

NORTHEAST UTILITIES

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NORTHEAST UTILITIES SERVICE COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY

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December 11, 1991

Docket No. 50-336
A09945

Re: Employee Concerns

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

Dear Mr. Hehl:

Millstone Nuclear Power Station, Unit No. 2
RI-91-A-0238

We have completed our review of identified issues concerning activities at Millstone Station. As requested in your transmittal letter of October 16, 1991, our responses do not contain any personal privacy, proprietary, or safeguards information. The material contained in these responses may be released to the public and placed in the NRC Public Document Room at your discretion. The NRC transmittal letter and our responses have received controlled and limited distribution on a "need-to-know" basis during the preparation of these responses. An additional two weeks in which to respond to these issues was granted in a telephone conversation with the Region I Staff on November 25, 1991.

ISSUE 04:

"On or about August 29, 1991, surveillance SP 2404AW for the RBCCW liquid radiation monitor RM-6038 could not be performed as written due to procedure/data sheet conflicts. More important, the calculated detector sensitivity and its linearity value were out of tolerance, as were seven other monitor channels."

REQUEST:

"Please discuss the validity of the above assertion, and actions taken to correct any deficiencies. If deficiencies are found to be of a generic nature, please notify us of the corrective actions you have taken to prevent recurrence. Please provide us with an assessment of the safety significance of any identified deficiencies."

RESPONSE:

This assertion is correct. We were made aware of the concern at the time the calibration was attempted when an Instrumentation and Controls (I&C) techni-

Mr. Charles W. Hehl
A09945/Page 2
December 11, 1991

cian identified problems in performing the surveillance as it was written. The procedure was revised to address the concerns of the individual and, following consultation with our Radiological Assessment Branch (RAB), a detector response linearity specification was removed from the data sheet. The calibration was successfully completed using the revised procedure and data sheet.

The calibration at issue uses three sources (designated 'A', 'B' and 'C') in the course of a calibration. Additional review following successful completion of the surveillance concluded that the 'B' source used in the calibration was weak enough to have resulted in the abnormal responses noted during the calibration. The Chemistry Department has since manufactured a new Cesium 137 source at the request of the I&C Department.

A second issue involved sensitivity and linearity abnormalities found during the calibration. As specified in Revision 2 of SP 2404AW, the I&C Supervisor and an RAB scientist were contacted for review of these calibration abnormalities. The supervisor and scientist concurred that the sensitivity calculation (on the 'B' test source) was not of concern, and the linearity value, while out of the desired range, did not invalidate the calibration and was acceptable as is.

There are no significant safety or generic concerns associated with these issues in that the techniques and procedures employed resulted in valid calibrations and fully functional equipment.

ISSUE 05:

"There appeared to be no acceptance criteria for Procedure 2404AW, Revision 2, although Revisions 0 and 1 had acceptance criteria. The review process did not identify this omission."

REQUEST:

"Please discuss the validity of the above assertion, and actions taken to correct any deficiencies. If deficiencies are found to be of a generic nature, please notify us of the corrective actions you have taken to prevent recurrence. Please provide us with an assessment of the safety significance of any identified deficiencies."

RESPONSE:

Acceptance criteria were present on the data sheet, but the words "Acceptance Criteria" were omitted. The surveillance procedure at issue (SP 2404AW) was revised as part of the procedure upgrade process in the Millstone Unit No. 2 I&C Department. During the upgrade, the data sheets were retyped and the 'Acceptance Criteria' notation and asterisk contained in Revision 1 were inadvertently omitted from Revision 2. The designation of required values and tolerances was present on the revised data sheet, but the acceptance designation indicators were not. The person responsible for the procedure and an independent reviewer did not find the error during the review process.

T-118.4

Mr. Charles W. Hehl
A09945/Page 3
December 11, 1991

When we were informed of this concern during performance of the surveillance in August 1991, the work was stopped and the procedure and data sheets were revised. The surveillance was successfully completed using the revised documents.

We find no safety significance to this omission since all of the required data, tolerances, and procedural steps were intact, and the data sheet would not have been accepted by the Operations Department had the procedure been completed with out-of-specification readings.

There is a potential for generic concern in that the independent and owner reviews of a procedure missed an important characteristic. A review within the I&C Department of all existing radiation monitor Technical Specification-required procedures has found that Acceptance Criteria are present on all associated data sheets. This review indicates that this specific problem is isolated. As a local action to prevent recurrence, the department manager and supervisors will be conducting training of all department personnel to stress the importance of thorough reviews at every step of the procedure revision process.

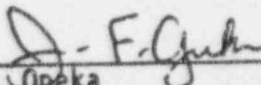
As an offshoot of our continuing procedure upgrade process, staffing is under way for a broad-based action to address the generic issue of procedure adequacy. Initiated by the Station Director, the Procedure Upgrade Project will ensure that procedures undergo a thorough review as well as a validation and verification process prior to being submitted for approval by the appropriate operating review committee.

After our review and evaluation of these issues, we find that these issues did not present any indication of a compromise of nuclear safety.

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



J. F. Opeka
Executive Vice President

cc: W. J. Raymond, Senior Resident Inspector, Millstone Unit Nos. 1, 2, and 3
E. C. Wenzinger, Chief, Project Branch No. 4, Division of Reactor Projects
E. M. Kelly, Chief, Reactor Projects Section 4A
J. T. Shedlosky, U.S. Nuclear Regulatory Commission, Millstone

T-118.5