

APPENDIX B

NOTICE OF DEVIATION

Northeast Nuclear Energy Company
Millstone Nuclear Power Station Unit 2

Docket No. 50-336
License No. DPR-65

During an NRC inspection conducted on October 2 - November 15, 1990, deviations of your written commitments were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Action," 10 CFR 2, Appendix C, (1990), the deviations are listed below:

- A. Final Safety Analysis Report (FSAR) section 7.2.2 states that the requirements of IEEE Standard 338-1971 will be met for the testing of reactor protection system (RPS) channels. IEEE Standard 338-1971 requires that tests be conducted by inserting a simulated signal "as close to the sensor as practicable." Licensee procedure SP 2401G was developed to meet the above commitments and provides the monthly functional test of RPS channels.

Contrary to the above, as of November 15, 1990, the monthly functional tests for the RPS channels for reactor coolant system flow, reactor coolant pump speed and the zero power mode bypass interlock were not performed by inserting a simulated signal as close to the primary sensor as practicable.

- B. FSAR section 7.5.7.4 states that during normal loose parts monitoring system operation, both loop magnetic recorders are in the record mode making an audio record of the output from each of the eight sensors on the primary coolant system. Licensee procedure OP-2387B Revision 2 was developed to meet the above commitment during normal system operations.

Contrary to the above, as of November 8, 1990, at 2:00 pm, the operating procedure OP-2387B was not being implemented in that magnetic recorders were not in service providing an audio record of output from the loose parts monitoring sensors.

Please provide 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 a copy to the NRC Resident Inspector, in writing within 30 days of the date of this Notice, the reasons for the deviations, the corrective steps which have been taken and the results achieved, the corrective steps which will be taken to avoid further deviations, and the date when your corrective action will be completed. Where good cause is shown, consideration will be given to extending the response time.

Dated at King of Prussia, Pennsylvania
this 28th day of December 1990.

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