

**NORTHEAST UTILITIES**

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

General Offices • Selden Street, Berlin, Connecticut

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

February 15, 1991

Docket No. 50-213  
B13729

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

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

- References:
1. M. W. Hodges letter to E. J. Mroczka, "NRC Region I Inspection Report No. 50-213/90-80," dated December 12, 1990.
  2. E. J. Mroczka letter to T. T. Martin, "Haddam Neck Plant, Inspection Report No. 50-213/90-80, Response to Notice of Violation," dated January 11, 1991.

Dear Mr. Martin:

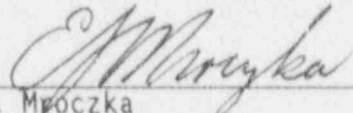
Haddam Neck Plant  
Response to Inspection Report No. 50-213/90-80

On December 12, 1990 (Reference 1), the NRC Staff transmitted to Connecticut Yankee Atomic Power Company (CYAPCO) Inspection Report No. 50-213/90-80. This report provided the results of the special maintenance team inspection conducted by the NRC Staff at the Haddam Neck Plant August 27 through September 21, 1990. Additionally, the Inspection Report required that CYAPCO provide the NRC Staff with a response to the Notice of Violation included in the report and a response to the Summary of Weaknesses identified in the report. CYAPCO provided its response to the Notice of Violation to the NRC Staff in a letter dated January 11, 1991 (Reference 2). The purpose of this letter is to provide CYAPCO's response to the Summary of Weaknesses identified in the Inspection Report. This information is provided as Attachment 1.

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

  
\_\_\_\_\_  
E. J. Mroczka  
Senior Vice President

cc: See next page

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Mr. T. T. Martin  
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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  
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Attachment 1

Haddam Neck Plant

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

February 1991

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

Provided below as items (1) through (13) are CYAPCO's responses to the Summary of Weaknesses, as identified in Appendix 2 of NRC Inspection Report No. 50-213/90-80. These items were identified during the NRC Staff's Special Maintenance Team Inspection conducted from August 27 through September 21, 1990 at the Haddam Neck Plant. CYAPCO believes that the planned and completed actions as identified below fully address the identified weaknesses and should enhance our maintenance activities.

NRC Summary of Weaknesses

1. There was a lack of QSD and plant management attention to achieve effective corrective action to known work order package documentation deficiencies identified by QSD.

Response:

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 the need to use Maintenance Department procedure, MA 1.5-2, "Work Order Preparation, Work Control, and Documentation."

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

We expect that this increased level of internal review of work order packages will achieve the desired results, 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 should not need to be relied upon to review each package prior to filing.

2. The BOM project concerning the identification and control of equipment parts is incomplete.

Response:

A mechanic will be assigned, by the end of February 1991, to work full time on upgrades to the existing BOM during nonoutage periods. The BOM project is an ongoing and continuing project that will require continual upgrades.

3. A structured method does not exist for management to measure maintenance performance and provide feedback for improving the maintenance process.

Response:

The Maintenance Department will develop a Maintenance Department Instruction (MDI) to measure maintenance performance using external inspections and reports, Quality Services Department reports and surveillances and Maintenance Manager meetings. These functions present supervision with evaluation and feedback on the day-to-day maintenance work process involving selected work activities. This procedure will be in place by April 1, 1991.

4. A substantial backlog exists in the procurement of spare parts which is attributed to insufficient engineering resources.

Response:

CYAPCO is establishing an improved priority system to more effectively deal with the backlog volume of procurement requisitions. This prioritization will more efficiently utilize engineering resources and ensure that required spare and replacement parts are on hand when needed. This prioritization program will be in place by the end of February 1991.

5. Some engineering personnel were not familiar with certain administrative and maintenance procedural requirements for testing safety related equipment in support of maintenance.

Response:

Troubleshooting procedure ACP 1.0-68 was first issued on March 1990 and since issuance, there have been cases where confusion was evident on the limitations of this procedure. A working meeting where personnel familiar with the limitations and proper usage of the troubleshooting procedure was held January 24, 1991 for personnel from the Haddam Neck Plant Engineering Department. This will increase the level of knowledge regarding use of the procedure by Engineering personnel.

6. Reducing QSD involvement in the work order process by removing their requirement to review completed work orders would be premature at this time.

Response:

The station revised its administrative control procedure (ACP 1.2-5.1) for control of work orders to implement a change initiated in a higher tier document to standardize work order processing among our four nuclear units. Part of that change was elimination of a final (close-out) review of work orders that do not implement modifications. QSD management is in agreement with that change. As discussed in CYAPCO's response to the NRC Notice of Violation (Reference 2), CYAPCO will maintain some level of continued QSD review of nonmodification work orders. QSD will continue to periodically review a sample of these work orders and report the results to station management until a sufficient confidence level has been achieved that would allow a reduction in QSD involvement.

7. The need to initiate a nonconformance report (NCR) is not well defined nor uniformly implemented and differences between the corporate and plant NCR procedures should be corrected.

Response:

A procedure change has been made to ACP 1.2-15.1, "Noncompliance Reports," to address the inconsistency between it and the corporate procedure, (NEO 3.05). This procedure change identifies deficiencies and how to address them and defines when a NCR may be used. Deficiencies can be identified by trouble reports, automated work orders, plant information reports, surveillances, inspections or audits. The NCR, however, may be used to identify such deficiencies if no other program is available.

8. The work order procedure contains no specific instructions or guidelines for documenting "Actual Work Performed" on the work order.

Response:

Procedure ACP 1.2-5.1, "PMMS Trouble System and Automated Work Order," is being revised to include specific instructions and guidelines for documenting "Actual Work Performed." In addition, the Haddam Neck Maintenance Department has in effect procedure MA 1.5-2, "Work Order Preparation, Work Control and Documentation," which gives instructions and guidance for work documentation. Completion of this revision is expected by April 1, 1991.

9. The work order procedure contains vague instructions concerning job supervisor responsibilities regarding documentation on work orders and guidance for the assignment of "Priority" codes on work orders.

Response:

As discussed in the response to Item No. 8 above, a revision to the procedure that specifies the instructions and guidelines for the documentation on work orders is being made in response to weaknesses pertaining to vague instructions concerning supervisors responsibilities regarding this documentation.

In regards to assignment of priority codes, procedure ACP 1.2-5.1, "PMMS Trouble Reporting System and Automated Work Order," is being revised to include procedural guidance for assignment, modification, review and use of priority codes. CYAPCO estimates completion of this revision to be April 1, 1991.

10. The documentation on complete work order packages, especially the "Work Performed" section, was poor as evidenced by various deficiencies in the recorded information.

Response:

The weakness identified in this item is actually a compilation of those weaknesses identified in Items No. 1, 8, and 9 above. As discussed in the responses to these items, various efforts to increase awareness of the importance of thorough and complete work order packages have been undertaken and we expect that the incidence of documentation deficiencies will continue to decline.

11. There is no formal program for the hiring, training and control of contractors.

Response:

A Task Force has been formed to address this concern, comprised of representatives from our four nuclear stations, training and construction. We expect a recommendation to address this issue by July 31, 1991.

12. The semiannual review of corrective maintenance activities has only reviewed mechanical equipment which has not received attention via the PIR process. This trending has omitted other plant components such as electrical equipment.

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Response:

A Job Aid, which is a maintenance department instruction, has been created to provide guidance for performing the semi-annual corrective maintenance review. The Job Aid states that an electrical and mechanical review will be performed, concentrating on safety related and major pieces of equipment.

13. The procedure (ACP 1.0-44) for the review of maintenance program effectiveness requires a quarterly report but does not give sufficient guidance concerning analysis of this report for feedback to improve maintenance.

Response:

ACP 1.0-44 will be revised to include guidance for analysis of the quarterly report to facilitate feedback for improvement of maintenance. CYAPCO estimates completion of this revision to be April 1, 1991.