

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

P.O. BOX 270
HARTFORD, CONNECTICUT 06101
(203) 666-6911

November 16, 1978

Docket 50-245

Mr. Boyce Grier
Director, Region I
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, Pennsylvania 19406

Reference: NRC Region I Inspection Report
50-245/78-34

Dear Mr. Grier:

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 October 27, 1978 which informed the Northeast Nuclear Energy Company of an apparent noncompliance with NRC requirements.

ITEM OF NON-COMPLIANCE

Technical Specification 6.8.1 states in part: "Written procedures shall be established, implemented and maintained covering...surveillance activities of safety-related equipment."

Surveillance Procedure 6.6.8.1, Operational Readiness Demonstration (Diesel Generator), requires that during surveillance testing the diesel generator be operated at full load as required by Technical Specification 4.9.A.1.a.

Contrary to the above, data reviewed for ten surveillances performed June 13, 1978, through August 14, 1978, showed that the engine appeared not to have been operated at full load during the performance of the surveillances. The engine appeared to have been operated at approximately 60% load.

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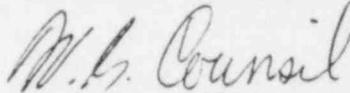
RESPONSE

Although the diesel generator was not operated at full load for the surveillance in question, it was operated at greater than the nominal maximum expected load for the loss of normal power accident condition. Our personnel had erroneously interpreted this as full load. Contributing to the error was the failure of the data sheet to specifically record the load on the machine in kilowatts. Instead, only voltage and amperage readings were taken and a computation would have been required to verify that full rated load was achieved. Hence, our past surveillance data review did not reveal this problem.

As corrective action we have rewritten the data sheet to make it clearer both for the operator and reviewer. We have re-instructed our personnel on Technical Specification and procedure compliance and have subsequently been performing the surveillance test at full rated load for the diesel generator. Additionally, we have reviewed similar surveillances to insure they do comply with Technical Specification requirements.

Very truly yours,

Northeast Nuclear Energy Company



W. G. Council
Vice President

WGC/WR:llm

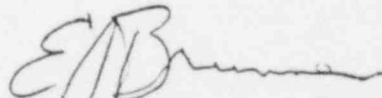
Northeast Nuclear Energy Company

2 27 OCT 1978

In accordance with Section 2.790 of the NRC's "Rules of Practice", Part 2, Title 10, Code of Federal Regulations, a copy of this letter and the enclosures will be placed in the NRC's Public Document Room. If this report contains any information that you (or your contractor) believe to be proprietary, it is necessary that you make a written application within 20 days to this office to withhold such information from public disclosure. Any such application must be accompanied by an affidavit executed by the owner of the information, which identifies the document or part sought to be withheld, and which contains a statement of reasons which addresses with specificity the items which will be considered by the Commission as listed in subparagraph (b)(4) of Section 2.790. The information sought to be withheld shall be incorporated as far as possible into a separate part of the affidavit. If we do not hear from you in this regard within the specified period, the report will be placed in the Public Document Room.

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,



Eldon J. Brunner, Chief
Reactor Operations and Nuclear
Support Branch

Enclosures:

1. Appendix A, Notice of Violation
2. Office of Inspection and Enforcement Inspection Report Number 50-245/78-34

cc w/encls:

- J. F. Opaka, Station Superintendent
- D. G. Diegrick, Manager of Quality Assurance
- J. R. Himmelwright, Licensing Safeguards Engineer
- A. Z. Roisman, Natural Resources Defense Council (without Report)

APPENDIX A

NOTICE OF VIOLATION

Northeast Nuclear Energy Company

Docket No. 50-245

Based on the results of an NRC inspection conducted on October 3-6, 1978, it appears that one of your activities was not conducted in full compliance with the conditions of your NRC license as indicated below. This item is an Infraction.

Technical Specification 6.8.1 states in part: "Written procedures shall be established, implemented and maintained covering . . . surveillance activities of safety-related equipment."

Surveillance Procedure 6.6.8.1, Operational Readiness Demonstration (Diesel Generator), requires that during surveillance testing the diesel generator be operated at full load as required by Technical Specification 4.9.A.1.a.

Contrary to the above, data reviewed for ten surveillances performed June 13, 1978, through August 14, 1978, showed that the engine appeared not to have been operated at full load during the performance of the surveillances. The engine appeared to have been operated at approximately 60% load.

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

Region I

Report No. 78-34

Docket No. 50-245

License No. DPR-21 Priority -- Category C

Licensee: Northeast Nuclear Energy Company

P. O. Box 270

Hartford, Connecticut 06101

Facility Name: Millstone Nuclear Power Station, Unit 1

Inspection at: Waterford, Connecticut

Inspection conducted: October 3-6, 1978

Inspectors: W. H. Baunack
W. H. Baunack, Reactor Inspector

10/25/78
date signed

L. H. Betterhausen For
L. H. Betterhausen, Reactor Inspector

10/25/78
date signed

Approved by H. B. Kister
for H. B. Kister, Chief, Nuclear Support
Section No. 2, RO&NS Branch

date signed
10/25/78
date signed

Inspection Summary:

Inspection on October 3-6, 1978 (Report No. 50-245/78-34)

Areas Inspected: Routine, unannounced inspection by regional based inspectors of administrative controls for surveillance procedures; surveillance testing; witnessing of surveillance tests; technician qualifications; and, facility tours. The inspection involved 30 inspector-hours onsite by two NRC regional based inspectors.

Results: Of the five areas inspected, no items of noncompliance were found in four areas; one apparent item of noncompliance was found in one area (Infraction - failure to perform a surveillance in accordance with procedural instructions).

DETAILS

1. Persons Contacted

- D. Bergeron, Maintenance Engineer
- *F. Dacimo, Quality Assurance Engineer
- *E. Farrell, Superintendent, Unit 2
- R. Herbert, Superintendent, Unit 1
- R. Johnson, Assistant to Operations Supervisor
- J. Nowell, Shift Supervisor
- G. Papanic, Senior Engineer - General Physics
- *P. Przekop, Engineering Supervisor
- *W. Romberg, Operations Supervisor

The inspector also interviewed other licensee employees, including members of the Technical 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-3.03, Document Control, Revision 6, September 8, 1978
- ACP-QA-9.02, Plant Surveillance Program, Revision 4, April 27, 1978
- ACP-QA-9.02A, Unit 1 Surveillance Master Test Control List

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.
 - Test results of selected tests are in conformance with Technical Specifications and procedure requirements have been reviewed by someone other than the tester or individual directing the test.
- b. The following surveillance tests were reviewed to verify the items identified above:
- SP 631.4, Control Rod Coupling Integrity, and Nuclear Instrumentation Discernible Response Verification, Revision 1, January 10, 1978. Data were reviewed for surveillances completed July 20, 1978 and December 8, 1976.
 - SP 776.1, Control Rod Drive Housing Support System Inspection, Revision 1, August 2, 1978. Data were reviewed for surveillances performed April 12, 1978 and November 28, 1976.
 - SP 661.4, Standby Liquid Control Pump Operational Readiness Test. Data were reviewed for five tests performed May 16, 1978 through September 15, 1978.
 - SP 830, Boron Concentration Determination, Revision 0, March 1, 1977. Data were reviewed for ten surveillances performed July 5, 1978 through September 29, 1978.
 - SP 625.4, Emergency Condensate Transfer Pump Operational Readiness Test, Revision 0, August 26, 1977. Data were reviewed for five tests performed November 16, 1977 through August 15, 1978.
 - SP 628.1, Integrated Simulated Automatic Actuation of FWCI, Core Spray, LPCI, Diesel and Gas Turbine Generators, Revision 1, April 5, 1978. Data were reviewed for test performed April 11, 1978.
 - SP 4138, Auto Blowdown Logic Test, Revision 0, October 17, 1977. Data were reviewed for four tests performed December 11, 1977 through July 6, 1978.
 - SP 626.2, Manual Operation of Relief Valves When Reactor is at Low Pressure, Revision 3, February 23, 1978. Performed April 14, 1978. (Data sheet for this surveillance could not be located at the time of the inspection. However, the shift supervisor's log book verified performance of the surveillance).

- MP 717.4, Target Rock APR Valves Testing, Revision 2, August 2, 1978. Data were reviewed for the following valves currently installed on the steam lines.

S/N 129	Tested March 30, 1978
S/N 1	Tested March 31, 1978
S/N 168	Tested March 31, 1978
S/N 4	Tested March 31, 1978
S/N 128	Tested March 31, 1978
S/N 117	Tested March 31, 1978

- SP 842, Condensate Demineralizer Anion Resin Calculation of Remaining Ion Exchange Capability, Revision 0, March 30, 1977. Data were reviewed for fourteen tests performed August 11, 1978 through September 28, 1978.
- SP 632.4, Suppression Chamber Drywell Vacuum Breaker Exercise, Revision 3, February 23, 1978. Data were reviewed for five tests performed May 1, 1978 through September 1, 1978.
- SP 646.8, Fifteen Minute Operational Check of STGS, Revision 1, April 20, 1978. Data were reviewed for five tests performed May 16, 1978 through September 19, 1978.
- SP 623.8, Containment Isolation Valve Operability Demonstration, Revision 2, August 26, 1977. Data were reviewed for five tests performed August 7, 1977 through August 29, 1978.
- SP 668.1, Operational Readiness Demonstration (Diesel Generator) Revision 3, August 2, 1978. Data were reviewed for ten tests performed June 13, 1978 through August 14, 1978.

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

- (1) Documentation associated with SP 631.4, Control Rod Coupling Integrity and Nuclear Instrumentation Discernible Response Verification, completed on July 20, 1978, did not indicate that the surveillance requirements of Technical Specification 4.3.B.1 were performed. The procedural requirements of an additional procedure SP 690C, performed following the last refueling, did insure that the Technical Specification requirements were completed. However, the data sheet associated with this procedure also did not clearly indicate this. The licensee stated these procedures would be changed to insure that the completion of the Technical Specification required surveillance is clearly documented. These procedure changes will be reviewed during a future inspection.

- (2) During the inspector's review of the required daily recording of the boric acid solution temperature, it was noted that the required reviews performed on the Daily Surveillance Log are not being documented. The licensee stated that a revision would be made to the Daily Surveillance Log which will require sign-offs by the reviewers. This matter is unresolved pending the review by NRC:RI of the licensee's actions (245/78-34-01).
- (3) The acceptance criteria in procedure SP 625.4, Emergency Condensate Transfer Pump Operational Readiness Test, appears to be adequate with regard to pump flow requirements. However, acceptance criteria relating to pump discharge head has not been included in the procedure. Pump discharge head is logged and is adequate to meet Technical Specification requirements. The licensee stated acceptance criteria relating to pump discharge head would be included in the procedure. This procedure change will be reviewed during a future inspection.
- (4) During the review of SP 626.2, Manual Operation of Relief Valves When Reactor is at Low Pressure, the inspector noted that the manual operation of the relief valves at low pressure was an energy release to the torus. Consequently, the performance of the surveillance specified by Technical Specification 4.7.A.5 was required. Although the surveillance required by Technical Specification 4.7.5.A is routinely being performed, the licensee stated SP 626.2 would be revised to include performance of vacuum breaker surveillance following the relief valve surveillance. This matter is unresolved pending the review by NRC:RI of the licensee's action (245/78-34-02).
- (5) During the review of SP 623.8, Containment Isolation Valve Operability Demonstration, it was noted that Technical Specification Table 3.7.1 listed three containment isolation valves in the wrong positions and omitted power operated isolation valves FSD-9-75 A-D (one inch solenoid valves to oxygen analyzer) from the table. In addition, since the valves were not listed in the Technical Specification surveillance for these valves in accordance with Technical Specification 4.7.D.1.C was not documented. The licensee stated the surveillance would be documented for these valves, and that in a future Technical Specification change, a correction to Table 3.7.1 would be submitted. This matter is unresolved pending review by NRC:RI of the licensee's action (245/78-34-03).

- (6) Procedure SP 668.1, Operational Readiness Demonstration (Diesel Generator) requires that during surveillance testing the diesel generator be operated at full load as required by Technical Specification 4.9.A.1.a. Data reviewed for ten surveillances performed June 13, 1978 through August 14, 1978 showed that the engine appeared to be operated at less than full load during the surveillances (approximately 60% load). This is contrary to Technical Specification 6.8 which requires implementation of written procedures covering surveillance activities, and is considered to be an item of non-compliance at the Infraction level (245/78-34-04).

4. Inspector's Witnessing of Surveillance Tests

- 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 1060, ISI Program Pump Vibration and Bearing Temperature Measurement, Revision 0, September 1, 1977. Tests performed on A and B Feedwater Pumps on October 4, 1978.
 - SP 631.2, Control Rod Exercise - Stuck Control Rods, Revision 2, August 26, 1977. Performed on October 5, 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, Section and Training of Nuclear Power Plant Personnel.

No unacceptable items were identified.

6. Facility Tour

On several occasions during the inspection, tours of the facility were conducted of the Reactor Building, Auxiliary Building, Turbine Building and Diesel and Gas Turbine Generator Rooms. During the tours, the inspector discussed plant operations and observed house-keeping, radiation control measures, monitoring instrumentation, and controls for Technical Specification compliance. In addition, the inspector observed control room operations on both day and evening shifts 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 items or items of noncompliance. Unresolved items identified during the inspection are discussed in Paragraph 3.

8. Exit Interview

The inspectors met with licensee representatives (denoted in paragraph 1) at the conclusion of the inspection on October 6, 1978. The purpose, scope and findings of the inspection were summarized. These findings were also discussed in a subsequent telephone conversation with Mr. R. Herbert on October 11, 1978.