

DEC 26 1990

Docket No. 50-245; 50-336; 50-423
License No. DPR-21; DPR-65; NPF-49
EA No. 90-219

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

Gentlemen:

Subject: NRC Region I Combined Inspection Nos. 50-245/90-20,
50-336/90-22, and 50-423/90-20

This letter transmits the NRC report of our routine safety inspection that was conducted by Messrs. D. Dempsey, P. Habighorst, and K. Kolaczyk of this office on September 18 - November 15, October 2 - November 15 (and continued December 3-13 to evaluate further one of the significant issues described herein), and October 16 - November 15, 1990, for Millstone Units 1, 2, and 3, respectively. At the conclusion of the inspection the findings were discussed by the above inspectors with Mr. S. E. Scace and other members of your staff.

Areas examined during the inspection are described in the NRC Region I inspection report, which is enclosed with this letter. Within these areas, the inspection consisted of observation of activities, interviews with personnel, and document reviews.

Based on the results of this inspection, two apparent violations were identified at Millstone Unit 2 and are being considered for escalated enforcement action in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions" (Enforcement Policy), 10 CFR Part 2, Appendix C (1990). The apparent violations involve the loss of containment integrity control as a result of personal errors and are discussed in the Unit 2 operations and outage sections of the enclosed report. Specifically, the apparent violations involve the loss of containment integrity due to the inoperability of the containment purge valve isolation system, and in a separate event, the loss of containment integrity via the No. 1 steam generator atmospheric dump valve. Accordingly, no Notice of Violation is presently being issued for these inspection findings. Please be advised that the number and characterization of apparent violations described in the enclosed inspection report may change as a result of further NRC review.

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An enforcement conference to discuss these apparent violations at Millstone Unit 2 has been scheduled for January 15, 1991. The purposes of this conference are to discuss the apparent violations, their causes and safety significance; to provide you the opportunity to point out any errors in our inspection report; to provide an opportunity for you to present your proposed corrective actions; and to discuss any other information that will help us determine the appropriate enforcement action in accordance with the Enforcement Policy. You will be advised by separate correspondence of the results of our deliberations on this matter. No response regarding these apparent violations is required at this time.

The enclosed report addresses your performance during the recent refueling and maintenance outage on Millstone 2. Overall, we found the control of outage activities to be good, with effective management of planned activities and aggressive followup of problems. The thorough evaluation of unplanned events, the extensive support by corporate engineering and vendors to disposition of these issues, and the effective interface between site and corporate engineering were notable strengths. Your assessment of the personnel performance aspects of these events was requested in our letter to you dated November 5, 1990, enclosing Inspection Report 50-336/90-18.

Notwithstanding the above conclusion regarding generally good performance, we noted a number of events attributed to personnel error, that apparently resulted from procedure quality and adherence weaknesses. Further, the failure to satisfactorily complete a critical step during the replacement of in-core instruments that resulted in the dropping of the incore instrument support plate was significant (see section 9.2 of the enclosed report). Our assessment was that the lift tool installation error resulted from a combination of inadequacies in procedure details, personnel experience, and supervision of the work activity. The event demonstrates the need for greater diligence in the review process for "tried and proven" procedures to eliminate any over-reliance on personnel experience for critical activities.

Based on the results of this inspection at Millstone Unit 1, certain of your activities appeared to be in violation of NRC requirements, as specified in the Notice of Violation enclosed herewith as Appendix A. We are concerned about the violation because it involved the operation of Millstone 1 with non-conservative setpoints on the steam jet air ejector radiation monitor. You are required to respond to this violation and should follow the instructions specified in Appendix A when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. After reviewing your response to Appendix A, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

In addition, certain of your activities at Millstone Unit 2 appeared to be in deviation from your written commitments, as specified in the Notice of Deviation enclosed herewith as Appendix B. We are concerned about the deviations because they involved the failures to test

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reactor protection channels and to operate the loose parts monitor in accordance with Final Safety Analysis Report commitments. You are requested to respond to these deviations, and should follow the instructions specified in Appendix B in preparing your response.

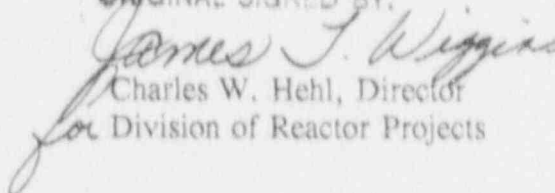
In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be placed in the NRC Public Document Room.

The responses directed by this letter and the enclosed Notices are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Pub. L. No. 96.511.

Your cooperation with us is appreciated.

Sincerely,

ORIGINAL SIGNED BY:


Charles W. Hehl, Director
for Division of Reactor Projects

Enclosures:

1. Appendix A, Notice of Violation
2. Appendix B, Notice of Deviation
3. NRC Region I Combined Inspection Report No. 50-245/90-20;
50-336/90-22; 50-423/90-20

cc w/encls:

W. D. Romberg, Vice President, Nuclear Operations
D. O. Nordquist, Director of Quality Services
R. M. Kacich, Manager, Generation Facilities Licensing
S. E. Seace, Station Director, Millstone
H. F. Haynes, Nuclear Unit Director, Millstone Unit 1
J. S. Keenan, Nuclear Unit Director, Millstone Unit 2
C. H. Clement, Nuclear Unit Director, Millstone Unit 3
Gerald Garfield, Esquire
Public Document Room (PDR)
Local Public Document Room (LPDR)
Nuclear Safety Information Center (NSIC)
NRC Senior Resident Inspector
State of Connecticut

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bcc w/encls:

- Region I Docket Room (with concurrences)
- Management Assistant, DRMA (w/o enclosures)
- DRP Section Chief
- E. Wenzinger, DRP
- J. Shedlosky, SRI, Haddam Neck
- W. Raymond, SRI, Millstone
- M. Boyle, PM, NRR
- G. Vissing, PM, NRR
- D. Jaffe, PM, NRR
- J. Caldwell, EDO
- L. Chandler, OGC
- J. Lieberman, OE
- J. Stewart, DRP

bcc w/Appendices A and B, Report Cover Sheet, and Executive Summary only:

- W. Hehl, DRP
- J. Wiggins, DRP
- W. Hodges, DRS
- J. Durr, DRS
- R. Gallo, DRS
- M. Knapp, DRSS
- R. Cooper, DRSS
- J. Stolz, NRR/PDI-4

RI:DRP

W. RAYMOND
12/ /90

RI:EO
*

D.HOLOGY
12/20/90

RI:DRP

D. HAVERKAMP
12/20/90
*

RI:RC
*

K.SMITH
12/20/90

RI:DRP

E. WENZINGER
12/20/90
*

RI:DRP

W.HEHL
12/20/90

12/31/90
 Discussed inspection results with
 ① Harry Haynes, Millstone 1 Director @ 11:45 am,
 ② Carl Clement, Millstone 3 Director @ 1:45 pm,
 ③ Jack Keenan, Millstone 2 Director @ 2:15 pm.
 J. E. Janschen

*SEE PREVIOUS CONCURRENCE SHEET

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inadequacies in procedure details, personnel experience, and supervision of the work activity. The event demonstrates the need for greater diligence in the review process for "tried and proven" procedures to eliminate any over-reliance on personnel experience for critical activities.

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Your cooperation with us is appreciated.

Sincerely,

Charles W. Hehl, Director
Division of Reactor Projects

Enclosures:

- 1. Appendix A, Notice of Violation
- 2. Appendix B, Notice of Deviation
- 3. NRC Region I Combined Inspection Report No. 50-245/90-20;
50-336/90-22; 50-423/90-20

RI:DRP	RI:DRP	RI:DRP
<i>[Signature]</i> W. RAYMOND	D. HAVERKAMP	E. WENZINGER
12/ /90	12/ /90	12/20/90

RI:EO	RI:RC	RI:DRP
<i>[Signature]</i> D. HOLODY	K. SMITH	W. HEHL
12/ /90	12/ /90	12/ /90

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