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September 30, 1980

Docket No. 50-245 A01167

Mr. Boyce H. Grier, Director Region 1 Office of Inspection and Enforcement U. S. Nuclear Regulatory Commission 631 Park Avenue King of Prussia, PA 19406

Reference: (1) B. H. Grier letter to W. G. Counsil dated September 10, 1980.

Gentlemen:

Millstone Nuclear Power Station, Unit No. 1 Isolation Condenser System NRC Investigation No. 50-245/80-02

In reference (1), Northeast Nuclear Energy Company (NNECO) was requested to furnish additional information regarding the corrective action for an apparent item of non-compliance. Accordingly, the following is submitted in response.

Item

Your response indicated that the Job Order System provides for the required reviews and approvals and satisfies the requirements of 10 CFR 50, Appendix B. The information which we examined during our investigation did not reveal that properly documented, controlled and approved repair procedures were developed in advance of the repair. In addition, we did not find evidence of adequate documentation of the corrective actions (repairs) which were actually performed. Please provide information describing in detail how the requirements were satisifed, including, as appropriate, any modifications or additions necessary or made to directives, procedures, training, etc. to ensure requirements are satisfied in the future.

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Response

NNECO Quality Control Department has performed an audit of job orders R440-79, R441-79 and R409-79, which were used for the pipe inspection, bolt re-torquing and hanger repair. The results of the audit indicate that the proper documented, controlled and approved repair procedures do exist and were developed in advance of the repair. In addition, inspection plans of the repair were reviewed and found acceptable.

Item

Your response indicated that NNECO used the best engineering judgement available to evaluate the integrity of the Isolation Condenser System. Your response also indicated that the Engineering Staff has been sufficiently sensitized to preclude recurrence. The information which we obtained during our investigation indicated that adequate effort was not made to obtain available information regarding the conditions in the facility to form the basis for good engineering judgement. It also is not apparent that the transient effects of sensitizing individuals to certain requirements will provide adequate long term assurance of proper future actions in the absence of appropriate directives and training. Please provide additional information regarding your actions to ensure adequate investigation of future problems which may occur.

Response

To ensure adequate investigation of future problems which may occur, the Administrative Control Procedure, concerning plant incident reporting and investigation will be modified by November 1, 1980 to provide additional direction to the assigned investigator. The procedure change will require the assigned investigator to summarize the data used to support the conclusion of his investigation. Additionally, it is required that the NNECO Engineering Department personnel be re-trained to this procedure on an annual basis. Initial training of this new requirement will be completed by December 1, 1980.

We would be pleased to review this information in detail with the I&E resident inspector should you deem this necessary to resolve your concerns.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

Counsi

Senior Vice Pr

W. F. Fee Executive Vice President