DCS

AUG 9 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: NRC INSPECTION REPORT NO. 50-245/94-22 (REPLY)

This refers to your July 22, 1994, correspondence in response to our letter, dated June 22, 1994, regarding Millstone Unit 1. This correspondence dealt with your response to the notice of violation regarding failure to perform suppression chamber to drywell vacuum breakers cycling following operation of safety relief valves.

Thank you for informing us of the corrective and preventive actions documented in your letter. We note that your long-term technical specification review will enhance proceduralization of technical specification surveillance activities. However, unscheduled event triggered technical specification surveillances may need additional consideration.

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, Chief
BWR/PWR Sections
Division of Reactor Safety

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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
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Gerald Garfield, Esquire
Nicholas Reynolds, Esquire
K. Abraham, PAO (2) (w/copy of letter dated July 22, 1994)
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NRC Resident Inspector
State of Connecticut SLO (w/copy of letter dated July 22, 1994)

bcc:
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J. Stolz, NRR/PD I-4
W. Dean, OEDO
J. Andersen, NRR
M. Shannon, NRR/ILPB

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Northeast
Utilities System

107 Selden Street, Berlin, CT 06037

Northeast Utilities Service Company
P.O. Box 270
Hartford, CT 06141-0270
(203) 665-5000

July 22, 1994

Docket No. 50-245
B14915

Re: 10CFR2.201

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

Millstone Nuclear Power Station, Unit No. 1
Reply to a Notice of Violation
Inspection Report Nos. 50-245/94-22, 50-336/94-20, 50-423/94-20

In a letter dated June 22, 1994,(1) the NRC Staff transmitted a Notice of Violation (NOV) relating to NRC Inspection Report Nos. 50-245/94-22, 50-336/94-20, and 50-423/94-20. The report discussed the results of the safety inspection conducted from May 16, 1994, through May 20, 1994, at Millstone Station. Based on the results of the Staff's inspection, a violation was identified at Millstone Unit No. 1 as a result of not performing a technical specification required operability test of the suppression chamber to drywell vacuum breakers, after heat had been added to the torus as a result of main steam safety relief valve testing.

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 Nos. 50-245/94-22, 50-336/94-20, and 50-423/94-20," dated June 22, 1994.

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

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

FOR: J. F. Opeka
Executive Vice President

BY: 
E. A. DeBarba
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
B14915

Attachment 1

Millstone Nuclear Power Station, Unit No. 1

Reply to a Notice of Violation
Inspection Report Nos. 50-245/94-22, 50-336/94-20, 50-423/94-20

July 1994

Millstone Nuclear Power Station, Unit No. 1
Reply to a Notice of Violation
Inspection Report Nos. 50-245/94-22, 50-336/94-20, 50-423/94-20

Restatement of Violation:

Technical specification (TS), surveillance Section 4.7.A.5.a., requires, in part, that the suppression chamber to drywell vacuum breakers be exercised through a cycle and inspected following any release of energy to the suppression chamber.

Contrary to the above, on May 19, 1994, at 11:30 a.m., the suppression chamber to drywell vacuum breakers had not been cycled or inspected and were not scheduled for cycling or inspection that day following the 7:39 a.m. completion of testing of safety relief valves (a release of energy to the suppression chamber).

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

Reason for the Violation:

Millstone Unit No. 1 Technical Specification section 4.7.A.5.a requires that each suppression chamber to drywell vacuum breaker be exercised through one open cycle and visually inspected following any release of energy to the suppression chamber. Additionally, Technical Specification section 4.6.E.3 requires that each safety/relief valve be manually opened until valve operability has been verified during the initial startup from each refueling outage.

On May 19, 1994, during the startup of Millstone Unit No. 1 from the Cycle 14 refueling outage, the main steam safety relief valves were manually opened and closed at rated reactor pressure, as required by technical specifications. This activity was performed in accordance with surveillance procedure (SP) 626.3 "Manual Operation of Safety Relief Valves When Near Operating Pressure." However, following performance of this surveillance, the suppression chamber to drywell vacuum breakers, as controlled by SP 632.4 "Suppression Chamber Drywell Vacuum Breaker Exercise," were not exercised through a cycle and inspected as required by technical specifications following the release of energy to the suppression chamber. The reason for not completing this surveillance is that relief valve test SP 626.3 did not reference or require that vacuum breaker test SP 632.4 be performed.

A historical review was conducted of this evolution and revealed that although the relief valve test SP 626.3 lacked the proper reference, vacuum breaker test SP 632.4 had been completed within four hours of completing relief valve test SP 626.3 following completion of the Cycle 13 refueling outage in 1991.

Prior to the Cycle 13 refueling outage, the relief valve surveillance was performed under SP 1097, "Manual Operation of Relief Valves ISI Readiness Test." SP 1097 included the requirement to perform vacuum breaker test SP 632.4 following relief valve testing. When the requirements of SP 1097 were transferred to SP 626.3 prior to the 1991 refueling outage, the requirement to conduct suppression chamber vacuum breaker testing was inadvertently deleted.

Corrective Steps Taken And Results Achieved:

Immediate corrective actions involved successful completion of the vacuum breaker test SP 632.4 at approximately 4:00 p.m. on May 19, 1994.

Additionally, procedural corrective actions were taken to include the requirement to perform SP 632.4 within four hours of any heat addition to the suppression chamber. These procedures include:

- SP 626.3, "Manual Operation of Safety Relief Valves When Near Operating Pressure,"
- OP 337, "Auto Pressure Relief System,"

Corrective Steps That Will Be Taken To Avoid Further Violations:

In addition to the above-mentioned immediate corrective actions, Millstone Unit No. 1 is proceeding with a long-term plan to review technical specifications to verify procedures exist for all TS surveillance requirements. This project is headed by a senior operator reporting directly to the Unit Director.

Date When Full Compliance Will Be Achieved:

Full compliance was achieved on May 19, 1994 following successful completion of the suppression chamber to drywell vacuum breaker testing.

The long-term plan to review technical specifications to ensure procedures exist for all TS surveillance requirements is scheduled for completion by December 31, 1994.