

APR 14 1993

Docket No. 50-213

Mr. John F. Opeka  
Executive Vice President - Nuclear  
Connecticut Yankee Atomic Power Company  
P.O. Box 270  
Hartford, Connecticut 06141-0270

Dear Mr. Opeka:

SUBJECT: INSPECTION NO. 50-213/92-22

This refers to your March 1, 1993, correspondence, in response to our January 26, 1993, letter.

Thank you for informing us of the corrective and preventive actions documented in your letter. These actions will be examined during a future inspection of your licensed program.

Your cooperation with us is appreciated.

Sincerely,

Jacque P. Durr, Chief  
Engineering Branch  
Division of Reactor Safety

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Mr. John F. Opeka


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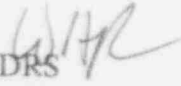
W. D. Romberg, Vice President, Nuclear Operations Services  
J. P. Stetz, Vice President, Haddam Neck Station  
G. H. Bouchard, Nuclear Unit Director  
R. M. Kacich, Director, Nuclear Licensing  
Gerald Garfield, Esquire  
Nicholas Reynolds, Esquire  
K. Abraham, PAO (2) (w/copy of letter dated March 1, 1993)  
Public Document Room (PDR)  
Local Public Document Room (LPDR)  
Nuclear Safety Information Center (NSIC)  
NRC Resident Inspector  
State of Connecticut (SLO) (w/copy of letter dated March 1, 1993)

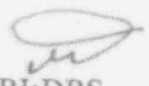
bcc w/encl:

Region I Docket Room (with concurrences)  
J. Durr, DRS  
J. Joyner, DRSS  
R. Blough, DRP  
W. Ruland, DRS  
L. Doerflein, DRP  
W. Raymond, SRI, Haddam Neck  
P. Swetland, SRI, Millstone  
V. McCree, OEDO  
A. Wang, PM, NRR  
DRS/EB SALP Coordinator  
L. Cheung, DRS  
R. De La Espriella, DRP  
DRS File

  
RI:DRS  
Cheung/dmg

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**NORTHEAST UTILITIES**

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

General Offices • Seiden Street, Berlin, Connecticut

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HARTFORD, CONNECTICUT 06141-0270  
(203) 665-5000

March 1, 1993

Docket No. 50-213  
B14387

Re: Response to Inspection  
Report No. 50-213/92-22

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

Gentlemen:

Haddam Neck Plant  
Inspection Report No. 50-213/92-22  
Response to Notice of Violation

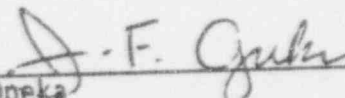
In a letter dated January 26, 1993,<sup>(1)</sup> the NRC Staff transmitted to Connecticut Yankee Atomic Power Company (CYAPCO) Inspection Report No. 50-213/92-22. As discussed in that report, the NRC Staff cited CYAPCO for a violation of the Commission's regulations.

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

  
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J. F. Opeka  
Executive 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. P. Durr letter to J. F. Opeka, "Inspection Report No. 50-213/92-22," dated January 26, 1993.

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Docket No. 50-213  
B14387

Attachment 1  
Haddam Neck Plant  
Response to Notice of Violation

March 1993

Haddam Neck Plant  
Response to Notice of Violation

• Description of Violation

10 CFR 50, Appendix B, Criterion V, requires that activities affecting quality shall be prescribed by documented instructions and shall be accomplished in accordance with these instructions.

Design Change Notice DCN-407-E-89 specifically identified that 2/0 jacketed ground cable be connected to the base of electrical penetrations.

Contrary to the above, on November 19, 1992, the above cable was found to be connected to the duct bank ground grid.

This is a Severity Level V violation (Supplement I).

• Background Information

The subject cable was installed as part of the Appendix R modifications project during the 1987 refueling outage. The cable was intended to be terminated to the station ground grid at both ends (analogous to rigid steel conduit) and provide shielding for instrument cable in the new PVC duct bank. CYAPCO had originally intended to use rigid steel conduit in the new duct bank, but this was not possible due to the tortuous path the new duct bank was forced to follow through existing structures. The cable was added to reduce the potential for noise in the instrument cable.

• Reason for Violation

ACP 1.2-3.1 requires that all work be controlled by the Automated Work Order (AWO) process. Additionally, the procedure requires that all modifications be walked down, tested, and formally released for operation prior to declaring the affected systems operational.

The subject cable was pulled under AWO CY-89-00591 in accordance with Design Change Notice (DCN) DCN-407-E-89. The AWO was closed and the DCN was signed off complete based on the cable being pulled. The fact that the DCN required termination of the cable was overlooked by the job supervisor and the plant engineer.

All cables, except unnumbered ground cables, pulled for the Appendix R modification project were tracked by a computer program called "Set Route." The project used the "Set Route" program to verify that cables and terminations were walked down and properly released for operation.

"Set Route" tracks cables by cable number. The subject cable was not numbered because it is a ground cable; therefore, it was not tracked by "Set Route."

All cable terminations for the Appendix R modification project were handled under separate PDCRs and AWOs. The cable in question, an insulated ground, was part of PDCR 905. There was an apparent oversight which failed to tie the cable termination to the proper termination AWO in this case. This is the same DCN and similar grounded cable concern discussed in CYAPCO's response to Inspection Report No. 50-213/92-14.<sup>(1)</sup>

Please note this cable was actually grounded, but at a different point than specified in the DCN. Grounding is typically handled as a non-quality item subject to good work practice for installations. This may have contributed to the oversight on the DCN (DCN-407-E-89).

The walkdown checklist includes an item to ensure all equipment is properly grounded. The fact that the subject cable was not grounded to the specified location in accordance with DCN-A07-E-89 was not identified during the walkdown. It is, therefore, assumed that the cable was not properly walked down and released. Use of pulled ground cables as described above was unique to this project and does not exist elsewhere at the site.

Special Test procedure ST 11.7-16: "Appendix R Duct Bank Noise Test" was successfully performed prior to release for operation. This test verified the adequacy of the other noise suppression measures. The instrument cables performed satisfactorily, indicating that grounding was functioning as designed.

• Corrective Steps Taken and Results Achieved:

DCN-5-1781-92 was generated to document the as-built condition as acceptable.

• Corrective Action Taken to Avoid Further Violations:

No further corrective action is required. The cable was terminated at the wrong location due to an oversight. The Appendix R modification effort was a very large project requiring many tests, walkdowns, and releases. The fact that the cable was not terminated per design did not render the instrument cables inoperable as demonstrated by the special test. The functional tests performed were comprehensive and would have identified any inoperable equipment or design features.

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(1) J. F. Opeka letter to U.S. Nuclear Regulatory Commission, "Haddam Neck Plant, Inspection Report No. 50-213/92-14, Reply to a Notice of Violation," dated September 30, 1992.

- Date When Full Compliance Will Be Achieved:

The instrument cables were not rendered inoperable by this discrepancy. Full compliance was achieved when the DCN (DCN-5-1781-92) was issued to document the as-built condition. During the upcoming Cycle 17 refueling outage, the other end of these ground cables will be verified to be properly terminated.

- Generic Implications:

This violation is only applicable to the Haddam Neck Plant because it identified a problem with a unit-specific design change.