

NORTHEAST UTILITIES



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

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March 5, 1993

Docket No. 50-213
B14397

Re: Response to Inspection
Report No. 50-213/92-23

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

Gentlemen:

Haddam Neck Plant
Inspection Report No. 50-213/92-23
Response to Notice of Violation

In a letter dated February 3, 1993,⁽¹⁾ the NRC Staff transmitted to Connecticut Yankee Atomic Power Company (CYAPCO) Inspection Report No. 50-213/92-23. As discussed in that report, the NRC Staff cited CYAPCO for a violation of the Commission's regulations.

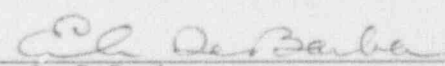
CYAPCO hereby provides the attached information in response to the Notice of Violation.

We trust that you will find this information satisfactory, and we remain available to answer any questions you may have.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER
COMPANY

FOR: J. F. Opeka
Executive Vice President

BY: 
E. A. DeBarba
Vice President

cc: T. T. Martin, Region I Administrator
A. B. Wang, NRC Project Manager, Haddam Neck Plant
W. J. Raymond, Senior Resident Inspector, Haddam Neck Plant

(1) J. H. Joyner letter to J. F. Opeka, "Emergency Preparedness (EP) Inspection 50-213/92-23," dated February 3, 1993.

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Attachment 1
Haddam Neck Plant
Response to Notice of Violation

March 1993

Haddam Neck Plant
Response to Notice of Violation

- Description of Violation

During NRC inspection from December 14-18, 1992, an apparent violation of NRC requirements was identified. In accordance with the NRC "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR 2, Appendix C, that violation is listed below:

10 CFR 50.54(q) requires licensees to follow and maintain in effect emergency plans which meet the requirements of 10 CFR 50 Appendix E.

10 CFR 50, Appendix E Section F.a. requires initial and periodic retraining of directors and/or coordinators of the plant emergency organization.

The Haddam Neck Emergency Plan, Revision 22, July 27, 1992, specifies in Figure 8-1 and Section 8.1.1 that Technical Support Managers receive annual (1 year \pm 3 months) Emergency Action Level (EAL) training (Training Module G007).

Contrary to the above, as of December 18, 1992, the Connecticut Yankee Atomic Power Plant Emergency Plan was not followed and maintained in effect as required. Specifically, qualified Technical Support Center Managers, who direct and/or coordinate plant emergency organization functions, had not received Emergency Action Level training (Module G007) since June 1991, a period of about 18 months.

This is a Severity Level IV Violation (Supplement VIII).

- Reason for the Violation

CYAPCO agrees with the finding that the Technical Support Managers have not received training in EALs in accordance with the Emergency Plan since June of 1991. The reason is that the training department procedure had been changed to delete this training based on a training program control committee review and sign-off process. During the sign-off process the appropriate emergency plan department reviews required by station Administrative Control Procedure (ACP) 1.06 and Corporate Organization for Nuclear Incidents (CONI) Procedure 10.02 were not performed.

- Corrective Steps That Have Been Taken and Results Achieved

1. A change has been made to the Training Program Implementing Procedure (TPIP) (NTM-3.212) to restore compliance with the Emergency Plan.
2. Training in the EALs (Training Module G-007) has been performed for the Managers of Technical Support.

- Corrective Steps that will be Taken to Avoid Further Violations

A sign-off will be added to the TPIP requiring the appropriate 10CFR50.54(q) reviews in accordance with ACP 1.06 and CONI 10.02 are performed to ensure compliance with the Emergency Plan.

The Emergency Planning Department will review the management control of the emergency planning program changes and implement upgrades as appropriate to enhance its effectiveness.

- Date When Full Compliance Will Be Achieved

The modification to the TPIP, which will require an individual from emergency planning to sign-off on the changes, will be incorporated in the next TPIP revision, or by December 31, 1993, whichever occurs first.

The emergency planning department review of the management control of emergency planning program changes and implementation of necessary upgrades will be completed by December 31, 1993.

- Generic Implication

The proposed corrective actions will also address this potential weakness at Millstone Unit Nos. 1, 2, and 3.