

OCT 10 1990

Docket Nos. 50-245  
50-336  
50-423  
50-213

EA Nos. 90-176  
90-177

Northeast Nuclear Energy Company and  
Connecticut Yankee Atomic Power Company  
ATTN: Mr. E. J. Mroczka  
Senior Vice President - Nuclear  
Engineering and Operations Group  
P. O. Box 270  
Hartford, Connecticut 06141-0270

Gentlemen:

Subject: Combined Inspection Nos. 50-245/90-22, 50-336/90-24, 50-423/90-22 and  
50-213/90-17

This letter refers to the initial inspection of the Fitness-For-Duty (FFD) Program developed for and being implemented at the Millstone Nuclear Power Station, Units 1, 2, and 3 and the Haddam Neck Plant. The inspection was conducted on September 24-28, 1990, by Messrs. E. B. King and A. Della Ratta of this office. The inspectors conducted the exit interview at the Northeast Utilities Corporate Office on September 28, 1990.

Areas examined during the inspection are described in the NRC Region I combined inspection report which is enclosed with this letter. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspectors.

Based on this inspection, we determined that the development and implementation of your FFD program are very responsive to both the spirit and intent of the NRC FFD rule and that the program is aggressive and comprehensive. We also found that the professionalism and technical expertise exhibited by personnel involved in administering the program, particularly, the onsite collection station staff, were excellent.

However, we are concerned about an apparent programmatic weakness that was identified during the inspection and is discussed in the enclosed report. That weakness relates to certain failures associated with development and/or implementation of initial and refresher training programs for licensee and contractor supervisory personnel, as required by the NRC rule. This failure, combined with significant violations of program implementation identified as a

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result of FFD-related events at both the Haddam Neck and Millstone sites indicate that further attention to the FFD program is required. Therefore, as discussed between Mr. R. Kacich of your staff and Mr. D. Haverkamp of this office, we have arranged to hold an enforcement conference with you at our office in King of Prussia, Pennsylvania, at 1:30 p.m., on October 19, 1990. At the meeting, you should be prepared to discuss the programmatic weaknesses described above, the Haddam Neck and Millstone events, their causal factors, as well as the corrective measures that you have taken or plan to take to prevent recurrence and any other factors the NRC should consider in determining the appropriate enforcement action. Our decision concerning enforcement action for this matter will be communicated to you following the enforcement conference. Inspection reports covering the FFD-related events at Haddam Neck and Millstone are being provided to you under a separate cover.

The inspectors also identified two unresolved items during the inspection. One involves the lack of a documented identification verification procedure for couriers who transfer specimens to the certified laboratory and the other involves the implied exemption of employees from random testing for both alcohol and drugs when called in for nonscheduled work. These matters are also further discussed in the enclosed inspection report. Please be prepared to discuss these unresolved items at the conference.

In accordance with 10 CFR 2.790(a), a copy of this letter and the enclosure will be placed in the NRC Public Document Room.

Your cooperation with us is appreciated.

Sincerely,

Original Signed By:  
Malcolm R. Knapp

Malcolm R. Knapp, Director  
Division of Radiation Safety  
and Safeguards

Enclosure: NRC Region I Combined Inspection Report Numbers 50-245/90-22,  
50-336/90-24, 50-423/90-22 and 50-213/90-17

cc w/encl:

J. P. Stetz, Station Director, Haddam Neck  
D. O. Nordquist, Director of Quality Assurance  
R. M. Kacich, Manager, Generation Facilities Licensing  
W. D. Romberg, Vice President, Nuclear Operations  
S. E. Scace, Station Director, Millstone  
Gerald Garfield, Esquire  
Public Document Room (PDR)  
Local Public Document Room (LPDR)  
Nuclear Safety Information Center (NSIC)  
NRC Resident Inspector  
State of Connecticut

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- bcc w/encl:
- Region I Docket Room (with concurrences)
- Management Assistant, DRMA (w/o encl)
- J. Joyner, DRSS
- D. Holody, EO
- D. Haverkamp, DRP
- K. Abraham, PAO (20) SALP Report and (2) All Inspection Reports
- J. Lieberman, OE
- J. Partlow, NRR
- J. Goldberg, OGC
- J. Caldwell, EDO
- A. Wang, PM, NRR
- D. McGuire, Region II
- J. Creed, Region III
- C. Cain, Region IV
- M. Schuster, Region V
- B. Grimes, NRR/DRIS
- P. McKee, NRR/RSGB
- L. Bush, NRR/RSGB
- J. Shedlosky, SRI, Haddam Neck
- W. Raymond, SRI, Millstone
- M. Boyle, PM, NRR

*bm*  
RI:DRSS

King/mk/slj  
10/10/90

RI:DRSS

*DR*  
Della Ratta  
10/10/90

RI:DRSS

*DR*  
Keimig  
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RI:DRSS

*Joyner*  
Joyner  
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