

UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
476 ALLENDALE ROAD
KING OF PRUSSIA, PENNSYLVANIA 19406

JUL 27 1990

Docket No. 50-423
File No. RI-89-A-0080

[REDACTED]

Dear [REDACTED]

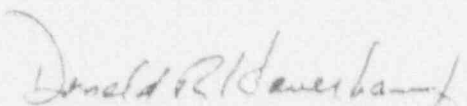
Subject: Allegation Concerning Millstone Nuclear Power Station Unit 3

The NRC Region I office has completed its follow up in response to the concerns you brought to our attention on June 20, 1989, alleging that: (1) personnel safety hazard exists in the cable vault rooms that are protected by the CO2 system in that personnel cannot get out of the area in the allotted time prior to system actuation; (2) no communication equipment exists in the CO2 protected areas; and (3) inadequate training is provided to security officers concerning entry to CO2 protected areas.

We found your allegation to be partially substantiated and have documented our findings in the enclosed NRC Region I Inspection Report No. 50-423/90-08, detail 7.3.2 dated July 3, 1990.

We appreciate your informing us of your concerns and feel that our actions in this matter have been responsive to those concerns. Should you have any additional questions, or if I can be of further assistance in this matter, please call me collect at (215) 337-5120.

Sincerely,


Donald R. Haverkamp, Chief
Reactor Projects Section SA
Division of Reactor Projects

Enclosure: As stated

Enclosure: As stated
bcc: Allegation File RI-89-A-0080
A. Vogel
W. Raymond

113



REGION I
478 ALLENDALE ROAD
KING OF PRUSSIA, PENNSYLVANIA 19406

JUL 03 1990

Docket No. 50-423

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

Gentlemen:

Subject: NRC Region I Inspection No. 50-423/90-08

This refers to the routine resident safety inspection conducted by Mr. K. Kolańczyk and others of this office on May 3 through June 11, 1990 at Millstone Nuclear Power Station, Unit 3, Waterford, Connecticut of activities authorized by NRC License No. NPF-49 and to the discussions of our findings by Mr. Kolańczyk with Mr. C. Clement and others 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 observation of activities, interviews with personnel, measurements, and document reviews.

Based upon the results of this inspection, it appears that certain of your activities were not conducted in full compliance with NRC requirements, as set forth in the Notice of Violation enclosed herein as Appendix A and further discussed in sections 3.3 and 3.5.1 of the enclosed inspection report. The violations involved: (1) the failure to follow procedures during plant cooldown/heatup operations; and (2) the failure to notify the NRC in a timely manner when safety-related equipment was rendered inoperable. These violations have been categorized by severity level in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10CFR Part 2, Appendix C (Enforcement Policy, 1990). You are required to respond to this letter and in preparing your response, you should follow the instructions in Appendix A.

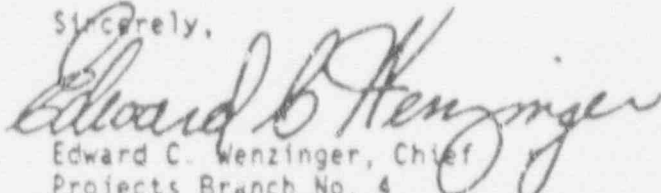
We are concerned about these events because: (1) multiple operator errors have recently occurred; (2) an operator training weakness apparently exists since operations personnel did not immediately recognize that certain equipment failures need to be reported to the NRC; and (3) procedures regarding use of a dedicated operator are inconsistent which could desensitize an operator to the importance of his function. We request that you address the above concerns in your response.

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A section of the enclosed inspection report contains details of your security program that have been determined to be exempt from public disclosure in accordance with 10 CFR 73.21 (Safeguards Information). Therefore, that information will not be placed in the NRC's Public Document Room and will receive limited distribution. This letter and the remainder of the inspection report will be placed in the Public Document Room, in accordance with 10 CFR 2.790(*).

Your cooperation with us is appreciated.

Sincerely,


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

Enclosures:

1. Appendix A, Notice of Violation
2. NRC Region I Inspection Report No. 50-423/90-08, (contains Safeguards Information (SGI) in Section 7)

cc w/encls: (w/o SGI)

W. D. Romberg, Vice President, Nuclear Operations
S. E. Scace, Station Director, Millstone (w/SGI)
D. O. Nordquist, Director of Quality Services
R. M. Kacich, Manager, Generation Facilities Licensing
C. Clement, Director, Millstone 3
Gerald Garfield, Esquire
Public Document Room (PDR)
Local Public Document Room (LPDR)
Nuclear Safety Information Center (NSIC)
NRC Senior Resident Inspector (w/SGI)
State of Connecticut

U S NUCLEAR REGULATORY COMMISSION
REGION I

Report No.: 50-423/90-08

Docket No.: 50-423

License No. NPF-49

Licensee: Northeast Nuclear Energy Company
P.O. Box 270
Hartford, Connecticut 06141-0270

Facility Name: Millstone Nuclear Power Station, Unit 3

Inspection at: Waterford, Connecticut

Inspection
Conducted: May 3, through June 11, 1990

Reporting
Inspector: Kenneth S. Kolaczyk, Resident Inspector, Millstone 3

Inspectors: William J. Raymond, Millstone Senior Resident Inspector
Kenneth S. Kolaczyk, Resident Inspector, Millstone 3
Jennifer L. Dixon, Reactor Engineer, Operational Programs
Section, Region I
Douglas A. Dempsey, Resident Inspector, Millstone 1

Approved by:

Donald R. Haverkamp 7/3/90
Donald R. Haverkamp, Chief Date
Reactor Projects Section 4A
Division of Reactor Projects

Inspection Summary: Inspection on 5/3/90-6/11/90 (Inspection Report No.
50-423/90-08)

Areas Inspected: Routine onsite inspection at Millstone 3 during normal and
backshift work periods of plant operations; maintenance and surveillance;
security; engineering and technical support; and safety assessment and quality
verification.

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during the early implementation of the new NRC requirement to maintain a security event log, it was initially unclear what events actually should be reported. Therefore, several NRC licensee facilities were inconsistent in the reporting of safeguard events. The inspector noted that review of the safeguard log, since the first quarter of 1988, did not identify any other lapses in reporting requirements. Therefore, the inspector determined no generic issue exists regarding reporting safeguard events, and although the concern was substantiated, no safety or security issue exists.

Inspector review concerning the fourth issue involved a review of maintenance work orders on the door for the affected period and interviews with security personnel to identify if appropriate action would be taken if a security door was found to be inoperable. Inspector review of work orders issued on the door in question for the affected period did not identify any which were issued to repair a defective security door switch. One work order MP-89-04688 was issued when a guard identified the mechanical door latch as defective. The inspector verified that the guard's discovery was properly documented in the safeguard log on September 6, 1989.

The inspector interviewed security personnel in the CAS and asked what type of action they would take if a security door was found to be inoperable. At all times the security individuals indicated that a search of the area would be conducted, a guard posted at the door, a trouble report would be issued and the event recorded. Based upon inspector review of completed work orders and interviews with security personnel, the inspector was assured that proper actions have been taken and would be taken in the future if a guard discovered that door was inoperable.

The inspector had no further questions.

7.3.2 Concerns Regarding Entry into Cable Vault Area (RI-89-A-0080)

The inspector was contacted by a former contract security guard officer with the following concerns: (1) A personnel safety hazard exists in the cable vault rooms that are protected by the CO2 system in that personnel cannot get out of the area in the allotted time prior to system actuation; (2) no communication equipment exists in the CO2 protected areas; and, (3) inadequate training is provided to security officers concerning entry into CO2 protected areas.

The inspector performed a walkdown of the cable vault areas and noted that there were several areas that could not easily be exited in the event of an impending CO2 discharge. Currently for Millstone Unit 3, the CO2 system provides a one-minute warning prior to discharge. The inspector noted that the procedures for guard entry into CO2 areas had changed in 1987. The inspector reviewed security procedures and noted that guards are not allowed to perform routine patrols in the

CO2 protected cable vaults. If a security guard is required to enter the vault areas in response to an alarm, the guard is required to first notify the operations department and to have the CO2 system to the affected area locked out prior to entry. Therefore, the inspector determined that exit from the CO2 protected area in the event of a discharge is moot since personnel would not be in the affected area if CO2 was discharged.

However, the inspector noted that labeling of the affected switchgear area could be improved. Specifically, prior to entering the cable vault from the 4'6" level of the switchgear room, a sign is posted on the steps entering the area which reminds personnel that CO2 must be disabled from the control room prior to entry. The inspector determined an improved location would entail placing it across the ladderwell handrails which an individual would have to cross in order to enter the cable vault area. The inspector discussed this observation with the unit director who noted the inspector's comment.

In response to the other concerns, the inspector reviewed training given to guards prior to their entering CO2 protected areas and determined the instructions provided were adequate. The inspector noted that permanent communication equipment does not exist in the cable vault areas, but determined that the additional equipment would not subsequently improve worker safety since guards already are required to notify the control room prior to entering the areas unless CO2 is removed from service. The inspector noted that the licensee had also installed CCTVs to monitor the access doors to the cable vault.

Based on the above concerns, the inspector determined that although the matter of whether personnel can exit the cable vault areas is a valid industrial safety concern, the licensee has established adequate controls and provided proper training to individuals that will minimize the obvious hazard. Therefore, this matter is closed.

8.0 Safety Assessment/Quality Verification

8.1 Technical Specification Amendment Implementation

The inspector reviewed recent technical specification amendments to determine if they were being implemented in a timely fashion. Review of the implementation schedule for license amendments 42-48 revealed that none of the amendments which required procedure revision or setpoint changes were implemented within the 30 days that is specified in the letter which accompanies the change. The delays in implementation ranged from 9 days for amendment 46, which changed the operability requirements for the main steam isolation valves and radiation monitors to four months for amendment 43, which lowered the reactor coolant pump underfrequency trip setpoint. The delays in

DATE: 7/17/89

FACSIMILE FROM MILLSTONE RESIDENT OFFICE

MESSAGE TO: Ebe McCabe

DEP

FROM:

PETE HABIGHORST

MILLSTONE UNIT 2

NUMBER OF PAGES: 3
(including this form)

Millstone Fax No. (203) 443-5893
Millstone Phone Nos. (203) 447-3179
442-5357

MESSAGE:

I/4

ALLEGATION RECEIPT REPORT

Date/Time Received: JULY 17, 1989 / 10:55 AM

Allegation No. RZ-89-A-0085
(leave blank)

[Redacted]

Name: [Redacted]

Address: [Redacted]

Phone: [Redacted]

City/State/Zip: [Redacted]

Confidentiality Requested: Yes ___ No X Implied ___

Allegor's Employer: NORTHEAST UTILITIES

Position/Title: SECURITY OFFICER

Facility: MILLSTONE STATION

Docket No.: 50-245/50-336/
50-423

(Allegation Summary (brief description of concern(s)): THE INDIVIDUAL WAS CONCERNED IF A GUARD SHOULD BE STATIONED AT THE GUARD SHACK DURING A LIGHTNING STORM.

Number of Concerns: 1

Employee Receiving Allegation: PETER J. HABIGHORST
(first two initials and last name)

Type of Regulated Activity (a) ___ Reactor (d) X 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
X (c) Safeguards ___ (g) Offsite Health and Safety
___ (d) Transportation ___ (h) Other: _____

ALLEGATIONS AND COMPLAINTS - GENERAL

Attachment 3
RI 1210.1/0

Page _____ of _____

Detailed Description of Allegation: _____

THE INDIVIDUAL WAS CONCERNED IF A GUARD SHOULD BE STATIONED AT THE 'GUARD SHACK' DURING A LIGHTNING STORM. THE 'GUARD SHACK' IS LOCATED IN THE OWNER CONTROLLED AREA FOR ACCESS INTO PARKING LOTS AT THE NORTH ACCESS POINT (NAP), SOUTH ACCESS POINT (SAP), AND SIMULATOR BUILDING. THE NAP AND SAP SHACKS ARE SMALL WOODEN STRUCTURES WITH WINDOWS. THE SIMULATOR BUILDING POST IS INSIDE, AND THUS TO THE INDIVIDUAL NOT A CONCERN.

THE INDIVIDUAL BELIEVES THIS IS A 'LIFE-THREATENING' SITUATION (I.E. AT THE 'GUARD SHACK' POST DURING A LIGHTNING STORM). THE INDIVIDUAL HAS APPROACH LICENSEE SECURITY SARGANTS, AND WAS TOLD TO STAND THE POST, AND IF LEFT, "YOU WOULD ^{BE} VOLUNTARILY LEAVING YOUR JOB."

THE INDIVIDUAL IF ASKED TO POST A WATCH AT THE GUARD SHACK DURING A STORM WOULD NOT ASSUME THE STATION POST.

INFORMED REGIONAL MANAGEMENT OF ABOVE ALLEGATION AT 11:30AM ON 7/17