

NORTHEAST UTILITIES



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

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April 27, 1990

Docket No. 50-336

A08673

Re: 10CFR2.201

Mr. Thomas T. Martin
Regional Administrator, Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Reference: J. P. Durr letter to E. J. Mroczka, dated March 29, 1990, on
Inspection Report No. 50-336/90-03.

Dear Mr. Martin:

Millstone Nuclear Power Station, Unit No. 2
Response to Notice of Violation
Inspection Report No. 50-336/90-03

In the referenced letter, the NRC Staff transmitted the results of their routine inspection conducted at Millstone Unit No. 2 from January 22-26, 1990. The NRC Staff identified one Severity Level IV Notice of Violation and requested that Northeast Nuclear Energy Company (NNECO) respond within 30 days. Pursuant to the provisions of 10CFR2.201, NNECO hereby provides Attachment 1 as the response to the subject Notice of Violation.

If you have any questions regarding the information contained in this letter, please contact us.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

FOR: E. J. Mroczka
Senior Vice President

BY: C. F. Sears
C. F. Sears
Vice President

cc: J. P. Durr, Chief--Engineering Branch, Division of Reactor Safety
G. S. Vissing, NRC Project Manager, Millstone Unit No. 2
W. J. Raymond, Senior Resident Inspector, Millstone Unit Nos. 1, 2, and 3

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Attachment 1

Millstone Nuclear Power Station, Unit No. 2
Response to Notice of Violation
Inspection No. 50-336/90-03

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Millstone Nuclear Power Station, Unit No. 2
Response to Notice of Violation
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Description of Violation (From NRC Notice of Violation)

"Technical Specification 6.8.1.a states in part, 'Written procedures shall be established, implemented and maintained covering..... the applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, February 1978.' These procedures include those for maintenance and work control.

"The licensee's Station Administrative Control Procedure ACP-QA-2.02C 'Work Orders' contains requirements for control of work in accordance with controlled documents such as work orders and drawings. Licensee drawing 25203-51112 defines the detailed requirements for certain pipe restraints designated, MFR-1, 2, 3, 4 and 5.

"Contrary to the above as of January 24, 1990, the as-found conditions of a six-inch auxiliary feedwater system pipe restraint designated MFR-4 did not meet its drawing requirements in three areas: (1) the four (4) hex nuts were loose, (2) the U-bolt threads adjacent to the nuts were not upset as required, and (3) the observed gap between the restraint and the pipe was approximately 1 inch compared to the required gap of 0.5 inch."

Root Cause

An unknown person or persons loosened and disarranged the restraint, probably to allow maintenance on a valve immediately under the restraint. No concrete evidence of time or persons involved can be found. It was apparently in this condition before the most recent maintenance on the valve. Personnel involved in the most recent maintenance on the valve indicated during the investigations that the restraint was in similar condition when they were assigned to perform work on the valve. In its as-found condition, no further effort was needed to allow valve work to be performed. They did not recognize that the restraint was not in its design condition.

Corrective Action

The restraint was restored to its design condition within 12 hours of its identification. The similar restraint on the other steam header was verified to be in conformance with design drawings. An analysis was performed to assure the restraint was capable of performing its design function in the as-found condition. This analysis showed that in its as-found condition, the restraint was capable of fulfilling its design function. A Plant Incident Report and a Nonconformance Report were generated to document the as-found conditions and the corrective actions.

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Action to Prevent Recurrence

Existing procedures clearly require that any change in approved work scope or disabling of high-energy line break restraints be properly documented and approved prior to performance of the work. The Maintenance Department Manager reviewed this violation with department personnel and emphasized the need to obtain proper authorization prior to removing or relocating interferences or otherwise exceeding the scope of authorized work. Personnel interviewed during the course of this investigation and other department personnel indicated they were aware of these requirements and would have obtained such approvals if the restraint had required action to allow work to proceed.

While there is no formal program for periodic inspection of whip restraints, it is expected that in-service inspections of Class 2 and 3 pipe supports in the vicinity of whip restraints or routine tours of plant areas by Operations, Engineering, Maintenance, or Quality Services personnel would identify whip restraints which were sufficiently disarranged to affect their ability to fulfill their design function. These routine inspections and tours have not identified similar failures.

Date When Full Compliance Will Be Achieved

NNECO considers itself in full compliance with the identified station procedures, and no further action is considered necessary.