

U.S. NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT

Region I

Report No. 78-30
Docket No. 50-336
License No. DPR-65 Priority -- Category C
Licensee: Northeast Nuclear Energy Company
P.O. Box 270
Hartford, Connecticut 06101

Facility Name: Millstone Nuclear Power Station, Unit 2

Inspection at: Waterford, Connecticut

Inspection conducted: September 19-22, 1978

Inspectors: W. H. Barnack 10/11/78
W. H. Barnack, Reactor Inspector date signed
T. H. Smith 10/11/78
T. H. Smith, Reactor Inspector date signed

Approved by: H. B. Kister 10/12/78
H. B. Kister, Chief, Nuclear Support Section date signed
No. 2, RO&NS Branch

Inspection Summary:

Inspection on September 19-22, 1978 (Report No. 50-336/78-30)

Areas Inspected: Routine, unannounced inspection by Regional based inspectors of administrative controls for surveillance procedures; surveillance testing; witnessing of surveillance tests; technician qualification; and facility tours. The inspection involved 35 inspector-hours onsite by two NRC Regional based inspectors.

Results: Of the five areas inspected, no items of noncompliance were found in four areas; two apparent items of noncompliance were found in one area (Deficiency-failure to update a surveillance procedure to reflect a plant modification-Paragraph 3.c(1); and Deficiency-failure to include two containment isolation valves on a containment integrity verification procedure-Paragraph 3.c(3)).

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DETAILS

1. Persons Contacted

- * F. Dacimo, Quality Assurance Supervisor
- * E. Farrell, Unit 2 Superintendent
- J. Kelley, Operations Supervisor
- * J. Opeka, Station Superintendent
- J. Spurr, Supervisory Control Operator
- A. Weber, Shift Supervisor

The inspector also interviewed other licensee employees, including members of the maintenance, and engineering staff, reactor operators, and general office personnel.

* denotes those present at the exit interview.

2. Administrative Controls for Surveillance Procedures

The inspector performed an audit of the licensee's administrative controls by conducting a sampling review of the below listed administrative procedures with respect to the requirements of the Technical Specifications, Section 6, "Administrative Controls", ANSI N18.7 "Administrative Controls for Nuclear Power Plants" and Regulatory Guide 1.33 "Quality Assurance Program Requirements".

- ACP-QA-3.02, Station procedures and forms, Revision 5, June 12, 1978;
- ACP-QA-9.02, Plant surveillance program, Revision 4, April 27, 1978; and,
- ACP-QA-9.02B, Unit 2 surveillance master test control list, Revision 1, September 1, 1978.

No items of noncompliance were identified.

3. Surveillance Testing

- a. The inspector reviewed surveillance tests on a sampling basis to verify the following.
 - Tests required by Technical Specifications are available and covered by properly approved procedures.
 - Test format and technical content are adequate and provide satisfactory testing of related systems or components.

- b. The following surveillance tests were reviewed to verify the items identified above:
- SP 2601A, Borated water source and flow path verification and boric acid pump operability test, Revision 3, March 10, 1978. Data were reviewed for nine tests performed July 18, 1978 through September 12, 1978.
 - SP 2601B, Borated water source flow path, Revision 1, June 15, 1978. Data were reviewed for six surveillances performed April 8, 1978 through September 8, 1978.
 - SP 2619A, Control room shift checks, Revision 2, June 14, 1977. Data were reviewed for fourteen checks performed September 2, 1978 through September 15, 1978.
 - SP 2604A, HPSI pump operability facility I, Revision 1, July 20, 1976. Data were reviewed for six tests performed July 1, 1978 through September 8, 1978.
 - SP 2604B, HPSI pump operability facility II, Revision 1, July 20, 1976. Data were reviewed for six tests performed April 7, 1978 through September 18, 1978.
 - SP 2604C, LPSI pump operability facility I, Revision 1, April 13, 1976. Data were reviewed for seven tests performed April 17, 1978 through September 13, 1978.
 - SP 2604D, LPSI pump operability test facility II, Revision 1, April 13, 1976. Data were reviewed for seven tests performed April 17, 1978 through August 23, 1978.
 - SP 2604E, HPSI alignment check and operability test facility I, Revision 1, August 20, 1976. Data were reviewed for five tests performed May 1, 1978 through September 1, 1978.
 - SP 2604F, HPSI alignment check and operability test Facility II, Revision 1, August 29, 1976. Data were reviewed for five tests performed May 15, 1978 through September 16, 1978.
 - SP 2604G, Facility I CTMT sump outlet isolation valve test, Revision 1, October 29, 1976. Data were reviewed for six tests performed April 14, 1978 through September 9, 1978.

- SP 2604H, Facility II CTMT sump outlet isolation valve test, Revision 1, October 29, 1976. Data were reviewed for six tests performed May 27, 1978 through August 22, 1978.
- OP Procedure 2607B, Facility II containment air recirculation and cooling unit operability test, Revision 2, April 11, 1978. Data were reviewed for five tests performed May 15, 1978 through September 15, 1978.
- OP Procedure 2607A, Facility I containment air recirculation and cooling unit operability test, Revision 2, April 11, 1978. Data were reviewed for five tests performed May 1, 1978 through September 1, 1978.
- OP Procedure 2607B, Facility II containment air recirculation and cooling unit operability test, Revision 2, April 11, 1978. Data were reviewed for five tests performed May 15, 1978 through September 15, 1978.
- OP Procedure 2607A, Facility I containment air recirculation and cooling unit operability test, Revision 2, April 11, 1978. Data were reviewed for five tests performed May 1, 1978 through September 1, 1978.
- OP Procedure 2605G, Containment isolation valve operability test - operating, Revision 1, September 1, 1975. Data were reviewed for four tests performed December 22, 1978 through August 1, 1978.
- SP 2605A, Verifying CTMT integrity, Revision 1, September 29, 1975. Data were reviewed for four tests performed May 22, 1978 through August 23, 1978.
- Maintenance Procedure 2736A, Battery pilot cell surveillance, Revision 1, September 22, 1976. Data were reviewed for six tests performed August 4, 1978 through September 8, 1978.
- Maintenance Procedure 2736B, Complete battery cell measurement, Revision 1, September 22, 1976. Data were reviewed for seven tests performed January 20, 1977 through July 18, 1978.

c. As a result of the above review the following items were identified.

- (1) Surveillance procedures SP 2601A and SP 2601B, which satisfy the requirements for exercising testable power operated valves and verifying the position of manually operated valves in boron injection flow paths (T. S. 4.1. 2.2.a.1 and b), were not revised to reflect the installation, during the last refueling outage, of a power operated valve (2-CH-192) in the flow path from the refueling water storage tank to the charging pump. In addition, these procedures had been performed on a number of occasions with no procedure changes being initiated by the operators to document deviations from the procedures as written.

This is contrary to the requirements of Technical Specification 6.8.1 which specifies that written procedures shall be established, implemented and maintained for surveillance activities of safety related equipment, and is considered to be an item of noncompliance at the deficiency level (336/78-30-01).

The licensee immediately retested the valve in the presence of the inspector and initiated procedure changes upon being made aware of the omission.

- (2) The control room copy of P&ID 26017, chemical and volume control system, was noted not to reflect a modification made during the last refueling to valves CH-196 and CH-192. The licensee was aware of this problem which deals with the method to be employed such that the personnel using P&ID's be made aware that a change has been made to a print in the interim between the time a modification has been completed and a new revised print has been issued. The current administrative method of print updating and control is scheduled for review. A licensee management meeting had been scheduled, prior to the inspection, at which time this issue will be addressed. This item is unresolved pending the licensee's resolution of the matter (336/78-30-02).
- (3) Surveillance Procedure SP 2605A Verifying CTMT Integrity, which verifies primary containment integrity each 31 days,

was noted not to contain two containment isolation valves (2-AC-46 and 2-AC-51) on hydrogen monitoring lines. This is contrary to Technical Specification 4.6.1.1 which requires that all valves required to be closed during accident conditions be verified closed each 31 days and is considered to be an item of noncompliance at the deficiency level (336/78-30-03).

Upon being notified of the valves omission from SP 2605A the valves were immediately inspected and verified locked closed. In addition the valves had been verified closed each 92 days in accordance with Technical Specification 4.6.3.1.1, and procedure OP 2605G. A procedure change to include the valves in SP 2605A was also immediately prepared.

4. Inspector Witnessing of Surveillance Test

- a. The inspector witnessed the performance of surveillance testing of selected components to verify the following.
 - Surveillance test procedure was available and in use.
 - Special test equipment required by procedure was calibrated and in use.
 - Test prerequisites were met.
 - The procedure was adequately detailed to assure performance of a satisfactory surveillance.
- b. The inspector witnessed the performance of SP 2612A, service water pumps operability for the A pump performed September 19, 1978.

No items of noncompliance were identified.

5. Technician Qualifications

The inspector discussed the qualification records of 2 personnel having responsibility for surveillance testing of safety related components and equipment to verify that the individual's experience level and training were in accordance with the guidelines of ANSI N18.1 - 1971, Selection and Training of Nuclear Power Plant Personnel.

No unacceptable items were identified.

6. Facility Tours

On several occasions during the inspection, tours of the facility were conducted of the Reactor Building, Auxiliary Building, Turbine Building, Diesel Generator Room, and portions of the Security Fence. During the tours, the inspectors discussed plant operations and observed housekeeping, radiation control measures, monitoring instrumentation, and controls for Technical Specification compliance. In addition, the inspector observed control room operation for control room manning, and facility operation in accordance with administrative and Technical Specification requirements.

No items of noncompliance were identified.

7. Unresolved Items

Unresolved items are matters about which more information is required in order to ascertain whether they are acceptable, an item of noncompliance, or a deviation. An unresolved item discussed during the inspection is discussed in Paragraph 3.c (2).

8. Exit Interview

The inspectors met with licensee representatives (denoted in Paragraph 1) at the conclusion of the inspection on September 22, 1978. The purpose, scope and findings of the inspection were summarized.