

# NORTHEAST UTILITIES



THE CONNECTICUT LIGHT AND POWER COMPANY  
THE HARTFORD ELECTRIC LIGHT COMPANY  
WESTERN MASSACHUSETTS ELECTRIC COMPANY  
HOLYOKE WATER POWER COMPANY  
NORTHEAST UTILITIES SERVICE COMPANY  
NORTHEAST NUCLEAR ENERGY COMPANY

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September 25, 1979

Docket No. 50-245

Mr. Eldon J. Brunner  
Chief Reactor Operations  
and Nuclear Support Branch  
U. S. Nuclear Regulatory Commission  
631 Park Avenue  
King of Prussia, Pennsylvania 19406

Reference: Inspection 50-245/79-19

Dear Sir:

In reference to your letter received September 4, 1979, this report is submitted pursuant to the provisions of Section 2.201 of the NRC's "Rules of Practice", Part 2, Title 10, Code of Federal Regulations.

## 1. Apparent Item of Noncompliance

Technical Specifications, Section 4.2, Table 4.2.1, requires a functional test to be performed on the ventilation exhaust duct and refueling floor radiation monitors, once every 3 months. Technical Specifications, Section 1, Item F defines "instrument functional test" to mean the injection of a simulated signal into the instrument primary sensor to verify the proper instrument channel response, alarms, and/or initiating action.

Contrary to the above, the functional test of the above described equipment consisted of injecting an electrical signal into the measurement channel and not testing the primary sensor as required.

## Response

The apparent item of noncompliance involved insertion of an electrical signal into the measurement channel rather than conducting the test with a known source applied to the primary sensor. The subject surveillance procedure has now been modified to specifically require the use of a known source at the primary sensor for demonstration of functional operability.

Presently, a Technical Specification change is being processed to allow the use of an inserted electrical signal for this functional demonstration. This is being done for two reasons. First, the radiation monitors have installed radiation sources which continuously demonstrate the functional response of the instrument channel. Secondly, since the primary sensors are already source calibrated quarterly, it is not felt that the additional personnel exposure incurred during a monthly source functional demonstration is justified consistent with the present ALARA program.

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2. Apparent Item of Noncompliance

Technical Specifications, Section 6.8.1, requires that procedures be established, implemented and maintained for surveillance activities.

The administrative control procedure, ACP-QA-9.02 requires the review of surveillance test data sheets for compliance with the established acceptance criteria and to write on the data sheet the basis for accepting those items not within the established acceptance criteria.

Contrary to the above, the inspector found eight surveillance tests where the data on the data sheets did not meet the established acceptance criteria and were not properly reviewed as required by the licensee's administration procedures.

Response

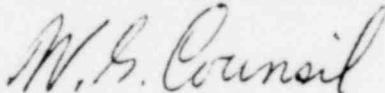
This apparent item of noncompliance involved improper review of surveillance test data sheets.

Surveillance test data sheets often contain more information, in the form of test data, than is required to meet the Technical Specification requirement for the specific surveillance test. The non Technical Specification information is typically used for component trending/reliability studies and therefore reviewed by the particular discipline requesting the information.

Personnel responsible for test data sheet review have been reminded to more closely compare the test data to ensure Technical Specification requirements are met and note any deviations from non Technical Specification data so that the appropriate discipline review can occur.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



W. G. Council  
Vice President

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