NCRTHEAST UTILITIES



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August 10, 1979

Docket Nos. 50-245 50-336

Mr. George H. Smith, Chief
Fuel Facility and Material Safety Branch,
Region I
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, Pennsylvania 19406

Reference: Nuclear Regulatory Commission, Office of Inspection and

Enforcement, Inspection 50-245/79-06, 50-336/79-06

Dear Mr. Smith:

Pursuant to the provisions of Section 2.201 of the NRC's "Rules of Practice" Part 2, Title 10, Code of Federal Regulations, this report is submitted in reply of your letter dated July 19, 1979, which informed the Northeast Nuclear Energy Company of apparent items of non-compliance with NRC regulations.

Appropriate responses are provided below each item of non-compliance. No response is provided for item C since corrective action has previously been taken and documented in the above referenced inspection report.

## Item A

Section 3.2 of the Environmental Technical Specifications (ETS) requires, in part, that environmental samples shall be collected and analyzed according to Tables 3.2-1 and 3.2-2 at the locations shown in Figure 3.2-1 through 3.2.3. Table 3.2-2 requires that oyster samples be collected, and analyzed for gamma spectrum, Sr-89, Sr-90, and I-131, from three locations including one location within 500 feet of the discharge canal.

Contrary to these requirements, cyster samples were not collected and analyzed from the required location within 500 feet of the discharge canal during 1978.

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## Response

Immediate corrective action has been taken to relocate the oyster sample trays at a point within the quarry which is within 500 feet of the discharge canal. This sample location is considered more conservative since it is upstream of the Quarry Cut in an area that is inaccessible to the general public. Personnel have been notified that the present sampling location should not be changed until appropriate Technical Specifications changes have been issued.

Long term corrective action consists of the submittal of the Appendix I, Technical Specifications, whereby sampling locations will be specified based on the natural availability of shellfish and food pathways to man.

#### Item B

Section 3.1.2.1.10 of the ETS requires, in part, that a minimum of three days each week, with no more than four days between counts, fish and shell-fish washed from the traveling screens into the collection baskets over a 24-hour period shall be identified, counted, and the length recorded according to three categories for each unit.

Contrary to these requirements, the required fish impingement sample collected for 24-hour on March 14, 1979, was inadequately sampled in that the sample was added to previously collected debris and fish resulting in erroneous counting and identification of the impinged fish.

### Response

Fish impingement monitoring at Millstone Unit 1 ordinarily does not require that the daily screen wash be dumped into the concrete trough to facilitate fish counting. Two baskets set side by side in the basket pit and the impingement counter simply rakes through the seaweed, separates out the organisms, and dumps the seaweed into the second basket. Occassionally during storm conditions, however, both baskets fill and it becomes necessary to sort through the debris by placing it in the trash trough.

To preclude the mixing of screen wash material from separate days, personnel responsible for fish impingement monitoring have been informed not to dump screen wash basket contents directly onto old material. Further, by August 31, 1979, the impingement monitoring procedure EPB-11-1-10 will be revised to reflect same.

# Item D

Section 2.3.1.2 of the ETS requires that simultaneous continuous chlorination at Unit 1 and Unit 2 can occur only when the intake water temperature is between  $45^{\circ}F$  and  $55^{\circ}F$ .

Contrary to this requirement, on December 10 and 11, 1977, simultaneous continuous chlorination of Unit 1 and Unit 2 was performed while the intake water temperature was  $43^{\circ}F$ .

## Response

Chemistry Form 813/2813-1 was revised on July 5, 1979, to include instructions to the Chemistry Technician to advise the Shift Supervisor(s) that the limiting temperature (either  $46^{\circ}F$  or  $54^{\circ}F$ ) has been reached and continuous chlorination must be terminated. The procedural limits of  $46^{\circ}F$  and  $54^{\circ}F$  are within the ETS limits of  $45^{\circ}F$  and  $55^{\circ}F$ . These measures should preclude recurrence of this deficiency.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

W. G. Counsil Vice President

By:

W. F. Fee Vice President