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December 21, 1990

Docket No. 50-213 B13686

Re: Inspection No. 50-213/89-200

Attention: L. H. Bettenhausen U.S. Nuclear Regulatory Commission Region I 475 Allendale Road King of Prussia, PA 19406

Gentlemen:

Haddam Neck Plant
Dedication of Commercial-Grade Items
Additional Information for Inspection No. 50-213/89-200

During the week of February 6-10, 1989, the NRC Staff conducted a site inspection at the Haddam Neck Plant (Inspection No. 50-213/89-200) to review vendor interface and procurement-related programs at the site. In a letter dated March 30, 1989, Connecticut Yankee Atomic Power Company (CYAPCO) provided the NRC Staff with additional information as a follow-up to the site inspection. In a letter dated May 25, 1989, the NRC Staff documented the results of the February inspection. In a letter dated August 28, 1989, CYAPCO provided the NRC Staff with some clarifications of CYAPCO's March 30, 1989, letter and the NRC Staff's May 25, 1989, inspection report. The purpose of this letter is to document the results of CYAPCO's evaluations related to the dedication of commercial-grade items.

In the March 30, 1989, letter, CYAPCO committed to performing a random sampling evaluation of purchase orders for commercial-grade items installed in safety-related systems between January 1, 1985, and May 31, 1988. As described in the March 30, 1989, letter, the sample size would be approximately

⁽¹⁾ E. J. Mroczka letter to the U.S. Nuclear Regulatory Commission, "Haddam Neck Plant, Additional Information," dated March 30, 1989.

⁽²⁾ S. A. Varga letter to E. J. Mroczka, "Inspection of the Vendor Interface and Procurement Programs at the Haddam Neck Plant (Inspection Report No. 50-213/89-200)," dated May 25, 1989.

⁽³⁾ E. J. Mroczka letter to the U.S. Nuclear Regulatory Commission, "Haddam Neck Plant, Additional Information for Inspection No. 50-213/89-200," dated August 28, 1989.

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125 purchase orders. CYAPCO committed to complete the sampling program approximately 60 days after the 1989 refueling outage. In the August 28, 1989, letter, CYAPCO states that the schedule for completion of the sampling program would be delayed to September 30, 1990. This was based on the realization of the amount of work required to complete the task. The September 30, 1990, date was also established based on a projected Cycle 15 refueling outage completion date of November 1989. Since the Cycle 15 refueling outage was extended to the end of September 1990, the schedule projected in the August 28, 1989, letter could not be met because of resources being diverted to the outage. In the period of time since the end of the refueling outage CYAPCO has completed the sampling program and hereby presents the results of that program.

In the March 30, 1989, letter, CYAPCO committed to a purchase order sample size of 125 items based on a projected total population of 1250 purchase orders, Military Standard 105D, and an acceptable quality level (AQL) set to assure less than a 0.1 percent defective rate. CYAPCO subsequently determined that there were only 1176 purchase orders that were applicable to this evaluation. On the basis of Military Standard 105D and the selected AQL, this translates to a sample size of 80 purchase orders.

Of the 80 purchase orders, 86.25 percent (69) were found to be "fully acceptable" or "acceptable with comments." Only 13.75 percent (11) were found to be "unacceptable," based upon recently evolved interpretations of commercial-grade procurement requirements. A total of three nonconformance reports (NCR) and one plant information report (PIR) were generated as a result. Neither the NCRs nor the PIR could be dispositioned "use as is." However, they were evaluated and found to not involve an operability concern.

We have concluded that the entire population of purchase orders is acceptable based on having identified no operability concerns. In addition, our procurement quality assurance program historically has provided CYAPCO with adequate assurance of quality replacement parts as demonstrated by past NRC inspections and our reliability and performance record.

Based on the results of the sampling effort, CYAPCO has concluded that there have been some weaknesses in our procurement program. CYAPCO is currently working to strengthen and enhance our overall procurement program. On behalf of 200, Northeast Utilities is developing a response to the Nuclear Management and Resources Council's (NUMARC) comprehensive procurement initiative implementation plan. It is expected that the programmatic changes will address the identified weaknesses.

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A. B. Wang, NRC Project Manager, Haddam Neck Plant
J. T. Shedlosky, Senior Resident Inspector, Haddam Neck Plant U.S. Nuclear Regulatory Commission Attention: Document Control Desk Washington, DC 20555

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY

Senior Vice President