

NORTHEAST UTILITIES



THE CONNECTICUT LIGHT AND POWER COMPANY
WESTERN MASSACHUSETTS ELECTRIC COMPANY
MILSTONE WATER POWER COMPANY
NORTHEAST UTILITIES SERVICE COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY

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August 9, 1991

Docket No. 50-336
A09559

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-0052

We have completed our review of identified issues 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 letter and our response have received controlled and limited distribution on a "need to know" basis during the preparation of this response.

ISSUE 1:

During work under PDCE M2-90-032, deficiencies have been identified in Drawing 25203-39692, Sheet 14C. Similar deficiencies have been identified for the drawings associated with radiation monitors RM-8262 and RM-8123. Although these deficiencies have been identified to management, no corrective actions have been implemented. Additionally, an engineer marked-up the above drawing (39692, Sheet 14C) on March 11, 1991, thereby implementing a change to a plant drawing without proper management review and approval. Finally, the PDCE (M2-90-032) did not contain appropriate guidance for the required tagout, appropriate wiring diagrams were not included as required to ensure a complete tagout.

Please discuss the validity of the above assertions. Please discuss your corrective actions for any procedural adherence or other identified problems and discuss if any generic deficiencies that may require additional action are identified.

Mr. Charles W. Hehl, Director
U. S. Nuclear Regulatory Commission
AC9559/Page 2
August 9, 1991

Background:

PDCE M2-90-032 does not reference Drawing 25203-39692 Sheet 14C. A review of the Generation Records Information and Tracking System (GRITS), indicates that no such drawing exists in the Northeast Utilities drawing system. Without specific details of these deficiencies it is difficult to assess what corrective action should be taken at this time.

Related to the issue of the engineer and improper implementation of a change to a plant drawing; pen and ink changes to design modification packages are required by ACP-QA-3.10 "Preparation, Review, and Disposition of Plant Design Change Records (PDCRs)." The drawings being referred to here are copies being used for construction. The official controlled drawing is maintained at the Northeast Utilities corporate office and can only be changed by a Design Change Notice (DCN) or a Design Change Request (DCR) with proper review. Upon completion of the modification, the pen and ink changes on the copies become an "as-built" drawing, and are submitted as a DCR or DCN. This is typical for all modifications being implemented by the PDCR/PDCE process.

ACP-QA-3.10 for PDCRs does not address requirements for tagouts. It is not required that the PDCR contain or reference all the information necessary to complete a tagout. Per ACP-QA-2.06A "Station Tagging", it is the responsibility of the Operations Shift Supervisor and the Job Supervisor to establish the necessary boundaries and requirements for the tagout. By definition in ACP-QA-2.06A, the Job Supervisor is the lead person actually performing the work in the field, i.e., Mechanic, Electrician, I&C Technician, etc. No corrective action is planned since all other actions taken were in accordance with plant approved procedures.

ISSUE 2:

The following errors in authorized work order procedural references have been identified; (A) Procedure IC 2422D-1 deletes reference to photohelic section for RM-8434A data sheet. The photohelic calibration is checked in procedure IC2422B; however, the physical location of the photohelic is in radiation monitor RM8434B. (B) radiation monitor 8132B has a magnehelic sensor but no calibration data sheet section exists. The flow instrument is in radiation monitor RM-8132A. Procedure SP-2404AF has the calibration for FIS-8132A. (C) Radiation monitor RM 8145A has a magnehelic calibration section; however, the flow element is in RM-8145B as opposed to RM-8145A.

Please discuss the validity of the above assertions. Please discuss any corrective actions that you have taken or will take to correct any identified problems.

Background:

The radiation monitors for Millstone Unit No. 2 were manufactured by Nuclear Measurement Corp. (NMC). The typical gaseous and particulate monitor consists of a skid design containing two lead shield assemblies, one for particulate (A) and one for gaseous (B) monitoring. Each assembly

Mr. Charles W. Behl, Director
U. S. Nuclear Regulatory Commission
A09559/Page 3
August 9, 1991

houses one detector. The shield assemblies (A&B) are piped in series with a sample pump which draws the sample through each monitor, and discharges back to the system being monitored. Sample flow through both shield assemblies is controlled by a flow switch located between the last shield and the sample pump. The flow switch identification is not related to either of the detector/shield assemblies (A or B), since it controls flow through both. The physical location of the switch is insignificant to its placement in either the particulate or gaseous monitor calibration procedure.

Instrumentation and Controls (I&C) procedures IC 2422B and IC 2422D perform calibrations for gaseous and particulate channels of monitors which are not required by the Millstone Unit No. 2 Technical Specifications. SP-2404AF is used for the calibration of RM 8132, Unit No. 2 Stack Gaseous Process Radiation Monitor, which is a Technical Specification required monitor.

Response:

Item A:

A review of the Program Maintenance Management System (PMMS) database indicates that both procedures IC 2422B and IC 2422D are correctly referenced for RM 8434 since it has both particulate and gaseous channels. No corrective actions are required.

Item B:

A review of the PMMS data base indicates that both procedures IC 2422D and SP-2404F are correctly referenced for RM 8132 since it has both particulate and gaseous channels. No corrective actions are required.

Item C:

A review of the PMMS data base indicates that both procedures IC 2422B and IC 2422D are correctly referenced for RM 8145 since it has both particulate and gaseous channels. No corrective actions are required.

ISSUE 3:

On the job training is not provided when required. Training is conducted only in conjunction with INPO visits. Acceptable on-the-job training could have eliminated confusion of the technicians involved in completion of SP-2401B on February 16, 1991.

Please discuss the validity of the above assertions. Please discuss any corrective actions that you have taken or will take to correct any identified problems.

Response:

There is no requirement to perform on-the-job training (OJT) prior to procedure performance for any specialist. OJT is conducted within the constraints of the program. This occurs throughout the year as the

Mr. Charles W. Behl, Director
U. S. Nuclear Regulatory Commission
A09559/Page 4
August 9, 1991

surveillance activities and appropriate personnel are available. The dates of these training activities do not occur only in conjunction with INPO visits, but are scheduled throughout the year. The wide range startup functional test procedure OJT is being reviewed for the ability to be performed in a non-critical path environment.

ISSUE 4:

Instrument and Controls technicians in the "upgrade" supervisory position have not received annual Fitness-For-Duty supervisory training.

Please discuss the validity of the above assertion. Please discuss any corrective actions that you have taken or will take to correct any identified problems.

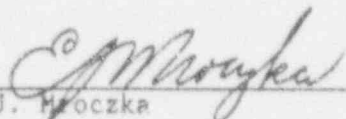
Response:

These assignments are for a short term duration. In this role, the "upgrade" position does not have Fitness-for-Duty (FFD) observation responsibilities. The normal supervisor as well as the Department Manager are available for conducting FFD observation. Supervisory FFD training is indeed necessary to be able to identify long term behavioral changes, and indications of aberrant behavior, but is not required for temporary upgrades to work supervision per our FFD Procedure Manual or 10CFR26.

After our review and evaluation, we find that these issues did not present any indication of a compromise of nuclear safety. We were not aware of any of the issues identified by the NRC. These issues are of a type that we could expect employees to bring directly to our attention. We appreciate the opportunity to respond and explain the basis of our actions. Please contact my staff if there are any further questions on any of these matters.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



E. J. Mroczka
Senior Vice President

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