

EXPIRES 04/30/98

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 3

DOCKET NUMBER (2)

05000423

PAGE (3)

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TITLE (4)

Lack of Verbatim Compliance with Technical Specification Surveillance Requirements for 125 Volt Batteries and Battery Chargers

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
01	04	97	97	001	00	02	03	97	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(b)		20.2203(a)(2)(v)		<input checked="" type="checkbox"/> 50.73(a)(2)(i)		50.73(a)(2)(vi)	
			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

J.M. Peschel, MP3 Nuclear Licensing Manager

TELEPHONE NUMBER (Include Area Code)

(860)437-5840

COMPLETE ONE LINE FOR EACH COMPONENT TO BE 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 January 4, 1997, with the plant in Mode 5, it was identified that 125 volt battery surveillance testing was being performed in a manner that was not in verbatim compliance with the Technical Specifications (TS). Similarly, on January 9, 1997, with the plant in Mode 5, it was identified that 125 volt battery charger surveillance testing was being performed in a manner that was not in verbatim compliance with the TS. These conditions were determined to be reportable pursuant to 10CFR50.73(a)(2)(i), as an event or condition prohibited by the Technical Specifications.

While the surveillance testing performed may have been more accurate or more conservative than the verbatim requirements of the specifications involved, this event is significant in that it identifies further examples of a lack of verbatim compliance with TS requirements. These conditions were identified as the result of a heightened awareness of the potential for additional lack of verbatim TS compliance such as those described in previous Licensee Event Reports, LER 96-038-00, and LER 96-048-00.

Corrective actions included immediate revision and performance of the battery and battery charger surveillance testing procedure requirements to effect verbatim TS compliance with the TS. Additionally, a review of the affected TS will be conducted for potential wording changes to ensure clarity, followed by the development and submittal of any resultant amendment request.

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

I. Description of Event

On January 4, 1997, with the plant in Mode 4, it was identified that 125 volt battery surveillance testing was being performed in a manner that was not in verbatim compliance with the Technical Specifications (TS) 4.8.2.1.b.3. Accordingly, previously performed surveillances were not acceptable, the 125 volt batteries should have been declared inoperable and the appropriate Limiting Condition for Operation (LCO) should have been entered. Since these actions were not performed, it was determined that this condition was reportable pursuant to 10CFR50.73(a)(2)(i), as any operation or condition prohibited by the Technical Specifications (TS).

Technical Specification 4.8.2.1.b.3 requires that, to demonstrate operability of the 125 volt batteries every 92 days, the average of six (6) connected battery cells' electrolyte temperatures be verified to be greater than 60°F. Obtaining the electrolyte temperatures of all (60) connected cells and averaging them was perceived as a more accurate and conservative validation of battery capabilities and, therefore, was believed to satisfy the TS testing requirement.

Similarly, on January 9, 1997, with the plant in Mode 5, it was identified that 125 volt battery charger surveillance testing was being performed in a manner that was not in verbatim compliance with TS 4.8.2.1.c.4. Accordingly, previously performed surveillances were not acceptable, the 125 volt battery chargers should have been declared inoperable and the appropriate Limiting Condition for Operation (LCO) should have been entered. Since these actions were not performed, it was determined that this condition was reportable pursuant to 10CFR50.73(a)(2)(i), as any operation or condition prohibited by the (TS).

Technical Specification 4.8.2.1.c.4 requires that, to demonstrate operability of the 125 vdc battery chargers every 18 months, the battery chargers each supply at least the current specified in TS Table 4.8-2b at 125 vdc for at least 24 hours. The actual surveillance testing was performed such that the specified current flow was supplied for at least 24 hours, but at a higher voltage than the TS required 125 volts. The surveillance was performed at, or above, the TS minimum float (operating) voltage of 129 vdc. Since testing at a voltage higher than 125vdc demonstrated greater charger capability than the TS required, this testing was considered as conservatively within the TS requirement. Testing at or above the TS minimum float voltage also eliminated making the battery bus inoperable during the testing; this was considered an additional conservatism that enhanced compliance with the TS requirements.

II. Cause of Event

The operation in a condition prohibited in the Technical Specifications (TS) was the result of a misconception that performing surveillances under conditions "more conservative than", or "meeting the intent of", a specific TS requirement was acceptable for compliance. A causal factor in this lack of understanding was that management expectations and guidance regarding literal compliance with TS were neither clear nor adequately communicated throughout the organization.

III. Analysis of Event

While the surveillance testing performed may have been more accurate or more conservative than meeting the verbatim requirements of the specifications in 4.8.2.1.b.3, this event is significant in that it identifies examples of a lack of verbatim compliance with TS requirements. These conditions would not have resulted in a loss of safety function and did not involve operation outside the design basis of the plant. They were identified as the result of a heightened awareness of the potential for additional lack of verbatim TS compliance such as those described in previous Licensee Event Reports, LER 96-038-00, and LER 96-048-00.

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IV. Corrective Action

The following corrective action was taken:

- The battery and battery charger surveillance testing procedures were revised to effect verbatim compliance with the TS.
- The plant entered the appropriate TS ACTION statements and performed the required verbatim testing to demonstrate equipment operability.

The following corrective actions will be taken:

- As described in LERs 96-038-00 and 96-048-00, the Unit Director will provide the unit staff with his expectations on compliance with Technical Specifications by March 31, 1997.
- A review of the affected TS will be conducted for potential changes to ensure clarity by March 15, 1997.
- Identification of any needed clarification or enhancement of the subject TS will be followed by the submittal of an amendment request by September 30, 1997.

V. Additional Information

None

Similar EventsLER 96-038-00 "Violation of Technical Specifications Pertaining to High Pressure Safety Injection & Charging System Pumps"

At 1800 on October 10, 1996, with the plant in Mode 5, plant personnel determined that the Technical Specification requirement for operability of High Pressure Safety Injection (SIH) and Charging (CHS) system pumps had not historically been met during transitions between Modes 3 and 4. Technical Specifications 3.1.2.4, 3.5.2 and 3.5.3 specify different combinations of SIH and CHS pumps that are required to be operable or inoperable at the transition point from Mode 3 to Mode 4 at 350 degrees Fahrenheit. The Technical Specifications do not provide a temperature transition band for removing pumps from service or restoring them to operable status as the transition is made from Mode 3 to Mode 4 or Mode 4 to Mode 3. The plant had historically changed modes and placed the plant in the configuration required by the new mode after the mode entry. These conditions occurred as a result of conducting operations to meet the intent of the Technical Specifications rather than ensuring compliance with the Technical Specifications.

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The corrective actions associated with this LER have not been fully implemented at this time. Implementation of these actions will aid in preventing recurrences similar to those being reported.

LER 96-048-00 "Failure To Complete Technical Specification Required Testing Of CHS Pump While Shutdown"

On December 2, 1996, with the plant in Mode 5, it was determined that a portion of the Technical Specification surveillance which tests the load shed function for both Emergency Diesel Generators (EDGs) had not been performed in accordance with Technical Specification Surveillance 4.8.1.1.2.g 6. This surveillance is required to be completed once per 18 months during shutdown. Contrary to this, the surveillances which tested the load shed for both trains of Charging (CHS) system pumps and re-energization feature for portions of the CHS system were performed during plant operation. The cause was determined to be a lack of verbatim compliance with the Technical Specifications. Contributing to this were ineffective corrective actions to identify "shutdown" surveillances, and incomplete updating of the Master Surveillance Test Control List (MSTCL) data base.

The safety significance of this event was minimal in that the mode in which the surveillances were performed had no physical affect on the ability to complete the surveillances or the ability of the EDGs to perform their safety function. As immediate corrective action, the EDGs were declared inoperable and the load shed surveillances were performed during shutdown prior to restoring the EDGs to operable status.

Manufacturer DataEIIS System Code

Not Applicable