practices.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



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

*1/10/97*

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PDR ADOCK 05000336  
S PDR

cc: see page 2

Attachment: LER 96-034-00

cc: W. D. Travers, Director of Special Projects  
H. J. Miller, Region I Administrator  
D. P. Beaulieu, Resident Inspector, Millstone Unit No. 2  
D. G. McDonald, Jr., NRC Project Manager, Millstone Unit No. 2

**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
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TITLE (4)  
Meteorological Monitoring Instrumentation Inoperable due to Failure to Meet Technical Specification Required Minimum Accuracy

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
10	04	96	96	-- 034 --	00	12	09	96	FACILITY NAME	DOCKET NUMBER
OPERATING MODE (9) 5		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5: (Check one or more) (11)								
POWER LEVEL (10) 000		20.2201			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 R. T. Lauderat, MP2 Nuclear Licensing Manager	TELEPHONE NUMBER (Include Area Code) (860) 444-5248
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**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 (If yes, complete EXPECTED SUBMISSION DATE).	<input checked="" type="checkbox"/> NO	EXPECTED SUBMISSION	MONTH	DAY	YEAR
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**ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)**

On October 4, 1996, it was identified that loop accuracy calculations for the meteorological instrumentation did not exist. On November 7, 1996, an engineering evaluation was completed which determined that the installed meteorological monitoring instrumentation did not meet the instrument minimum accuracies as required by Technical Specification 3.3.3.4. The composite instrument accuracies from sensor to data display were calculated for each of the required instruments. The Wind Speed (at wind speeds significant for radiological assessment) and Wind Direction instrument accuracies were within the specified accuracy requirements of Technical Specification 3.3.3.4; however, the Air Temperature - Delta T instrument accuracy was not.

The cause of this event was lack of attention to detail in the preparation of the Technical Specification. The original Technical Specification reflected the information provided in Regulatory Guide 1.23 without providing a written basis for those requirements.

As a result of this event, a loop accuracy calculation for the installed meteorological instrumentation has been completed which documents the loop accuracies. A Technical Specification revision will be requested to remove the instrument accuracy requirements of Table 3.3-8. The meteorological instrumentation accuracy requirements and criteria will be clarified and appropriate requirements will be placed in an administrative document consistent with industry practices.

LICENSEE EVENT REPORT (LER)  
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Millstone Nuclear Power Station Unit 2

05000336

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

I. Description of Event

On October 4, 1996, it was identified that loop accuracy calculations for the meteorological instrumentation did not exist. It was also believed that the accuracy of the installed instrumentation would not meet the Technical Specification requirements. The meteorological instrumentation was declared inoperable and actions were taken to comply with the Technical Specification requirements. At the time of discovery of this event, the unit was in Mode 5 at 0 percent power.

On November 7, 1996, an engineering evaluation was completed which determined that the installed meteorological monitoring instrumentation did not meet the instrument minimum accuracies as required by Technical Specification 3.3.3.4.

The composite instrument accuracies from sensor to data display were calculated for each of the required instruments. The Wind Speed (at wind speeds significant for radiological assessment) and Wind Direction instrument accuracies were within the specified accuracy requirements of Technical Specification 3.3.3.4; however, the Air Temperature - Delta T instrument accuracy was not. The Air Temperature - Delta T instrument calculated accuracy was  $\pm 0.27^{\circ}\text{F}$ .

Technical Specification 3.3.3.4, Table 3.3-8, requires that the meteorological monitoring instrumentation be operable in all Modes with the following instrument minimum accuracies (Wind Speed, Wind Direction, and Temperature are measured by two instruments - one each at elevations 142 and 374 feet).

Instrument Parameter	Instrument Minimum Accuracy
Wind Speed	$\pm 0.22$ m/sec
Wind Direction	$\pm 5^{\circ}$
Air Temperature - Delta T	$\pm 0.18^{\circ}\text{F}$

The instrumentation minimum accuracies were included in the Technical Specifications issued for fuel load in 1975. These accuracy values were consistent with the values for instrument accuracy contained in Regulatory Guide 1.23, "Onsite Meteorological Programs" (February 17, 1972). The installed instrumentation was intended to meet the provisions of Regulatory Guide 1.23. However, documentation of compliance with the Technical Specification values has not been identified.

With the meteorological monitoring instrumentation inoperable, Technical Specification 3.3.3.4 requires the suspension of all release of gaseous radioactive material from the radwaste gas decay tanks. Also, with one or more required meteorological monitoring channels inoperable for more than 7 days, a Special Report must be prepared and submitted. These instruments are also utilized by Units 1 and 3. However, the Units 1 and 3 Technical Specifications do not specify instrument minimum accuracies.

Since past compliance with the Technical Specification limits for instrument accuracy and the associated action requirements were not met, this event is reportable in accordance with 10 CFR 50.73(a)(2)(i)(B), any operation or condition prohibited by the plant's Technical Specifications. The Special Report required by Technical Specification 3.3.3.4 was submitted on October 21, 1996.

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

II. Cause of Event

The cause of this event was lack of attention to detail in the preparation of the original Technical Specification. The original Technical Specification reflected the information provided in Regulatory Guide 1.23 without providing a written basis for those requirements.

III. Analysis of Event

The meteorological instrumentation ensures that sufficient meteorological data is available for estimating potential radiation doses to the public as a result of routine or accidental release of radioactive materials to the atmosphere. This capability is required to evaluate the need for initiating measures to protect the health and safety of the public. Although the minimum accuracy requirements specified in the Technical Specifications have not been met for the Air Temperature - Delta T instrumentation, the meteorological monitoring instrumentation has been operating with channel checks and channel calibrations being performed as required by Technical Specification surveillance requirements. Additionally, the instrument accuracy of the Air Temperature - Delta T instrumentation meets the requirements of the Second Proposed Revision 1 to Regulatory Guide 1.23 (April 1986). This assures that the function of the instrumentation was, and is, adequate.

Information from the meteorological monitoring instrumentation is utilized in the radiological dispersion models for determining radiological doses. The small difference in accuracies of the Air Temperature - Delta T instrumentation is insignificant compared to the uncertainties in the meteorological and dose models. Therefore, this event is not considered to be safety significant.

IV. Corrective Action

As a result of this event, the following corrective actions have been, or will be, performed.

1. A loop accuracy calculation for the installed meteorological instrumentation has been completed which documents the loop accuracies.
2. A Technical Specification revision will be requested to remove the instrument accuracy requirements of Table 3.3-8. This revision will be submitted to the NRC by December 20, 1996.
3. The meteorological instrumentation accuracy requirements and criteria will be clarified and appropriate requirements will be placed in an administrative document consistent with industry practices.

V. Additional Information

None

Similar Events

None

Manufacturer Data

None