

NORTHEAST UTILITIES



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

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

July 22, 1980

Mr. Eldon J. Brunner
Chief, Reactor Operations and Nuclear
Support Branch
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, Pennsylvania 19406

Docket No. 50-245
50-336
A01079

Reference: Nuclear Regulatory Commission Inspection
50-245/80-06 and 50-336/80-04

Dear Sir:

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 June 26, 1980, which informed the Northeast Nuclear Energy Company of apparent items of noncompliance with NRC Regulations and Facility License Nos. DPR-21 and DPR-65.

ITEM A Unit 1 Technical Specification 6.8.1 states in part, "Written procedures shall be established, implemented and maintained..."

Health Physics Procedure - 901, Dosimetry and Exposure Control, Revision 6, dated April 3, 1980, paragraph 5.2.2.1 states, "All Station, Contractor and Utility personnel shall be required to wear a FB/TLD badge in areas with dose rates greater than 0.5 mrem/hour."

Contrary to the above, on April 23, 1980, a station employee was observed working in the Unit 1 Reactor Building, a radiation area with dose rates greater than 0.5 mrem/hour, without a personal film badge/thermoluminescent dosimeter. (50-245).

RESPONSE A

The individual was removed from the radiation area and an investigation determined that he had removed his jacket which contained his dosimetry device prior to entry into the radiation area.

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An exposure investigation was performed which resulted in the addition of one millirem to the individual's exposure record. This individual was counseled by the Health Physics Supervisor on the necessity and reasons for strict adherence to dosimetry/exposure control requirements. A memorandum from the Station Superintendent with distribution to all cognizant organizations was issued on May 8, 1980, addressing the April 24, 1980, occurrence, discussion of proper use of personnel dosimetry, and the purpose of complying with the rules.

Northeast Nuclear Energy Company disagrees with the assignment of the infraction level of noncompliance for this type of incident. The procedures which were unintentionally violated have additional steps which provide for misplaced (lost) or damaged dosimetry equipment in order to determine personnel exposure under conditions where dosimetry exposure is not available. Therefore, a more appropriate designation of noncompliance would be at the deficiency level.

ITEM 3

Unit 2 Technical Specification 3.7.8.1 states, "All hydraulic snubbers listed in Table 3.7-1 shall be operable." Surveillance Requirement 4.7.8.1 states, in part, "(a) Hydraulic snubbers shall be demonstrated operable by performance of the following augmented inservice inspection program. (b) Each hydraulic snubber with seal material not fabricated from ethylene propylene or other material demonstrated compatible with the operating environment shall be determined operable at least once per 31 days by a visual inspection of the snubber."

Contrary to the above, the Reactor was operated in Modes 1 through 4 during a period from December 4 through 22, 1979, with two hydraulic snubbers (Hanger numbers 413082 and 490031) listed in Table 3.7-1 which have seals fabricated from material other than ethylene propylene, which were not demonstrated to be compatible with the environment and had not been inspected with the previous 31 days.

RESPONSE B

The snubber visual inspection data sheets for hanger number 413082 and 490031 could not be located for the period audited and, therefore, it must be assumed that the visual inspections were not performed.

All subsequent inspections to the subject hangers have been satisfactory, indicating that the hydraulic snubbers were operable during that period.

There is a technical specification change pending which will delete hanger number 490031 from technical specification applicability as it is Non-Category I. Also during the next refueling outage, it is planned to change hanger number 413082 hydraulic snubber to a unit utilizing ethylene propylene seal material.

ITEM C

Item C contains security-related material which is exempt from public disclosure per 10CFR2.790(d). Item C is discussed in Attachment 1, which shall have a limited distribution.

Very truly yours,

Northeast Nuclear Energy Company



W. G. Council
Senior Vice President

Attachment

ATTACHMENT 1 - ITEM C

THIS PAGE, CONTAINING 10 CFR 2.790 INFORMATION, NOT FOR PUBLIC
DISCLOSURE, IS INTENTIONALLY LEFT BLANK.