UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PENNSYLVANIA 19406-1415

July 30, 2002

Docket No. 05000245 License No. DPR-21
EA No. 02-014

Mr. J. Alan Price, Vice President
Nuclear Technical Services
c/o David A. Smith, Manager-Regulatory Affairs
Dominion Nuclear Connecticut, Inc.
Millstone Power Station
Rope Ferry Road
Waterford, CT 06385

SUBJECT: INSPECTION 05000245/2002010, DOMINION NUCLEAR CONNECTICUT, INC., MILLSTONE POWER STATION UNIT 1, WATERFORD, CONNECTICUT

Dear Mr. Price:

On July 5, 2002, the NRC completed an inspection at your Millstone Unit 1 facility. The enclosed report presents the results of this inspection.

During the four month period covered by this inspection, you conducted limited decommissioning activities at Millstone Unit 1 in a safe manner and maintained appropriate focus on the safe storage of fuel in the spent fuel pool.

In accordance with 10 CFR 2.790, a copy of this letter, its enclosure, and your response (if you choose to provide one) will be placed in the NRC Public Document Room (PDR) and will be accessible from the NRC Web site at http://www.nrc.gov/reading-rm.html. To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction.

Sincerely,

/RA/

Ronald R. Bellamy, Chief
Decommissioning and Laboratory Branch

Enclosure: Inspection Report No. 05000245/2002010

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U.S. NUCLEAR REGULATORY COMMISSION
REGION I

INSPECTION REPORT

Inspection No.	05000245/2002010
Docket No.	05000245
License No.	DPR-21
Licensee:	Dominion Nuclear Connecticut, Inc.
Location:	Millstone Power Station, Unit 1 Rope Ferry Road Waterford, CT 06385
Inspection Dates:	March 18 - July 5, 2002
Inspector:	Todd Jackson, CHP, Health Physicist
Approved By:	Ronald R. Bellamy, Chief Decommissioning and Laboratory Branch Division of Nuclear Materials Safety

EXECUTIVE SUMMARY

Dominion Nuclear Connecticut, Inc.
NRC Inspection Report No. 05000245/2002010

This integrated inspection included aspects of licensee operations and plant support during decommissioning activities. The report covers a four-month period of announced inspections by one regional inspector. No violations were identified.

Operations

The inspector concluded that the Corrective Action Program was effective in identifying and tracking issues for resolution. Unit 1 issues and concerns were incorporated into the Millstone Station program, although database design limitations made searches for Unit 1 related issues and corrective actions somewhat difficult. No safety concerns were identified. (O1.1)

An unresolved item (URI) was identified in 1997 concerning spent fuel pool cleanliness. The licensee's actions are adequately addressing the concerns regarding raised fuel bundles, controlling fuel bundle movements within the Unit 1 SFP, and there are no longer any relevant concerns regarding operational impacts from foreign material entrained within fuel assemblies. The issues in unresolved item 50-245/97-01-01 have been resolved or rendered irrelevant by the decision to decommission Millstone 1, and URI 97-01-01 is therefore closed. **(URI 97-01-01)** (O1.3)

Maintenance

The licensee was adequately addressing the maintenance rule. No safety concerns were identified. (M1)

Engineering

Safety reviews related to engineering work activities were in progress for planned major activities. The licensee's project organization and management were beginning detailed planning for the work, scheduled for later in 2002. No safety concerns were identified. (E1)

Plant Support

Unit 1 Radiation Protection (RP) activities had been successfully integrated back into the Millstone Station RP programs. RP surveys were appropriate for the level of work being performed at Unit 1, and RP was involved in planning of work to drain water from the Unit 1 reactor vessel, a significant upcoming work activity. The licensee responded adequately to, and was investigating the discovery of, a small ^{90}Sr source not listed in the site radioactive materials inventory. The licensee had completed accounting for non-fuel special nuclear material at Unit 1, in response to a recommendation of the Fuel Rod Accountability Project. (R1.1)

Airborne effluent releases of radioactive material were significantly less than allowable release limits. There were no liquid effluents from Unit 1 during this inspection period. (R1.2)

Unit 1 radioactive waste shipments were completed in accordance with Millstone procedures. No safety concerns were identified. (R1.3)

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REPORT DETAILS

I. Operations

O1 Conduct of Operations

O1.1 General Comments (71801)

The licensee made significant progress at re-integrating Unit 1 back into the Millstone Station site organization and programs. Physically, much of the actions taken to separate Unit 1, such as the erecting of fences and other barriers, had been completely reversed. Some of the work to make Unit 1 "cold and dark" had also been reversed. For example, electrical power to installed lighting had been disconnected and temporary lighting strung throughout many of the buildings. Recent work had restored adequate permanent plant lighting to areas where licensee personnel routinely enter for work or operator rounds. Unit 2 Operations had taken over responsibility for Unit 1 facilities. Additionally, in late 2001 the Unit 1 Central Monitoring Station (CMS) had been closed down and the monitoring computers and programmable logic controllers for Unit 1 moved into the Unit 2 control room. Organizational units dedicated to Unit 1, such as engineering and licensing, had also been fully integrated back into the Millstone Station organization.

O1.2 Corrective Action Program

a. Inspection Scope (40801)

The inspector reviewed the corrective action program implementation and results applicable to Unit 1.

b. Observations and Findings

The inspector noted that the corrective action program (CAP) for Millstone Unit 1 is integrated into the CAP for all of Millstone Power Station. A set of 20 procedures implements the CAP, with the top-tier program description contained within Master Manual MP-16-MMM (Rev. 4, effective 9/6/01). The inspector reviewed selected program procedures and observed that the written program scope descriptions did not specifically include references to Unit 1. The licensee pointed out that the references to Unit 2 and to common systems in the procedures covered Unit 1 because Unit 2 Operations now had operational responsibility for Unit 1, and Unit 1 facilities and equipment were also covered by the definition of common systems. The inspector noted similar scoping terminology in the CAP 2001 Trend Report for Millstone Station, which indicated that the report contained "...an analysis of Millstone Unit 2, Unit 3, and common condition reports initiated during 2001." The licensee stated that all condition reports (CRs) addressing Unit 1 issues were included in the analysis documented in the report.

The licensee described the structure of the computer database used to document CRs and track resulting work assignments to final closure. The database system was

designed for Units 2 and 3 at Millstone when Unit 1 was being managed by a contractor as an independent decommissioning project, separate from Units 2 and 3. As a result, the database data entry page does not permit a CR to be identified as specific to Unit 1, as it does for Units 2 or 3. Unit 1 CRs therefore must be coded as either “Unit 2" or as “common” in the database data field. The licensee stated that CAP program guidance, while not written, provided that CRs for Unit 1 should be written including “Unit 1" or Unit One” in the title, thus enabling the database to be searched for Unit 1 related CRs by searching the title or text fields for references to Unit 1. The inspector observed that Unit 1 activities and issues were included in the CAP, however some CRs for Unit 1 issues did not include references to Unit 1 in the title and therefore were more difficult to identify when the CAP/CR database was searched.

The inspector reviewed the status of recommended corrective actions from the licensee’s Root Cause Analysis Report for the Millstone missing fuel rods. The corrective actions were described in the licensee’s Fuel Rod Accountability Project (FRAP) report and in NRC Inspection Report 50-245/2000-013. As a result of the previous corrective action recommendation to perform a physical verification of non-fuel Special Nuclear Materials (SNM) in the spent fuel pool (SFP), during April 2002 the licensee initiated two CRs due to conditions encountered while performing the inventory in the SFP. Details of the SNM verification activities are discussed in paragraph R.1.1.b of this inspection report.

c. Conclusions

The inspector concluded that the CAP was effective in identifying and tracking issues for resolution. Unit 1 issues and concerns were incorporated into the Millstone Station program, although database design limitations made searches for Unit 1 related issues and corrective actions somewhat difficult. No safety concerns were identified.

O1.3 (Closed) Unresolved Item 1997-001-01: Spent Fuel Issues

a. Inspection Scope (40801)

The inspector reviewed licensee actions and documentation addressing issues related to the unresolved item (URI).

b. Observations and Findings

The licensee had begun work on several activities planned for the Unit 1 SFP, including fully seating those fuel assemblies with mechanical interferences. In 1997, the licensee had committed to inspect fuel assemblies from below for foreign material prior to reloading the core, to restrict movement of fuel bundles in the SFP until resolution of the raised bundles issue, and to clean up the SFP, including removal of debris and various used components prior to refueling outage 16. In Inspection Report 50-245/97-01, NRC opened an unresolved item (URI 50-245/97-01-01) regarding degraded conditions in the SFP and concerns about these unseated fuel assemblies, specifically that the conditions within the SFP could impact future fuel integrity because of entrained foreign material.

The licensee subsequently decided to decommission Unit 1, and therefore outage 16 and any core reload did not occur.

The focus of the URI was on foreign material exclusion (FME) from the core during reactor operations. The NRC Inspection Report referenced a root cause analysis the licensee was planning to perform regarding FME problems in the Unit 1 SFP. In August 1997, the licensee had determined that an adequate root cause evaluation addressing previous FME corrective action effectiveness had already been performed, dated March 1995 and documented as part of ACR 03428. Since then, operational concerns from foreign material in spent fuel assemblies have become irrelevant due to the decommissioning status of Millstone 1. Significant clean up of the SFP has also occurred since the URI was opened, and the licensee has adequately maintained controls over movement of fuel bundles due to the raised bundles presenting a fuel storage configuration different than the original design of the storage racks. Additionally, the criticality concerns from raised fuel bundles in the racks had been analyzed by the licensee and documented in Engineering Record Correspondence NE-97-F-023, 25202-ER-97-0021, dated January 29, 1997. Procedure EN 1067, "Supplemental Procedure for Inventory and Control of Special Nuclear Material", Rev. 3, includes a restriction that "no fuel assembly will be moved until it is confirmed that the proposed movement is bound by a previous evaluation, or an evaluation of the proposed movement is performed".

c. Conclusions

The licensee's actions are adequately addressing the concerns regarding raised fuel bundles, controlling fuel bundle movements within the Unit 1 SFP, and there are no longer any relevant concerns regarding operational impacts from FME. The issues in the URI have been resolved or rendered irrelevant by the decision to decommission Millstone 1. This item is therefore closed. **(URI 97-01-01)**

II. Maintenance

M1 Conduct of Maintenance

a. Inspection Scope (62801)

The inspector reviewed the licensee's program to implement the maintenance rule (10 CFR 50.65) for Unit 1.

b. Observations and Findings

The inspectors discussed with responsible licensee staff the maintenance rule program being implemented for Unit 1. The maintenance rule applies to the licensee's monitoring of performance or condition of Unit 1 structures, systems, and components (SSCs) associated with the storage, control, and maintenance of spent fuel in a safe condition. The following documents were reviewed as part of the inspection:

- Minutes of the expert panel meeting conducted on January 16, 2002.

- Proposed draft of revision 3 to the Unit 1 Maintenance Rule Unit Basis Document.
- Procedure DEC 1510, "Unit 1 Decommissioning Maintenance Rule Program", Rev. 1 and proposed rev. 2.
- Procedure DEC 1510.01, "Scoping, Importance Ranking, and Performance Criteria Assignment Using an Expert Panel Within the Maintenance Rule Program During Decommissioning of Unit 1", Rev. 1 and proposed rev. 2.
- Procedure DEC 1510.02, "Guidelines for the Unit 1 Decommissioning Maintenance Rule Program Implementation", Rev. 1 and proposed rev. 2.
- Millstone Station Maintenance Rule Program (a)(3) Periodic Assessment Report, covering Unit 1 for the period June 2000 through August 2001.

The licensee had determined that 12 systems at Unit 1 were within the scope of the maintenance rule, with three of these (fuel pool liner, fuel storage racks, and the reactor building structure which support the SFP) remaining as the only nuclear safety-related SSCs. These are all passive structures and components, with their condition monitored to implement the maintenance rule program. The licensee does not monitor performance nor track availability because these are passive SSCs that are not removed from service for maintenance. Maintenance work at Unit 1 was being performed as necessary to maintain important equipment, with a minimal backlog of scheduled activities.

c. Conclusions

The licensee was adequately addressing the maintenance rule. No safety concerns were identified.

III. Engineering

E1 Conduct of Engineering

a. Inspection Scope (37801)

The inspector reviewed current engineering projects and planning for upcoming work related to Unit 1 decommissioning.

b. Observations and Findings

Licensee staff described the following planning and engineering work in progress:

- Re-seat the unseated fuel assemblies in the SFP
- Move fuel assemblies within the Holtec racks to a "3 out of 4" rack position configuration in which the Boraflex neutron absorber material is neither credited nor necessary for reactivity control
- Remove/dispose of irradiated hardware taking up some of the rack locations. (Disposal is dependent on the burial site permitting resumption of irradiated hardware disposals)

- Remove the top fuel guide rack from the reactor pressure vessel (RPV). This will remove the greater than Class C radioactive material currently in the reactor vessel, which will be stored in the SFP.
- Drain the water now filling the RPV. Process the water as necessary for discharge.
- Cover the remaining RPV hardware with shielding material to control radiation levels on the refueling floor.

Engineering work was at an early stage, with evaluations in progress. The licensee had recently approved performance of the work, enabling planning to go beyond the preliminary stage. Contractors were expected to visit the site during summer 2002, with most work expected to occur following the fall 2002 Unit 3 refueling outage.

c. Conclusion

Safety reviews related to engineering work activities were in progress for planned major activities. The licensee's project organization and management were beginning detailed planning for the work. No safety concerns were identified.

IV. Plant Support

R1 Radiation Protection & Chemistry (RP&C) Controls

R1.1 Radiation Protection Program

a. Inspection Scope (83750)

The inspector reviewed the radiation protection program implementation at Unit 1.

b. Observations and Findings

Unit 1 radiation protection (RP) responsibilities have been integrated into the Millstone Station site organization. Routine surveys and other activities are performed by Station RP personnel assigned to Unit 1. Workloads have been minimal, with planning beginning for draining of the RPV and removal of greater than class C radioactive materials for storage in the spent fuel pool. RP was appropriately involved in the planning of the RPV draindown project.

The licensee had discovered a radiation detector containing a radioactive ^{90}Sr source stored in the former Unit 1 maintenance shop area. It was not expected that any radioactive sources remained in Unit 1 areas following an inventory search during 1999-2000 of installed process instrumentation to identify and remove all sources. The ^{90}Sr source was not listed in the licensee's radioactive source inventory, and the licensee determined that it should have been included in the inventory per Station procedures. The licensee initiated CR 02-06144 to document the issue and ensure adequate corrective action.

The inspector also reviewed the licensee's efforts to inventory and account for SNM contained in IRMs in the SFP. As part of the corrective actions identified during the licensee's Millstone 1 Fuel Rod Accountability Project (FRAP), which investigated the two spent fuel rods missing from the Unit 1 SFP, it was recommended as part of the corrective action to confirm the non-fuel SNM inventory at Millstone 1. The IRMs, which are nuclear instrumentation detectors, contain small quantities of SNM and are therefore carried as part of the licensee's inventory. Records indicated that three IRMs were located in a "basket on the east wall of the SFP." On April 3, 2002, the licensee was unable to examine the contents of a basket in the SFP believed to contain the IRMs due to interference from filters in the basket which obscured its contents. Removal of the filter materials was subsequently performed on April 15 and 16, 2002, and the contents of the basket examined. No IRMs were identified among the materials in the basket, and additional containers in the SFP were then searched. The IRMs were located in the second container examined, also on the east wall of the SFP, thus verifying the non-fuel SNM in the SFP and completing the FRAP corrective action item 00010931-37. Non-fuel SNM was handled or observed directly and accounted for except for the monitors which remain installed within the Unit 1 reactor vessel. The licensee stated these remaining 42 detectors are inaccessible and no work has been performed which would have moved or impacted the detectors since they were installed.

Following verification of the IRMs in the SFP, the licensee transferred the three IRMs into another storage container and transferred the container to a different SNM Item Control Area, the Unit 1 Traversing Incore Probe (TIP) room, for long term storage. The inspector observed the tamper-sealed storage cabinet within the locked TIP room. CR-02-05771, "Unit 1: SNM (3 IRMs) were moved prior to completing MTFs", was initiated to assure corrective action. Documentation of this SNM transfer was captured on the pertinent work order.

c. Conclusions

Unit 1 RP activities had been successfully integrated back into the Millstone Station RP programs. RP surveys were appropriate for the level of work being performed at Unit 1, and RP was involved in planning of work to drain water from the Unit 1 reactor vessel, a significant upcoming work activity. The licensee responded adequately to, and was investigating discovery of a small ^{90}Sr source not listed in the site radioactive materials inventory. The licensee had completed accounting for non-fuel SNM at Unit 1, in response to a recommendation of the FRAP.

R1.2 Radwaste Processing and Effluent Monitoring

a. Inspection Scope (84750)

The inspector reviewed the processing and monitoring of gaseous and liquid effluents.

b. Observations and Findings

There were no liquid effluents from Unit 1 during this inspection period. Liquids that collect in the Unit 1 containment sumps are pumped into a holding tank and evaporated as a batch, with vapor exhausted into the balance of plant (BOP) ventilation exhaust, a monitored release pathway. Prior to operation of the evaporator to process a batch, the holding tank is sampled and analyzed for tritium and gamma emitting radionuclides. The inspector observed the evaporator, which was operating at the time of the inspection. The inspector also noted the operator aid posted on the Unit 1 monitoring computer display, located in the Unit 2 control room, used to alert operators that the evaporator was in operation.

The SFP island and BOP ventilation exhaust systems are both continuously sampled for particulates, Particulate filters are changed and analyzed every two weeks on the SFP island exhaust system, and the BOP filters are changed and analyzed at least twice per month in accordance with Millstone procedures. The SFP island system is also sampled and analyzed for tritium at least monthly.

The inspector reviewed the results of analyses of effluent samples collected from October 2001 through May 2002. All sample analysis results were very low values, with most reported as less than the minimum detectable activity. As of April 8, 2002 (the most recent cumulative calculation), the licensee determined using the Radiological Environmental Monitoring Offsite Dose Calculation Manual that the Unit 1 discharges of gaseous radioactivity were equivalent to maximum offsite doses that were 0.002% of the 7.5 mrem quarterly limit and 0.001% of the 15 mrem annual limit for 2002.

c. Conclusions

Releases of radioactive material were significantly less than allowable release limits. No safety concerns were identified by the inspector.

R1.3 Solid Radioactive Waste Management

a. Inspection Scope (86750)

The inspector reviewed the management of solid radwaste related to Unit 1 through discussions with responsible personnel and review of records.

b. Observations and Findings

The inspector reviewed document packages for selected shipments of radioactive waste from Unit 1 during the period January 2001 through June 2002. Document packages

were complete and included mobile crane lift plans, waste package inspection results, truck inspections, state transportation permits, waste characterization data, truck radiation surveys, and individual package radiation surveys. The inspector also reviewed selected documentation of waste shipped to processors and records of subsequent shipments from the processor to the disposal site. In 2001, there were 53 such shipments, with 13 more during 2002 (through May 20). The processor provided the licensee with detailed records of radioactive material received, processed, stored, and disposed.

The inspector observed activities on the refueling floor related to removal of control rod blades from the spent fuel pool and placement into shipping containers for disposal. A seavan container wrapped in plastic was staged near the SFP to enable loading of control rod blades after removal from the SFP.

Following the licensee's investigation and NRC inspection of the spent fuel missing from Unit 1 (Inspection Report 05000245/2001013), the State of South Carolina (SC) had imposed limitations on the type of radioactive waste that the Barnwell disposal site could accept from Millstone. The restriction was imposed pending acceptable corrective actions by the licensee to satisfy SC that only acceptable types of waste (with assurance that no spent fuel rods or fragments are included) would be sent for disposal from Millstone. During this inspection period, the licensee met with representatives of SC to discuss corrective actions taken and what the State required to enable lifting of the restrictions on Millstone shipments for disposal. The licensee continued to work toward satisfying the concerns of SC and stated that the meetings were productive. The licensee plans to take action to resolve SC concerns as soon as possible to enable resumption of waste shipments.

c. Conclusions

Unit 1 radioactive waste shipments were completed in accordance with Millstone procedures. No safety concerns were identified.

V. Management Meetings

X1 Exit Meeting Summary

The inspectors met with licensee management representatives following each site visit during the inspection period and discussed the results of the inspection. The licensee acknowledged the findings presented.

PARTIAL LIST OF PERSONS CONTACTED

Licensee

D. Meekhoff, Supervisor, Operations Support
R. Griffin, Manager, Radiation Protection and Chemistry
J. E. Laine, Supervisor, Radiation Protection
P. Tulba, Supervisor, Waste Services
G. Holtz, Health Physicist, Radiation Protection and Chemistry
T. Petit, Project Manager, Engineering
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M. Jaworsky, Licensing
W. Eakin - Manager, Station Effluents and Environmental Monitoring Group
W. Gorman, Supervisor, Unit 3 I & C
B. Robinson, Radiation Protection
H. McKenney, Supervisor, Reactor Engineering
V. Wessling, Supervisor, Corrective Actions

INSPECTION PROCEDURES USED

36801	Organization, Management, and Cost Controls at Permanently Shutdown Reactors
37801	Safety Reviews, Design Changes and Mods
40801	Self-Assessments, Auditing, and Corrective action
62801	Maintenance and Surveillance at PSRs
71801	Decommissioning Performance and Status at Permanently Shutdown Reactors
83750	Occupational Radiation Exposure
84750	Radioactive Waste Treatment, and Effluent and Environmental Monitoring
86750	Solid Radwaste Management and Transportation

ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

None

Closed

URI 97-001-01 Spent Fuel Pool Cleanliness

Discussed

URI 97-001-01 Spent Fuel Pool Cleanliness

LIST OF ACRONYMS USED

BOP	Balance of Plant
CAP	Corrective Action Program
CMS	Central Monitoring Station
CR	Condition Reports
FME	Foreign Material Exclusion
FRAP	Fuel Rod Accountability Project
IRM	Intermediate Range Monitor
RP	Radiation Protection
RPV	Reactor Pressure Vessel
SFP	Spent Fuel Pool
SFPI	Spent Fuel Pool Island
SNM	Special Nuclear Material
SC	South Carolina
SSC	Structures, Systems and Components
URI	Unresolved Item