



**Northeast
Utilities System**

Millstone Offices • Rope Ferry Rd., Waterford, CT

P.O. Box 128
Waterford, CT 06385-0128
(203) 447-1791

February 12, 1997
Docket No. 50-336
B16235

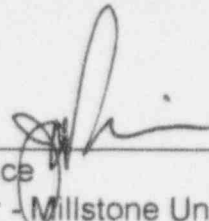
Re: 10 CFR 50.73(a)(2)(i)

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

This letter forwards Licensee Event Report (LER) 97-003-00, documenting an event that occurred at Millstone Nuclear Power Station, Unit No. 2 on December 16, 1996. This LER is being submitted pursuant to 10 CFR 50.73(a)(2)(i).

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



J. A. Price
Director - Millstone Unit No. 2

cc: see page 2

9702260065 970212
PDR ADOCK 05000336
S PDR

Attachment: LER 97-003-00

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

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 2

DOCKET NUMBER (2)

05000336

PAGE (3)

1 OF 3

TITLE (4)

Historical Technical Specification Noncompliance of Plant Surveillance Procedure Used to Perform Periodic Inspection of Fire Protection System Smoke Detectors

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
12	16	96	97	-- 003 --	00	02	12	97	FACILITY NAME	DOCKET NUMBER
OPERATING MODE (9)		5	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (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

R. T. Laudenat, MP2 Nuclear Licensing Manager

TELEPHONE NUMBER (Include Area Code)

(860) 444-5248

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 DATE (15)	MONTH	DAY	YEAR
---	--	-------------------------------	-------	-----	------

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

On December 16, 1996, a discrepancy was discovered in the plant procedure utilized to perform the periodic inspection of the fire protection system smoke detectors. On January 13, 1997, a review of this discrepancy identified that the surveillance procedure utilized prior to November 1995 (Surveillance Procedure (SP) 2618C, "Fire Protection System Smoke Detector Test") did not ensure that the requirements of Technical Specification (TS) Surveillance Requirement 4.3.3.7.1 were met.

Fire protection requirements are no longer contained in the Technical Specifications. These requirements were removed by Millstone Unit No. 2 License Amendment No. 191 which was issued on November 3, 1995. Prior to Amendment No. 191, Technical Specification Surveillance Requirement 4.3.3.7.1 included requirements for smoke detectors in the Auxiliary Building (-5 foot elevation). The requirements for the fire protection equipment were relocated to the Technical Requirements Manual (TRM) which is a plant controlled document.

The cause of the event was failure to properly incorporate Technical Specification surveillance requirements into plant surveillance procedures.

This event reports the historical noncompliance with Technical Specification Surveillance Requirement 4.3.3.7.1. Plant procedures have been revised to ensure compliance with the fire protection system requirements in the TRM for the Auxiliary Building smoke detectors.

LICENSEE EVENT REPORT (LER)

TEXT CONTINUATION

FACILITY NAME (1)	DOCKET	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Millstone Nuclear Power Station Unit 2	05000336	97	003	00	2 OF 3

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

I. Description of Event

On December 16, 1996, a discrepancy was discovered in the plant procedure utilized to perform the periodic inspection of the fire protection system [FRA] smoke detectors [DET]. On January 13, 1997, a review of this discrepancy identified that the surveillance procedure utilized prior to November 1995 (Surveillance Procedure (SP) 2618C, "Fire Protection System Smoke Detector Test") did not ensure that the requirements of Technical Specification (TS) Surveillance Requirement 4.3.3.7.1 were met. At the time of discovery of this event on December 16, 1996, the unit was in Mode 5 at 0 percent power.

Fire protection requirements are no longer contained in the Technical Specifications. These requirements were removed by Millstone Unit No. 2 License Amendment No. 191 which was issued on November 3, 1995. Prior to Amendment No. 191, Technical Specification Surveillance Requirement 4.3.3.7.1 included requirements for smoke detectors in the Auxiliary Building (-5 foot elevation). This specification required that 1 of 2 smoke detectors in the Auxiliary Building West Piping Penetration Room and 10 of 13 smoke detectors in the Auxiliary Building General Area were operable. The plant surveillance procedure in place at the time only required 11 of 15 smoke detectors in the combined area to be operable to satisfy the surveillance requirement. Individual requirements for each area were not addressed. Therefore, it would have been possible for the performance of the surveillance procedure to be accepted with no operable smoke detectors in the Auxiliary Building West Piping Penetration Room or with only 9 operable smoke detectors in the Auxiliary Building General Area.

Corresponding to the implementation of Technical Specification Amendment No. 191, the requirements for the fire protection equipment were relocated to the Technical Requirements Manual (TRM) which is a plant controlled document. The identification of the discrepancy between the TRM requirements and the present plant procedure prompted the review of past compliance with Technical Specification 4.3.3.7.1.

Past review of the SP 2618C surveillance testing indicated that all 15 smoke detectors in the Auxiliary Building West Piping Penetration Room and the Auxiliary Building General Area at the -5 foot elevation had been satisfactorily tested in October 1996. After identification of this event, additional testing was performed on the 2 smoke detectors in the Auxiliary Building West Piping Penetration Room at the -5 foot elevation with acceptable results on December 16, 1996. Plant procedures were revised on January 13, 1997 to identify the number of smoke detectors required operable in the Auxiliary Building General Area and the Auxiliary Building West Piping Penetration Room.

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, due to the inadequacy of the surveillance procedure utilized prior to November 1995.

II. Cause of Event

The cause of the event was failure to properly incorporate Technical Specification surveillance requirements into plant surveillance procedures.

III. Analysis of Event

Technical Specification Surveillance Requirement 4.3.3.7.1 defined the testing requirements for fire detection instrumentation in designated fire areas. The term "fire area" as used in 10 CFR 50 Appendix R describes an area sufficiently bounded to withstand the hazards associated with the fire and, as necessary, to protect important equipment within the fire area from a fire outside the area. SP 2618C has been the mechanism to ensure that the required fire detection instrumentation is operable in fire areas identified in the TS and in the TRM. These

LICENSEE EVENT REPORT (LER)

TEXT CONTINUATION

FACILITY NAME (1)	DOCKET	LER NUMBER (6)			PAGE (3)
Millstone Nuclear Power Station Unit 2	05000336	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	3 OF 3
		97	-- 003 --	00	

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

areas include the Auxiliary Building West Piping Penetration Room and the Auxiliary Building General Area at the -5 foot elevation.

Although SP 2618C did not distinguish between the number of smoke detectors required operable in the respective areas of the Auxiliary Building West Piping Penetration Room and the Auxiliary Building General Area at the -5 foot elevation, there was reasonable assurance that all the detectors were tested and any inoperable detectors were repaired through normal maintenance practices. In the event of a fire, safe shutdown could be achieved per the Appendix R compliance report issued to the NRC, dated April 16, 1987.

Based on the above, this event is not safety significant.

IV. Corrective Action

This event reports the historical noncompliance with Technical Specification Surveillance Requirement 4.3.3.7.1. Noncompliance with the Technical Specification ended with the implementation of Amendment No. 191 in November 1995. Plant procedures have been revised to ensure compliance with the fire protection system requirements in the TRM for the smoke detectors in the Auxiliary Building West Piping Penetration Room and the Auxiliary Building General Area at the -5 foot elevation.

Additionally, in the response to NOV 336/96-08-07 (NNECO Commitment No. B16076-2), Millstone Unit No. 2 committed to perform a review of Technical Specification surveillance procedures to ensure compliance with Technical Specification surveillance requirements as part of the Operational Readiness Plan.

V. Additional Information

Similar Events

Previous LERs that involve deficient surveillance procedures include:

- LER 96-023-01: Discrepancies Found in Various Technical Specification Required Valve Lineups
- LER 96-024-01: Inadequate Surveillances for Reactor Protection System and Engineered Safety Actuation System Response Time Testing
- LER 96-025-00: Enclosure Building Filtration Actuation Signal/Auxiliary Exhaust Actuation Signal Interlock Not Tested Periodically
- LER 96-026-00: Incomplete Technical Specification Required Surveillance - Valve Lineups Inside Containment
- LER 96-035-00: Failure to Perform Periodic Surveillance Testing for Interlock Function Associated with the Main Steam Isolation System Function of the Engineered Safeguards Actuation System
- LER 96-037-00: Inadequate Surveillance Procedure for Verifying Average Water Temperature at the Unit 2 Intake Structure
- LER 96-038-00: Inadequate Surveillance Procedures Used to Verify Emergency Diesel Generator Operability
- LER 96-039-00: Failure to Perform Periodic Surveillance Testing for Containment Purge System Containment Isolation Valves in Accordance with Technical Specification 4.9.10
- LER 96-040-00: Inadequate Surveillance Procedure for Verifying Motor Circuit Breaker Position in Accordance with Technical Specification Requirements 4.1.2.3.2, 4.1.2.3.3, and 4.4.1.4

Energy Industry Identification System (EIIIS) codes are identified in the text as [XX].