

JUN 6 1994

Docket No. 50-245

Mr. John F. Opeka  
Executive Vice President - Nuclear  
Northeast Nuclear Energy Company  
P. O. Box 270  
Hartford, Connecticut 06141-0270

Dear Mr. Opeka:

SUBJECT: INSPECTION REPORT NO. 50-245/94-13 (REPLY)

This letter refers to your May 23, 1994, correspondence in response to our letter, dated April 21, 1994, regarding Millstone Unit 1. This correspondence dealt with a 10 CFR 50 Appendix B, Criterion III Level IV Notice of Violation concerning design change control.

Thank you for informing us of the corrective and preventive actions documented in your letter. We believe that it is very important that nonconforming materials be properly identified and tracked in accordance with your program requirements.

We consider these actions acceptable, pending further review in a future inspection of your licensed program.

We appreciate your cooperation.

Sincerely,

Original Signed By:  
Glenn W. Meyer

Glenn W. Meyer, Chief  
PWR & BWR Sections  
Division of Reactor Safety

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Mr. John F. Opeka

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JUN 6 1994

cc:

S. E. Scace, Vice President, Nuclear Operations Services  
D. B. Miller, Senior Vice President, Millstone Station  
J. P. Stetz, Vice President, Haddam Neck Plant  
H. F. Haynes, Nuclear Unit Director  
R. M. Kacich, Director, Nuclear Planning, Licensing, and Budgeting  
J. Solymossy, Director, Nuclear Quality and Assessment Services  
Gerald Garfield, Esquire  
Nicholas Reynolds, Esquire  
K. Abraham, PAO (2 w/letter dated May 23, 1994)  
Public Document Room (PDR)  
Local Public Document Room (LPDR)  
Nuclear Safety Information Center (NSIC)  
NRC Resident Inspector  
State of Connecticut SLO (w/letter dated May 23, 1994)

bcc:

Region I Docket Room (with concurrences)  
J. Stolz, NRR/PD I-4  
W. Dean, OEDO  
J. Andersen, NRR  
M. Shannon, NRR/ILPB

RI:DRS

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6/7/94

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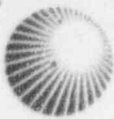
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May 23, 1994

Docket No. 50-245  
B14856

Re: 10CFR2.201

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555

Millstone Nuclear Power Station, Unit No. 1  
Reply to Notice of Violation  
Inspection Report 50-245/94-13

In a letter dated April 21, 1994,<sup>(1)</sup> the NRC Staff transmitted a Notice of Violation (NOV) relating to NRC Inspection Report 50-245/94-13. The report discussed the results of the safety inspection conducted from March 28, 1994, through March 31, 1994, at Millstone Station. Based on the Staff's inspection, a violation was identified at Millstone Unit No. 1 as a result of replacement parts being installed without the implementation of the appropriate design change evaluation and documentation.

The Staff requested that NNECO respond within 30 days of the date of the letter transmitting the NOV. Accordingly, Attachment 1 to this letter provides NNECO's reply to the NOV, on behalf of Millstone Unit No. 1, pursuant to the provisions of 10CFR2.201.

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(1) G. W. Meyer letter to J. F. Opeka, "Inspection Report No. 50-245/94-13," dated April 21, 1994.

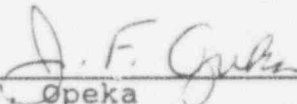
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U.S. Nuclear Regulatory Commission  
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If you have any questions regarding the information contained herein, please contact Mr. T. B. Silko at (203) 665-5241.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

  
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J. F. Opeka  
Executive Vice President

cc: T. T. Martin, Region I Administrator  
J. W. Andersen, NRC Acting Project Manager, Millstone Unit  
No. 1  
P. D. Swetland, Senior Resident Inspector, Millstone Unit  
Nos. 1, 2, and 3

Docket No. 50-245  
E14856

Attachment 1

Millstone Nuclear Power Station, Unit No. 1

Reply to Notice of Violation  
Inspection Report 50-245/94-13

May 1994

U.S. Nuclear Regulatory Commission  
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May 23, 1994

Millstone Nuclear Power Station, Unit No. 1  
Reply to Notice of Violation  
Inspection Report No. 50-245/94-13

Restatement of Violation:

During an NRC inspection conducted from March 28, 1994, through March 31, 1994, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10CFR2, Appendix C, the violation is listed below:

"10 CFR 50 Appendix B, Criterion III, on design control, requires, in part, that design changes shall be subject to design control measures commensurate with those applied to the original design.

Contrary to the above, on March 5, 1994, service water system SW-9 valve was modified (a design change) and placed in the service water system without a commensurate design control measure (replacement item evaluation) as specified by procedure NEO-6.12, 'Evaluation of a Replacement Item.'"

This is a Severity Level IV Violation. (Supplement I)

Reason for the Violation:

The reason for this violation has been determined to be personnel error, in that a nonconformance report (NCR) was not processed to document the acceptability of installing the replacement valve with an identified design discrepancy. In retrospect, an NCR would have been the appropriate vehicle to document the installation of the replacement valve prior to reconciliation of the design discrepancy. It is noted however, that although NNECO did not follow it's administrative program in this case, the actions taken ensured that appropriate documentation of the replacement valve would be completely processed prior to returning the service water (SW) system to operation.

On February 28, 1994, during the cycle 14 refueling outage, visual inspection of the SW system valve SW-9 internals identified internal corrosion and a need for replacement. SW-9 is a safety related motor-operated isolation valve, credited with isolating the SW system supply to the turbine building closed cooling water (TBCCW) heat exchangers during a loss of normal power event.

As a result of the identified corrosion, a replacement valve was requested from the site warehouse. The requested valve was

delivered and verified as having the same part number and identical markings as the original valve. However, during pre-installation inspections, the stem diameter of the replacement valve was found to be 1/4" less than the diameter of the original valve. Discussions with the valve manufacturer (Stockham) indicated that the design of the subject 20" 150lb Stockham gate valve was modified in 1977.

Following identification of the smaller diameter stem, Engineering Department personnel discussed the discrepancy and decided to process a Replacement Item Evaluation (RIE) or a Plant Design Change Record (PDCR) as a means of disposition. Included within the appropriate change mechanism would be the fabrication of a new stem nut for the motor operator to adapt to the different valve stem diameter.

Prior to completion of the design change document, the replacement valve was installed to support "fit up" of adjacent piping and to facilitate SW system hydrostatic testing. During this period, the SW system remained inoperable. Additionally, the subject valve's motor operator was not installed pending the completion of the design change document and fabrication of the replacement stem nut. However, an NCR was not processed to document the installation of the nonconforming material.

**Corrective Steps Taken and Results Achieved:**

A Plant Design Change Request (PDCR 1-37-94), "Replacement of 3W-9," was processed and a new stem nut was fabricated. Following approval of the design change, the new stem nut and motor operator were installed. The SW system was subsequently declared operable following the installation of the motor operator and stem nut.

**Corrective Steps that will be Taken to Avoid Further Violations:**

The Technical Support manager discussed this event, and the need to initiate an NCR for this, and similar events, with the individuals involved. Also, this incident will be the topic at a Technical Support department meeting to reinforce to all department personnel the need to process an NCR prior to the installation of nonconforming material. Additionally, this event will be communicated to all departments responsible for dispositioning NCRs. This communication will be completed by July 31, 1994.

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Date When Full Compliance will be Achieved:

Full compliance was achieved on March 24, 1994, upon approval of PDCR 1-37-94.

Generic Implications:

This response to the Notice of Violation will be distributed to Millstone Unit Nos. 2 and 3, and the Haddam Neck Plant for their review. Actions will be evaluated based on applicability.