

U.S. NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT

Region I

Report No. 50-336/78-31

Docket No. 50-336

License No. DPR-65 Priority -- Category C

Licensee: Northeast Nuclear Energy Company

P. O. Box 270

Hartford, Connecticut 06101

Facility Name: Millstone Nuclear Power Station, Unit 2

Inspection at: Waterford, Connecticut

Inspection conducted: September 26-29, 1978

Inspectors: R. P. Zimmerman for
R. J. Conte, Reactor Inspector

10/26/78
date signed

R. P. Zimmerman
R. P. Zimmerman, Reactor Inspector

10/26/78
date signed

date signed

Approved by: H. B. Kister for
H. B. Kister, Chief, Nuclear
Support Section No. 2, RO&NS Branch

10/27/78
date signed

Inspection Summary:

Inspection on September 26-29, 1978 (Report No. 50-336/78-31)

Areas Inspected: Routine, unannounced inspection by regional based inspectors of administrative controls of safety related maintenance; documented activities associated with completed safety related maintenance; qualification records of selected individuals who performed safety related maintenance; licensee action on previous inspection findings; and, conditions in the control room as noted by inspector tour. The inspection involved 50 inspector-hours onsite by two NRC regional based inspectors.

Results: Of the five areas inspected no items of noncompliance were found in four areas, two apparent items of noncompliance were found in one area (Infraction - failure to identify safety related parts and therefore receipt inspection and material control requirements were not implemented, Paragraph 4.e; Deficiency - failure to document functional acceptability of safety related maintenance, Paragraph 4.c).

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DETAILS

1. Persons Contacted

- M. Black, Unit 3, Unit Superintendent
- D. Clark, Shift Supervisor
- *G. Closius, Unit 2, Quality Control (QC) Engineer
- *F. Dacimo, Quality Assurance (QA) Supervisor
- E. Farrell, Superintendent, Unit 2
- H. Hunter, Maintenance Technician
- A. Mazzulli, Maintenance Foreman
- *E. Mrozcha, Station Service Superintendent
- *J. Opeka, Plant Superintendent
- R. Place, Maintenance Supervisor

The inspector also interviewed other licensee employees, including members of the technical staff and control room operators.

*denotes those present at the exit interview

2. Licensee Action on Previous Inspection Findings

(Closed) Unresolved (366/77-03-19): Review of Control Room Job Order File. It was determined that this file is for information purposes only with respect to the nature of outstanding maintenance activities, and not to ascertain equipment status in the control room. ACP 2.02 was revised (Revision 8 dated June 20, 1978) to permit discarding the control room copy of the JO after completion of the maintenance activity. Further ACP 2.02 provides for the forwarding of the original JO (completed white copy) to QA for review and record retention upon completion of all JO requirements.

The inspector noted that the JO form still requires the forwarding of the Control Room copy to QA. The licensee representative stated the revision to this form is not imminent due to the extensive bank of blank forms and that the ACP governs the use of these forms as the overruling document. The inspector had no further questions in this area.

(Closed) Unresolved (336/78-05-02): Applicability of 10 CFR 50.59 to Revisions of Administrative Procedures. Revision 2 to ACP-QA-105, Site Operations Review Committee, incorporated the requirement to review administrative procedure changes for unreviewed safety questions with respect to changes in procedures as described in the Final Safety Analysis Report. Further, documentation of such a review was observed in the committee's meeting minutes for several administrative procedures.

Based on this review Item (245/78-04-02) for Unit 1 is also closed.

(Closed) Noncompliance (336/78-05-01): Failure to properly document temporary changes. Revision 6 to ACP-QA-3.02 establishes the use of a vertical line as an administrative aide to indicate effective temporary changes in applicable areas of facility procedures. This was accomplished based on the recommendations of several QA audits conducted in this area.

Inspector review of selected procedures with effective temporary changes indicated extensive use of the subject administrative aide. The inspector stated that this area will be reviewed in subsequent inspections to insure that the control of temporary change is maintained.

Based on this review Item (245/78-04-01) for Unit 1 is also closed.

3. Procedures for Administrative Control of Safety Related Maintenance

The inspector reviewed the licensee's administrative controls for safety related maintenance as detailed in the following procedures:

- Administrative Control Procedure (ACP)-QA-2.01, Revision 1, July 31, 1978, Quality Assurance Program Boundary;
- ACP-QA-2.02, Revision 9, September 26, 1978, Performing Category I Work;
- ACP-QA-2.02A, Revision 4, August 8, 1978, Installation Inspections;
- ACP-QA-2.02B, Revision 2, August 8, 1978, Retests;
- ACP-QA-2.03, Revision 0, August 7, 1977, Maintenance Requests;
- ACP-QA-2.06, Revision 5, August 3, 1978, Station Tagging and Bypass/Jumper Control;
- ACP-QA-2.07, Revision 2, July 31, 1978, Control of Special Processes;
- ACP-QA-2.08, Revision 1, May 24, 1977, Preventive Maintenance;
- ACP-QA-4.01, Revision 6, August 9, 1978, Plant Housekeeping.

No items of noncompliance were identified.

4. Review of Safety Related Maintenance

- a. The licensee performs the majority of safety related maintenance items through Job Orders as detailed in ACP-QA-2.02. However, certain Category I work is performed on Maintenance Requests as deemed appropriate by the licensee. The inspector reviewed safety related maintenance conducted by both methods on a sampling basis to verify that:
- Limiting Conditions for Operations (LCO's) were met while equipment was out of service;
 - Required administrative approvals were obtained to perform the work;
 - An approved procedure was used where required;
 - Required inspections were performed;
 - QA/QC records were available to substantiate quality of work and parts used; and,
 - A Reportable Occurrence, if required by Technical Specifications, was submitted based on review of circumstances associated with the maintenance activity.
- b. The following completed safety related maintenance items were reviewed.
- Job Order (JO) 70218, completed July 12, 1977, LPSI Pump "A" - retorque suction flange.
 - JO 80183, April 12, 1978, Safety Injection Actuating System - modify wiring on Relay K515C.
 - JO 80012, January 18, 1978, "A" Diesel Generator - replace #6 piston and liner.
 - JO 80227, May 20, 1978, Coolant Charging Pump "B" - repack and replace plunger.
 - JO 80117, March 9, 1978, Containment - transfer penetration wires in I.R.circuit WB2.
 - JO 70458, December 22, 1977, Main Steam System - clean and repack 2MS-12A.
 - JO 80193, April 20, 1978, Auxiliary Feed Pump-uncouple, check overspeed and recouple.

- JO 80027, March 27, 1978, Spray Injection System - replace Level Transmitter LT 1123D.
- JO 80233, June 26, 1978, Fuel Pool - install permanent upper end fitting on irradiated fuel assembly.
- JO 80274, August 17, 1978, Containment Particulate Detector - replace 96560 photomultiplier tube.
- JO 80216, May 5, 1978, Charging System - install new motor in 2CH-5104.
- JO 7224, August 5, 1977, LPSI Pump "A" - replace studs in section line spool piece.
- JO 80263, August 1, 1978, HPSI pump "A" - replace thrust bearings.
- Maintenance Request (MR) 406-78, March 1, 1978, Diesel "A" Service Water Heat Exchanger - cleaning;
- MR 793-78, April 14, 1978, Motor Driven Auxiliary Feed Pump (P-90) - packing adjustment;
- MR 3535-17, December 20, 1977, No. 1 Steam Generator Bottom Blowdown Isolation Valve (2-MS-12A) - mating surface inspection;
- MR 2782-77, October 1, 1977, Steam Generator Atmospheric Relief Isolation Valve (2-MS-3A) - packing adjustment;
- MR 1886-78, July 28, 1978, "C" Reactor Building Closed Cooling Water Heat Exchanger - inspection of service water side;
- MR 1203-78, May 11, 1978, "B" Service Water Supply Isolation to "B" Diesel (2-SW-12C)-replaced stem and bushing;
- MR 1194-78, May 10, 1978, "A" Service Water Supply Isolation to "A" Diesel (2-SW-12B) - replaced stem and bushing;
- MR 1466-76, January 9, 1978, Shutdown Cooling System Primary Isolation Valve (2-SI-652) - repacked valve;

- MR 1051-78, May 2, 1978, "A" Boric Acid Pump-recoupled; and,
- MR 3354-77, December 2, 1977, "B" Containment Spray Suction Flange - repaired leak.

- c. During the review of Maintenance Requests (MR) it was determined that certain safety related activities were controlled by the MR form in distinction to the JO form. The MR form meets the procedural requirements of ANSI 18.7-1972 for the conduct of safety related maintenance. However, the Post-Maintenance Check Out and Return to Service requirements were not implemented in that complete instructions were not included or referenced for equipment return to normal operating status and there was no documentation of equipment functional acceptability by the operations department. The instances where this occurred were observed for the following MR's: 406-78, 793-78, 1194-78, and 1051-78.

This represents an apparent noncompliance (deficiency) with 10 CFR 50, Appendix B, Criterion V; Northeast Utilities quality Assurance Manual, Volume II, paragraph 2.3.1.1, ANSI 18.7, 1972, paragraph 5.3.5 (3), and ACP-QA-2.03. (336/78-31 -01)

Further investigation revealed that it appeared adequate post maintenance check out and return to service was conducted at some short time interval after the performance of the subject activities. However it remained questionable as to whether or not post maintenance testing was conducted directly as a result of the specific maintenance activities referenced.

- d. Associated with the review of MR's for safety related activities it was determined that specific record retention requirements for these MR's have not been established. Administrative Procedure ACP-2.03, Revision 0, August 7, 1977, Maintenance Requests, states in part that the department head "may" retain the MR, implying that it could be discarded.

A sample review of completed MR's revealed no instances where the MR form had been discarded.

The licensee representative stated that the area of the use of MR for certain safety related maintenance activities, including record retention requirements, would have to be reviewed.

This is unresolved pending license action as stated above and subsequent NRC:RI review. (336/78-31-02)

- e. The inspector reviewed the licensee's Material Equipment and Parts List (MEPL), Revision 4, August 31, 1978 with respect to JO 80012, JO 80227, MR 1194-78, and MR 1203-78. This list identifies those structures, systems, and components to be covered by the quality assurance program as required by 10 CFR Part 50, Appendix B, Criterion II. It appeared to the inspector that the list was not complete with respect to internal parts that perform safety related functions of pumps, valves and emergency diesel generators.

In particular for Diesel Generator "A" on January 9, 1978 various internal parts that perform a safety function such as a thrust bearing, piston and liner were replaced (50-88012). For Charging Pump "B" on May 16, 1978 the oil seals and a plunger were replaced (50-80227). In both cases, since these type of parts were not specifically listed on the MEPL, no receipt inspections was conducted nor were these parts identified as acceptable for use.

This represents an apparent noncompliance (infraction) with 10 CFR 50 Appendix B, Criterion II, VII, VIII and with the QA program Northeast Utilities Quality Assurance Manual, Volume II, Revision 3, June 23, 1975, Section 2. (366/78-31-03)

5. Technician Qualifications

The inspector reviewed the qualification records of selected technicians having responsibility for maintenance of safety related systems and components to verify that the individual's experience level and training were in accordance with the guidelines of ANSI N18.1-1971, Selection and Training of Nuclear Power Plant Personnel.

No items of noncompliance were identified.

6. Control Room Operations

The inspector observed control room operations for proper control room manning, and facility operation in accordance with selected Administrative and Technical Specification requirements.

No items of noncompliance were identified.

7. Unresolved Items

Unresolved items are matters about which more information is required in order to ascertain whether they are acceptable items, items of noncompliance, or deviations. An unresolved item identified during this inspection is discussed in Paragraph 4.(d).

8. Exit Interview

The inspectors met with licensee representatives (denoted in Paragraph 1) at the conclusion of the inspection on September 29, 1978. The inspector summarized the scope and findings of the inspection.

Subsequent discussions of the inspectors' findings occurred in telephone conversations between the licensee and NRC:I on October 6, 18, and 19, 1978.