

**NORTHEAST UTILITIES**

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

General Offices • Selden Street, Berlin, Connecticut

P.O. BOX 270  
HARTFORD, CONNECTICUT 06141-0270  
(203) 665-5000

October 12, 1990

Docket No. 50-245  
A09033

Re: 10CFR2.201

Mr. Thomas T. Martin  
Regional Administrator, Region I  
U.S. Nuclear Regulatory Commission  
475 Allendale Road  
King of Prussia, PA 19406

Dear Mr. Martin:

Millstone Nuclear Power Station, Unit No. 1  
Response to Notice of Violation  
Inspection Report 50-245/90-12

In a letter dated September 12, 1990, <sup>(1)</sup> the NRC transmitted the results of their routine safety inspection conducted at Millstone Unit No. 1 from June 26 through August 6, 1990. In its letter the Staff identified one Severity Level V violation and requested that Northeast Nuclear Energy Company (NNECO) respond to the Notice of Violation within 30 days of the date of the letter. Pursuant to the provisions of 10CFR2.201, NNECO hereby provides its response to the subject Notice of Violation in Attachment 1.

NNECO agrees with the Staff's assessment of the safety significance of this event as being low. Additionally, since this system does not adversely impact the systems necessary to achieve and maintain safe shutdown conditions following a fire, no safety consequences resulted from this event.

In Section 7.4.3 of Inspection Report 50-245/90-12, the NRC stated that "the licensee had ample opportunity to correct the condition reported in this LER." It appears that this conclusion was based on the fact that several fire detection systems requiring major modifications were evaluated in the Integrated Safety Assessment Program (ISAP).

While NNECO acknowledges that the gas turbine enclosure fire detection system should have been surveillance tested monthly until the requirement was removed from the technical specifications, we do not believe this discrepancy is related to implementation of the ISAP process at Millstone Unit No. 1. The appropriate system modifications were evaluated (and reported to the Staff) under ISAP Topic 1.101, "Fire Detection System Code Compliance." As discussed more fully in Attachment 1, personnel oversight in not including the gas turbine enclosure in the original surveillance procedure was the cause of not satisfying Technical Specification 4.12.E.2.

(1) E. C. Wenzinger letter to E. J. Mroczka, "NRC Region I Inspection No. 50-245/90-12," dated September 12, 1990.

1501  
111

Mr. Thomas T. Martin  
A09033/Page 2  
October 12, 1990

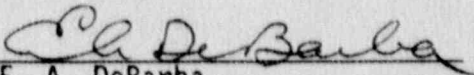
NNECO is confident that this type of oversight can be controlled through increased personnel accountability and a heightened sensitivity for satisfactorily implementing and tracking commitments.

If you have any questions regarding the information contained in this letter, please contact us.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

FOR: E. J. Mroczka  
Senior Vice President

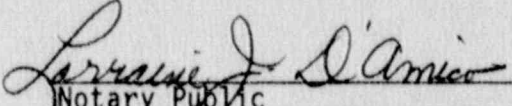
BY:   
E. A. DeBarba  
Vice President

cc: M. L. Boyle, NRC Project Manager, Millstone Unit No. 1  
W. J. Raymond, Senior Resident Inspector, Millstone Unit Nos. 1, 2, and 3

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555

STATE OF CONNECTICUT )  
                                              ) ss. Berlin  
COUNTY OF HARTFORD )

Then personally appeared before me, E. A. DeBarba, who being duly sworn, did state that he is Vice President of Northeast Nuclear Energy Company, a Licensee herein, that he is authorized to execute and file the foregoing information in the name and on behalf of the Licensee herein, and that the statements contained in said information are true and correct to the best of his knowledge and belief.

  
Notary Public  
My Commission Expires March 31, 1993

Docket No. 50-245  
A09033

Attachment 1

Millstone Nuclear Power Station, Unit No. 1  
Response to Notice of Violation  
Inspection Report 50-245/90-12

October 1990

Mr. Thomas T. Martin  
A09033/Attachment 1/Page 1  
October 12, 1990

Millstone Nuclear Power Station, Unit No. 1  
Response to Notice of Violation  
Inspection Report 50-245/90-12

1. Description of Violation

Plant Technical Specification 4.12.E.2, Fire Detection Instrumentation, requires that the nonsupervised circuits between the control room and the detection circuits listed in Table 3.12.2, including those in the gas turbine enclosure, shall be demonstrated to be operable once every 31 days per approved procedures. However, Surveillance Procedure SP-418H, Gas Turbine Fire Detection Functional Test, Revision 9, which provides the specific functional test procedure for this nonsupervised circuit, is performed semiannually.

Contrary to the above, on April 24, 1990, the licensee determined that the above test had not been performed at the required 31-day interval pursuant to Technical Specification 4.12.E.2.

2. Root Cause

As stated in Licensee Event Report 90-006-00, during preparation for the Appendix R compliance audit in 1987, it was discovered that six technical specification fire detection systems were not completely electrically supervised. Surveillance of these systems was being performed on a 6-month frequency under the technical specification requirements for electrically supervised fire detection systems. During the Appendix R audit, it was suggested that one of the six systems, the gas turbine enclosure fire detection system, may not need to be included in the technical specifications. At that time, a verbal commitment to the Staff was made to evaluate if a change was warranted to remove the gas turbine fire detection system from technical specifications.

The corrective actions established in 1987 included the development of a new surveillance procedure to satisfy technical specification requirements to test the fire detection systems at the required 31-day frequency. This procedure erroneously omitted surveillance of the gas turbine enclosure fire detection system.

The cause of this event has been attributed to personnel error. This event occurred by not requiring the gas turbine enclosure fire detection system to be included in the surveillance procedure which was prepared to satisfy technical specification requirements following the 1987 audit, until such time that a license amendment was approved, removing the requirement. In addition, personnel oversight resulted in failure to follow through on the verbal commitment to remove the gas turbine enclosure fire detection system from technical specifications. This

Mr. Thomas T. Martin  
A09033/Attachment 1/Page 2  
October 12, 1990

commitment should have been placed in the Millstone Unit No. 1 tracking system to ensure completion.

3. Corrective Steps Taken and Results Achieved

The frequency for the gas turbine fire detection functional surveillance was promptly changed from semiannual to monthly to monitor the gas turbine enclosure fire detection system nonsupervised circuit as required by Technical Specification 4.12.E.2. The circuit had been successfully tested within the 31-day surveillance interval.

4. Corrective Steps to Prevent Future Violations

To meet the original commitment, a technical specification change is being evaluated which would remove this fire detection system from the technical specifications. Additionally, it has been reinforced with unit personnel that formal tracking of commitments is necessary to ensure timely completion.

5. Date When Full Compliance Will be Achieved

As discussed in Sections 3 and 4, NNECO's initial corrective actions were implemented immediately. The license amendment request will be submitted by December 31, 1990, if warranted.