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P.O. BOX 270 HARTFORD, CONNECTICUT 06101 (203) 666-6911

January 31, 1979

Mr. Eldon J. Brunner, Chief Reactor Operations and Nuclear Support Branch Office of Inspection and Enforcement U. S. Nuclear Regulatory Commission Region I 631 Park Avenue King of Prussia, PA 19406

Reference: NRC Inspection 50-336/78-37

Dear Mr. Brunner:

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 to your letter of January 10, 1979 which informed the Northeast Nuclear Energy Company of certain activities conducted in apparent noncompliance with NRC requirements.

ITEM OF NONCOMPLIANCE

Technical Specification 4.6.1.3.b requires that the containment air lock be leak tested at pressure Pa at least once per six months.

Contrary to the above, as of December 20, 1978, the last leak test at pressure Pa conducted on the containment air lock was on April 10, 1978.

The inspector noted that a successful leak test was conducted on the containment air lock prior to the conclusion of the inspection on December 22, 1978.

RESPONSE

Corrective steps which will be taken to avoid further items of noncompliance in this area consist of the following:

 The responsible supervisors have been informed of the seriousness of the violation and reminded of the importance of full compliance with the Technical Specifications. Mr. Eldon J. Brunner, Chief - Page 2

- 2. An Operations Department status board will be developed for surveillance with a frequency of quarterly or longer. This board will provide the latest completion date and the month when the item is next scheduled and when next required. This will provide a backup to the Departmental Test Control List.
- 3. The Operations Department Test Control List (computer printout) will be updated to remove all miscellaneous tests so that each computer entry will normally require a completion date. (See paragraph 5 regarding miscellaneous items.) Thus the exceptions would be more easily identified and corrective action taken before the test was overdue. In addition all tests with multiple data sheets will be annotated to identify the feature.
- 4. An independent review of the Operations Department Test Control List will be completed by an individual not in the department. This review will ensure a correct entry is indicated for each item on the list.
- 5. A review of all surveillance items will be completed to ensure all requirements are adequately covered by an approved surveillance procedure. In addition it will be verified that a tracking mechanism exists for scheduling the items, particularly the miscellaneous. The mechanisms would be the Department Test Control Lists, outage schedules, and/or procedures.

Full compliance with the specifications was achieved on December 22, 1978. Implementation of the corrective actions will be complete by February 1, 1979.

Very truly yours,

Northeast Nuclear Energy Company

W. G. Counsil Vice President

WGC/ECF/11m