

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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July 26, 1993

Docket No. 50-336
B14555

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

Gentlemen:

Millstone Nuclear Power Station, Unit No. 2
 Inspection Report No. 50-336/93-81
Reply to Notice of Violation

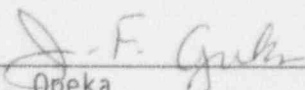
In a letter dated June 25, 1993,⁽¹⁾ the NRC Staff transmitted to Northeast Nuclear Energy Company (NNECO) a Notice of Violation (NOV) relating to Inspection Report No. 50-336/93-81. The report discussed the results of an electrical distribution system functional inspection conducted during the period between March 15 and April 2, 1993. Based on the results of the Staff's inspection, one apparent violation of NRC requirements was identified. Attachment 1 to this letter provides NNECO's reply to the violation, on behalf of Millstone Unit No. 2, in accordance with the requirements of 10CFR2.201, and the instructions contained within the inspection report.

Additionally, the NRC letter requested that NNECO provide, in writing, a schedule for the resolution of the 13 unresolved items identified in the subject inspection report. This document is currently being prepared and will be submitted by August 24, 1993, in accordance with the requirement denoted in the inspection report.

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

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



 J. F. Opeka
 Executive Vice President

cc: (See Page 2)

(1) M. W. Hodges letter to J. F. Opeka, "Notice of Violation, NRC Inspection Report No. 50-336/93-81," dated June 25, 1993.

JEO

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cc: T. T. Martin, Region I Administrator
G. S. Vissing, NRC Project Manager, Millstone Unit No. 2
P. D. Swetland, Senior Resident Inspector, Millstone Unit Nos. 1, 2,
and 3

Docket No. 50-336
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Attachment 1

Millstone Nuclear Power Station, Unit No. 2

Inspection Report 50-336/93-81

Reply to Notice of Violation

July 1993

Millstone Nuclear Power Station Unit No. 2

Inspection Report 50-336/93-81

Reply to Notice of Violation

Restatement of Violation

During an NRC inspection conducted on March 15 through April 2, 1993, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

Part 50 of Title 10 of the Code of Federal Regulations, Appendix B, Criterion XVI, Corrective Action, requires measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition.

Contrary to the above, as of March 17, 1993, the measures to assure conditions adverse to quality were not taken to promptly identify and correct deficiencies as evidenced by the following: (1) NRC notification on August 29, 1984, and February 24, 1986, to avoid the potential for rendering all emergency diesel generators (EDG) unavailable by paralleling one or more EDGs to the grid while the remaining EDG(s) were inoperable, and (2) on January 7, 1987, the licensee had experienced a situation where both EDGs were rendered inoperable for 56 minutes due to an event which occurred while the "A" EDG was declared inoperable and the "B" EDG was paralleled with the grid. In spite of these notices and the previous failure, the licensee continued to load one EDG in parallel with the grid during testing while the other EDG was declared inoperable. In addition, on March 17, 1993, while the plant was at full power, both EDGs were loaded in parallel with the grid for more than one hour.

This is a Severity Level IV violation (Supplement 1).

1. Reason for the Violation

In response to Information Notice No. 84-69 issued August 29, 1984, NNECO evaluated Millstone Unit No. 2's practice of loading one EDG in parallel with the grid while the other EDG was declared inoperable. This evaluation almost entirely focused on the issue that the EDGs would not be paralleled with the grid during adverse weather conditions that could jeopardize EDG paralleling operations. The potential risks under these conditions were recognized and acknowledged. However, the counter concern was the potential risk cited by the engine vendor of oil fouling to the engine from unloaded runs. This vendor concern, coupled with the Millstone Unit No. 2 Technical Specification requirement that the EDG be paralleled to the grid for a 60 minute loaded run each month led NNECO to conclude that performing loaded runs was appropriate,

independent of the operability status of the second EDG. On this basis, past practice was considered appropriate until the recent electrical distribution system functional inspection (EDSFI).

2. Corrective Steps That Have Been Taken and Results Achieved

In response to the violation, a lessons learned presentation was made to the Millstone Unit No. 2 Engineering Department on July 16, 1993. The presentation emphasized the importance of Information Notices, and of giving full consideration to the information presented therein. This presentation included a discussion of the specific violation received on paralleling the EDGs with the grid, and the failure to change the practice. The presentation was made to increase the awareness of those individuals who typically review Information Notices and provide recommendations regarding the appropriate actions to take to resolve the condition described in the Information Notice.

As stated in NRC Combined Inspection Report 50-245/93-10, 50-336/93-06, and 50-423/93-07,⁽¹⁾ the tracking and distribution of NRC Information Notices had been loosely controlled, since one specific individual was not responsible for that area. To improve performance in this area, the responsibility of tracking NRC Information Notices was transferred from the Nuclear Operations Department to Nuclear Licensing. Additionally, one individual was assigned the specific task of tracking NRC Information Notices. The NRC Combined Inspection Report stated: "the inspector determined that the revised Information Notice tracking system should improve performance since positive administrative controls have now been placed on Information Notice distribution. Therefore, this issue is closed." NNECO believes that this action is applicable to resolution of this violation, since the NRC Information Notice of note was issued prior to 1993.

The Millstone Unit No. 2 condition, regarding the potential of paralleling the operable EDG with the offsite electrical power grid while the other EDG was inoperable, was reported under Licensee Event Report 93-007-00 on April 28, 1993.⁽²⁾ To resolve this condition, changes to operating procedure OP 2346A, "Emergency Diesel Generator," and the associated surveillance procedures SP 2613A, "Diesel Generator Operability Test, Facility 1," and SP 2613B, "Diesel Generator Operability Test, Facility 2," have been implemented to prohibit paralleling the only operable EDG to the offsite power grid. These changes were implemented following discussions with the diesel engine vendor which demonstrated that unloaded EDG runs can be performed on a limited basis without degrading EDG operability.

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- (1) A. R. Blough letter to J. F. Opeka, "Millstone Combined Inspection 50-245/93-10; 50-336/93-06; 50-423/93-07," dated April 30, 1993.
 - (2) S. E. Scace letter to U. S. Nuclear Regulatory Commission, "Facility Operating License No. DPR-65, Docket No. 50-336, Licensee Event Report 93-007-00," dated April 28, 1993.

3. Corrective Steps That Will Be Taken to Avoid Further Violation

Northeast Utilities Service Company's Nuclear Safety Engineering Group (NSE) will perform a technical evaluation of a sample of the Millstone Unit Nos. 1, 2, and 3 and Haddam Neck Plant dispositions of NRC Information Notices to ensure dispositions have addressed the issues in a complete and thorough manner. The technical evaluation will be completed by November 15, 1993. Actions will be taken commensurate with the findings.

A lessons learned presentation, similar to that discussed in item 2 above, will be made to the Engineering Departments of Millstone Unit Nos. 1 and 3 by September 30, 1993.

A license amendment will be requested to propose a revision to the action statements of Millstone Unit No. 2 Technical Specification 3.8.1.1. The proposed changes will eliminate the requirement that the operable EDG must be started when the other EDG becomes inoperable for preplanned preventative maintenance or testing. The proposed license amendment will be submitted by December 15, 1993.

4. Date When Full Compliance Will Be Achieved

NNECO believes Millstone Unit No. 2 fully complies with Criterion XVI of Appendix B of 10CFR50. As stated in item 3, NSE will perform a technical evaluation of a sample of the Millstone Unit Nos. 1, 2, and 3, and Haddam Neck dispositions of NRC Information Notices to ensure dispositions have addressed the issues in a complete and thorough manner.

5. Generic Implications

As stated in sections 3 and 4, a technical evaluation of a sample of Millstone Unit Nos. 1, 2, and 3, and the Haddam Neck Plant dispositions to NRC Information Notices will be conducted.

Also, NNECO is reviewing the condition regarding the potential of paralleling an operable EDG with the offsite electrical power grid while the other EDG is inoperable for applicability to Millstone Unit Nos. 1 and 3 and the Haddam Neck Plant. Actions will be taken commensurate with findings.

On July 2, 1993, a Millstone Unit No. 3 Operations Department Night Order was issued to prohibit paralleling the operable EDG with the offsite electrical power grid while the other EDG is inoperable. An engineering evaluation was initiated on July 14, 1993, to determine whether Millstone Unit No. 3 is susceptible to a condition similar to the Millstone Unit No. 2 condition. If the Millstone Unit No. 3 situation is determined to be reportable, NNECO will report this via separate correspondence.