

NORTHEAST UTILITIES



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

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December 7, 1990

Docket No. 50-336

A09127

Mr. F. C. Wenzinger, Chief
Projects Branch No. 4
Division of Reactor Projects
U. S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, Pennsylvania 19406

Dear Mr. Wenzinger:

Millstone Nuclear Power Station, Unit No. 2
RI-90-A-175

We have completed our review of an allegation concerning activities at Millstone Unit 2 (RI-90-A-175). As requested in your transmittal letter, our response does not contain any personal privacy, proprietary, or safeguards information. The material contained in this response may be released to the public and placed in the NRC Public Document Room at your discretion. The NRC letter and our response have received controlled and limited distribution on a "need to know" basis during the preparation of this response.

Issue 1

On September 19, 1990, the on-call electrician was assigned duties as electrical coverage for reduced inventory condition while on shutdown cooling and drained to the centerline of the hot-leg for nozzle dam stallation. Reduced inventory coverage is a dedicated position as is the on-call electrician. The on-call electrician would be required to respond to station emergencies.

- a. Are these multiple assignments contrary to company procedures? Please explain.

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Response

During shutdown periods with reduced reactor coolant inventory, Millstone Unit 2 has established an on-site emergency response team of one electrician and five mechanics whose task is to establish containment integrity by closing the containment equipment hatch and the personnel access door in the event of loss of shutdown cooling. The team provides 24-hour coverage and is required to respond and complete the tasks within two hours. Each of the team members carries a radiopager while on site to ensure that the team members can be contacted in a short period of time. Assignment to this team is not an emergency plan on-call assignment, and as such, there is no multiple on-call assignment issue. This assignment is not contrary to company procedures.

Issue 2

On September 15, 1990, an electrician was assigned to disconnect the "A" heater drain pump and hang grounds on both the 4160V switchgear and locally on the pump motor. During verification of the AWO and the tagging, the following allegedly discrepant conditions were identified:

1. The wrong procedure was referenced in the AWO vibration data procedure rather than the grounding of metal-clad switchgear procedure.
2. The motor heaters were not tagged.
3. The "refuel-heat" drain transfer was tagged in the wrong position.
4. The AWO did not allow for grounding of the switchgear even though this is a necessary first step to disconnecting the motor.

Please address these discrepant conditions. If tagging discrepancies are identified, please discuss whether or not this is a recurring condition that may require corrective action.

Combined Response to Items 1 and 4

In reviewing the work order for this job, it was noted that procedures referenced in the Procedures Cautions section of the automated work order (AWO) were not applicable for the work to be performed. This was caused by the fact that various procedure numbers may automatically appear in the procedure fields of the AWO. These numbers appear as a function of the equipment identification number used in the creation of the AWO. These procedure numbers appear as a convenience to aid in writing the AWO and are for information only. The Maintenance Supervisor and the Job Supervisor are responsible for reviewing the AWO for accuracy prior to the commencement of work, as was done in this case.

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The original "Job Description" section of the work order did not provide instructions to install grounds on the switchgear prior to disconnecting the motor leads. This error was brought to the attention of the Maintenance Supervisor by the Job Supervisor prior to starting the work. The Maintenance Supervisor made pen and ink changes to the work order, correcting the error and indicating that grounds were to be installed on the switchgear prior to proceeding with the work described in the AWO. This review and correction process is consistent with the provisions of the governing station procedure. The changes made corrected the error, and the work order was correct and complete before the work was initiated.

Response Item 2

The motor heaters for the "A" heater drain pump were not initially tagged for this AWO. The heaters did not need to be tagged to safely perform the grounding of the heater drain pump side of the "refuel load center/heater drain pump transfer switch" (NA-105). After the safety tags were placed and the AWO released for this work, the Job Supervisor requested that the "A" heater drain pump motor heaters be tagged. Tags were placed at that time. The reason the Job Supervisor requested tagging of the motor heaters was in anticipation of having to remove the entire "A" heater drain pump at some later time.

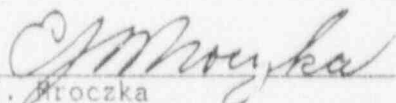
Response Item 3

The "refuel load center/heater drain pump transfer switch" was not tagged in the wrong position. The heater drain pump transfer switch was tagged in the "heater drain pump" position and never changed. Another tag was initially made out for the transfer switch in the "refuel load center" position. That tag was not needed, was never placed on the transfer switch, and was destroyed.

After our review and evaluation, we find that none of these issues taken either singularly or collectively present any indication of a compromise of nuclear safety. We appreciate the opportunity to respond and explain the basis for our actions. Please contact my staff if there are any further questions on any of these matters.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



E. J. Proczka
Senior Vice President

cc: W. J. Raymond, Senior Resident Inspector, Millstone Unit Nos. 1, 2, and 3