

## 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 1

DOCKET NUMBER (2)

05000245

PAGE (3)

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TITLE (4)

Failure to Exert Best Efforts to Restore the Radwaste Effluent Line Radiation Monitor to Operable Status

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
01	31	97	97	006	00	03	03	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)			<input checked="" type="checkbox"/> 50.73(a)(2)(i)		50.73(a)(2)(viii)
POWER LEVEL (10)		000			20.2203(a)(1)			50.73(a)(2)(ii)		50.73(a)(2)(x)
					20.2203(a)(2)(i)			50.73(a)(2)(iii)		73.71
					20.2203(a)(2)(ii)			50.73(a)(2)(iv)		OTHER
					20.2203(a)(2)(iii)			50.73(a)(2)(v)		Specify in Abstract below or in NRC Form 366A
					20.2203(a)(2)(iv)			50.73(a)(2)(vii)		

## LICENSEE CONTACT FOR THIS LER (12)

NAME

Robert W. Walpole, MP1 Nuclear Licensing Manager

TELEPHONE NUMBER (include Area Code)

(860)440-2191

## 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
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EXPECTED  
SUBMISSION

MONTH

DAY

YEAR

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

On January 31, 1997, with the plant in the Cold Shutdown condition, it was determined that "best efforts" were not being demonstrated to restore the Radwaste Effluent Line Radiation Monitor to an operable status. Technical Specification (TS) Section 3.8.A, Action 3 states, "exert best efforts to restore the inoperable monitor to OPERABLE status within 30 days and, if unsuccessful, explain in the next Annual Effluent Report why the inoperability was not corrected in a timely manner." The Radwaste Effluent Line Radiation Monitor has remained inoperable since June 5, 1996, due to issues addressed in previous LERs: 96-043-00 on inadequate time response testing; 96-053-00 on inadequate source checks; and 96-065-00 and 97-001-00 on non-conservative setpoints due to draining the discharge piping. Since these conditions were not resolved using best efforts, as specified in TS, this event is reportable as a condition prohibited by the plant's TS. The cause of this event was failure to provide clear management expectations of what constitutes "best efforts" and inadequate prioritization of work required to restore the Radwaste Effluent Line Radiation Monitor to an operable status. Corrective actions include providing guidance for TS "best efforts" and returning the Radwaste Effluent Line Radiation Monitor to an operable status. The safety significance of this event is low since required TS compensatory actions were in place the entire time. Therefore, no safety consequences resulted from this event.

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

I. Description of Event

On January 31, 1997, at 0930 hours, with the plant in the Cold Shutdown condition, it was determined that "best efforts" were not being demonstrated to restore the Radwaste Effluent Line Radiation Monitor to an operable status. TS Section 3.8.A, Action 3 states, "exert best efforts to restore the inoperable monitor to OPERABLE status within 30 days and, if unsuccessful, explain in the next Annual Effluent Report why the inoperability was not corrected in a timely manner." The Radwaste Effluent Line radiation monitor has remained inoperable since June 5, 1996, due to a variety of issues. Since these issues were not resolved using best efforts, as specified in TS, this event is reportable pursuant to 10CFR50.73(a)(2)(i)(B), as a condition prohibited by the plant's Technical Specifications.

The recent inoperability of the Radwaste Effluent Line Radiation Monitor can be summarized by the following Millstone 1 reportable events: on January 10, 1997, potential failure of the Radwaste Effluent Line Radiation Monitor to isolate the discharge when required due to leaking isolation valves (LER 97-001-00); on December 12, 1996, failure to adjust the Radwaste Effluent Line Radiation Monitor setpoints in accordance with TS was identified (LER 96-065-00); on October 2, 1996, it was determined that inadequate radiation monitor source checks had been performed (LER 96-053-00); and on June 5, 1996, it was determined that the response time testing requirements of the TS calibration definition had not been met (LER 96-043-00). Although time response testing was completed on December 11, 1996, and adequate source checks have now been proceduralized, the monitor remains inoperable due to design issues identified during the events concerning the improper setpoints and leaking isolation valves. Completion of LER 96-065-00 commitment to revise the discharge procedure by March 31, 1997, to ensure a proper background level is accounted for while discharging effluents, is scheduled to return the monitor to an operable status. Due to the length of time that the monitor has been inoperable, including several periods of inactivity, Northeast Nuclear Energy Company (NNECO) has determined that best efforts have not been demonstrated to return the monitor to an operable status. The monitor routinely remained in a functional status during liquid effluent discharges.

II. Cause of Event

The cause of this event was failure to provide clear management expectations of what constitutes "best efforts" and inadequate prioritization of work required to restore the Radwaste Effluent Line Radiation Monitor to an operable status. Prioritization and scheduling of tasks required to exit the radiation monitor "best efforts" LCO were based upon perceived impact on plant operations, vice the literal requirements of the best efforts Technical Specifications.

III. Analysis of Event

The Radwaste Effluent Line Radiation Monitor is provided to monitor and control, as applicable, the release of radioactive material in liquid effluents during actual or potential releases. The operability and use of this monitor provides a means of compliance with 10CFR20; 10CFR50 Appendix A, General Design Criteria 60, 63 and 64; as well as Regulatory Guides 1.21, 1.97, 4.15 and 8.8. Per Updated Final Safety Analysis Report (UFSAR) Section 11.5.1, monitoring the radiation level in the radioactive liquid discharge effluents and associated actions are non-safety related functional requirements.

The Liquid Radwaste Effluent Radiation Monitor continuously monitors, measures and records the activity level in the liquid radioactive waste discharged from the station via the liquid effluent line to the discharge canal to Long Island Sound. These liquids are combined with dilution flow that will result in concentrations

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

less than allowable limits at the plant discharge. The radioactive waste monitor will alarm in the main control room when radiation levels reach the high setpoint. The monitor on this discharge line will also alarm in the main control room if the established Hi-Hi setpoint is exceeded and close the discharge valves in the line, prior to reaching allowable release limits. The system is composed of a shielded scintillation detector positioned on a section of the process liquid piping prior to leaving the radwaste building.

TS section 3.8.A requires that the Liquid Radwaste Effluent Line radiation monitor be operable and in service on a continuous, uninterrupted basis. If the radiation monitor is not operable, effluent releases may continue provided that best efforts are made to restore the monitor to an operable status and that independent verification of the discharge valving, release rate calculations, and samples are conducted. Since "best efforts" were not demonstrated in accordance with the associated TS action statement, as described above, this event is reportable pursuant to 10CFR50.73(a)(2)(i)(B), as a condition prohibited by the plant's Technical Specifications.

The safety significance of this event is low since required TS compensatory actions were in place the entire time. Therefore, no consequences resulted from this event.

Equipment restoration efforts were focused on operational impact to the plant. Since the Radwaste Effluent Line Radiation Monitor was initially inoperable for failure to perform time response testing, no clear line of responsibility was assigned to restore the instrument. The Radwaste Effluent Line Radiation Monitor routinely remained capable of performing its intended function, and TS permitted continued radwaste discharges with minimal additional actions; therefore although best efforts were required, little urgency existed to restore the monitor to an operable status. This complacency regarding Radwaste Effluent Line Radiation Monitor inoperability resulted in the failure to schedule and prioritize the tasks necessary to restore the monitor to an operable status.

#### IV. Corrective Action

NNECO will provide management guidance on the requirements for meeting TS "best efforts" action statement which will be communicated to appropriate personnel prior to March 31, 1997.

NNECO will ensure that the Radwaste Effluent Line Radiation Monitor is returned to an operable status consistent with best efforts prior to March 31, 1997.

#### V. Additional Information

##### Similar Events

None

##### Manufacturer Data

Not Applicable