

OCTOBER 24 1980

Docket No. 50-336

Mr. W. G. Council, Vice President
Nuclear Engineering & Operations
Northeast Nuclear Energy Company
P. O. Box 270
Hartford, Connecticut 06101

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Dear Mr. Council:

SUBJECT: ORDER FOR MODIFICATION OF LICENSE CONCERNING ENVIRONMENTAL
QUALIFICATION OF SAFETY-RELATED ELECTRICAL EQUIPMENT

Ref. (a) Commission Memorandum and Order of May 23, 1980 (80-CLI-21)
Ref. (b) Inspection and Enforcement Bulletin Supplement No. 2 to
IEB-79-01B, September 30, 1980.

This letter transmits an Order for Modification of License which changes the Technical Specifications for Millstone Nuclear Power Station, Unit No. 2. This change is a result of Ref. (a) which required the staff to codify the documentation requirements for the qualification of safety-related electrical equipment. A copy of the Order is being filed with the Office of the Federal Register for publication.

The deadline of November 1, 1980 for submittal of the qualification information is not changed by this Order. Some additional information regarding the file is contained in Ref. (b). Questions regarding this Order should be directed through your Project Manager.

Sincerely,

Original Signed By

Robert A. Clark, Chief
Operating Reactors Branch #3
Division of Licensing

Enclosure:
Order

cc w/enclosure: See Next Page

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*Conformed with
identified
corrections, only.*

G

GV

OFFICE	ORB#3:DL	ORB#3:DL	ORB#3:DL	ORB#3:DL	P:DL
SURNAME	PMKreutzer/JL	PM	RAClark	M. Williams	DEisenhut
DATE	10/24/80	10/24/80	10/24/80	10/24/80	10/24/80

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Docket No. 50-336

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

October 24, 1980

Mr. W. G. Council, Vice President
Nuclear Engineering & Operations
Northeast Nuclear Energy Company
P. O. Box 270
Hartford, Connecticut 06101

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Sincerely,

A handwritten signature in cursive script, appearing to read "Robert A. Clark".

Robert A. Clark, Chief
Operating Reactors Branch #3
Division of Licensing

Enclosure:
Order

cc w/enclosure: See Next Page

October 24, 1980

cc:
William H. Cuddy, Esquire
Day, Berry & Howard
Counselors at Law
One Constitution Plaza
Hartford, Connecticut 06103

Anthony Z. Roisman
Natural Resources Defense Council
917 15th Street, N.W.
Washington, D.C. 20005

Mr. Lawrence Bettencourt, First Selectman
Town of Waterford
Hall of Records - 200 Boston Post Road
Waterford, Connecticut 06385

Northeast Nuclear Energy Company
ATTN: Superintendent
Millstone Plant
Post Office Box 128
Waterford, Connecticut 06385

Director, Technical Assessment
Division
Office of Radiation Programs
(AW-459)
U. S. Environmental Protection Agency
Crystal Mall #2
Arlington, Virginia 20460

U. S. Environmental Protection Agency
Region I Office
ATTN: EIS COORDINATOR
John F. Kennedy Federal Building
Boston, Massachusetts 02203

Waterford Public Library
Rope Ferry Road, Route 156
Waterford, Connecticut 06385

Northeast Utilities Service Company
ATTN: Mr. James R. Himmelwright
Nuclear Engineering and Operations
P. O. Box 270
Hartford, Connecticut 06101

Mr. John Shedlosky
Resident Inspector/Millstone
c/o U.S. NRC
P. O. Drawer KK
Niantic, CT 06357

Mr. Charles B. Brinkman
Manager - Washington Nuclear
Operations
C-E Power Systems
Combustion Engineering, Inc.
4853 Cordell Ave., Suite A-1
Bethesda, Maryland 20014

Connecticut Energy Agency
ATTN: Assistant Director, Research
and Policy Development
Department of Planning and Energy
Policy
20 Grand Street
Hartford, Connecticut 06106

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)
)
NORTHEAST NUCLEAR ENERGY COMPANY)
CONNECTICUT LIGHT AND POWER COMPANY)
HARTFORD ELECTRIC LIGHT COMPANY)
WESTERN MASSACHUSETTS ELECTRIC COMPANY)
(Millstone Nuclear Power Station)
Unit No. 2))

Docket No. 50-336

ORDER FOR MODIFICATION OF LICENSE

I.

Northeast Nuclear Energy Company, et al. (licensee) is the holder of License No. DPR-65, which authorizes the operation of the Millstone Nuclear Power Station, Unit No. 2 at steady state reactor power levels not in excess of 2700 megawatts thermal (rated power). The facility consists of a Pressurized Water Reactor located at the licensee's site in the Town of Waterford, Connecticut.

II.

On November 4, 1977, the Union of Concerned Scientists (UCS) filed with the Commission a "Petition for Emergency and Remedial Relief." The petition sought action in two areas: fire protection for electrical cables, and environmental qualification of electrical components. By Memorandum and Order dated April 13, 1978 (7 NRC 400), the Commission denied certain aspects of the petition and, with respect to other aspects, ordered the NRC staff to take several related actions. UCS filed a Petition for Reconsideration on May 2, 1978. By Memorandum and Order, dated May 23, 1980, the Commission reaffirmed its April 13, 1978 decision regarding the possible shutdown of operating reactors. However, the Commission's May 23, 1980 decision directed licensees and the NRC staff to undertake certain actions.

With respect to environmental qualification of safety-related electrical equipment, the Commission determined that the provisions of the two staff documents - the Division of Operating Reactors "Guidelines for Evaluating Environmental Qualification of Class IE Electrical Equipment in Operating Reactors" (DOR Guidelines) and NUREG-0588, "Interim Staff Position on Environmental Qualification of Safety-Related Electrical Equipment," December 1979 (copies attached) "form the requirements which licensees and applicants must meet in order to satisfy those aspects of 10 CFR Part 50, Appendix A General Design Criterion (GDC-4), which relate to environmental qualifications of safety-related electrical equipment." The Commission directed, for replacement parts in operating plants, "unless there are sound reasons to the contrary, the 1974 standard in NUREG-0588 will apply." The Commission also directed the staff to complete its review of the information sought from licensees by Bulletin 79-01B¹ and to complete its review of environmental qualification of safety-related electrical equipment in all operating plants, including the publication of Safety Evaluation Reports, by February 1, 1981. The Commission imposed a deadline that, "by no later than June 30, 1982 all safety-related electrical equipment in all operating plants shall be qualified to the DOR Guidelines or NUREG-0588."

¹ Bulletin 79-01B was not sent to licensees for plants under review as part of the staff's Systematic Evaluation Program. The information sought by Bulletin 79-01B was requested from these licensees by a series of letters and meetings during the months of February and March, 1980.

The Commission requested the staff to, "keep the Commission and the public apprised of any further findings of incomplete environmental qualification of safety-related electrical equipment, along with corrective actions taken or planned," and requested the staff to provide bi-monthly progress reports to the Commission.

The Commission further directed that, "In order to leave no room for doubt on this issue, the staff is to prepare additional Technical Specifications for all operating plants which codify the documentation requirement paragraph of the Guidelines (paragraph 8.0)." The staff was directed to add these documentation requirements to each license after they were approved by the Commission.

The Commission also pointed out that the various deadlines imposed in its Order, "do not excuse a licensee from the obligation to modify or replace inadequate equipment promptly."

III.

The Commission has approved the Technical Specification provisions set forth in Section IV below which specify documentation requirements and which specifically impose on the licensee the requirement of the Commission's May 23, 1980 Memorandum and Order that by no later than June 30, 1982 all safety-related electrical equipment shall be qualified to the DOR Guidelines or NUREG-0588.

The information developed during the Commission review of the UCS Petition emphasizes the importance of prompt completion of the upgrading of

environmental qualification of safety-related electrical equipment to conform to the DOR Guidelines or NUREG-0588 and of adequate documentation of equipment qualifications. The deadlines set forth in the Commission's Memorandum and Order dated May 23, 1980, assure that such upgrading will be accomplished promptly. In order to assure prompt completion of necessary qualification work or replacement of unqualified components, if necessary, in conformance with the requirements of the Commission's Memorandum and Order dated May 23, 1980, and to provide complete and adequate documentation as promptly as possible, such upgrading and documentation work must commence immediately. Therefore, I have concluded that the public health, safety and interest require this Order for Modification of License to be effective immediately.

IV.

Accordingly, pursuant to the Atomic Energy Act of 1954, as amended, and the Commission's Rules and Regulations in 10 CFR Parts 2 and 50, IT IS ORDERED THAT EFFECTIVE IMMEDIATELY Facility Operating License No. DPR-65 is hereby amended to add the following provisions to the Appendix A Technical Specifications.

- (a) "By no later than June 30, 1982, all safety-related electrical equipment in the facility shall be qualified in accordance with the provisions of: Division of Operating Reactors "Guidelines for Evaluating Environmental Qualification of Class IE Electrical Equipment in Operating Reactors" (DOR Guidelines); or, NUREG-0588, "Interim Staff Position on Environmental

Qualification of Safety-Related Electrical Equipment," December 1979. Copies of these documents are attached to Order for Modification of License No. DPR-65 dated October 24, 1980.

- (b) "By no later than December 1, 1980, complete and auditable records must be available and maintained at a central location which describe the environmental qualification method used for all safety-related electrical equipment in sufficient detail to document the degree of compliance with the DOR Guidelines or NUREG-0588. Thereafter, such records should be updated and maintained current as equipment is replaced, further tested, or otherwise further qualified."

To effectuate the foregoing, appropriate pages for incorporation into the Technical Specifications are attached to this Order.

V.

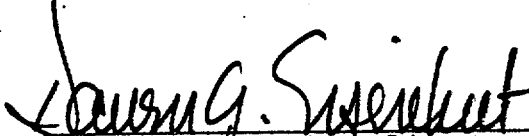
The licensee or any person whose interest may be affected by this Order may request a hearing within 20 days of the date of publication of this Order in the Federal Register. Any request for a hearing will not stay the effective date of this Order. Any request for a hearing shall be addressed to the Director, Office of Nuclear Reactor Regulation, U. S. Nuclear Regulatory Commission, Washington, D. C. 20555. A copy of the request should also be sent to the Executive Legal Director, U. S. Nuclear Regulatory Commission, Washington, D. C. 20555, and to William H. Cuddy, Esq., Day, Berry & Howard, One Constitution Plaza, Hartford, Connecticut, attorney for the licensee.

If a hearing is held concerning this Order, the issues to be considered at the hearing shall be:

- a. whether the licensee should be required to have the environmental qualification records referred to in Section IV, above, available at a central location by no later than December 1, 1980; and
- b. whether all safety-related electrical equipment should be qualified as required in Section IV, above, by no later than June 30, 1982.

Operation of the facility on terms consistent with this Order is not stayed by the pendency of any proceedings on the Order.

FOR THE NUCLEAR REGULATORY COMMISSION



Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation

Effective Date: October 24, 1980
Bethesda, Maryland

Attachments:

1. Technical Specification Pages
2. Guidelines for Evaluating Environmental Qualification of Class IE Electrical Equipment in Operating Reactors
3. NUREG-0588, Interim Staff Position on Environmental Qualification of Safety-Related Electrical Equipment.

ADMINISTRATIVE CONTROLS

- g. Records of training and qualification for current members of the plant staff.
- h. Records of inservice inspections performed pursuant to these Technical Specifications.
- i. Records of quality assurance activities required by the QA Manual.
- j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR Part 50.59.
- k. Records of meetings of the PORC, the NRB, the SORC and the SNRB.
- l. Records of Environmental Qualification which are covered under the provisions of paragraph 6.13.

6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

6.12 HIGH RADIATION AREA

6.12.1. In lieu of the "control device" or "alarm signal" required by paragraph 20.203(c)(2) of 10 CFR 20, each high radiation area in which the intensity of radiation is greater than 100 mrem/hr but less than 1000 mrem/hr shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit*. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

- a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.
- b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate level in the area has been established and personnel have been made knowledgeable of them.

*Health Physics personnel or personnel escorted by Health Physics personnel shall be exempt from the RWP issuance requirement during the performance of their assigned radiation protection duties, provided they comply with approved radiation protection procedures for entry into high radiation areas.

ADMINISTRATIVE CONTROLS

- c. An individual qualified in radiation protection procedures who is equipped with a radiation dose rate monitoring device. This individual shall be responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified in the Radiation Work Permit. The surveillance frequency shall be established by the Health Physics Supervisor.

6.12.2 The requirements of 6.12.1, above, shall also apply to each high radiation area in which the intensity of radiation is greater than 1000 mrem/hr. In addition, locked doors shall be provided to prevent unauthorized entry into such areas and the keys shall be maintained under the administrative control of the Shift Supervisor on duty and/or the Health Physics Supervisor.

6.13 ENVIRONMENTAL QUALIFICATION

6.13.1 By no later than June 30, 1982 all safety-related electrical equipment in the facility shall be qualified in accordance with the provisions of: Division of Operating Reactors "Guidelines for Evaluating Environmental Qualifications of Class IE Electrical Equipment in Operating Reactors" (DOR Guidelines); or NUREG-0588 "Interim Staff Position on Environmental Qualification of Safety-Related Electrical Equipment", December 1979. Copies of these documents are attached to Order for Modification of License DPR-65 dated October 24, 1980.

6.13.2 By no later than December 1, 1980, complete and auditable records must be available and maintained at a central location which describe the environmental qualification method used for all safety-related electrical equipment in sufficient detail to document the degree of compliance with the DOR Guidelines or NUREG-0588. Thereafter, such records should be updated and maintained current as equipment is replaced, further tested, or otherwise further qualified.