

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 4

TITLE (4)

Inadequate Surveillance Procedure for Verifying Operability of Reactor Coolant System Vents

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
03	08	97	97	-- 007 --	00	04	04	97	FACILITY NAME	DOCKET NUMBER
OPERATING MODE (9)		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5: (Check one or more) (11)								
N		20.2201(b)			20.2203(a)(2)(v)			X	50.73(a)(2)(i)	50.73(a)(2)(viii)
POWER LEVEL (10)		20.2203(a)(1)			20.2203(a)(3)(ii)				50.73(a)(2)(iii)	50.73(a)(2)(x)
000		20.2203(a)(2)(i)			20.2203(a)(3)(iii)				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 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. G. Joshi, MP2 Nuclear Licensing

TELEPHONE NUMBER (include Area Code)

(860) 440-2080

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).	X NO	EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
---	------	-------------------------------------	-------	-----	------

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

On March 8, 1997, while reviewing a revision of Surveillance Procedure, "Reactor Head and Pressurizer Vent Solenoid Valve Operability Test," it was discovered that the procedure was not in compliance with Technical Specification Surveillance Requirement 4.4 11.3. The surveillance requires that the Reactor Coolant System (RCS) vent path be determined operable by "Verifying flow through the reactor coolant vent system vent paths during venting during COLD SHUTDOWN or REFUELING." Two RCS Vents are provided, one from the reactor vessel head, and the other from the pressurizer steam space. The current procedure does not adequately verify flow from the RCS. In addition, the test is not performed "during venting" as required by the TS wording.

The cause of this event was failure to properly incorporate Technical Specification surveillance requirements into plant Surveillance Procedures.

The Surveillance Procedure, "Reactor Head and Pressurizer Vent Solenoid Valve Operability Test," will be revised to ensure that this surveillance requirement is fulfilled, before entering Mode 4 from the current outage. Technical Specification surveillance procedures will be reviewed to ensure compliance with Technical Specification surveillance requirements as part of the Millstone Unit No. 2 Operational Readiness Plan. The review will initially focus on Technical Specification surveillance procedures required for Mode 6 and defueled. Surveillance procedures required for subsequent mode changes will be reviewed prior to mode entry.

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	2 OF 4
		97	-- 007 --	00	

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

I. Description of Event

On March 8, 1997, while reviewing a revision of Surveillance Procedure, "Reactor Head and Pressurizer Vent Solenoid Valve Operability Test," it was discovered that the procedure was not in compliance with Technical Specification (TS) Surveillance Requirement 4.4.11.3. The surveillance requires that the Reactor Coolant System (RCS) [AB] vent path be determined operable by "Verifying flow through the reactor coolant vent system vent paths during venting during COLD SHUTDOWN or REFUELING." Two RCS Vents are provided, one from the reactor vessel head, and the other from the pressurizer steam space. The current procedure does not adequately verify flow from the RCS. In addition, the test is not performed "during venting" as required by the TS wording. At the time of discovery of this event, the reactor was defueled.

This condition is being reported pursuant to 10 CFR 50.73(a)(2)(i)(B), any operation or condition prohibited by the plant's Technical Specifications.

II. Cause of Event

Failure to properly incorporate Technical Specification surveillance requirements into plant Surveillance Procedures.

III. Analysis of Event

The vent system for the RCS provides a remotely operated method for removing noncondensable gases collected in the RCS during post accident conditions in order to assure satisfactory long term cooling. The system can also be used for venting the RCS while refilling with borated water after maintenance outages. The reactor vessel head and the pressurizer steam space are provided with vents. Each vent is provided with two parallel sets of remotely operated isolation valves. Each set of isolation valves consists of two solenoid operated valves in series. These solenoid valves are part of the RCS pressure boundary. In parallel with each remotely operated vent path is an additional vent path with manually operated valves.

The current test method closes the vent piping root valve and uses temporary primary makeup water flow through the two in series solenoid isolation valves in each vent path. By cycling the solenoid valves, thus stopping and starting flow, the majority of each vent path is verified. This method, however, fails to verify flow through a portion of the vent piping from the RCS because of the closed root valves. When the RCS is filled and vented following maintenance, flow through the majority of the untested portion of the vent path is verified. A small portion of piping is untested (refer to Figure 1 of this LER). The combination of the two procedures provides reasonable assurance that the vent line is functioning. Therefore, this event is not safety significant.

IV. Corrective Action

The following actions will be performed.

1. The Surveillance Procedure, "Reactor Head and Pressurizer Vent Solenoid Valve Operability Test," will be revised to ensure that this surveillance requirement is fulfilled before entering Mode 4 from the current outage.

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 4
		97	-- 007	-- 00	

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

2. Technical Specification surveillance procedures will be reviewed to ensure compliance with Technical Specification surveillance requirements as part of the Millstone Unit No. 2 Operational Readiness Plan. The review will initially focus on Technical Specification surveillance procedures required for Mode 6 and defueled. Surveillance procedures required for subsequent mode changes will be reviewed prior to mode entry. (This commitment was previously sent to the NRC in the response to NOV 336/96-08-07, NNECO Commitment No. B16076-2.)

V. Additional InformationSimilar 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
- LER 97-003-00: Surveillance Procedure SP2618C Fails to Meet Technical Requirements Manual Surveillance Requirements

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

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	4 OF 4
		97	007	00	

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

SIMPLIFIED VENT SYSTEM

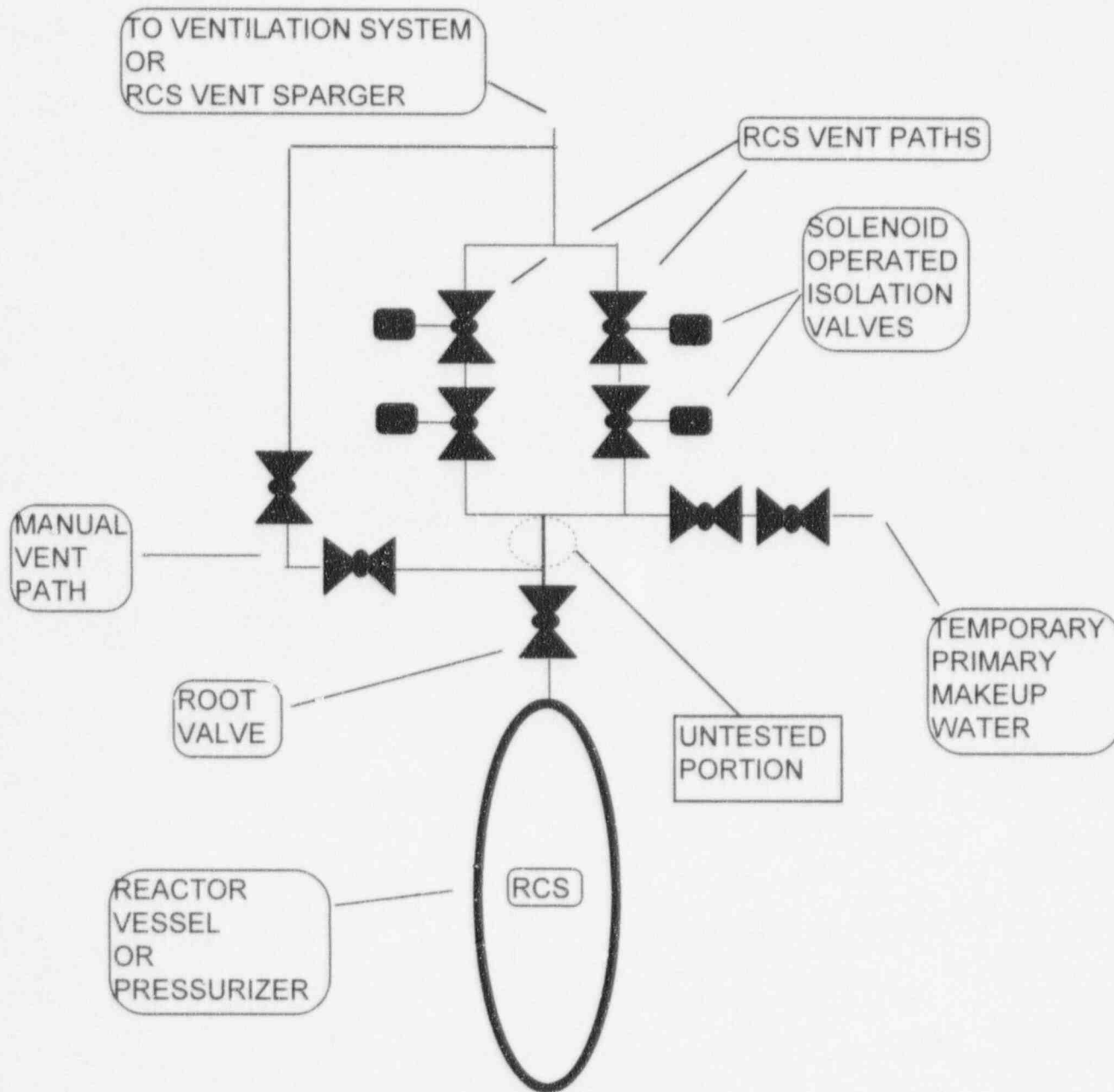


FIGURE 1