



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PENNSYLVANIA 19406

JUL 12 1989

RI-87-A-0113
50-336

Mr. John Delcore
244 Saint Johns Street
New Haven, CT 06511

Dear Mr. Delcore:

This letter responds to your statement to the NRC at East Lyme, Connecticut, on June 13, 1989, and to your June 27, 1989 telephone call to the NRC senior resident inspector at Millstone. A copy of the transcript of your statement and the October 16, 1987 NRC letter to you (signed by my subordinate, Ebe C. McCabe, Jr.) are enclosed for reference.

The enclosed transcript has been reviewed by me and other NRC managers on a regional NRC Allegation Panel. Our review noted that your general concern about non-nuclear activities not being controlled by the nuclear tagout procedure remains.

We also noted that the transcript of your June 13, 1989 statement alleges that the October 16, 1987 letter from the NRC stated: "...if they (tagging procedures) were not being followed in a non-nuclear capacity, that would carry over into the nuclear capacity." We differ on this point. Our October 16, 1987 letter (Enclosure 2) did not make such a statement.

Our regulatory position is that non-nuclear activities must not adversely impact nuclear activities, but nuclear grade procedures need not be used to achieve that. If necessary, we can require nuclear grade controls over related non-nuclear areas. In the case you identified, NRC follow-up found no unsafe condition and no carryover into the nuclear area.

We do agree with you that performing similar activities under different procedures can potentially have an adverse impact on following procedures, including safety-related procedures. We do not agree that necessarily happens unless nuclear grade controls are generally applied to non-nuclear activities. Lesser controls are acceptable in most non-nuclear cases. If a carryover into nuclear safety is specifically indicated for an activity which is not covered by the licensee's nuclear quality assurance program, an evaluation is made, appropriate controls are established, and related procedures are upgraded.

As our October 16, 1987 letter to you stated, we have continued to monitor activities involving nuclear safety, including electrical tagging. Overall, we have found the licensee's control of these activities to be acceptable.

Our discussions with the licensee have provided information that, after the non-nuclear electrical tagout occurrence you described, the licensee decided to impose additional control over non-nuclear tagouts. After considering a

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non-nuclear tagout procedure, the licensee opted to use the nuclear tagout procedure throughout the site. This was their choice and not a requirement imposed by the NRC.

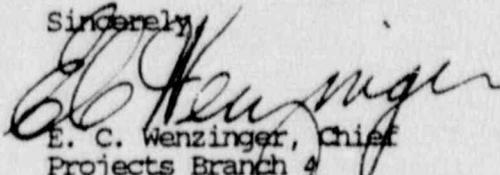
We acknowledge your June 27, 1989 telephone request for further follow-up of your previous allegations. We also acknowledge receipt of your telephone statement that NRC follow-up of your input in 1988 was ineffective in preventing what you stated to be the present problem of procedures not being followed generally at Millstone Station, as documented in allegations by Messrs. D. Del Core, G. Johnson, and T. O'Sullivan. Many different NRC inspectors have found and continue to find basically sound procedures and compliance with nuclear safety procedures at Millstone. NRC reviews of Millstone nuclear power plant performance have found a proper safety perspective and appropriate controls over activities affecting safety. We see no tracable linkage between your allegations and those of the other allegers you mentioned. Further, no significant safety inadequacy has been identified in NRC follow-up of your allegations.

Our evaluation of the transcript of your statement and of our telephone record of your June 27, 1989 call concluded that they contain insufficient identification of safety specifics to warrant additional NRC follow-up. If you have specific details of any uncorrected safety inadequacies or of failures to control nuclear safety in accordance with the established program, we would appreciate your submitting them to this office in writing, in detail, within 30 days, for our consideration. Otherwise, we plan to close your allegations as unsubstantiated, with no further NRC follow-up.

I hope that the above information resolves your concerns to your satisfaction.

Thank you for this opportunity to address your concerns.

Sincerely,



E. C. Wenzinger, Chief
Projects Branch
Division of Reactor Project

Enclosures:

- (1) Transcript of June 13, 1989 John Delcore Statement to NRC
- (2) Copy of October 16, 1987 NRC Lettr to Mr. John Delcore