

**ENCLOSURE 1  
NOTICE OF VIOLATION**

Northeast Nuclear Energy Company  
Millstone Nuclear Power Station  
Units 1 and 2

Docket No.: 50-245; 50-336  
License No.: DPR-21; DPR-65

During an NRC inspection conducted on January 5, 1994 through February 22, 1994, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violations are listed below:

- A. 10 CFR 50 Appendix B, Criterion XIII, Handling, Storage and Shipping, requires that measures shall be established to control the..storage..of material and equipment in accordance with ..instructions to prevent damage or deterioration. When necessary for particular products special protective environments...shall be specified." Northeast Utilities Quality Assurance Topical Report, Appendix D, commits to ANSI Standard 45.2.2 - 1972, "...Storage and Handling of Items for Nuclear Power Plants." ANSI 45.2.2 - 1972, Paragraph 2.7.2, states in part that items requiring Level B storage require measures for protection from the effects of temperature extremes, humidity and vapors, acceleration forces, physical damage and airborne contamination.

Pursuant to the above, Administrative Control Procedure, ACP-QA-4.04, "Instructions for Packaging, Shipping, Receiving, Storage and Handling," requires Level B materials to be stored in secure, environmentally protected areas.

Contrary to the above, on September 7, 1993 and January 21, 1994, respectively, three safety related 4160 volt circuit breakers and several stainless steel globe valves that were specified as requiring Level B storage were found not stored in secure, environmentally protected Level B storage areas. These items were improperly stored for at least several days.

This is a Severity Level IV violation (Supplement I).

- B. 10 CFR Part 50 Appendix B, Criterion XVI requires that measures shall be established to assure that conditions adverse to quality are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition.

Contrary to the above, from approximately February 6 to February 18, vital inverter #1 was not capable of automatically transferring to its alternate power supply at all times. Vital inverter #3 was similarly affected from January 28 to February 19, 1994. These significant conditions adverse to quality were not corrected until the inability of inverter #1 to automatically transfer to its alternate source was recognized as an operationally limiting condition on February 18, 1994.

This is a Severity Level IV Violation (Supplement I).

- C. Millstone Unit 2 Technical Specification 6.8.1 requires that procedures covering station activities be established and implemented. Station administrative procedure ACP-QA-2.02C, "Work Orders," was established pursuant to the above.

Procedure ACP-QA-2.02C, Section 5.10.1 requires, in part, that the Operations Work Control (OWC) Supervisor shall inform the Shift Supervisor (SS)/Shift Control Operator (SCO) of all work released.

Contrary to the above, on January 18, 1994, the OWC supervisor did not inform the SS/SCO that the facility 2 control room air conditioning unit had been released for corrective maintenance under authorized work order M2-94-00590. Consequently, the operating shift did not know the unit was out of service and that a limiting condition for operation applied with one of two independent control room emergency ventilation systems inoperable.

This is a Severity Level IV Violation (Supplement I).

- D. 10 CFR Part 50, Appendix B, Criterion III, "Design Control," requires that measures shall be established for the selection and review for suitability of the application of parts that are essential to the safety-related functions of the components. The design control measures shall provide for verifying or checking the adequacy of design.

Contrary to the above, the measures established for review for suitability of the application of replacement solenoid operated valves used in the safety-related emergency diesel generator starting air systems were not adequate, as evidenced by the following examples:

1. The design review for suitability performed in February 1988 for the replacement of valve 2-DG-95B did not verify incorrect vendor information used in lieu of valve name plate data and the emergency diesel generator seismic design specification. Consequently, a valve which did not meet the system design criteria was installed from February 1988 until October 8, 1993.

2. The design review for suitability performed on October 8, 1993, for the replacement of valve 2-DG-95B did not verify vendor information used in lieu of the emergency diesel seismic design specification. Consequently, the valve installed on October 8, 1993 had not been shown to adequately meet the system design criteria.
3. The design reviews for suitability performed for the replacement in 1985 of valve 2-DG-96A, and in 1986 of valve 2-DG-96B, did not verify the vendor information used in lieu of the emergency diesel generator seismic design specification. Consequently, the valves had not been verified to adequately meet the system design criteria.

This is a Severity Level IV Violation (Supplement I)

- E. Millstone Unit 2 Technical Specification (TS) 3.7.1.1, "Turbine Cycle - Safety Valves," which applies in operating modes one through three, requires that with one or more main steam line code safety valves (MSSV) inoperable, either restore the inoperable valve(s) to operable status or reduce the power level high trip setpoint within four hours. Otherwise, the plant must be placed in at least hot standby within the next six hours and in cold shutdown within the following 30 hours.

Contrary to the above, from May 31, 1992, at 6:50 p.m. until June 1, 1992, at 4:18 a.m., with one or more MSSV inoperable and without reducing the power level high trip setpoint, the plant was not placed in cold shutdown within 40 hours.

This is a Severity Level IV Violation. (Supplement I)

- F. Millstone Unit 1 Technical Specification 4.7.b.3.c requires that when one circuit of the standby gas treatment system becomes inoperable, the other circuit shall be demonstrated to be operable immediately and daily thereafter.

Contrary to the above, on November 11, 1993, with Unit 1 operating at 100 percent power and one circuit of the standby gas treatment system inoperable, the surveillance testing immediately to demonstrate the operability of the other circuit was inadequately performed. Specifically, surveillance procedure SP 646.6, "Functional Test When One Circuit of the Standby Gas Treatment Becomes Inoperable," which was the only test performed, was not conducted at the design flow rate of 1100 scfm and did not verify the functionality of the 5 KW relative humidity heaters.

This is a Severity Level IV Violation (Supplement I). No response is required.

Pursuant to the provisions of 10 CFR 2.201, Northeast Nuclear Energy Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the

Regional Administrator, Region I, and if applicable, a copy to the NRC Resident Inspector within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.

Dated at King of Prussia, PA  
this 22<sup>ND</sup> day of APRIL, 1994