

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 (IT-
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

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TITLE (4)

Violation of Technical Specifications Pertaining to High Pressure Safety Injection & Charging System Pumps

| 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 | 10 | 96 | 96 | 038 | 00 | 11 | 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(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

J.M. Peschel, MP3 Nuclear Licensing Manager

TELEPHONE NUMBER (Include Area Code)

(860)437-5840

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 |
|-------|--------|-----------|--------------|---------------------|-------|--------|-----------|--------------|---------------------|
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SUPPLEMENTAL REPORT EXPECTED (14)

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

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

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 has historically changed modes and placed the plant in the configuration required by the new mode after the mode entry. These conditions are being reported pursuant to 10CFR50.73(a)(2)(i)(C) as a condition prohibited by the plant's Technical Specifications.

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.

A Technical Specification change request will be submitted to resolve the conflict between the applicable Technical Specifications. The procedures affected by the conflict between these Technical Specifications will be changed prior to entry into Mode 4.

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

I. Description of Event

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, and 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 (°F). 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 has historically changed modes and placed the plant in the configuration required by the new mode after the mode entry. These conditions are being reported pursuant to 10CFR50.73(a)(2)(i)(C) as a condition prohibited by plant's Technical Specifications.

Technical Specification 3.1.2.4 requires that two CHS pumps be operable in Modes 1, 2, 3, and 4 except when the Reactor Coolant System (RCS) cold leg temperature is less than or equal to the Low Temperature Overpressure Protection (LTOP) temperature of 350 °F. With the temperature less than or equal to 350 °F, a maximum of one charging pump is allowed to be operable. No provision is contained within the Technical Specification for transition from or to the LTOP temperature range. The plant has historically entered Mode 3 from Mode 4 with one operable charging pump. This violates the requirements of Technical Specification 3.0.4. In conformance with Technical Specification 3.1.2.4, the CHS pumps were restored to an operable condition after entry into Mode 3.

Technical Specification 3.5.3 requires that a minimum of one Emergency Core Cooling System (ECCS) subsystem to be operable when RCS average temperature (T_{avg}) is less than 350 °F. A note contained within this Technical Specification states that a maximum of one CHS and one SIH pump be operable whenever the temperature of one or more of the RCS cold legs is less than or equal to 350 °F. Technical Specification 3.5.2 requires in Modes 1, 2, and 3 that two independent ECCS subsystems must be operable whenever T_{avg} is greater than or equal to 350 °F. These Technical Specifications contradict one another in that only one CHS pump is allowed to be operable at less than or equal to 350 °F while two CHS pumps are required to be operable at greater than or equal to 350 °F. The failure to comply with these contradictory Technical Specifications when transitioning between Modes 3 and 4 violates Technical Specification 3.0.4. The plant has historically restored the CHS pumps to operable condition after entry into Mode 3.

Additionally, Surveillance Requirement 4.5.3.2 requires in Mode 4 that all CHS and SIH pumps not required to be operable under Technical Specification 3.5.3 must be demonstrated inoperable by verifying that the breakers are secured in their open position. Historically, only one SIH pump breaker has been secured in its open position. The other SIH pump's breaker has been procedurally racked into position and the pump switch placed in the "pull to lock" position and the common SIH pump discharge valve closed. In addition, transitions between Modes 4 and 5 have occurred with only one SIH pump breaker secured in the open position. Although both pumps are inoperable, the Technical Specification Surveillance Requirement is not satisfied by this configuration.

Technical Specification 3.5.2 includes the SIH pumps as required equipment for Modes 1, 2, and 3 to satisfy the requirement for two operable ECCS subsystems. Two SIH pumps have historically not been operable until after entry into Mode 3. Technical Specifications 3.0.4 does not allow a transition between Modes under this condition. Therefore, this also violates the requirements of Technical Specification 3.5.2.

Technical Specification Surveillance Requirement 4.5.2.b.2 requires, for Modes 1, 2, and 3, that each valve in the ECCS subsystem flow path that is not locked, sealed, or otherwise secured in position, is verified in its correct

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position. The SIH to RCS cold leg stop valve (3SIH*MV8835) is required to be open in Modes 1, 2, and 3. Historically this valve has been closed when the plant transitions into Mode 3 from Mode 4. This valve has not been opened until after an operational readiness test was performed on the SIH pumps. This readiness test has not been performed until after entry into Mode 3. This is a violation of the requirements contained within Technical Specification 3.04, 4.0.4 and 3.5.2.

II. Cause of Event

These conditions occurred as a result of interpreting the Technical Specifications as to their intent rather than conducting operations to ensure compliance with the Technical Specifications. Historically, the plant has conducted operations to meet the intent of the Technical Specifications when it was difficult or impossible to comply with the Technical Specifications as they are written, as is the case in the transition between Mode 4 to Mode 3.

Management's expectations for compliance with the Technical Specifications are not clearly understood in parts of the organization. The Technical Specification inconsistencies noted above have been known since the issuance of the original Technical Specifications. The inconsistencies have been addressed by interpreting the intent of the Technical Specifications rather than developing the appropriate Technical Specification changes and submitting them to the NRC for review and approval.

III. Analysis of Event

There were no adverse safety consequences as a result of these conditions in that the equipment was not called upon to perform its required safety function during the mode change transitions. In addition, the Technical Specification required configuration was promptly and expeditiously restored immediately following the mode transition. However, this event has safety significance in that the practice of conducting operations to meet the intent of the Technical Specifications rather than complying with the Technical Specifications as written detracts from the proper conservative operating philosophy. The appropriate revisions to the Technical Specifications should have been developed and submitted to the NRC for approval when they were first identified.

IV. Corrective Action

The following corrective actions will be implemented as a result of this event:

1. A review of the Technical Specifications and implementing procedures to ensure the Limiting Conditions for Operation and Surveillance Requirements can be met for both their intent and for compliance will be performed. Required Technical Specification change requests will be developed, submitted to the NRC, and approved prior to entry into mode 4.
2. A Technical Specification change request will be submitted to the NRC to resolve the conflict between Technical Specifications 3.1.2.4, 3.5.2 and 3.5.3. This change request will be submitted prior to entry into Mode 4.
3. The procedures affected by the conflict between Technical Specifications 3.1.2.4, 3.5.2 and 3.5.3 will be changed prior to entry into Mode 4.
4. The Unit Director will provide the unit staff with his expectations on compliance with Technical Specifications.

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V. Additional Information

None

Similar Events

LER 94-013-00 Main Steam Isolation Valves And Turbine Driven Auxiliary Feedwater Pump, Inadequate Technical Specifications For Mode Change

On September 16, 1994, it was identified that Technical Specification surveillance requirements for testing of the Main Steam Isolation Valves and Turbine Driven Auxiliary Feedwater Pump prior to entry into Mode 4 from Mode 3 could not be physically accomplished until entry had been made into Mode 4. The corrective actions under this LER required that a review of Technical Specifications for similar conditions be performed. The review failed to identify the conflict between Technical Specifications surveillance requirements 4.3.5.2 and Technical Specifications 3.1.2.4, and 3.5.2.

Manufacturer Data

ELIS System Code:
High Pressure Safety Injection - BQ
Chemical and Volume Control System - CB

ELIS Component Code:
Pump - P