



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION I  
475 ALLENDALE ROAD  
KING OF PRUSSIA, PENNSYLVANIA 19406-1416

FEB 27 1992

177

Dear [ ]

I am responding to the concerns that you provided to us on July 5, 1991, asserting that Millstone Unit 2 maintenance personnel worked on a contaminated system without Radiation Work Permit (RWP) controls, and as a result your tools and procedure package became contaminated.

We have inspected this concern; a report with the results of that inspection is attached for your information. Based on our inspection, we have determined that the actions by the Health Physics (HP) personnel, when the contamination was detected, were prompt and correct. The contamination was caused by leakage from a ventilation housing, not by the work being performed under either of the automated work orders (AWO) referenced in the allegation. The work control procedures in place were adequate for the tasks being performed. Therefore, no further action is planned by the NRC in this matter, and we consider this concern to be resolved.

We appreciate you informing us of your concerns and feel that we have been responsive. Should you have any additional questions regarding these matters, please call me collect at (215) 337-5225.

Sincerely,

*Edward B. Wenzinger*  
Edward Wenzinger, Chief  
Reactor Projects Branch 4

Attachment: Excerpts from NRC Inspection Report 50-336/91-31 (Detail 17.2).

information in this record was deleted  
in accordance with the Freedom of Information  
Act, exemptions 6  
FOIA-92-162

9412130192 931207  
PDR FOIA  
HUBBARD92-162 PDR

N-129

bcc /w encl:

Allegation File: RI-91-A-0189-1

E. Conner's files

W. Raymond/T. Shedlosky

Contractor's office files (Meeker)

concurrences:

RI/DRP  
*[Signature]*  
Barkley  
2/13/92

RI/DRP  
*[Signature]*  
Kelly  
2/13/92

RI/DRP  
*[Signature]*  
Wenzinger  
2/17/92



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION I  
475 ALLENDALE ROAD  
KING OF PRUSSIA, PENNSYLVANIA 19406-1418

Docket No. 50-336

FEB 24 1992

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

Dear Mr. Opeka:

Subject: NRC Region I Inspection Report No. 50-336/91-31

Mr. J. T. Shedlosky and others of this office conducted a special safety inspection December 17, 1991, through February 7, 1992, at the Millstone Nuclear Station Unit 2, Waterford, Connecticut. The inspection results are documented in the enclosed report. They were discussed with Mr. J. S. Keenan and other members of your staff at the conclusion of the inspection.

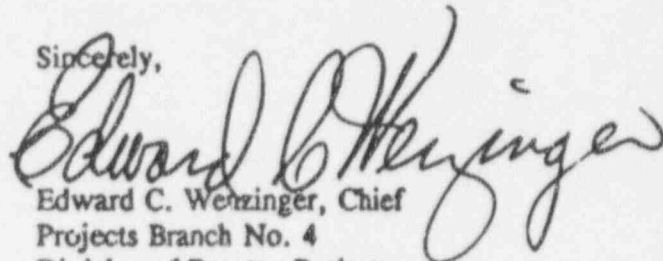
Areas examined during the inspection are described in the enclosed report. Within these areas, the inspection focused on issues brought to Northeast Utilities by the NRC. Our independent review evaluated your performance in complying with regulatory requirements important to public and worker health and safety. This review consisted of performance observations of ongoing activities, inspection of plant equipment, interviews with personnel, and review of records.

Our overall assessment was that performance was acceptable. The enclosed inspection report notes a number of issues on which your staff agreed to provide a response to the NRC. NNECO's response to the NRC may be made in communication with the resident inspectors.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be placed in the NRC Public Document Room. The responses directed by this letter are not subjected to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Public Law No. 96.511.

Your cooperation with us is appreciated.

Sincerely,

  
Edward C. Wenzinger, Chief  
Projects Branch No. 4  
Division of Reactor Projects

9203020233 HRP

FEB 24 1992

Northeast Nuclear Energy Company

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Enclosure: NRC Region I Inspection Report No. 50-336/91-31

cc w/enclosure:

W. D. Romberg, Vice President, Nuclear Operations

D. O. Nordquist, Director of Quality Services

R. M. Kacich, Manager, Nuclear Licensing

S. E. Scace, Nuclear Station Director, Millstone

J. S. Keenan, Nuclear Unit Director, Millstone Unit 2

Gerald Garfield, Esquire

Nicholas Reynolds, Esquire

K. Abraham, PAO (2)

Public Document Room (PDR)

Local Public Document Room (LPDR)

Nuclear Safety Information Center (NSIC)

NRC Resident Inspector

State of Connecticut

## 17.0 SUPPLEMENTARY INFORMATION ON PRIOR INSPECTION ISSUES

The following are either clarifications or additional documentation regarding issues the NRC described in previous inspection reports.

### 17.1 Drawing Control

Employees found it convenient to use drawings located within vendor technical manuals, but expressed concerns that drawings within vendor technical manuals were not up-to-date. Vendor drawings typically depicted standard equipment designs and were not necessarily the exact configuration installed at MP2. The licensee was committed to maintenance of vendor drawings and incorporating them, as necessary, with the NUSCO controlled drawing system. Licensee I&C Department management stated it was considering an enhancement of current NNECO practices such that vendor manuals would include appropriate references to NUSCO drawing numbers.

Inspection Report (IR) 50-336/91-27, section 7.1, documented the findings of a review made of the drawing control system and its use during activities at the station. The report incorrectly stated that there were no administrative control procedure requirements to verify the latest drawing information prior to the use of a drawing for quality work. This was an error.

Administrative Control Procedure ACP-QA-3.03, Document Control, Revision 33 in section 6.2, Design Document Control, requires that persons using drawings for quality work activities are responsible for verifying they have the latest revision of a drawing by referencing the Drawing Status File within the Generation Records Information Tracking System.

This information does not change the report conclusion that some personnel were not using the drawing control system when required, but it does correct the finding of a deficiency within the system of administrative controls.

### 17.2 Tool and Document Contamination During AWO M2-91-06732

The NRC provided a concern related to contamination of tools and a procedure package while doing AWO M2-91-06732 in July 1991, and the NRC promptly inspected the concern.

#### Background

NRC Inspection Report 50-336/91-18 (IR91-18), section 4.0, documented the NRC review of various radiological control issues related to posting and control of radiological areas, radiation monitor RM-8132, and a spent fuel pool area frisker. In part, that report found that "posting of contaminated, high airborne radiation and high radiation areas was observed to be appropriate with respect to boundary identification, locking requirements, and hold points." The following NRC assessment of the employee concern related to AWO M2-91-06732 was done in July 1991,

but was not specifically described in IR91-18.

### Assessment

Two work activities in the vicinity of stack gas radiation monitor RM-8132B took place during the period of July 2 - 3, 1991. One activity was calibration of RM-8132B using surveillance procedure SP 2404AF. The other activity was replacement of the RM-8132B sample fan assembly blower and drive belt per AWO M2-06732. The concern was that work done per AWO M2-06732, which had no radiation work permit (RWP) requirements, may have caused contamination of an I&C technician's tools and documentation for the SP 2404AF work package.

MP2 health physics (HP) was involved with the issue when the I&C technician exited the work area on the morning of July 3, 1991. In addition to contamination found on the papers and tools, HP surveys found 15K dpm in the work area. Access to the work area was then controlled as a contaminated area. Other floor areas accessible to personnel were clean. There was no contamination of personnel. HP review of the maintenance work activity identified no contamination in the fan removed on July 3, 1991, or in the maintenance shop. NNECO assigned decontamination personnel to clean the affected area.

HP concluded the maintenance work did not cause the contamination and that there were acceptable radiological work controls. HP did identify leakage from a ventilation housing near the job site as the source of the contamination. NNECO took action to contain any further leakage from the ventilation housing and to continue decontamination of the area.

On July 4, 1991, the inspector reviewed HP survey sheets and observed the job site. The inspector found that NNECO removed most of the contamination and that NNECO had appropriate barricades and postings to control access to the area.

### Conclusion

Based on review of HP records and physical inspection of the work area, the inspector concluded NNECO adequately responded to the contamination event. The inspector had no further questions on the adequacy of work controls.

## **17.3 ASI Curve for LHGR**

As described in NRC Inspection Report 50-336/89-08, section 5.4, on May 1, 1989, the licensee found that the incore analysis (INCA) program produced unexplained results during power ascension testing. For example, a coefficient error resulted in the INCA program being unable to precisely measure LHGR over the full length of the core. The licensee resolved this matter and declared the INCA system operable on May 6, 1989. The NRC evaluated licensee actions and found no inadequacies.



## APPENDIX 3.1

Information in this record was deleted  
in accordance with the Freedom of Information

## ALLEGATION RECEIPT REPORT

Act, exemptions  
FOIA: 92-162Date/Time  
Received:

9:30 AM 7/11/91

Allegation No. RI-91-A-190  
(leave blank)

Name:

{ }

Address:

Phone:

City/State/Zip:

## Confidentiality:

Was it requested?

Yes

No

Was it initially granted?

Yes

No

Was it finally granted by the allegation panel?

Yes

No

Does a confidentiality agreement need to be sent  
to allegor?

Yes

No

Has a confidentiality agreement been signed?

Yes

No

Memo documenting why it was granted is attached?

Yes

No

Allegor's  
Employer:

ENC 7

Position/Title:

{ }

Facility:

Millstone 2

Docket No.:

(Allegation Summary (brief description of concern(s):

On-Call Electrician for Status Emergency

did not exist from 5pm 7/4 until 6:30am 7/6

(see attached 2-way Memo and Form SF107B)

Number of Concerns:

1

Employee Receiving Allegation:

Gene Kelly

(first two initials and last name)

Type of Regulated Activity

(a) ☒ Reactor(d) ☐ Safeguards(b) ☐ Vendor(e) ☐ Other:(c) ☐ Materials

(Specify)

Materials License No. (if applicable):

Functional Area(s):

☒ (a) Operations☐ (e) Emergency Preparedness☐ (b) Construction☐ (f) Onsite Health and Safety☐ (c) Safeguards☐ (g) Offsite Health and Safety☐ (d) Transportation☐ (h) Other:

**REPLY**

DEPT.-LOCATION

SIGNED

DATE

FORM NO. OS 445 REV. 5-77

**SEND PARTS 1 & 3 WITH CARBON INTACT - PART 3 WILL BE RETURNED WITH REPLY**



Stephen Trace  
FORM APPROVED BY STATION SUPERINTENDENT

9/1/89  
EFFECTIVE DATE

84-30  
SORC MTG NO.

STATION EMERGENCY ORGANIZATION  
ON-CALL SCHEDULE CHANGE REQUEST

Date: \_\_\_\_\_

TO: Unit 1 SSSA

FROM: Name: \_\_\_\_\_

Department: \_\_\_\_\_

REFER: CHANGE TO \_\_\_\_\_ SEO ON-CALL LIST

The following changes should be made to the Station Emergency Organization On-Call List identified above.

<u>START DATE</u>	<u>END DATE</u>	<u>NAME (Last, First, M.I.)</u>	<u>TELEPHONE #</u>	<u>RADIOPAGER BEEPER #</u>
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NOTE 1: The period of On-Call is from 0730 of the "Start Date" to 0730 of the morning after the last day of On-Call, unless otherwise noted.

NOTE 2: Changes must be submitted at least two working days prior to Start Date, please hand deliver if unable to do so.

REPLY

DEPT.-LOCATION

SIGNED

DATE

Stephen Trace  
FORM APPROVED BY STATION SUPERINTENDENT

9/1/84  
EFFECTIVE DATE

84-30  
SORC MTG NO.

STATION EMERGENCY ORGANIZATION  
ON-CALL SCHEDULE CHANGE REQUEST

Date: \_\_\_\_\_

TO: Unit 1 SSSA

FROM: Name: \_\_\_\_\_

Department: \_\_\_\_\_

REFER: CHANGE TO \_\_\_\_\_ SEO ON-CALL LIST

The following changes should be made to the Station Emergency  
Organization On-Call List identified above.

<u>START DATE</u>	<u>END DATE</u>	<u>NAME (Last, First, M.I.)</u>	<u>TELEPHONE #</u>	<u>RADIOPAGER BEEPER #</u>
-------------------	-----------------	---------------------------------	--------------------	--------------------------------

NOTE 1: The period of On-Call is from 0730 of the "Start Date" to 0730 of the morning after the last day of On-Call, unless otherwise noted.

NOTE 2: Changes must be submitted at least two working days prior to Start Date, please hand deliver if unable to do so.

UPDATES to:

RI-A-91-190

RI-A-91-184-01

## ALLEGATION RECEIPT

Wed, Jul 17, 1991  
3:13 PMALLEGATION NO.: RI-A-91-  
Resident Office No.: B.Name: [ ]  
Phone: [ ]Address: [ ]  
City/ St: [ ]

Confidentiality:

Was it requested? granted?

Yes ☐ No ☒Employer: [ WNECO ]  
Facility: MILLSTONE 2

Position/Title: [ ]

DOCKET NO.: 50-336

91-184-01

SUMMARY: The allegor forwarded by interoffice mail two issues summarized in the attached memo: (i)

and, (ii) he is withdrawing an allegation that the on-call electrician did not meet E-Plan requirements on July 5. See the attached.NUMBER OF CONCERNS: 1 and -1

EMPLOYEE RECEIVING ALLEGATION: WILLIAM J. RAYMOND

ACTIVITY: X REACTORFUNCTIONAL AREA: (a) X Operations (f) X Onsite H&STime Required to Process Request: 1 Man-Hours

Information in this record was deleted  
in accordance with the Freedom of Information  
Act, exemptions 6  
FOIA 92-162

N-131

REF: ~~RI-91A-184-01~~  
RI-91A-190

ALLEGATION RECEIPT

Wed, Jul 17, 1991  
3:13 PM

ALLEGATION NO.: RI-A-91-  
Resident Office No.: B.

Name: [ ]  
Phone: [ ]

Address: [ ]  
City/ St: [ ]

Confidentiality:

Was it requested? granted?

Yes ☐ No ☒

Employer: ~~ENNEC~~  
Facility: MILLSTONE 2

Position/Title: [ ]  
DOCKET NO.: 50-336

SUMMARY: The ~~allegor~~ forwarded by interoffice mail two issues summarized in the attached memo: (i)

I 91A-184-01  
I 91A-190  
and, (ii) he is withdrawing an allegation that the on-call electrician did not meet E-Plan requirements on July 5. See the attached.

NUMBER OF CONCERNS: 1 end - 1

EMPLOYEE RECEIVING ALLEGATION: WILLIAM J. RAYMOND

ACTIVITY: ☒ REACTOR

FUNCTIONAL AREA: (a) ☒ Operations (f) ☒ Onsite H&S

Time Required to Process Request: 1 Man-Hours

Information in this record was deleted  
in accordance with the Freedom of Information  
Act, exemptions b6  
FOIA 92-162

N-132