

NORTHEAST UTILITIES



THE CONNECTICUT LIGHT AND POWER COMPANY
THE MIDDLEBURY ELECTRIC COMPANY
THE NEW HAVEN WATER POWER COMPANY
NORTHEAST UTILITIES SERVICE COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY

General Offices • Selden Street, Berlin, Connecticut

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

November 27, 1991

Docket No. 50-336
A09958

Re: Employee Concerns

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

Dear Mr. Behl:

Millstone Nuclear Power Station, Unit No. 2
R1-91-A-0243

We have completed our review of an identified issue concerning activities at Millstone Station. As requested in your transmittal letter, our response does not contain any personal privacy, proprietary, or safeguards information. The material contained in this response may be released to the public and placed in the NRC Public Document Room at your discretion. The NRC transmittal letter and our response have received controlled and limited distribution on a "need to know" basis during the preparation of this response.

ISSUE:

During the performance of SP-2404AV, it was noted that copies of form OP 2383C-1, "Alarm Setpoint Control," were not forwarded to the Engineering Department for review on two occasions as required by procedure OP 2383C, "Radiation Monitor Setpoint Control." Specifically, the alarm setpoint changes for RM 6038, the Reactor Building Closed Cooling Water Monitor, which occurred on May 11, 1991 and July 8, 1991 were not forwarded to Engineering Department as required. In fact, the last change made to the setpoint for RM 6038 which was reviewed occurred on February 2, 1991.

REQUEST:

Please provide your review of the above assertion. If the above conditions are valid, notify us of the corrective actions you have taken to prevent recurrence. Also, provide us with an assessment of the safety significance of any identified deficiencies, including any potentially generic considerations.

RESPONSE:

The assertion is not valid as stated. We were aware of this issue prior to receipt of the notification letter from the NRC. The control forms for

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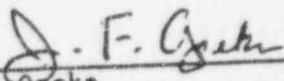
Mr. Charles V. Behl, Director
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the two setpoint adjustments cited indicate that both 2383C-1 forms were sent to Engineering by Millstone Unit No. 2 Senior licensed operators at the time that the setpoint changes were implemented consistent with governing procedures. In early September, 1991, the Operations department responded to the person who raised the concern, indicating that the forms had indeed been forwarded. Copies of the forms at issue are on file in the engineering department and were satisfactorily re-reviewed following original notification of the concern.

After our review and evaluation of this issue, we find that this issue 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. Venzinger, Chief Projects Branch No. 4, Division of Reactor Projects
E. M. Kelly, Chief, Reactor Projects Section 4A
J. T. Shedlosky, U.S. Nuclear Regulatory Commission, Millstone



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

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.

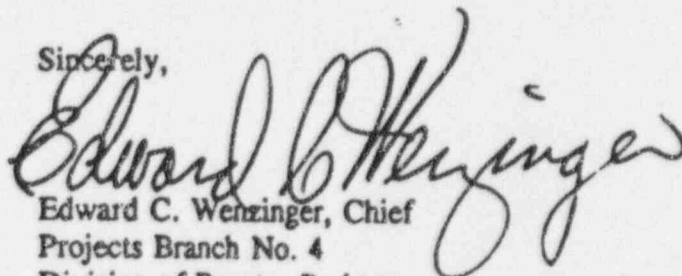
Areas examined during the inspection are described in the enclosed report. Within these areas, the inspection focused on issues brought to Northeast Utilities by the NRC. Our independent review evaluated your performance in complying with regulatory requirements important to public and worker health 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

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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. Scafe, 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

Conclusions regarding the adequacy, on programmatic basis, of non-seismically qualified instrumentation installed in seismic category I systems were pending NRC evaluation of NNECO's assessment of this matter.

9.0 ADMINISTRATIVE CONTROL OF RADIATION MONITOR MAINTENANCE

Concerns had been expressed regarding administration deficiencies surrounding activities for radiation monitors. Specific issues include contradictions between procedures and vendor manuals, setpoint control, and inadequate radiological work practices.

Assessment

One concern involved discrepancies between acceptance criteria specified by a vendor technical manual and that specified by surveillance procedure SP 2404AG, "Waste Gas Process Radiation Monitor (RM 9095) Functional Test," revision 1. Specifically, the vendor manual had stated that correct operation of the Upscale Check system was verified by obtaining a "count level equal to the check source level." However, the procedure specified acceptance criteria for the Upscale Check as "count level indicator increase." Because of this discrepancy, the validity of the surveillance, and therefore the operability of the monitor was in doubt.

The licensee had responded that the vendor manual contained generic recommendations for Upscale Check tests, and that these recommendations were not applicable and were superseded by the PORC-approved procedure. The Northeast Utilities Service Company (NUSCO) Radiological Analysis Branch had confirmed the adequacy of the Waste Gas Monitor functional test in a memorandum (NE-91-RA-338, dated May 28, 1991) and concurred that the procedure took precedence over the vendor manual.

The original concern and licensee response referenced Section 6.2 of a draft Revision 2 to the surveillance procedure as providing the intended acceptance criteria ("Upscale Check > Background"). To date, this revision has yet to be approved. The inspector considered that NNECO should have referenced an approved procedure in response to this concern.

The inspector also reviewed a copy of SP 2404AF, Revision 1, Change 5, which includes corrections to identified problems and extensive procedure step rewrites that were incorporated as part of this latest upgrade. The inspector determined, based on review, that the original procedure "deficiencies" would not have prevented a knowledgeable I&C technician from completing the calibration in a satisfactory manner. The Change Routing Sheet used to process and implement the I&C procedure change is not required by Millstone administrative procedures, but rather is a tool developed by the MP2 I&C department to initiate, track, and document actions taken by personnel in the procedure upgrade process.

A concern was identified related to the disposition of setpoint control forms for radiation monitor surveillance. Specifically, procedure OP 2383C, "Radiation Monitor Setpoint Control," requires that Alarm Setpoint Control form OP 2383C-1 be forwarded to the Engineering Department for review following an equipment setpoint change. However, during the performance of SP 2404AV, "RBCCW Radiation Monitor RM 6038 Calibration," it was noted that Setpoint Control forms for two setpoint changes conducted May 11, 1991, and July 8, 1991, had not been forwarded to the Engineering Department.

NNECO responded that the necessary forms were on file, having been reviewed in September 1991. The inspector obtained copies of the forms in question and conducted a review of the forms and procedure OP 2383C. The procedure specifies no time frame restrictions for routing Setpoint Control forms to the Engineering Department, and the inspector concluded that the procedure was being followed. Unit 2 Engineering does maintain a file of all radiation monitor setpoint control forms.

Conclusion

The inspector determined that NNECO took appropriate action in response to the above issues. Correct actions were taken to resolve vendor manual and procedure differences for RM 9095. Additionally, the Change Routing Sheet was adequate as initially filled out to implement the necessary procedure change of SP 2404AF, and the I&C supervisor was exercising supervisory discretion in his assignment of the procedure change action. The issues reflected minor administrative problems in the conduct of routine maintenance, procedures, and record keeping. These issues did not affect nuclear safety, and the corrective actions taken indicate that these concerns should be closed.

10.0 STATION BATTERIES

The NRC provided a concern about the safety-related Station Battery and the non-safety-related Turbine and Computer Battery procedures. The NRC disposition of this concern involved an initial NRC inspection of the safety aspects of the concern and then the concern was provided to the licensee for review and resolution. After the licensee response was received, a subsequent NRC inspection was conducted to evaluate the adequacy of the licensee's corrective actions. NNECO letter A10024, dated January 8, 1992, described the licensee's evaluation of the concern. The results of the subsequent NRC inspection are as follows:

Assessment

The inspector reviewed the battery procedures in question along with the technical manual and other applicable technical documentation associated with the installed batteries. The inspector also interviewed the engineer responsible for battery procedures and reviewed the ongoing actions at Millstone to improve the battery procedures.

A change to "Battery Pilot Cell Surveillance," SP 2736A, did provide retorque values for the



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

OCT 24 1991

Dear [redacted]

Per your October 10, 1991 request, enclosed is a listing of concerns that you have provided to the NRC which are currently open according to our records. For your information, we have broken down each allegation into individual concerns, and there are 86 concerns that remain open. The 21 concerns which are preceded by an asterisk are considered technically closed with the appropriate paperwork in process. You will be receiving closeout letters for those concerns, commensurate with their priority and our other work activities.

The enclosed listing provides the date of receipt of your concerns, and a brief summary. Your records should enable cross-reference between our case file numbers and related correspondence that you have received. Regarding any other allegations you have made, according to our files, those are closed with no further action planned by the NRC. I trust this meets your needs. I may be contacted at (215) 337-5225 if you have any further questions.

Sincerely,

Edward Wenzinger
Edward Wenzinger, Chief
Reactor Projects Branch 4

Enclosure: As stated

Information in this record was deleted
in accordance with the Freedom of Information
Act, exemptions 7C
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