



**Northeast
Nuclear Energy**

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The Northeast Utilities System

MAR - 7 2000

Docket No. 50-336
B18015

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

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

Millstone Nuclear Power Station, Unit No. 2
Licensee Event Report 2000-002-00
Technical Specification Surveillance Requirement
of Cask Crane Was Not Performed

This letter forwards Licensee Event Report (LER) 2000-002-00, documenting an event that occurred at Millstone Nuclear Power Station, Unit No. 2, on February 8, 2000. This LER is being submitted pursuant to 10 CFR 50.73(a)(2)(i)(B).

Northeast Nuclear Energy Company (NNECO) commitments contained in this letter are located in Attachment 1.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

FOR: C. J. Schwarz
Station Director

BY: 

Douglas S. McCracken
Assistant Station Director - Safety

cc: See next page

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**U.S. Nuclear Regulatory Commission
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**Attachments (2): List of Regulatory Commitments
LER 2000-002-00**

**cc: H. J. Miller, Region I Administrator
J. I. Zimmerman, NRC Project Manager, Millstone Unit No. 2
D. P. Beaulieu, Senior Resident Inspector, Millstone Unit No. 2**

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Attachment 1

Millstone Nuclear Power Station, Unit No. 2

Regulatory Commitments

March 2000

List of Regulatory Commitments

The following table identifies actions committed to by NNECO in this document.

| Number | Commitment | Due |
|---------------|---|--------------|
| B18015-01 | The Technical Requirement corresponding to "Crane Travel - Spent Fuel Storage Pool Building" in the Technical Requirement Manual will be revised specifically to address the Cask Crane, clarify Applicability and remove the conflict between Applicability and Surveillance Requirements. | May 15, 2000 |

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Attachment 2

Millstone Nuclear Power Station, Unit No. 2

LER 2000-002-00

March 2000

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 hrs. Reported lessons learned are incorporated into the licensing process and fed back to industry. Forward comments regarding burden estimate to the 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. If an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

| | | | |
|--|--|--------------------------------------|---------------------------|
| FACILITY NAME (1) Millstone Nuclear Power Station Unit 2 | | DOCKET NUMBER (2) 05000336 | PAGE (3) 1 OF 3 |
|--|--|--------------------------------------|---------------------------|

TITLE (4)
Technical Specification Surveillance Requirement of Cask Crane Was Not Performed

| 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 |
| 02 | 08 | 2000 | 2000 | -- 002 | -- 00 | 03 | 07 | 2000 | FACILITY NAME | DOCKET NUMBER |
| OPERATING MODE (9) | | 1 | THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5: (Check one or more) (11) | | | | | | | |
| POWER LEVEL (10) | | 100 | 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)(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 of 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. Joshi, MP2 Acting Regulatory Compliance Supervisor | 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 |
|-------|--------|-----------|--------------|---------------------|--|-------|--------|-----------|--------------|---------------------|
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|---|-------------------------------------|----|--|--------------------------------------|--|-------|-----|------|
| SUPPLEMENTAL REPORT EXPECTED (14) | | | | EXPECTED SUBMISSION DATE (15) | | MONTH | DAY | YEAR |
| YES (If yes, complete EXPECTED SUBMISSION DATE). | <input checked="" type="checkbox"/> | NO | | | | | | |

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

On February 8, 2000 at 1130, it was discovered that the Technical Specification Surveillance Requirement (SR) for Technical Specification (TS) 3.9.7, "Crane Travel - Spent Fuel Storage Pool Building," was not performed. A prerequisite of the Spent Fuel Pool Handling Operations procedure called out testing of Cask Crane Interlock within 72 hours prior to initiation of irradiated fuel handling operations. This prerequisite was not performed. Subsequent to this event, TS 3.9.7 was relocated to the Technical Requirement Manual upon receiving the Nuclear Regulatory Commission's approval on February 10, 2000.

The cause of the event was a deficiency in the TS. The TS Applicability and SR did not meet the intent of the TS.

As a result of this event, the Technical Requirement corresponding to "Crane Travel - Spent Fuel Storage Pool Building" in the Technical Requirement Manual will be revised specifically to address the Cask Crane, clarify Applicability, and remove the conflict between Applicability and SR. Additionally, an interim administrative control was implemented to ensure that the Technical Requirement is satisfied.

LICENSEE EVENT REPORT (LER)

TEXT CONTINUATION

| FACILITY NAME (1) | DOCKET | LER NUMBER (6) | | | PAGE (3) |
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| Millstone Nuclear Power Station Unit 2 | 05000336 | YEAR | SEQUENTIAL NUMBER | REVISION NUMBER | 2 OF 3 |
| | | 2000 | -- 002 -- | 00 | |

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

I. Description of Event

On February 8, 2000 at 1130, it was discovered that the Technical Specification Surveillance Requirement (SR) for Technical Specification (TS) 3.9.7, "Crane Travel - Spent Fuel Storage Pool Building," was not performed. A prerequisite of the Spent Fuel Pool (SFP) [DA] Handling Operations procedure called out testing of Cask Crane Interlock within 72 hours prior to initiation of irradiated fuel handling operations. This prerequisite was not performed. Subsequent to this event, TS 3.9.7 was relocated to the Technical Requirement Manual (TRM) upon receiving the Nuclear Regulatory Commission's (NRC) approval on February 10, 2000. At the time of this event, the plant was in Mode 1 at one hundred (100) percent power.

On February 7, 2000, Reactor Engineering requested permission to move irradiated fuel assemblies within the SFP. The Operations Department followed operating procedure (OP) 2303B, "SFP Fuel Handling Operations," with the exception of performing prerequisite 2.1.9 (SP 2614C - SFP Cask Crane Interlock Testing). The operating crew decided that this step was not applicable after referring to TS 3.9.7, "Crane Travel - Spent Fuel Storage Pool Building," and interpreting the Limiting Condition for Operation (LCO) to apply only to heavy loads (>1800 pounds) being moved by the SFP Cask Crane. The SFP Cask Crane was not being used for this evolution and was therefore not surveilled. During this event, irradiated fuel assemblies [AC] were being moved within the spent fuel pool only using the Platform Crane and not the Cask Crane.

On February 8, 2000, it was questioned whether or not the TS was violated. The question was raised due to the conflict between a verbatim interpretation of the Technical Specification Surveillance Requirement and the actual intent of the TS. All fuel movements were stopped, and were not resumed until the Cask Crane was surveilled.

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

II. Cause of Event

The cause of the event was a deficiency in the TS. The TS Applicability and SR did not meet the intent of the TS.

III. Analysis of Event

TS 3.9.7, "Crane Travel - Spent Fuel Storage Pool Building," states that "loads in excess of 1800 pounds, with the exception of the consolidated fuel storage box, shall be prohibited from travel over irradiated fuel assemblies in the storage pool." The restriction on movement of loads in excess of the nominal weight of a fuel assembly and control element assembly (CEA) over irradiated fuel assemblies ensures that no more than the contents of one fuel assembly will be ruptured in the event of a fuel handling accident.

The Cask Crane is used for handling loads (such as fuel casks) which exceed the weight of a fuel assembly and CEA and is not used for handling irradiated spent fuel assemblies. The Cask Crane is surveilled prior and during usage to ensure the interlocks function as designed to restrict movement over the spent fuel pool. During this event, irradiated fuel assemblies were being moved within the spent fuel pool using of the Platform Crane and not the Cask Crane. The Platform Crane is normally positioned over the spent fuel pool and did not move any loads in excess of 1800 pounds.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

| FACILITY NAME (1) | DOCKET | LER NUMBER (6) | | | PAGE (3) |
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| Millstone Nuclear Power Station Unit 2 | 05000336 | YEAR | SEQUENTIAL NUMBER | REVISION NUMBER | 3 OF 3 |
| | | 2000 | -- 002 | -- 00 | |

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

The Cask Crane has not been used to move any loads around the spent fuel pool in February, 2000 nor have any loads in excess of 1800 pounds been moved by the Platform Crane over the SFP. Therefore, this event was not safety significant.

IV. Corrective Action

As a result of this event, the Technical Requirement corresponding to "Crane Travel - Spent Fuel Storage Pool Building" in the Technical Requirement Manual will be revised specifically to address the Cask Crane, clarify Applicability, and remove the conflict between Applicability and Surveillance Requirements. This action will be completed by May 15, 2000. Additionally, an interim administrative control was implemented to ensure that the Technical Requirement is satisfied.

V. Additional Information

Similar Events

LER 97-010: On January 12, 1997, with the plant in Mode 6, it was determined that the combined weight of the Heavy Dummy Fuel Assembly (HDFA) and the handling tool exceeds the 1800 pound limit of TS 3.9.7 LCO. The TS LCO states, "Loads in excess of 1800 pounds, with the exception of the Consolidated Fuel Storage Box, shall be prohibited from travel over irradiated fuel assemblies in the storage pool." The HDFA has previously been moved over stored irradiated fuel assemblies in the storage pool. The weight of the HDFA is 1745 pounds and the handling tool weighs 270 pounds, for a total of 2015 pounds. Previously, the handling tool had not been considered to be part of the load. The HDFA is stored in the SFP and is used to perform load tests of the SFP platform crane, refueling machine and new fuel elevator. The cause of this condition was that the weight of the handling tool was never considered to be part of the load. The HDFA weight alone is less than the 1800 pound limit, so the requirements of the TS were considered satisfied. As a temporary measure, appropriate procedures have been revised to assure the HDFA is prohibited from travel over irradiated fuel assemblies in the SFP. A TS change request has been initiated to resolve this issue.

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