

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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August 6, 1982

Docket Nos. 50-245
50-336
A02634

Mr. Thomas T. Martin
Director Division of Engineering
and Technical Programs
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, Pennsylvania 19406

Reference: (1) T.T. Martin to W.G. Council, dated July 8, 1982.

Gentlemen:

Millstone Nuclear Power Station
Unit Nos. 1 and 2

Response to Inspection Reports 50-245/82-13 and 50-336/82-13

Pursuant to the provisions of Section 2.201 of the NRC's "Rules of Practice" Part 2, Title 10, Code of Federal Regulations, this report is submitted in reply to your letter of July 8, 1982, which informed the Northeast Nuclear Energy Company of a Severity Level V Violation.

As a result of the inspection, corrective action has been taken to resolve the inspection finding identified in Reference (1).

Presently, the Station Administrative Control Procedures (ACP) and Nuclear Engineering and Operational Procedures (NEO) are being revised to strengthen the documentation associated with the design control process.

The content of future PDCR's will include checklists identifying the specific design inputs included in the design. Also, a Design Verification Checklist for Category I PDCR's will identify the process employed for the independent design review.

The above formalization of the design control process should provide the information needed to ensure the design change has considered all important design parameters.

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Item (1)

An audit sample of seven PDCR's identified that these PDCR's did not contain the required documentation to demonstrate how the applicable design requirements were translated into drawings and other design documents.

Response (1)

The referenced PDCR's were adequately designed but were deficient in documenting the design inputs. Documentation will be strengthened by the above described program. Safety reviews were also adequate, and improvement will result from a Nuclear Engineering and Operations procedure NEO 3.12, Safety Evaluations and Technical Reviews, which is being prepared.

Item (2)

Approved and controlled drawings for two completed PDCR's (PDCR 1-113-79 and PDCR 1-19-79) were not distributed to the affected locations in accordance with controlled distribution lists.

Response (2)

When updating the drawing for PDCR 1-19-79, one electrical control wiring diagram was inadvertently overlooked and not properly marked up. The drawing was immediately marked up to the as-built condition. This is considered to be an isolated case. The existing controls are adequate.

PDCR 1-113-79 relates to the lack of issuance of final as-built drawings resulting in a drawing not being part of the operations critical drawing package. To prevent future recurrence, an evaluation of the existing drawing control and issuance program will be made and appropriate changes effected.

Item (3)

An approved PDCR (PDCR 2-41-81) was significantly changed after its approval, to use two Model 3 snubbers instead of one Model 10 snubber as approved, without a review of the change.

Response (3)

PDCR 2-41-81 involved the change out of several snubbers. One of those snubber installations was presented to PORC as a single snubber installation. During the installation process, conditions warranted a two snubber configuration. All appropriate design reviews were completed and the change was authorized but not presented to PORC.

This oversight was corrected by presenting PDCR 2-41-81 with the new snubber configuration at PORC Meeting 2-113-82. To prevent recurrence, appropriate engineering personnel have reviewed ACP 3.04 section 6.14.2, "Changes to PDCR's."

The improvements addressed in this reply are an ongoing program. Specific items noted in Responses (1) and (2) will be completed by January 1, 1983.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

W. G. Council

W. G. Council
Senior Vice President

J. P. Cagnetta

By: J. P. Cagnetta
Vice President
Nuclear and Environmental Engineering