

# 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

P.O. BOX 270  
HARTFORD, CONNECTICUT 06141-0270  
(203) 665-5000

April 30, 1990

Docket No. 50-336

A08687

Re: 10CFR2.201

Mr. Thomas T. Martin  
Regional Administrator, Region 1  
U.S. Nuclear Regulatory Commission  
475 Allendale Road  
King of Prussia, PA 19406

Reference: E. C. Wenzinger letter to E. J. Mroczka, dated April 4, 1990,  
on Inspection Report No. 50-336/90-01.

Dear Mr. Martin:

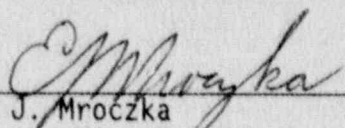
Millstone Nuclear Power Station, Unit No. 2  
Response to Notice of Violation  
Inspection Report No. 50-336/90-01

In the referenced letter, the NRC Staff transmitted the results of their routine resident safety inspection conducted at Millstone Unit No. 2 from January 20, 1990 through March 5, 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

  
E. J. Mroczka  
Senior Vice President

cc: E. C. Wenzinger, Chief--Projects Branch No. 4, Division of Reactor  
Projects  
G. S. Vissing, NRC Project Manager, Millstone Unit No. 2  
W. J. Raymond, Senior Resident Inspector, Millstone Unit Nos. 1, 2, and 3

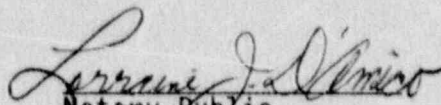
U.S. Nuclear Regulatory Commission  
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STATE OF CONNECTICUT)  
                                  ) ss. Berlin  
COUNTY OF HARTFORD )

Then personally appeared before me, E. J. Mroczka, who being duly sworn, did state that he is Senior Vice President of Northeast Nuclear Energy Company, a Licensee herein, that he is authorized to execute and file the foregoing information in the name and on behalf of the Licensee herein, and that the statements contained in said information are true and correct to the best of his knowledge and belief.

  
Notary Public

My Commission Expires March 31, 1993

Docket No. 50-336  
A08687

Attachment 1

Millstone Nuclear Power Station, Unit No. 2  
Response to Notice of Violation  
Inspection No. 50-336/90-01

April 1990



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Millstone Nuclear Power Station, Unit No. 2  
Response to Notice of Violation  
Inspection No. 50-336/90-01

Description of Violation (From NRC Notice of Violation)

"10 CFR 50.73(a)(2)(i)(B) requires a Licensee Event Report (LER) for any operation or condition prohibited by the plant's Technical Specification.

"Contrary to the above, on February 28, 1989 between 12:25 a.m. and 4:31 p.m., the control room emergency air clean-up system was not aligned to the recirculation mode as required by technical specification 3.7.6.1.a, a condition prohibited by the plant's technical specification. As of March 5, 1990, no LER had been submitted to the NRC."

Root Cause

Millstone Unit No. 2 management did not consider the control room emergency air cleanup system alignments referred to above to be a condition prohibited by the plant's Technical Specifications since the specifications permit one emergency diesel generator to be operable in Mode 5 and both control room emergency air cleanup systems were otherwise operable. (NNECO considers this to be a discrepancy within the Millstone Unit No. 2 Technical Specifications and plans to submit a change to the control room emergency air cleanup system specification to resolve this conflict.) The Millstone Unit No. 2 staff had thoroughly discussed this position with the Millstone NRC Resident Inspector Staff, and Inspection Report 50-336/89-05 noted that this event had been "appropriately reported and corrected."

Corrective Action

NNECO submitted LER 90-004 on April 30, 1990, to document the condition prohibited by the plant's Technical Specification.

Action to Prevent Recurrence

1. Millstone Unit No. 2 management has reviewed this event and the basis for requiring an LER under these circumstances. A more conservative approach to determining the need for an LER will be applied should a similar event involving apparent discrepancies within the Technical Specifications arise in the future.
2. NNECO tentatively plans to submit by the end of June 1990 a proposed change to Technical Specification 3.7.6.1 for Modes 5 and 6. This change will eliminate the present conflict between Limiting Condition for Operation (LCO) LCO 3.7.6.1 and LCO 3.8.1.2, Electrical Power Systems--Shutdown.

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Date of Full Compliance

Full compliance to the reporting requirements of 10CFR50.73 was achieved on April 30, 1990, with the submittal of LER 90-004.