

NORTHEAST UTILITIES



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

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August 8, 1980

Docket No. 50-245
A01128

Mr. Boyce H. Grier, Director
U.S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

Reference: Inspection 50-245/80-08

Gentlemen:

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 July 15, 1980, which informed Northeast Nuclear Energy Company of certain activities conducted in apparent noncompliance with NRC requirements.

Apparent Item of Noncompliance

- A. Technical Specification 6.10.1.d states: "Records of surveillance activities, inspections, and calibrations required by these Technical Specifications...shall be retained for at least five years."

Contrary to the above, test results were not maintained for the surveillance test, SP 680M, Annual Fire Protection System Fire Pump Flow Rate Test, performed on August 28, 1979.

Response to Item of Noncompliance

- A. The test was performed in conjunction with a fire inspection conducted by American Nuclear Insurers. A Millstone surveillance form was inadvertently omitted at the completion of the test. Copies of the test data sheets have been obtained from the insurers and have been placed in the appropriate surveillance files. This is an isolated case, no further action is required.

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Apparent Item of Noncompliance

- B. Technical Specification 4.13 requires inspection and testing with appropriate exemptions, and alternative inspections and testing as per the Inservice Inspection Program.

"The Inservice Inspection Ten-Year Program for Northeast Utility Company, Millstone Unit 1", implements the requirements of Technical Specification 4.13.

Inservice Inspection Ten-Year Program, Table IWV-1, requires, in part, the following:

1. That Valve I-1C-12, "Makeup to Isolation Condenser Stop" be verified locked in its proper position before operations are performed;
2. That Valve 1-RC-6, "Reactor Building Closed Cooling Water Header Inlet Check" be exercised (full stroke) at each reactor refueling;
3. That Valve 301-138, "CRD Return Header Isolation" be verified open quarterly.

Contrary to the above, it was observed that the above requirements were not being implemented in that:

- Valve 1-1C-12 was placed in the "open" rather than the "locked open" position. Check-off List (COL) 307-1, Isolation Condenser System Valve Check-off List, last performed June 23, 1979, only requires valve 1-1C-12 be in the open position. In addition, during the inspection, the valve was observed to be open but not locked.
- Valve 1-RC-6 was not exercised full stroke during the last refueling outage which occurred during 1979.
- Valve 301-138 has not been verified in the open position each quarter.

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Response to Item of Noncompliance 1101A

B.1 The Valve Check-off List OPS Form 307-1 has been corrected to show 1-IC-12 locked open. The valve has been locked in the open position.

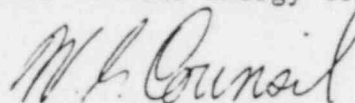
The previous change to the Check-off List was made without consulting the Inservice Inspection Manual, this was an isolated case, no further action is required.

B.2 Full stroking of valve 1-RC-6 cannot be verified by the present system design. Possible modifications to system are presently being investigated and/or relief request will be submitted for full stroking of this valve prior to the completion of 1980 refueling outage.

B.3 Revisions to surveillance form SP 1060-14 have been made to record the data to verify that valve 301-138 is open.

The Inservice Inspection Program is currently being reviewed to upgrade to the Summer 1978 addenda of Section XI of the ASME Code. The review and upgrade process will provide adequate insurance that the above items of noncompliance do not recur.

Very truly yours,
Northeast Nuclear Energy Company



W. G. Council
Senior Vice President