

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 P33), 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)

Incompletely Implemented Technical Specification Amendment Resulting in a Missed Surveillance on RMS
Monitors

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	28	96	96	042	00	11	27	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

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 October 28th, 1996 at 1600 hours, with the plant in Mode 5, it was discovered that Technical Specifications (TS) response time surveillance testing of Containment Fuel Drop Radiation Monitoring System (RMS) monitors 3RMS-RE41 and 3RMS-RE42 had not been performed. The RMS monitors were declared inoperable and the containment purge & vent valves were shut as required by the applicable TS ACTION statement.

This condition is reportable pursuant to 10CFR50.73 (a)(2)(i)(B), as any operation or condition prohibited by the plant's Technical Specifications.

Response time testing of the Containment Fuel Drop Instrument channels will be completed prior to returning the Containment Purge & Vent to service. The procedure governing license amendment incorporation and implementation will be revised to clarify roles and responsibilities. Licensing personnel will be trained on the requirements and responsibilities associated with developing and processing Technical Specification change requests.

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

I. Description of Event

On October 28th, 1996 at 1600 hours, with the plant in Mode 5, it was discovered that a requirement in a recently issued amendment to the Technical Specifications (TS) had not been implemented. Specifically, the surveillance for response time testing of Containment Fuel Drop Radiation Monitoring System (RMS) monitors 3RMS-RE41 and 3RMS-RE42 had not been performed within 60 days of receipt of the amendment that added those instruments to the Engineered Safety Features Actuation System (ESFAS) instrumentation Technical Specification.

The RMS monitors were declared inoperable and the containment purge & vent valves were shut as required by the applicable TS ACTION statement.

The failure to have operable RMS monitors resulted in a condition that is reportable, pursuant to 10CFR50.73 (a)(2)(i)(B), as any operation or condition prohibited by the plant's Technical Specifications.

II. Cause of Event

The root causes of this event are:

1. The procedure that governs amendment receipt, incorporation in the operating license and implementation in the plant does not clearly define roles and responsibilities for these functions. This lack of specific direction led to improper tracking and followup of assigned activities and resulted in the surveillance testing not being performed within 60 days of receipt of the amendment.
2. The design and testing requirements associated with the relocation of the radiation monitor to the Technical Specification ESFAS Table were not understood by the personnel involved in the License Amendment process.

III. Analysis of Event

There were no adverse safety consequences from this condition. The reactor vessel head was in place; therefore, there was no manipulation of nuclear fuel that could have led to radiological conditions while the containment purge & vent valves were open and while the radiation monitors that provide an isolation signal to the containment purge & vent valves were inoperable. However, this condition is significant in that had the plant been moving nuclear fuel in Mode 6, and had a radiological condition occurred that required isolation of the containment purge & vent pathway, the RMS channels relied upon would not have responded within the analyzed time.

IV. Corrective Action

1. Response time testing of the Containment Fuel Drop Instrument channels was completed on November 11, 1996 and failed to meet the required acceptance criteria. The results of this testing will be reported in a separate License Event Report not later than December 7, 1996.

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

2. Procedure DC 10, "Incorporation and Implementation of License Amendments", will be revised to clarify the requirements and responsibilities for implementation of license amendments by March 31, 1997.
3. Licensing personnel and appropriate line personnel will be trained on the requirements and responsibilities associated with developing and processing Technical Specification change requests by March 31, 1997.

V. Additional Information

None

Similar EventsLER 94-013-00 Missed Technical Specifications Operability Testing

On September 16, 1994, with the plant in cold shutdown, it was determined that previous plant start-ups were conducted with several operability tests not performed prior to entry into Modes 4 and 3. The affected equipment included the Main Steam Isolation Valves, the engineered safety features actuation system, and the turbine-driven Auxiliary Feedwater pump. Since the plant was shut down at the time of discovery, changes to the Technical Specifications were necessary to allow the plant to enter Modes 4 and 3, to perform the required operability tests.

The missed operability testing was a historical condition that is reportable under 10CFR50.73(a)(2)(i)(B), as a condition prohibited by the Technical Specifications.

LER 96-004-00 Auxiliary Feedwater Isolation Valves Noncompliance with Technical Specifications

On March 19, 1996, with the plant in MODE 1 at 100% power, it was determined that there were several historical occasions when the plant had failed to enter the appropriate Technical Specification's limiting condition for operation (LCO) action statement when shutting the Turbine Driven Auxiliary Feedwater pump discharge valves, at less than 10% power.

The failure to enter and abide by the appropriate LCO action statement is reportable under 10CFR50.73(a)(2)(i)(B) as a condition prohibited by the Technical Specifications.

The cause of the historical Technical Specification noncompliance was a misinterpretation of the Technical Specifications. The plant erroneously used a Technical Specification Surveillance Requirement to take exception to a Technical Specification LCO.

Manufacturer Data

EIS System Code:

Radiation Monitoring System RMS