

NORTHEAST UTILITIES



THE CONNECTICUT LIGHT AND POWER COMPANY
WESTERN MASSACHUSETTS ELECTRIC COMPANY
MIDDLESEX WATER POWER COMPANY
NORTHEAST UTILITIES SERVICE COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY

General Offices • Seiden Street, Berlin, Connecticut

P.O. BOX 270
HARTFORD, CONNECTICUT 06141-0270
(203) 665-5000

January 11, 1991

Docket No. 50-213
B13711

Re: Response to Inspection
Report No. 50-213/90-80

Mr. T. T. Martin
Region I Administrator
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Reference: M. W. Hodges letter to E. J. Mroczka, "NRC Region I
Inspection Report No. 50-213/90-80," dated December 12,
1990.

Dear Mr. Martin:

Haddam Neck Plant
Inspection Report No. 50-213/90-80
Response to Notice of Violation

On December 12, 1990 (reference), the NRC Staff transmitted to Connecticut Yankee Atomic Power Company (CYAPCO) Inspection Report No. 50-213/90-80. As discussed in the Inspection Report, the NRC Staff cited CYAPCO for one violation of the Commission's regulations for failure to assure that conditions adverse to quality were promptly corrected and failure to assure corrective action taken to preclude repetition was adequate. In addition, this Inspection Report identified several weaknesses in the effectiveness of maintenance activities at the Haddam Neck Plant.

Pursuant to 10CFR2.201, and in accordance with the instructions contained in the Inspection Report, CYAPCO hereby provides the attached information in response to the Notice of Violation cited in the Inspection Report. This information is provided as Attachment 1. CYAPCO's response to the maintenance program weaknesses identified in this Inspection Report will be provided to the NRC Staff in a subsequent submittal in accordance with the instructions provided in the Inspection Report.

9101150366 910111
PDR ADOCK 05000213
© PDR

//
IE01

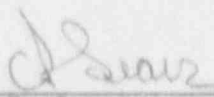
Mr. T. T. Martin
B13711/Page 2
January 11, 1991

We trust you will find the attached information satisfactory and we remain available to answer any questions you may have.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY

FOR: E. J. Mroczka
Senior Vice President

BY: 
C. F. Sears
Vice President

cc: M. W. Hodges, Director, Division of Reactor Safety
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

Docket No. 50-213
B13711

Attachment 1
Haddam Neck Plant
Response to Notice of Violation

January 1991

Haddam Neck Plant
Response to Notice of Violation

1. Description of Violation

10CFR 50, Appendix B, Criterion XVI states in part, that "Measures shall be established to assure that conditions adverse to quality . . . are promptly identified and corrected . . . and corrective action taken to preclude repetition."

Contrary to the above, as of September 21, 1990, the licensee's measures established to assure that conditions adverse to quality are promptly corrected and corrective action taken to preclude repetition were inadequate as evidenced by the following.

Quality Services Department memorandum CY-QSD-90-1117, dated February 2, 1990, reported to plant management various 1989 work order deficiencies, such as poor documentation and procedure deviations, that required corrective action. However, the licensee's actions to promptly correct these deficiencies have not been adequate since similar deficiencies in various 1990 completed work order documents were identified where the documentation of the work performed or the retest conducted was either incomplete or nondescriptive.

2. Reason for Violation

This violation occurred due to lack of attention to detail by first line supervision and inadequate management oversight of this function.

3. Corrective Action

The issue of work order package documentation deficiencies has been discussed with maintenance supervisors. These discussions, with those who are responsible for ensuring package completeness, have heightened the awareness of the importance of thorough and complete work order package documentation, and have emphasized appropriate procedures including Maintenance Department procedure MA 1.5-1, "Work Order Preparation, Work Control, and Documentation." Deficiencies on completed, closed out work orders cannot be corrected. If proper documentation was not performed at the time the work was done, reconstructing is uncertain at best. CYAPCO has taken action to prevent recurrence as described below.

4. Corrective Actions to Prevent Recurrence

Throughout 1991, the Maintenance Manager will be performing random reviews of completed work order packages. In addition, a series of

Attachment 1
B13711/Page 2
January 11, 1991

work order reviews will be performed by a task force made up of maintenance personnel from each of our four nuclear units. The Quality Services Department will continue to review a sampling of completed work order packages. We expect these efforts will achieve improvement in the very near future, and full compliance by the end of September, 1991.

We expect that this increased level of internal review of work order packages will achieve the desired result, and alleviate the concern over reducing QSD involvement in the work order process. We feel strongly that it is important for the people doing work to do it properly and that there should not be a need for others to ensure it is done. Specifically, the supervisors will complete the work order documentation thoroughly, and QSD will not be needed to review each package prior to filing.