



December 16, 1996

Docket No. 50-245  
B16036

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

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

This letter forwards supplemental License Event Report (LER) 96-026-01, documenting an event that occurred at Millstone Nuclear Power Station, Unit No. 1 on March 21, 1996. This LER is submitted pursuant to 10CFR50.73(a)(2)(i).

This LER supplement documents that as a result of the Millstone Unit No. 1's on-going self-assessment, it has been revealed that the Integrated Leak Rate Tests (ILRTs) performed since 1976 have not included the leakage from the feedwater penetration leakage paths as required by 10CFR50 Appendix J. The failure to vent and drain the feedwater penetrations for the ILRT, and the inability to include valid Local Leak Rate Test (LLRT) penalty factors for these penetrations due to invalid LLRT results has caused the assessment of overall containment integrity based on ILRT results from 1976 to 1980 to be invalid. Since there is no method available to assess ILRT results prior to 1980, all ILRTs performed prior to 1980 are considered invalid. The five ILRTs performed after 1980 are suspect pending an assessment of feedwater penetrations LLRTs.

This supplemental report includes administrative and editorial changes through out the entire LER. The Commitments have been moved from the LER form to this letter. The Commitment B15675-2 has also been modified to complete the Type C testing and provide supplemental report prior to startup for operating cycle 16. Lastly, there are three new commitments.

The following are Northeast Nuclear Energy Company's (NNECO's) commitments made within this letter. All other statements made within this letter are for information only.


- B15675-1 NNECO commits to implement modifications to penetrations X-8, X-9A, and X-9B to allow the system lines to be drained for an acceptable Appendix J Type C test. These modifications will be completed prior to startup for operating cycle 16.
- B15675-2 NNECO commits to perform an Appendix J Type C test for penetrations X-8, X-9A, and X-9B prior to startup for operating cycle 16. NNECO will supplement this LER with the results of those Type C tests prior to startup for operating cycle 16.

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- B15675-3 NNECO commits to review all Appendix J system configurations and procedures to identify other piping configurations which preclude the ability to conduct an adequate Appendix J Type C test. This review and any required modifications will be completed prior to startup for operating cycle 16.
- B16036-1 NNECO commits to determine if the penetrations have resulted in two consecutive ILRT failures and, if required, develop and submit a Corrective Action Plan (CAP) in accordance with IN 85-71 to propose an alternative leakage test program to monitor the Type C test performance for penetrations X-8, X-9A and X-9B in lieu of two consecutive ILRTs prior to startup for operating cycle 16. The CAP will address the penetration discrepancies associated with penetrations X-9A and X-9B by implementing modifications to properly vent, drain, and perform Type C test on these penetrations.
- B16036-2 NNECO commits to conduct a Type A test subsequent to the modifications to these penetrations prior to startup for operating cycle 16.
- 6036-3 NNECO commits to modify the Type A test procedure to specify those systems which are not vented and drained during the Type A test. Systems that are not vented or drained during the Type A test which could become exposed to the containment atmosphere during a design basis accident shall be Type C tested and the Type C "as-left" minimum pathway leakage rate shall be added to the Type A test leakage rate. A valid minimum pathway leakage rate from the Type C test shall be applied to the Type A test per the requirements of 10 CFR 50 Appendix J.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



P. D. Hinnenkamp  
Director, Unit Operations

Attachment: LER 96-026-01

cc: Dr. W. D. Travers, Director, Special Projects  
H. J. Miller, Region I Administrator  
S. Dembek, NRC Project Manager, Millstone Unit No. 1  
T. A. Easlick, Senior Resident Inspector, Millstone Unit No. 1