

NORTHEAST UTILITIES



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

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June 7, 1982

Docket No. 50-423

AEC-MP3-273

A02476

U. S. Nuclear Regulatory Commission
Mr. R. W. Starostecki, Director
Projects Branch #1
Division of Project and Resident Programs
Region I
Office of Inspection and Enforcement
631 Park Avenue
King of Prussia, PA 19406

Reference: (1) R. W. Starostecki letter to W. G. Council, I.E.
Inspection 50-423/82-04, dated May 6, 1982.

Gentlemen:

Millstone Nuclear Power Station, Unit No. 3
IE Inspection No. 50-423/82-04

On March 1-31, 1982 and April 1-9, 1982, a routine safety inspection of selected areas of Millstone Nuclear Power Station, Unit No. 3 was conducted by your Mr. J. C. Mattia. As a result of that inspection, Reference (1) was transmitted to us for our response and contained essentially two parts: Appendix A, Notice of Violation and IE Inspection Report No. 50-423/82-04.

Pursuant to the provisions of 10CFR2.201, Northeast Nuclear Energy Company hereby is submitting a response to the Notice of Violation. The provided format includes a recap of the Appendix A violation followed by the corrective and preventative actions taken or to be taken.

APPENDIX A, ITEM A

On March 10, 1982, the RHR pump alignment plates were being leveled by grinding the support plate which is contrary to the requirements specified in Design Drawing EV-52A, Revision 5, and its associated design change E&DCR number F-J-6640. Furthermore, during this grinding the support plate thickness was reduced below the minimum of 1.537 inches allowed by ASTM A6.

Corrective Action

Nonconformance and Disposition Report number 1236 was issued March 16, 1982 for grinding the support plate beyond the tolerances allowed in ASTM A6. The disposition was to accept as is. The justification was: "The drawing specifies 1½" through the plate and the reduction of thickness amounts only to 1.23 percent of the thickness. This reduction does not impair the structural integrity of the support structure. Review of the calculation indicates an ample factor of safety."

Preventive Action

Specification 914 has been changed by Engineering and Design Coordination Report F-P-7758 to allow construction to remove uneven material to produce good surface to surface contact on support structures.

APPENDIX A, ITEM B

As of April 1, 1982, the Stone and Webster Field QC Department was not providing indoctrination and continuing education of personnel in accordance with Quality Assurance Procedure No. 2.1, QA Department Continuing Education System, Revision A, issued on September 6, 1978. The following are examples:

- (1) Section 5.3 requires that approved CE courses shall be presented in accordance with the monthly forecast, unless changed in writing. Contrary to this, a total of six CE courses that were scheduled were neither held nor deleted or rescheduled. These are listed below.

<u>Course No.</u>	<u>Course Title</u>	<u>Month Scheduled</u>
28-JBC-0161	S&W Standard NQA Program 1-74A	Dec. 1981
63-JOE-0600	Nonconformance & Disposition Rpt.	Nov. 1981
63-JFE-0650	Engineering & Design Coordination Report	Nov. 1981
28-SCF-0050	Principles of Quality Concrete	Oct. 1981
28-KEB-0900	Guide to Training Coordinator Responsibilities	Jan. 1982
28-SAG-0080	MS-3 Containment	Feb. 1982

Corrective Action

Stone & Webster agrees that the six courses listed were not changed in writing as required by the procedure. However, these courses were changed via telecon between the site and the Boston office.

Three of the courses had been rescheduled and have been presented. (28-JBC-0161, 63-JOE-0600, 63-JFE-0650)

One course has been rescheduled for presentation in June 1982. (28-SAG-0080)

Two courses have been recalled for revision. When these courses are revised they will be reviewed for presentation to the Millstone site. (28-SFC-0050, 28-KEB-0900)

Preventive Action

In the future, Stone & Webster will comply with the requirements of QAD 2.1.

- (2) Section 5.4.1 states that copies of attendance reports shall be kept at the CE presentation location. Contrary to this, three courses were held at the site in October 1981. The attendance reports were not available during this inspection period. The course was presented by someone from the S&W Boston office. The specific courses were as follows:

<u>Course No.</u>	<u>Course Name</u>
28-FCE-0030	Magnetic Particle Testing
28-FCE-0020	Liquid Penetrant Testing
28-IEE-0500	Visual Weld Inspection

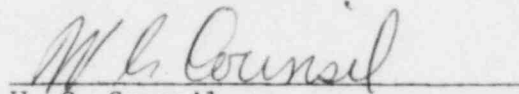
Response

An Attendance Report for the above courses was prepared by the instructor at the time the courses were presented. The courses were for Nondestructive Testing (NDT) certifications which are presented by the NDT Division from Boston. All NDT Certification Records including Attendance Reports are maintained by that Division in Boston in accordance with the requirements of the Quality Assurance Directive (QAD) 2.5. Attendance Reports are inputted, by the NDT Division, into the IS-228 computer (Computerized Training Records System). A copy of this computer report for Millstone III will be maintained at the site to meet the requirement of QAD 2.1.

We trust the above information satisfactorily responds to the violations cited by your inspector.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

A handwritten signature in cursive script, appearing to read "W. G. Council", is written over a horizontal line.

W. G. Council
Senior Vice President

cc: E. J. Brunner