

NORTHEAST UTILITIES



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

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October 1, 1982

Docket No. 50-336
A02757

Mr. T. T. Martin
Director, Division of Engineering and Technical Programs
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, Pennsylvania 19406

References: (1) T. T. Martin Letter to W. G. Council dated September 8, 1982
transmitting I&E Inspection 50-245/82-16 and 50-336/82-17

Gentlemen:

Millstone Nuclear Power Station, Unit 2
Response to I&E Inspection 50-336/82-17 Notice of Violation

Pursuant to the provisions of Section 2.201 of the NRC's "Rules of Practice", Part 2, Title 10, Code of Federal Regulations, this report is submitted in reply to Reference (1). Reference (1) informed the Northeast Nuclear Energy Company (NNECo) of an apparent Severity Level V Violation as a result of an item of non-compliance noted during the routine safety inspection conducted on August 2, 1982 through August 6, 1982.

In accordance with NRC Enforcement Policy 47 FR 9987 (March 9, 1982), the following violation was identified:

10 CFR 50, Appendix B, Criterion VI, requires, in part, that measures shall be established to control issuance of documents and their changes; and to assure that the documents are distributed to the location where the activity described in the document is to be performed.

NUSCo Quality Assurance Manual, Volume II, Section VI, "Design Document Control", paragraph 6.4.9.12, states, in part, "...Technical Specification changes are distributed...to holders of controlled copies of...the Technical Specifications who are responsible for updating their copies..."

NUSCo Quality Assurance Manual, Volume II, Section V, Paragraphs 5.5.2.4, 5.5.2.5, and 5.5.2.6 require, in part, that station procedures and their changes must be controlled and distributed to affected personnel; and that prior to initiating activities, the latest applicable procedure must be available to personnel performing the activity.

Contrary to the above, on August 4, 1982, controlled copies of the Technical Specifications were identified as not having been properly updated and station procedures located in the Control Room and at the Hot Shutdown Panel as not being properly controlled and distributed in that:

Items 1 and 2

During posting of Amendment No. 79 to the Control Room Technical Specification, Controlled Copy No. 84, five pages in Section 2 were incorrectly removed and replaced with five pages designated for Section 3.2. Obsolete pages in Section 3.2 were not replaced.

During posting of Amendment 79 to Technical Specifications, Controlled Copy No. 82, obsolete pages from Section 2 were not removed.

Response

Corrective action was initiated upon discovery of the above items and was completed on the day of the exit interview (8/6/82). Both copies of Technical Specifications were correctly updated.

The incorrect posting of the Technical Specifications is attributable to a clerical error and is considered an isolated event. A proper document control system was in existence for this item. The need to ensure detection of an incorrect posting had been recognized and a program to audit Technical Specification controlled copies was in the process of being established at the time of this inspection. This audit program has been implemented and will complement the in-place document control system.

Items 3 and 4

Copies of two operating procedures, one surveillance procedure, two operating forms, and two Technical Specification Figures being maintained at the Hot Shutdown Panel were not controlled. The two operating forms were not the latest revision.

Copies of operations forms being maintained in the Control Room Technical Forms and Data Book were not controlled. At least one form was not the latest revision.

Response

Corrective action was initiated upon discovery of the above items and was completed on the day of the exit interview (8/6/82). Procedures, figures and forms were brought up to current revision at the Hot Shutdown Panel and Control Room Technical Forms and Data Book locations.

A document control system for the distribution of procedures, figures and forms was in existence of the time of the inspection. However, the Hot Shutdown Panel location and Control Room Technical Forms and Data Book were not on the controlled distribution list. Required documents for these locations have been added to the controlled distribution list. This will ensure proper distribution and document control at these locations.

We believe the actions taken have corrected the problem and will prevent recurrence. For your future reference, note that the Appendix A Notice of Violation incorrectly referenced the NUSCo Quality Assurance Manual. This Manual was replaced by the Northeast Utilities Quality Assurance Program Topical Report. Revision 4 of the Topical Report was accepted by the Nuclear Regulatory Commission on April 9, 1982.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

W. G. Council

W. G. Council
Senior Vice President

J. P. Cagnetta

By: J. P. Cagnetta
Vice President Nuclear and
Environmental Engineering

WGC/JJK:mo

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