

REGION : 475 ALLENDALE ROAD KING OF PRUSSIA, PENNSYLVANIA 19405-1415

SEP 2 6 1991

MEMORANDUM FOR:

Jose Calvo, Assistant Director for Region I

Reactors

Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

FROM:

Charles W. Hehl, Director

Division of Reactor Projects

Region I

SUBJECT:

PROPOSED TASK INTERFACE AGREEMENT REGARDING

CHANNEL CALIBRATION FOR THE INCORE DETECTION

SYSTEM AT MILLSTONE 2

Region I has recently developed a technical concern involving the acceptability of the licensee's interpretation of the technical specification requirement for channel calibration of the incore detection system at Millstone 2. Unit 2 is a Combustion Engineering design with fixed incore detectors, and these do not feed to RPS but are used for computerized flux mapping and reactor physics monitoring. The incore instrumentation system is considered a QA-category I system because the instruments are reactor vessel internals. The cables outside the reactor vessel are Class 1E in agreement with NUREG-0737, Section II.F-2 for the inadequate core cooling (ICC) subsystem within the ICI system.

The current 18-month calibration procedure SP-2407, Rev. 4 (last performed in Fall 1990) consists of a resistance check (Section 7.1), a cable continuity check (Section 7.2), and an analog to digital check (Section 7.4). The cable continuity check, for which no acceptance criteria is provided, is performed using a voltage source which is not traceable to national standards and is provided. Our present question is whether this calibration, on a whole, satisfies the intent of a "channel calibration" within the context of the technical specification definition. The licensee's Revision 3 to procedure SP-2407 approved on December 4, 1986, differed from Revision 4 of SP 2407 in that a traceable digital multi-meter measured the output voltage at the precision resistor with an acceptance criteria. We are, in parallel, soliciting the licensee's position relative to the current method of channel calibration.

We would appreciate your prompt attention to this matter and a preliminary assessment by October 1991 so that, if a weakness is identified, actions can be taken to ensure that the intent of a channel calibration for the incore detection system is preserved. The Region I point of contact is Eugene Kelly, Chief, Reactor Projects Section 4A (FTS 346-5183). This TIA proposal has been discussed with John Stolz of NRR.

5/138

9503010229 940809 PDR FDIA HIRBARD92-162 PDR Enclosed is applicable referenced material.

Charles W. Hehl, Director Division of Reactor Projects

#### Attachments:

- 1. NU Technical Memorandum dated 9/6/91
- 2. Technical Specification 3/4.3.3
- 3. FSAR 7.5.4
- 4. Unit 2 Procedure SP 2407, Rev 4

#### CC:

- S. Newberry, NRR
- J. Stolz, NRR

3/2/92 from the desk of FILE 91-238 .TIAte NLR in Wellstone 2 ICTs Isocke to Brion McDein Hollen WRR ISGB who has been review by the sortient questry regarding the calibration of the twhe hall he meet the Gulent of Tech Specs. While he centre resonal is being drefte his polining cardes on / will, NR Mangenet crosses ) is that the cerrent melhor in use by NUa Vullstine is acceptable Pharefre. The seport of file 9/238 is resolved, and a closent lette tallege may be pregated an

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SEP 2 3 1991

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5/139

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Randy Blough for

Charles W. Hehl, Director Division of Reactor Projects

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cc:

S. N. wberry, NRR

J. Stolz, NRR

bcc:

Allegation File RI-91-A-238-02

G. Meyer, DRP

J. Durr, DRSS

C. Anderson, DRS

W. Raymond, SRI, Millstone

E. Conner

Deep

Kelly 9/4/201 DR

Hehl 9/24/91 DRA/RI Kane RA:RI

a:CALVO.MEM

OFFICIAL RECORD COPY



REGION I 475 ALLENDALE ROAD KING OF PRUSSIA, PENNSYLVANIA 19406-1415

SEP 2 6 1991

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REGION I 475 ALLENDALE ROAD KING OF PRUSSIA, PENNSYLVANIA 19406-1415 OCT 1 6 1991

Docket Number: 50-336 File Number: RI-91-A-238

Northeast Nuclear Energy Company ATTN: Mr. John F. Opeka

Executive Vice President - Nuclear Engineering and Operations Group

P.O. Box 270 Hartford, Connecticut 06141-0270

Dear Mr. Opeka:

The U.S. Nuclear Regulatory Commission recently received information concerning activities at the Millstone Nuclear Power Facility, Unit 2. The details are enclosed for your review and follow-up.

We request that the results of your review and disposition of these matters be submitted to Region I within 30 days of the date of receipt of this letter. We request that your response contain no personal privacy, proprietary, or safeguards information so it can be released to the public and placed in the NRC Public Document Room. If necessary, such information shall be contained in a separate attachment which will be withheld from public disclosure. The affidavit required by 10 CFR 2.790(b) must accompany your response if proprietary information is included. Please refer to file number RI-91-A-238 when providing your response.

The enclosure to this letter should be controlled and distribution limited to personnel with a "need to know" until your investigation of the concern has been completed and reviewed by NRC Region I. The enclosure to this letter is considered Exempt from Public Disclosure in accordance with Title 10, Code of Federal Regulations, Part 2.790(a). However, a copy of this letter excluding the enclosure will be placed in the NRC Public Document room.

The response requested by this letter and the accompanying enclosure are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Your cooperation in this matter will be appreciated. We will gladly discuss any questions you have concerning this information.

Sincerely,

Charles W. Hehr Director Division of Reactor Projects

Enclosure: 10 CFR 2.790(a) Information

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911115-0200 41

cc w/o encl:
Public Document Room (PDR)
Local Public Document Room (LPDR)
State of Connecticut

bcc:

Allegation File:

RI-91-A-238

W. Raymond/T. Shedlosk;

E. Conner's Files

G. Kelly

conc:

RI-DRP

E. Conner 10/7/91 RI:DRP

G. Kally /

RIDRP

E. Wenzinger 1049/91 RI:DRP

C. Aehl 10/16/91





REGION I 475 ALLENDALE ROAD KING OF PRUSSIA, PENNSYLVANIA 19406 1415

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Dicket No. 50-336

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

Dear Mr. Opeka:

Subject: Millstone Unit 2 Inspection 91-20

This refers to the routine safety inspection conducted by Mr. P. Habighorst of this office on August 15 through September 28, 1991, for Millstone Unit 2 in Waterford, CT. The preliminary findings 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 important to public health and safety, and consisted of performance observations of ongoing activities, independent verification of safety system status and design configuration, interviews with personnel, and review of records.

Overall operation of the facility continued to be satisfactory. Several activities associated with the emergency diesel generators were reviewed. We found that conservative assessments were made regarding diesel performance while operating in the parallel mode, and prompt actions were taken when diesel operability was questioned. Maintenance for the inoperable diesels was well controlled, and troubleshooting received strong support by engineering personnel and technical consultants. However, it appears that the vibration monitoring program could be upgraded to increase its effectiveness as a diagnostic tool for diesel performance trends, and consideration should be given to less frequent "cold" starts of the engines per vendor recommendations.

Your cooperation with us is appreciated.

Sincerely,

Edward C. Wenzinger, Chief,

Projects Branch No. 4

Division of Reactor Projects

Enclosure: NRC Inspection Report 50-336/91-20

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