



April 8, 1994

Docket Nos. 50-213
50-245
50-336
50-423
B14794

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

Haddam Neck Plant
Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3
Update to a Reply to a Notice of Violation
NRC Inspection Report Nos. 50-213/93-23, 50-245/93-30,
50-336/93-25, and 50-423/93-27

In a letter dated February 2, 1994,⁽¹⁾ Connecticut Yankee Atomic Power Company (CYAPCO) and Northeast Nuclear Energy Company (NNECO) submitted a response to two Severity Level IV violations concerning our Fitness-for-Duty (FFD) program. The Notices of Violation (NOV) were transmitted by the NRC Staff on December 23, 1993.⁽²⁾ The purpose of this letter is to inform the Staff of an implementation discrepancy which has been identified subsequent to our response.

Summary

Contrary to statements made in our February 2, 1994, letter, one of the corrective steps taken in response to the FFD NOV had not yet been fully implemented. CYAPCO and NNECO have resolved this situation. Immediately following discovery of this oversight, the NRC Region I Staff was notified by telephone. It has been

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- (1) J. F. Opeka letter to U.S. Nuclear Regulatory Commission, "Reply to a Notice of Violation -- NRC Inspection Report Nos. 50-213/93-23, 50-245/93-30, 50-336/93-25, and 50-423/93-27," dated February 2, 1994.
 - (2) J. H. Joyner letter to J. F. Opeka, "Combined Inspection Nos. 50-213/93-23, 50-245/93-30, 50-336/93-25, and 50-423/93-27 (11/15-18/93)," dated December 23, 1993.

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determined that this oversight did not have any adverse impact on our FFD program.

Discussion

One of the violations transmitted within the December 23, 1993, letter stated that contrary to 10CFR26, Appendix A, Subpart B, Section 2.2(d)(3), collection site persons were not provided with detailed, clearly illustrated, written instructions on the collection of specimens.

In our reply to this particular violation, we indicated that our corrective steps included providing SmithKline Beecham Clinical Laboratories' NIDA Collection/Submission Procedures, Version 2 to collection personnel and that this procedure was to be utilized until the FFD manual had been revised and implemented.

Subsequent to our February 2, 1994 reply to the NOV, we discovered that Version 2 of SmithKline Beecham Clinical Laboratories' NIDA Collection/Submission Procedure was not readily available to site collection personnel. Upon discovery, the Occupational Health Administrators (OHAs) for the Millstone Station, Haddam Neck Plant, and Berlin collection sites were provided with a copy of the appropriate version of this procedure. Version 2 of the SmithKline Beecham Laboratories' NIDA Collection/Submission Procedure was reviewed against the department instructions that had been implemented at each collection facility.

Based on this evaluation, it was determined by the OHAs that the existing department instructions effectively implemented both Version 2 of the SmithKline Beecham Procedure and the requirements of 10CFR26, and that specimen collection activities were being performed in accordance with 10CFR26 during the time in which the corrective action discrepancy existed. It should be noted that all collection personnel had been given initial training in specimen collection, and all had been certified as being qualified to perform specimen collection as outlined in 10CFR26.

In addition, immediately following discovery of the oversight, the NRC Region I Staff was notified. Subsequent discussions took place in which the oversight was discussed in detail.

Conclusion

CYAPCO and NNECO have provided Version 2 of the SmithKline Beecham Clinical Laboratories' NIDA Collection/Submission Procedure to the OHAs. The OHAs have ensured that collection

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activities are being completed in accordance with 10CFR26 requirements. Additionally, we have reviewed all the corrective actions described in our February 2, 1994, submittal and have verified that no further discrepancies exist. We believe that compliance with the provisions of 10CFR26 was maintained despite the oversight to provide site collection personnel with Version 2 of SmithKline Beecham Clinical Laboratories' NIDA Collection/Submission Procedures.


Additionally, it should be noted that the FFD Manual has been revised on schedule, controlled copies have been distributed, and the revised manual is, therefore, now implemented.

If you have any questions, please contact us.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY

FOR: J. F. Opeka
Executive Vice President

BY: 
E. A. DeBarba
Vice President

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