

NORTHEAST UTILITIES

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

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October 12, 1989

Docket Nos. 50-24550-33650-423B13384

Re: Inspection Report
Nos. 50-245/89-18,
50-336/89-18, and
50-423/89-15

Mr. R. M. Gallo, Chief
Operations Branch
Division of Reactor Safety
U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

Reference: R. M. Gallo letter to E. J. Mroczka, Combined Inspection Report
Nos. 50-245/89-18, 50-336/89-18, and 50-423/89-15.

Dear Mr. Gallo:

Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3
Response to Combined Inspection Report
Nos. 50-245/89-18, 50-336/89-18, and 50-423/89-15

In the referenced letter, the U.S. Nuclear Regulatory Commission (NRC) identified a concern (Unresolved Item 4.2, 30-day response) regarding the untimely response within Northeast Nuclear Energy Company (NNECO) to some internal Quality Services Department audit findings. The NRC requested that this concern be addressed. Accordingly, NNECO is hereby informing the NRC of actions taken or proposed by NNECO to address this matter.

The inspection refers to Northeast Utilities Service Company (NUSCO) Audit A0455, Purchasing. This audit was previously discussed in the Combined Utility Assessment Team (CUAT) audit report issued June 20, 1989. The NRC inspection echoes concerns from the CUAT audit. Actions taken to resolve the CUAT audit concerns therefore also respond to the NRC's unresolved item.

The corrective actions described may be grouped into three areas: those actions already taken, those that are in progress, and those actions that will be implemented upon revision to the governing Nuclear Engineering and Operations (NE&O) procedure.

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Actions Already Taken

1. Millstone Station Memo MP-133383, dated August 10, 1989, was sent by the Station Superintendent to the superintendents and department heads at Millstone Station. In this memo, he stressed the unacceptability of the station's current level of performance in the resolution of audit findings. This memo charged each superintendent and department head with maintaining close communications with the auditing organization to identify issues as they develop and to ensure full and open communications between the station and the Quality Service Department (QSD) during the audit process. He expects that this action will help ensure that station responses will correctly address issues identified by QSD in a timely fashion.
2. QSD has begun reporting the frequency and status of late, unacceptable, and extended audit responses. This report (C. F. Sears to E. J. Mroczka, CFS-89-133, dated August 9, 1989) highlighted this problem to all levels of management within NE&O. This action alone is expected to result in improvements. Unacceptable performance will be identified and corrected by increased management attention. The report will be issued every six months. This frequency may be revised at a future time as performance warrants.

Actions in Progress

1. The Station Superintendent is actively promoting his expectations to the superintendents and through them to the department heads at staff meetings. He will continue to address elevated attention to audit responsiveness until such time as he is satisfied that this problem is culturally resolved.
2. QSD is working to better communicate emerging issues to the department heads during the audit process. The Station Superintendent expects this to reduce any possible propensity for surprises at postaudit meetings and to ensure that findings are fully understood at the time of the postaudit meeting. This will enable NNECO to provide acceptable responses in a timely fashion.

Proposed Procedural Changes

Implementation of the following corrective actions requires a revision to NEO 3.07, "Response to Audit Findings." The changes described are preliminary in nature but are expected to be implemented as described. The revision will be completed by December 31, 1989.

1. Due dates for audit findings will be addressed and mutually agreed to at the time of the postaudit meetings. Responses that require more than 30 days to generate will be identified at this time.

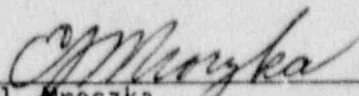
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2. The postaudit report will be addressed to the Unit Superintendent level instead of the Station Superintendent level. This action will reduce delays in the assignment of corrective action to the responsible department and allow the Station Superintendent to perform an oversight role in providing acceptable responses on a timely basis.
3. The QSD Supervisor will be empowered to grant only one extension for audit responses of a maximum of 30 days. Subsequent extensions will be requested by the next higher level of management and granted by the Director--QSD.
4. Responses found by QSD to be inadequate will be addressed by the QSD Supervisor one time only. Subsequent inadequate responses will be resolved by the next higher level of station management and the Director--QSD.

We believe the above actions will appropriately address the concern of untimely audit responses in the future.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



E. J. Mroczka
Senior Vice President

cc: U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

W. T. Russell, Region I Administrator
M. L. Boyle, NRC Project Manager, Millstone Unit No. 1
G. S. Vissing, NRC Project Manager, Millstone Unit No. 2
D. H. Jaffe, NRC Project Manager, Millstone Unit No. 3
W. J. Raymond, Senior Resident Inspector, Millstone Unit Nos. 1, 2, and 3