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

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February 2, 1990

Docket Nos. 50-213
50-245
50-336
50-423
B13398

Re: Inspection Report
Nos. 50-245/89-20,
50-336/89-19, and
50-423/89-20

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

Gentlemen:

Haddam Neck Plant
Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3
Inspection Report Nos. 50-245/89-20, 50-336/89-19, and 50-423/89-20

The purpose of this letter is to provide comments on the subject inspection report which was issued on October 26, 1989.(1) Section 14 of the report provides a discussion of Millstone Unit No. 2's response to actual Unusual Events. The report states that on two occasions, both of the Millstone Unit No. 2 diesel emergency generators (DEGs) were declared inoperable and the Action Statement of Technical Specification 3.8.1 was entered. The DEGs were restored to an operable condition within the two-hour window specified in the Technical Specification limiting condition for operation on both occasions.

The report states on the first occasion "the DEGs were idling but were not loaded," and "During the second event, a malfunctioning meter was believed to be the cause." The following statements further clarify what actually occurred during both events. On the first occasion the DEGs were loaded to approximately 75 percent of full load, and during the second event one DEG was out for maintenance and the second DEG failed to start due to a bad relay. These were the reasons for the declaration of inoperability in each case, respectively.

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(1) R. R. Bellamy letter to E. J. Mroczka, dated October 26, 1989, "Combined Inspection Report Nos. 50-245/89-20, 50-336/89-19, and 50-423/89-20."

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The report also states that "on each occasion Unit 2 was operating in Mode 1 and two connections to other AC supplies were available (back up from the grid and Units 1 and 3)." NNECO wishes to clarify that Millstone Unit No. 3 is not connected to Unit No. 2. Millstone Unit No. 2 has four sources of AC power available:

1. The normal station service transformer connected to the grid.

2. The Unit No. 2 reserve station transformer also connected to the grid via a separate circuit and structures.

3. The Unit No. 2 DEGs (for limited loads).

4. The Unit No. 1 backfeed (for limited loads).

The inspection report also noted the inconsistency between the Millstone Unit No. 2 Emergency Action Level (EAL) tables and Technical Specification 3.8.1 concerning the action required when both DEGs are declared inoperable. The report concurred with the decisions made by Millstone Unit No. 2 personnel regarding notification under 10CFR50.72 and concurred with not classifying loss of both DEGs as an Unusual Event since the plant was within the Technical Specification 2-hour Action Statement.

To eliminate the disparity between the EAL table and the Technical Specifications for Millstone Unit No. 2, a change has been made to the EAL table. The table for loss of power, loss of AC, now states that an Unusual Event does not have to be declared until both DEGs are inoperable for > 2 hours.

Based on the problem encountered with Millstone Unit No. 2, our other three units were evaluated to verify the absence of a similar concern. Millstone Unit No. 3 correctly reflects the > 2 hours criterion in the appropriate EAL table, consistent with Technical Specification 3.8.1.1.e. Millstone Unit No. 1 does not have the > 2-hour criterion, but the EAL tables are consistent with the Technical Specifications. The Haddam Neck Plant has consistency between their EAL tables and Technical Specifications based on the current Technical Specifications.

Section 14 of the report also stated that to avoid a repetition of this event, NNECO "will replace 'symptom' with 'EAL' in the classification tables (CTs)." Note that CYAPCO and NNECO denote CTs as EAL tables. After further investigation by unit task groups, the consensus was that changing the title of the column was a cosmetic change and the real root cause is how the columns should be interpreted. Based on this determination, the appropriate Emergency Plan Implementing Procedures (EPIPs) will be revised to provide improved guidance on the interpretation/use of the EAL tables.

All proposed changes to the EAL tables will be evaluated per 10CFR50.54q. NNECO and CYAPCO intend to implement, in early 1990, some minor changes to the EAL tables. In addition, after the final issuance of the NUMARC/NESP

report,[2] "Methodology for Development of Emergency Action Levels," scheduled for late 1990, NNECO and CYAPCO plan to make significant revisions to the EAL tables. We expect to submit these latter changes for NRC review and approval prior to implementation since they may be interpreted as decreasing the effectiveness of the current emergency plan.

This letter is submitted for information only; therefore, no response is required. If you have any questions or comments concerning this issue, please contact our licensing representative directly.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY

FOR: E. J. Mroczka
Senior Vice President

BY: _____
C. F. Sears
Vice President

cc: 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
A. B. Wang, NRC Project Manager, Haddam Neck Plant
W. J. Raymond, Senior Resident Inspector, Millstone Unit Nos. 1, 2, and 3
J. T. Shedlosky, Senior Resident Inspector, Haddam Neck Plant

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(2) NUMARC/NESP Preliminary Report, "Methodology for Development of Emergency Action Levels," August 1989.