

**Northeast
Nuclear Energy**

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The Northeast Utilities System

June 6, 1994

Docket No. 50-245
B14867

Mr. Wayne D. Lanning
Acting Director, Division of
Reactor Projects
U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

Dear Mr. Lanning:

Millstone Nuclear Power Station, Unit No. 1
Maintenance Evolutions of "B" AC MG Set

In your letter dated April 26, 1994,⁽¹⁾ you requested information regarding the conduct and documentation of maintenance evolutions at Millstone Unit No. 1. Specifically, your letter refers to an incident where "operation of drain valves on the oil strainer and filter on the 'B' Vital AC MG set which were yellow caution tagged was in violation of procedures." As requested, the following information describes the results of Northeast Nuclear Energy Company's (NNECO) review of this matter and the actions we have taken in response to this incident. This submittal does not contain any personal privacy, proprietary, or safeguards information, and can, therefore, be placed in the NRC Public Document Room.

Summary

NNECO has completed an internal audit review of the maintenance matter described briefly above and has identified two areas which warrant attention: (1) the process of developing automated work orders (AWO) and (2) the assurance that station personnel assume full responsibilities of their positions. At the request of management, this situation has been addressed within the Nuclear Safety Concerns Program (NSCP).

(1) W. D. Lanning letter to J. F. Opeka regarding conduct and documentation of maintenance evolutions at Millstone Unit No. 1, dated April 26, 1994.

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It should be noted that NNECO has not identified any violation of station tagging procedures during the subject maintenance evolution. Yellow caution tagging on the drain valves that needed to be cleared before completion of the evolution was not listed in the AWO but was properly identified in the field by the station mechanics involved. The tagging was also properly cleared by the Operations Department prior to conduct of the maintenance.

Background

The evolution in question occurred on February 19, 1994, during the Millstone Unit No. 1 Cycle 14 refueling outage. Two Station Mechanic A's proceeded to perform maintenance on the "B" Vital AC MG set and found that the valves to drain the remaining oil in the system were yellow tagged and could not be manipulated, and that oil canisters that house the oil filters were yellow tagged and could not be removed. The mechanics requested that their supervisor obtain the necessary clearances from the Operations Department. The supervisor obtained the proper clearance, but indicated that the mechanics should have been capable of completing the assignment without supervisory assistance.

Following completion of the maintenance activities, both the station mechanics involved and their immediate supervision raised concerns to management regarding how the evolution was handled. Management requested that the NSCP review the incident. The NSCP specifically requested that NNECO's Internal Audit Department (IAD) conduct interviews as a means to ascertain what transpired during this evolution and to identify any suggested corrective actions, improvements, or enhancements.

Because the IAD report was conducted in the interest of critical self-evaluation and specifically discusses the performance of several individuals, we have not included the IAD report with this response. The report, however, is available for NRC review at Millstone Station and would be provided to the Staff, with the appropriate protections to protect personal privacy, upon request.

The IAD report identifies two areas for possible future action by Millstone Unit No. 1 management as a result of the February 19, 1994, evolution and the concerns raised. These areas are (1) the process of developing accurate and timely AWOs, and (2) management's assurance that station personnel assume full responsibilities of their positions. With respect to the former, the yellow caution tagging in this case was not identified in the AWOs, suggesting the need for input in the AWO creation process, regarding job site conditions. With respect to the latter, there was disagreement as to whether management's expectations (i.e.,

U.S. Nuclear Regulatory Commission
B14867/Page 3
June 6, 1994

that a Station Mechanic A should be able to identify tagging and obtain necessary clearances) had been established.

Based, in part, on the results of this maintenance evolution and the recommendations stemming from the internal review, management is taking action to improve performance in the area of work control. The Millstone Unit No. 1 Work Planning and Control Department has been assigned the task of developing the strategy for eliminating problems related to the AWO process. In addition, consistent with the recommendations of the report, management is attempting station-wide to address the issue of communications between management and station personnel. We recognize that a productive environment depends upon clear expectations, accountability, teamwork, and mutual respect. Management is working to achieve this environment at Millstone Station, as is evident by inclusion of a "cultural awareness" philosophy into several strategic documents, such as the nuclear organization's expectations document, strategic plan, and business plan.

Conclusion


No station tagging violations or violations of NRC requirements occurred during the February 19, 1994, maintenance evolution on the "B" AC MG set. Nonetheless, NNECO is taking action as identified above to address the lessons-learned from the evolution. Our internal review confirms that nuclear safety was not compromised by this situation. We remain confident that the overall maintenance program at our nuclear facilities functions in an effective and safety conscious manner.

As in the past, we appreciate the opportunity to respond and explain our actions regarding resolution of this nuclear safety concern. Please contact Mr. Drexel N. Harris at (203) 447-1791, Extension 5903, if there are further questions regarding this matter.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

FOR: J. F. Opeka
Executive Vice President

BY: 
E. A. DeBarba
Vice President

cc: See Page 4

U.S. Nuclear Regulatory Commission
E14867/Page 4
June 6, 1994

cc: T. T. Martin, Region I Administrator
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No. 1
P. D. Swetland, Senior Resident Inspector, Millstone Unit
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