

NUCLEAR REGULATORY COMMISSION

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

August 20, 1991

MEMORANDUM FOR:

David C. Williams, Inspector General

FROM:

Thomas T. Martin, Regional Administrator

SUBJECT:

CONCERNS WITH NRC HANDLING OF ALLEGATIONS AT MILLSTONE

has provided to NRC Region I on several occasions concerns r., rding inappropriate silencing of radiation monitor alarm horns, including the first instance in 1988. Most recently, on July 22, 1991, in a telephone conversation with Edward Wenzinger, Branch Chief, DRP. Region I, expressed dissatisfaction with the NRC's handling of his concerns. He stated that we were not responsive to his concerns because he has pointed out to us several times that the problem has recurred, yet NRC has not issued enforcement action against Northeast Utilities on this issue.

Jallegations relate to his concerns for Process Radiation Monitor alarm horns being disabled at the Millstone Unit 2 Station by mechanical means, such as stuffing a norm with rags, taping over the horn, or pulling the horn out of its housing to disconnect it. Certain aspects of this issue were originally evaluated over three years ago as part of allegation RI-88-A-0040, and was the subject of an unresolved inspection finding documented in report 50-336/89-13. Based on our evaluation at that time, we concluded that this practice was substantiated (and in-fact, licensee identified) but not pervasive, and was at that time subject to inadequate procedure control. This open item was satisfactorily resolved in August 1990, with NRC review of procedure revisions which specified the manner in which the horns were to be silenced. Prior to issuance of that procedure revision, there was no basis for enforcement action for silencing of nuisance alarms.

We note that, as a result of an assertion by ______ on May 13, 1991, (Allegation RI-91-A-0103) which indicated that operators are not following procedures regarding the bypass of horns, the concern was referred to the licensee for its evaluation. A response is expected by August 22, 1991. However, this issue has been independently assessed by on-site inspectors, and has been reviewed by a recent IPAT inspection team, as well as a specialist inspector, none of whom have found continued or pervasive instances which would corroborate _______ assertion. The generic issue of procedural adherence at the Millstone Station is currently being assessed on a more global basis by NRC management, and the alleged bypass of horns is but one aspect of that assessment.

Information in this record was detected in accordance with the Freedom of information

Act, exemptions FORA. 92-162

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9503020010 940809 PDR FDIA HUBBARD92-162 PDR I am providing this information to you for whatever action you deem is appropriate. The identity of the alleger should be protected consistent with the requirements set forth in NRC Manual Chapter 0517 and its appendices.

Thomas T. Martin Regional Administrator

cc: J. Taylor, EDO

Attachments:

- 1. NRC Inspection Report 50-336/91-19
- 2. August 8, 1991 Memorandum (Shedlosky to Wenzinger)
- 3. NU letter A09588 to NRC, dated August 8, 1991

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I am providing this information to you for whatever action you deem is appropriate. The identity of the alleger should be protected consistent with the requirements set forth in NRC Manual Chapter 0517 and its appendices.

Thomas T. Martin Regional Administrator

cc:

J. Taylor, EDO

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- 1. NRC Inspection Report 50-336/91-19
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- 3. NU letter A09588 to NRC, dated August 8, 1991

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ULITED STATES NUCLEAR REGULATORY COMMISSION REGION I 475 ALLENDALE ROAD KING OF PRUSSIA, PENNSYLVANIA 19406 1415

Docket No. 50-336

AUG: 51531 91

Mr. E. J. Mroczka
Senior Vice President - Nuclear Engineering and Operations
Northeast Nuclear Energy Company
P.O. Box 270
Hartford, Connecticut 06141-0270

Dear Mr. Mroczka:

910 \$ 200000

Subject: Millstone Unit 2 Inspection Number 50-336/91-19

This letter refers to the special inspection conducted by Dr. Jason C. Jang of this office on July 22-24, 1991 of activities authorized by NRC License Number DPR-65, and to the discussions of our findings held by Dr. Jang with Mr. J. Keenan and other members of your staff at the conclusion of the inspection.

Areas examined during this inspection are described in the NRC Region I Inspection Report which is enclosed with this letter. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspector.

Within the scope of this inspection, very good routine radioactive gaseous and liquid effluent control programs were implemented by the Chemistry Department. Excellent management support to maintain the radiation monitoring system integrity and operability was also noted during this and previous inspections. No violations or deviations were identified during this inspection.

No reply to this letter is required. Your cooperation with us in this matter is appreciated.

Sincerely,

Ernes K.

James H. Joyner, Chief Facilities Radiological Safety and Safeguards Branch Division of Radiation Safety and Safeguards

Enclosure: NRC Region I Inspection Report Number 50-336/91-19

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Northeast Nuclear Energy Company

cc w/encl: 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 K. Abraham, PAO (2) Public Document Room (PDR) Local Public Document Room (LPDR) NRC Resident Inspector State of Connecticut Nicholas Reynolds, Esquire Nuclear Safety Information Center (NSIC) bcc w/encl: Region I Docket Room (with concurrences) Management Assistant, DRMA (w/o encl) E. Wenzinger, DRP E. Kelly, DRP W. Raymond, SRI, Millstone J. Shedlosky, SRI, Haddam Neck S. Stewart, DRP M. Conner, DRP J. Jovner, DRSS R. Arrighi, DRP R. Fuhrmeister, RA G. Vissing, PM, NRR W. Oliveira, DRS (SALP Reports Only) K. Brockman, EDO

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U.S. NUCLEAR REGULATORY COMMISSION **REGION I**

Report Number	50-336/91-19
Docket Number	50-336
License Number	DPR-65
Licensee:	Northeast Nuclear Energy Company P.O. Box 270 Hartford, Connecticut 06141-0270
Facility Name:	Millstone Nuclear Generating Station, Unit 2
Inspection At:	Waterford, Connecticut
Inspection Conduct	ted: July 22-24, 1991
Inspector	R.C. Varg

Inspector

Jang, Sr. Radiation Specialist Affluents Radiation Protection Section (ERPS) Facilities Radiological Safety and Safeguards Branch (FRS&SB)

Approved by :

9108200030 6pp.

-31-91

7-26-91

Date

R. J. Boing, Chief, ERPS, FRS&SB Division of Radiation Safety and Safeguards

Inspection Summary: Special, announced inspection of the licensee's radioactive liquid and gaseous effluent control programs including: calibration and functional test of radioactive liquid and gaseous effluent/process radiation monitoring systems (RMS), and implementation of the Offsite Dose Calculation Manual.

Very good routine radioactive liquid and gaseous effluent control programs Results: were implemented by the Chemistry Department. A very good program to calibrate the effluent/process radiation monitors was also implemented by the I&C Department. Excellent management support to maintain the radiation monitoring system integrity and operability was also noted during this inspection. Within the areas inspected, no violations or deviations were identified.

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DETAILS

1.0 Individuals Contacted

1.1 Licensee Personnel

- * J. Becker, I&C Manager
 - R. Crandall, Supervisor, Radiological Assessment Branch
 - T. Itteilag, Unit 2 Chemistry Supervisor
- * J. Kangley, Senior Engineer, Chemistry Department
- J. Keenan, Unit 2 Director
 P. Smith, Unit 2 I&C Supervisor

1.2 NRC Personnel

- P. Habighorst, Resident Inspector
 W. Raymond, Senior Resident Inspector
- Denotes personnel who attended that exit meeting on July 24, 1991.
 Other licensee employees were also contacted or interviewed during this inspection.

2.0 Purpose

The purpose of this special inspection was to review the licensee's programs for the areas of liquid and gaseous effluent controls, including calibration of the effluent and process radiation monitoring systems (RMS); implementation of the Offsite Dose Calculation Manual (ODCM); and assessment of environmental impact and public health and safety.

3.0 Calibration of Effluent/Process Radiation Monitoring Systems

The inspector reviewed the licensee's most recent calibration and functional test results for the following liquid and gaseous effluent/process radiation monitors, and for the following effluent flow instrumentation to determine the implementation of the Technical Specification (TS) requirements.

- o High Range Stack Gas Radiation Monitor (RM-8186)
- o Normal Range Stack Gas Radiation Monitor (RM-8132B)
- o Waste Gas Process Radiation Monitor (RM-9095)
- o Containment Gaseous Process Radiation Monitor (RM-8123B)
- o Steam Jet Air Ejector Gaseous Radiation Monitor (RM-5099)
- o Aerated Liquid Radwaste Process Radiation Monitor (RM-9116)

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- o Clean Liquid Radwaste Process Radiation Monitor (RM-9094)
- o Steam Generator Blowdown Liquid Process Radiation Monitor (RM-4262)
- o Waste Neutralization Sump Radiation Monitor (RM-245)
- o Reactor Building Closed Cooling Water Liquid Process Radiation Monitor (RM-6038)
- o Effluent Flow Instrumentation
 - Stack Flow Instrumentation (F-8412)
 - Aerated Liquid Flow Instrumentation (F-9118)
 - Clean Liquid Flow Instrumentation (F-9050)
 - Waste Neutralization Sump Flow Instrumentation (F-246)

The I&C Department had the responsibility to perform electronic and radiological calibrations for the above monitors, and to perform calibrations of the above effluent flow instrumentation. All reviewed results were within the licensee's acceptance criteria. The licensee performed calibrations and functional testss for the above radiation monitors more frequently than required by the TS as shown the following table.

RMS/Flow Inst. TS Requirement			Licensee's Performance	
	Calibration	Functional Test	Calibration	Functional Test
RM-8186	Refueling	Monthly	Refueling	Monthly
RM-8132B	Refueling	Quarterly	Quarterly	Monthly
RM-9095	Refueling	Quarterly	Quarterly	Monthly
RM-8123B	Refueling	Quarterly	Annually	Monthly
RM-5099	Refueling	Quarterly	Quarterly	Monthly
RM-9116	Refueling	Quarterly	Quarterly	Monthly
RM-9094	Refueling	Quarterly	Quarterly	Monthly
RM-4246	Refueling	Quarterly	Quarterly	Monthly
RM-245	Refueling	Quarterly	Quarterly	Quarterly
RM-6038	Refueling	Quarterly	Quarterly	Monthly
F-8412	Refueling	Not Required	Quarterly	Quarterly
F-9118	Refueling	Quarterly	Quarterly	Quarterly
F-9050	Refueling	Quarterly	Ouarterly	Quarterly
F-246	Refueling	Quarterly	Quarterly	Quarterly

During the review of the high range stack gas radiation monitor calibration results, the inspector noted that the licensee upgraded Procedure SP 2404AR, "Unit 2

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Stack Gaseous High Range Radiation Monitor, RM-8186, Functional Test" on July 12, 1991. Therefore, the licensee will determine the accuracy between meter, computer, and chart recorder rather than chart recorder during the monthly functional test. This item was recommended by the Radiological Assessment Branch (RAB), Nuclear Engineering Department during the RMS Phases I and II Audits conducted in December 1988 and November 1989, respectively. Based on these audits, the RAB and the licensee issued the Radiation Monitor Manual (see combined Inspection Report Nos. 50-245/90-18, 50-336/90-20, and 50-423/90-18 for details). The inspector noted that calibration (performed on January 12, 1990) and functional test (perform on June 26, 1991) results for the high range stack gas radiation monitor were within the licensee's acceptance criteria. The inspector stated that the determination of the accuracy between meter, computer and chart recorder will be reviewed during a subsequent inspection. The inspector also noted that this monitor was out of service as of July 16, 1991 due to failure of the power supply. The licensee stated that the replacement power supply was delivered on July 23, 1991 and will be installed within a week. The licensee also stated that the reliability and operability of the high range stack gas radiation monitor will be followed closely. It should be noted that this high range stack radiation monitor was installed to monitor potential releases in the event of an accident. All Unit 2 gaseous effluents are released through the Unit 1 stack during any accident.

The inspector noted that the licensee's calibration technique for the above radiation monitors was excellent. Radiological calibrations of these monitors were performed as the primary calibration (same monitoring geometry with National Institute of Standards and Technology traceable radionuclides: Cs-137 for the liquid monitors and Kr-85 for the gaseous monitors). The inspector discussed with the licensee the benefit of the current calibration technique versus using solid sources (button sources), because the primary calibration technique requires many extra steps during the calibration. The inspector stated that using button sources is very common after the primary calibration (See ANSI N13.10-1974, "Specification and Performance of On-site Instrumentation for Continuously Monitoring Radioactivity in Effluents" for details) and is acceptable to the NRC.

Based on the above review, the inspector determined that the licensee conducted an excellent program to calibrate the effluent/process radiation monitors.

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4.0 Operability and Reliability of Radiation Monitoring Systems (RMS)

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Contamination of the liquid effluent monitor sample chamber is a generic problem throughout the nuclear industry. Radioactive materials will plate out on the sample chamber resulting in increased background levels. Currently there is no optimum solution. The most common practice throughout the industry is flushing the sample chamber using clean water after radioactive liquid releases to reduce background. Occasionally the sample chamber is cleaned using decontamination solution, or the chamber is replaced if the background level is too high to obtain the required monitor sensitivity. During cleaning or replacement of the chamber, additional grab samples are taken and analyzed to satisfy the TS requirement for sampling liquid effluent prior to release.

The inspector reviewed the licensee's draft investigation results regarding a high background level [as high as 12,000 counts per minute (CPM)] for the steam generator blowdown radiation monitor on May 13, 1991. The investigation results demonstrated that the actual background level (electronic noise in the RMS, ambient background, and contamination of the sample chamber) was 5,500 CPM and the actual blowdown activity was 6,500 CPM. The licensee also calculated and demonstrated that 6,500 CPM correlated well with the latest monitor calibration curve and measured blowdown grab sample activity of about 10E-5 microcuries/cc (uCi/cc) during that time period. Based on the above licensee's investigation results, the inspector had no further questions in this matter.

Although the calibration results were within the acceptance criteria, one should perform the systematic trending analysis (RMS results versus measured effluent sample activity) to assess the RMS reliability. To track the reliability of radioactive liquid and gaseous effluent monitors, the RAB and Chemistry Department initiated the trending analysis in late 1990. The inspector conducted an independent evaluation during this inspection to determine the reliability. The inspector observed the actual radioactive liquid release process performed by the Operations and Chemistry (Liquid Discharge Permit Number 2283) on July 23. 1991. A grab sample counting result using a Ge gamma spectrometry system was 4.03E-5 uCi/cc for activation/fission products (about 2% of total activity and dominated by Sb-124) and 1.79E-3 uCi/cc for noble gases (about 98% of total activity and dominated by Xe-133). The inspector expected the RMS response would be higher than the grab sample result due to the contribution of noble gases (98%) and small contribution of Cs-137 activity (about 4.5% of total activation/fission products). The licensee used Cs-137 for the calibration. The net radiation monitoring result (RM-9094) was 27,000 CPM. The inspector converted this net monitoring result to activity, as uCi/cc, using a conversion factor

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(CPM/uCi/cc) of RM-9094 and compared the result to a grab sample result. The comparison between the monitoring results and the grab sample indicated that the monitoring result was higher by about a factor of 2, as expected). The inspector also compared gaseous effluent monitoring results against grab sample measurement results for 1991 and the comparisons were good.

Based on the observation and independent evaluation, the inspector determined that the RM-9094 was operable and reliable. The inspector stated that the licensee's trending analysis was an excellent tool to trend the operability and reliability of the RMS.

5.0 Radioactive Liquid and Gaseous Effluent Control Programs

The inspector reviewed selected licensee's procedures and radioactive liquid and gaseous discharge permits to determine the implementation of the TS and the Offsite Dose Calculation Manual (ODCM). The selected radioactive liquid and gaseous discharge permits were completed and dose projections were made prior to discharge as required. The inspector also determined that the reviewed discharge permits met the TS requirements for sampling and analyses at the frequencies and lower limit of detections established in the TS.

Based on these reviews, the inspector determined that the licensee has conducted an effective radioactive liquid and gaseous effluent control programs.

6.0 Assessment

The licensee has experienced daily routine difficulties, such as high background problem for the effluent monitors, purchasing of monitoring system components. and procedure upgrading in the effluent control programs. Despite of all these daily routine difficulties and corrective actions, and based on this inspection results, the inspector determined that the licensee has conducted an excellent effluent control program and there were no impacts on either the environment or the public health and safety.

7.0 Exit Interview

The inspector met with the licensee representatives denoted in Section 1.1 of this inspection report at the conclusion of the inspection on July 24, 1991. The inspector summarized the purpose, scope, and findings of the inspection.

41.12

August 8, 1991

MEMORANDUM TO: Edward C. Wenzinger, Chief Reactor Projects No. 4, Division of Reactor Projects, Region I

FROM: John T. Shedlosky, Senior Allegation Coordinator for the Millstone Nuclear Station, Reactor Projects Section No. 4A

SUBJECT: RADIATION MONITOR LOCAL ALARM HORNS

REFERENCE: RI-88-A-040 RI-91-A-103 RI-91-A-183 RI-91-A-204

9412050194

The equipment status of local alarm horns, which are associated with radiation monitors, has resulted in a series of nuclear safety allegations at Millstone Unit 2. The issues have been concerned with the audible alarm horns for the area and process radiation monitors which are located in the plant Auxiliary Building and in the Containment Enclosure Building.

Allegations have been made of personnel both improperly defeating local alarm horns by tampering with equipment; and also, of personnel failing to follow station procedures which require an alarm to be bypassed (and silenced) under certain conditions.

This issue was first documented in the report of a special team inspection, 50-336/89-13, as Allegations No. A.6.17 and A.7.4, and was also tracked as Unresolved Item No. 50-336/89-13-13 through resolution in inspection report 50-336/90-11. Closure was based on revisions made to operating procedures.

However, these changes have apparently not been totally effective in addressing aspects of the problem. Additional cases where personnel may have failed to follow procedures have been brought to the NRC in the referenced allegations.

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Edward C. Wenzinger, Chief 2 Reactor Projects No. 4, Division of Reactor Projects, Region I August 8, 1991

Because of the recurring nature of this issue, the operation and equipment status of these monitors has been under increased surveillance by both the Millstone Station NRC Resident Staff and the myself, the station allegation coordinator. We have attempted to independently discover instances where these monitors were degraded or not in conformance with procedures.

Additionally, equipment operation, calibration and procedure requirements have recently been reviewed by Dr. Jason C. Jang, Senior Radiation Specialist, ERPS, FRSSB, DRSS and by Mr. Don Lasher of EG&G, Rockville, MD. This was during the week of July 22.

We have not observed equipment conditions in which radiation monitor local alarms have been degraded. Dr. Jang's inspection will be documented as report 50-336/91-19; the findings of Mr. Lasher's review will be a feeder to report 50-336/91-20.

However, the person making these allegations has become impatient with both the licensee and NRC response to this issue. This is because the alleger continues to observe these conditions; but, find that after our investigation, NRC enforcement action has not been taken.

You informed me that both you and the Regional Administrator have recently been contacted by the alleger. You also requested that I meet with the alleger and explain that we needed additional information to corroborate his concerns.

I met with the alleger on July 31, 1991 and engaged in a lengthy conversation concerning the history of this issue. I indicated to him that both the resident staff and I had attempted to independently corroborate his observations. The monitors were observed operating properly without degraded local alarms. I requested that he inform the office promptly of any condition which affected the operability of these monitors or indicated the failure to follow station procedures.

41.14

Edward C. Wenzinger, Chief Reactor Projects No. 4, Division of Reactor Projects, Region I August 8, 1991

I found this discussion and the allegers personal perspective beneficial in better understanding the his concerns. I can better appreciate the circumstances in which these issues had originated. This detail is generally not available through allegation files and reports; but, from personnel interaction.

During this and all my discussions with those people bringing allegations, I have attempted to put the NRC effort in perspective. That being that the agency and its management is committed to thorough review and analysis of all allegations, primarily those brought from employees. I have also attempted to explain that enforcement action is an agency process, based on the day-to-day use of 10 CFR 2, Appendix C, and was subject to review by several levels of management to insure uniform application of this process.

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John T. Shedlosky Millstone Site Allegation Coordinator

cc: E. Kelly W. Raymond S. Stewart Allegation File: RI-88-A-C40 RI-91-A-103-04 RI-91-A-183-01, -02, -03 RI-91-A-204-01, -02, -05, -06

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NORTHEAST UTILITIES

General Offices . Selden Street, Berlin, Connecticut

P O. BOX 270 HARTFORD, CONNECTICUT 06141-0270 (203) 665-5000

August 8, 1991

Docket No. 50-336 A09588

Mr. Charles W. Hehl, Director Division of Reactor Projects U.S. Nuclear Regulatory Commission Region I 475 Allendale Road King of Prussia, Pennsylvania 19406

Dear Mr. Hehl:

Millstone Nuclear Power Station, Unit No. 2 RI-91-A-0103

We have completed our review of Issue 1 concerning activities at Millstone Station. A request for a two-week extension to respond to Issue 2 is addressed below. As requested in your transmittal letter, our response does not contain any personal privacy, proprietary, or safeguards information. The material contained in those responses may be released to the public and placed in the NRC Public Document Room at your discretion. The NRC letter and our responses have received controlled and limited distribution on a "need to know" basis during the preparation of this response.

ISSUE 1:

-9412050186 3pp

On May 13, 1991, the Steam Generator blowdown radiation monitor was inoperable and was being repaired under AVO-M2-91-3765. The monitor had a contaminated sample canister which caused the monitor to read as high as 12,000 cpm. This radiation monitor was also inoperable because the background determination and correction were not accomplished properly causing the monitor reading to not agree with Chemistry results from the sampled generators. Problems with background determinations (during SP 404AJ) for radiation monitors have existed for a long time and no corrective actions have been taken. Additionally, the Steam Generator leakage on this day was .15 gpm (by N-16), and no corrective actions were being taken.

Please discuss the validity of the above assertions. If any deficiencies in procedures or equipment are identified, please provide us the corrective actions that you have taken to ensure that safe operation of the unit continues.

41.16

Mr. Charles V. Hehl, Director U. S. Nuclear Regulatory Commission A09588/Page 2 August 8, 1991

Background:

The Chemistry Department requested that Instrumentation & Control (I&C) investigate the performance of the blowdown radiation monitor. The request was based on the monitor indicating higher than expected for the activity being detected in the sample results. The radiation monitor canister was removed and flushed to remove any particulate matter. When water was then added to the canister, the radiation monitor reading was reduced from 5000 cpm to 4000 cpm.

The contamination of process radiation monitor canisters and the subsequent effect on the sensitivity of the radiation monitor had been previously identified. Currently, as in the past, it has been addressed by periodic cleaning of the canister. The Radiological Assessment Branch is currently developing minimum required sensitivities for each process radiation monitor. These sensitivities will be added to the Radiation Monitor Manual and will specify the maximum allowed background level before canister decontamination is required.

Response:

The procedure for the calibration of the blowdown radiation monitor has been reviewed and has been found to appropriately correct for background readings. Contamination of the radiation monitor canister during periods of high process activity has been previously identified and is being appropriately addressed.

The radiation monitor was not rendered inoperable due to canister contamination. The effect of the contamination is to raise the output of the monitor. The current setpoint controls are adequate to ensure isolation takes place at conservative values.

The assertion that the steam generator leak rate was .15 gpm on May 13, 1991 is not valid. The steam generator leak rate on May 13, 1991 was less than 0.2 gallons per day (gpd) (by N-16).

ISSUE 2:

Plant Equipment Operators and Control Operators are not following procedures on the bypassing of radiation monitor alarms. During verification of tagging for the Steam Generator blowdown radiation monitor, the unit was found in an alarmed condition with an illuminated red lamp. Control Room annunciator had also indicated the alarm. The horn had been taped over and no bypass key had been installed. Because of this design both the Control Room operators and the Plant Equipment Operator (PEO) were at fault; the PEO for attempting to mute the alarm without a bypass key, and the Control Room operators for not acting promptly on the control board annunciator. Mr. Charles V. Behl, Director U. S. Nuclear Regulatory Commission A09588/Page 3 August 8, 1991

Please discuss the validity of the above assertions. Please discuss any actions that you have taken or will take to ensure that plant procedures regarding these alarms are being used.

Response:

Recent unit shutdowns have caused a reassignment of Operations personnel knowledgeable on this event to other tasks. We will continue our investigation on this matter and will respond when the investigation is complete. Our current schedule for providing this response is August 22, 1991.

After our review and evaluation of Issue 1, we find that this issue did not present any indication of a compromise of nuclear safety. Perhaps the concern expressed was based on a lack of awareness of the action taken to address the previously identified problem. Information was available within the Unit No. 2 I&C Department regarding this issue. We will continue to ensure that activities taken to address radiation monitor problems are appropriately disseminated or discussed within the department. We recognize the need to strive for a higher level of performance in this area, and are aggressively working towards that objective. We appreciate the opportunity to respond and explain the basis of our actions. Please contact my staff if there are further questions on any of these matters.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

Senior Vice President

cc: W. J. Raymond, Senior Resident Inspector, Millstone Unit Nos. 1, 2, and 3 E. C. Wenzinger, Chilf, Projects Branch No. 4, Division of Reactor Projects E. M. Kelly, Chief, Reactor Projects Section 4A

41.18

September 30, 1991

Memorandum To: Gene Kelly, Chief RPS No. 4A, DRP From: Tom Shedlosky

Subject: Eusponse to RI-91-A-103

We need to bey this response to several other allegations, which deal with radiation monitor alarm horns, procedure compliance, bypass keys and NRC inaction. These include:

RI-91-A-183 of July 8, 1991 Items -02, NRC inaction. -03, RM 8168 disabled on July 7, 1991. RI-91-A-204 of July 22, 1991 Items -01, Non-specific bypass key problems. -02, Horns taped over. -05, NRC inaction. -06, RM-4262 horn taped over in May or June (?). -07, Other instances to the NRC. -08, NRC response time.

In response to your questions penned on the attached draft: 1st paragraph- We think that we are done with horns.

Insert, at "A", something like the following:

Information in this record was deleted

FOIA 92-162

in accordance with the Freedom of information Act, exemptions

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We share your concern that safety related plant activities be conducted in accordance with detailed approved procedures. Thank you for bringing in the sto us, where you believe that there has been a lapse in the attention to detail which is normally expected.

The NRC staff has reviewed the licensee's response to these issues and have made independent assessments of these concerns. Based on our understanding of both your allegation and the licensee's response additional surveillance observations of the radiation monitors for proper operation are in order. Your concerns have heightened our awareness of this aspect of procedure compliance. We will continue to make additional observations of this equipment at increased random frequency at a level appropriate to the safety aspects of the equipment. However the issue of procedural adherence at the Millstone Station is currently being assessed by NRC management . . .

Tom

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The NRC Region 1 office has completed its followup of the concerns that you brought to our attention on May 13, 1991, regarding: 1) the operability of the Steam Generator Blowdown radiation monitor; 2) the bypassing of radiation monitor alarms; 3) the Steam Generator leakage; and 4) availability of the NRC residents.

Issues (1) and (2), above, are identical to previous concerns that you provided to us on July 22, 1991. These issues in addition to issue (3), above, have been referred to the licensee for their evaluation. A copy of Northeast Utilities' August 8 and August 22, 1991 responses which address issues (1) and (2), respectively, are enclosed.

Dear

NRC inspectors reviewed the licensee's diversification and made independent assessments of these concerns. Based on the investigation results, the inspectors had no further questions in these matters. However, the issue of procedural adherence at the Millstone Station is currently being assessed by NRC management, and the concern regarding the bypassing of radiation monitor alarms is one aspect of that assessment. Enclosed is a copy of Inspection Report (IR)50-336/91-1? which addresses Issue (1) and (2), and Issue (2) will be addressed in the current report (IR)50-336/91-27.

Issue (4) was addressed in our May 21, 1991 letter to you. Therefore, we consider this issue closed.

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

Sincerely;

Edward Wenzinger, Chief Reactor Projects Branch 4

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Enclosures: As stated