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The Northeast Utilities System

April 9, 1997

Docket No. 50-423
B16350

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

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

Millstone Nuclear Power Station Unit 3
Licensee Event Report 97-025-00
Submitted Pursuant to 10CFR 50.73(a)(2)(i)(B)

This letter forwards Licensee Event Report 97-025-00, documenting a condition that was determined at Millstone Unit No. 3 on March 10, 1997. This LER is submitted pursuant to 10CFR 50.73(a)(2)(i)(B). NNECO's commitments in response to this event are contained within Attachment 1 to this letter.

Should you have any questions regarding this submittal, please contact Mr. James M. Peschel at (860) 437-5840.

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Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

G. D. Hicks
Unit Director, Millstone Unit No. 3

170068

Attachment: 1) NNECO's commitments in response to LER 97-025-00
2) LER 97-025-00

cc: H. J. Miller, Region I Administrator
A. C. Cerne, Senior Resident Inspector, Millstone Unit No. 3
J. W. Andersen, NRC Project Manager, Millstone Unit No. 3
W. D. Travers, Dr., Director, Special Projects

Docket No. 50-423
B16350

Attachment 1

Millstone Nuclear Power Station, Unit No. 3
NNECO's Commitments
In Response To
(LER 97-025-00)

April 9, 1997

Enclosure
List of Regulatory Commitments

The following table identifies those actions committed to by NNECO in this document. Any other actions discussed in the submittal represent intended or planned actions by NNECO. They are described to the NRC for the NRC's information and are not regulatory commitments. Please notify the Manager - Nuclear Licensing at the Millstone Nuclear Power Station Unit No. 3 of any questions regarding this document or any associated regulatory commitments.

Number	Commitment	Due
B16350-01	Abnormal operations response procedures will be revised to require entry into Technical Specification 3.0.3 upon a loss of VIAC-1 or VIAC-2.	August 1, 1997

Docket No. 50-423
B16350

Attachment 2

Millstone Nuclear Power Station, Unit No. 3
NNECO's Submittal of
(LER 97-025-00)

April 9, 1997

NRC FORM 366 (4-95) U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB NO. 3150-0104
EXPIRES 04/30/98

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.

LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
Millstone Nuclear Power Station Unit 3	05000423	1 of 5

TITLE (4)

Historical Event: A Failure to Enter Technical Specification 3.0.3 Upon Loss of Vital AC Bus VIAC-1

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
03	10	97	97	025	00	04	09	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)	[X] 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	TELEPHONE NUMBER (Include Area Code)
J.M. Peschel, MP3 Nuclear Licensing Manager	(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)		EXPECTED SUBMISSION	MONTH	DAY	YEAR
[ ] YES (If yes, complete EXPECTED SUBMISSION DATE).	[X] NO				

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

On March 10, 1997, with the unit in Mode 5, it was identified that with either 120-Volt (V) alternating current (A.C.) vital bus VIAC-1 or VIAC-2 inoperable, the four channels of 4160-V emergency bus undervoltage - grid degraded voltage detection instrumentation associated with the respective 4160-Volt Emergency Bus, #34C or #34D would be inoperable. Technical Specification (TS) 3.3.2, "Engineered Safety Features [ESF] Actuation Instrumentation," Functional Unit 8.b, "Loss of Power, 4 kV Bus Undervoltage - Grid Degraded Voltage" specifies required actions for a single channel inoperable. Four channels inoperable requires entry into TS 3.0.3 because this condition is not addressed. During the investigation it was determined that a historical, reportable, event had occurred on March 27, 1988, when the "120-Volt A.C. Vital Bus #VIAC-1" had been inoperable for two (2) minutes, without entry into TS 3.0.3. Failure to enter TS 3.0.3 when required is reportable pursuant to 10CFR50.73(a)(2)(i)(B) as an operation or condition prohibited by the unit Technical Specifications.

The cause of this historical event was attributed to a failure to address an inconsistency between Technical Specification 3.3.2 and TS 3.8.3.1 during development.

Abnormal operations response procedures affected by a loss of VIAC-1 or VIAC-2 will be revised to require entry into TS 3.0.3.

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)					PAGE (3)
		YEAR	SEQUENTIAL NUMBER			REVISION NUMBER	
Millstone Nuclear Power Station Unit 3	05000423	97	--	025	--	00	2 of 5

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

I. Description of Event

On March 10, 1997, with the unit in Mode 5, it was identified that with either 120-Volt (V) alternating current (A.C.) vital bus VIAC-1 or VIAC-2 inoperable, the four channels of 4160-V emergency bus undervoltage - grid degraded voltage detection instrumentation associated with the respective 4160-Volt Emergency Bus, #34C or #34D would be inoperable. Technical Specification (TS) 3.3.2, "Engineered Safety Features [ESF] Actuation Instrumentation," Functional Unit 8.b, "Loss of Power, 4 kV Bus Undervoltage - Grid Degraded Voltage" specifies required actions for a single channel inoperable. Four channels inoperable requires entry into TS 3.0.3 because this condition is not addressed. During the investigation it was determined that a historical, reportable, event had occurred on March 27, 1988, when the "120-Volt A.C. Vital Bus #VIAC-1" had been inoperable for two (2) minutes, without entry into TS 3.0.3. Failure to enter Technical Specification 3.0.3 when required is reportable pursuant to 10CFR50.73(a)(2)(i)(B) as an operation or condition prohibited by the unit Technical Specifications.

The impact of vital buses VIAC-1 or VIAC-2 being inoperable was previously considered to be fully addressed in Modes 1 through 4, by TS 3.8.3.1, "Electrical Power Systems: Onsite Power Distribution - Operating," Action Statement b. part (1), which requires reenergization of "the A.C. vital bus within 2 hours," or be in Cold Shutdown within the following 36 hours. It was previously not recognized that upon loss of either vital bus VIAC-1 or VIAC-2 that entry into both Technical Specification 3.8.3.1 and 3.0.3 is required.

II. Cause of Event

The cause of this historical event was attributed to a failure to address an inconsistency between Technical Specification 3.3.2 and Technical Specification 3.8.3.1 during development.

III. Analysis of Event

There were no safety consequences associated with this event.

There was no safety significance associated with this event. Technical Specifications, 3.8.3.1 and 3.3.2, both require the unit to be placed in Cold Shutdown within 36 hours after providing a period to return the inoperable equipment to operable status. TS 3.8.3.1, requires reenergization of "the A.C. vital bus within 2 hours," or be in Cold Shutdown within the following 36 hours. TS 3.0.3, which is entered when TS 3.3.2 cannot be satisfied, states that "when a Limiting Condition for Operation is not met ... within 1 hour action shall be initiated to place the unit in a MODE in which the specification does not apply" and the unit is required to be in Cold Shutdown in the following 36 hours. Therefore, because the unit was in this condition for only two minutes the unit complied with the more restrictive one hour TS 3.0.3 Action Statement requirement. The event consisted solely of not recognizing and logging the entry into the TS 3.0.3, as required. The Technical Specification inconsistencies between the two specifications noted above had not been previously recognized.

IV. Corrective Action

The following corrective action will be taken:

1. Abnormal operations response procedures will be revised to require entry into Technical Specification 3.0.3 upon a loss of VIAC-1 or VIAC-2 by August 1, 1997.

V. Additional Information

None

Similar Events

LER 97-008-00 "Failure to Enter Technical Specification 3.0.3 Action Statement for MSIV Closure"

On January 24, 1997, it was determined that the plant had previously operated in a condition prohibited by Technical Specifications (TS). Specifically, while conducting a scheduled plant shutdown on April 15, 1995, Unit 3 operators shut all four Main Steam Isolation Valves (MSIV)s in Mode 4. Due to the known inability of the valves to satisfy surveillance test requirements at the low steam pressures in Mode 4, the valves were declared inoperable. TS 3.7.1.5 for Modes 2, 3, and 4 states that "With one MSIV inoperable, operation may proceed provided that the isolation valve is maintained closed. Otherwise, be in Hot Standby within the next 6 hours and in Cold Shutdown within the following 30 hours". The plant complied with these required actions. However, the TS do not bound the condition of four MSIVs inoperable which would require entry into TS 3.0.3.

It has also been determined that TS 3.0.4 has been historically violated based upon the plant's entering Mode 4 from Mode 5 with the MSIVs closed, but inoperable because the valves could not meet TS surveillance acceptance criteria at the low steam pressures existing in Mode 4. This condition is reportable pursuant to 10CFR50.73(a)(2)(i)(B)as an operation or condition prohibited by the TS.

It was determined that there was no safety significance nor adverse safety consequence in that the valves were closed in their safety function position and the plant was brought to hot shutdown and cold shutdown conditions in the specified times of TS 3.0.3.

LER 97-001-00 "Lack of Verbatim Compliance with Technical Specification Surveillance Requirements for 125 Volt Batteries and Battery Chargers"

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.

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.

As immediate action, the plant determined to no longer shut these valves in MODE 1, at less than 10% power, or in MODE 2 or 3, without entering the appropriate Technical Specification LCO action statement. As action to prevent recurrence, this event will be reviewed with station personnel to caution others on using Technical Specification Surveillance requirements to alter Technical Specification LCOs.

LER 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 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.

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)					PAGE (3)
		YEAR	SEQUENTIAL NUMBER			REVISION NUMBER	
Millstone Nuclear Power Station Unit 3	05000423	97	--	025	--	00	5 of 5

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

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.

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 event is being reported pursuant to 10CFR50.73(a)(2)(i)(B)as a condition prohibited by Technical Specifications

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 is minimal in that the mode in which the surveillances are performed has 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. Additional corrective actions will be completed prior to the unit entering mode 4 from the current outage.

Manufacturer Data

EIIS System Code

Engineered Safety Features Actuation
[Instrumentation] System.....JE
Medium Voltage Power System - Class 1E.....EB

EIIS Component Code

Relay, Undervoltage.....27