

NORTHEAST UTILITIES



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

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August 9, 1991

Docket No. 50-336
B13905

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-0064

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 these responses 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.

In our letter of July 10, 1991 (A09594) addressing Issue 1 of RI-91-A-0064, we addressed the technical aspects of the prefabricated structure for the new steam jet air ejector monitor. We would like to supplement that information at this time with additional background.

NU was aware of the situation throughout the entire process. The inspector who questioned the fit-up inspection, documented the condition on a Non-Conformance Report on March 28, 1991 in accordance with our quality program. Functional line and station management became involved in the resolution and recommended corrective action options on April 2, 1991. This is the same date on which the Nuclear Safety Concerns Program (NSCP) was also contacted on a confidential basis regarding this issue. The NSCP continued to monitor progress towards resolution via independent contacts on site. This monitoring assured the material, as well as procedural, aspects of the issue were thoroughly addressed. The NRC Resident Inspection staff were apprised of our actions throughout this process. Subsequent line management review of this situation for generic implications was completed on May 17, 1991, two weeks before the NRC Staff's letter was issued to NNECO.

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Mr. Charles W. Hehl, Director
U. S. Nuclear Regulatory Commission
B13905/Page 2
August 9, 1991

We provide the above background information to assure you of our ongoing efforts to bring all concerns to prompt and thorough resolution.

ISSUE 2:

On April 8, 1991, a NNECO technician and a contractor were assigned fire protection surveillance, IC-2439A. The NNECO technician had never been trained on the surveillance procedure. On April 3, 1991, another technician was performing monthly function surveillance SP-2410A for the acoustic valve monitoring system associated with the pressurizer relief valves. This was the first time the technician had performed the surveillance since the last major revision and again, there had been no training on the conduct of the procedures with the incorporated revisions. In both cases, the technicians experienced difficulty in completing the procedures and numerous questions were raised.

Please discuss the validity of the above assertions. Please discuss employee training prior to performance of complex surveillances especially in cases involving first time assignment and performance subsequent to major revisions. Please discuss any corrective actions that you have taken or will take in these cases, to ensure that the surveillances are completed competently and safely.

Background:

I&C Procedure SP-2439A

A review of the completed data sheets indicates that the Instrumentation and Controls (I&C) procedure was performed competently and safely. The technician assigned to this work had worked on various components of the fire protection system a total of 13 times since February 11, 1987, with the most recent work effort being May 23, 1991. While working on the system the technician has demonstrated to his management his competence and understanding of the system and individual components.

This technician has worked on the fire protection system both alone and with other members of the shop. When questions have arisen in the past he has not been reluctant to stop and resolve those questions before continuing. All of the preceding facts led to the decision to assign him to perform the procedure in question. During the performance of IC 2439A there were no unresolved questions that were brought to the attention of I&C supervision.

I&C Procedure SP-2410A

Both technicians assigned to perform this surveillance had not received on-the-job training (OJT) specifically for this procedure revision. They were, however, interim qualified due to their past experience in performing the procedure. Each technician had successfully performed previous revisions of the procedure. Since 1984, one technician had participated in the performance of this procedure 9 times and the other technician 4 times. The technician who had performed the procedure 4 times had not done so since 1988.

Mr. Charles W. Hehl, Director
U. S. Nuclear Regulatory Commission
B13905/Page 3
August 9, 1991

Response:

The two assertions are accurate. However, it should be noted that it is not NNECO's expectation that all procedures will be performed without any questions by all workers. Difficulty may be experienced in performing a task that has not been performed for a period of time. Personnel are expected to have a questioning attitude toward their work and are encouraged to seek assistance from others in the shop.

In the case of the surveillances identified, the results of the work have been reviewed and found acceptable. The procedures were completed competently and safely.

The personnel involved in these work activities were both Level 2 qualified which allows them to work independently on the majority of Millstone Unit No. 2 systems. The process for training personnel to work on surveillances is to assign less experienced personnel to work with experienced personnel. This allows for the transfer of knowledge and experience. The OJT program formally documents the training and evaluates aspects of this practice. During implementation of the OJT program, experienced personnel are interim qualified to allow their continued participation prior to conducting the OJT activity.

ISSUE ?

During performance of modification package PDCE M2-90-032, drawing errors were noted for radiation monitor RM-9095. The errors involve the omission of a terminal board between the 120 VAC power supply and the radiation monitor solenoid valve on drawings 25203-39092 sheet 14a, 25203-31118 sheet 1, and 25203-32026 sheet 53. In addition to not identifying the drawing errors, the modification package did not identify the need for an equipment tagout.

Please discuss the validity of the above assertions. Please discuss actions that have been taken to correct any deficiencies with the modification package and with work control deficiencies, in general.

Response:

ACP-QA-3.14 "Design Change Notices For Design Documents," and ACP-QA-3.24 "Drawing Change/Submittal Requests," provide the necessary guidance to anyone who feels that a drawing change is necessary. A review of the Generation Records Information Tracking System (GRITS) showed no open change records for any of the reported drawings for this PDCE. Since the design change package is still open, the necessary As-Built drawings will be generated as part of the closure process.

Mr. Charles W. Behl, Director
U. S. Nuclear Regulatory Commission
B13905/Page 4
August 9, 1991

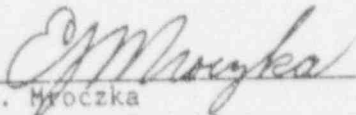
A review of the reported drawings was performed in order to determine exactly what changes might be required to respond to this assertion. No deficiencies were apparent. Unless more specific identification of the missing terminal board can be supplied, no corrective action is believed to be required.

The work consisted of preparation activities and actual work on installed plant equipment. It is our expectation that the AWO would not initially specify the need for tagout. Tagout was added prior to the time actual work on the plant equipment was started. No work control deficiencies were found during this review.

Our review and evaluation finds that the above assertions did not present any indication of a compromise to nuclear safety. We were not aware of these two issues prior to the receipt of the Staff's letter. 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