

# NORTHEAST UTILITIES



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

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August 16, 1991

Docket No. 50-336  
A09700

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, Pennsylvania 19406

Dear Mr. Hehl:

Millstone Nuclear Power Station, Unit No. 2  
RI-91-A-0093

We have completed our review of the 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:

While performing a review of surveillance procedure SP 2404AG (Waste Gas Monitor Functional Test) data, it was noted that the acceptance criteria contained in SP 2404AG differs from the acceptance criteria specified in the vendor's technical manual. Specifically, the vendor's technical manual states that correct operation of the upscale check system is determined by obtaining a counting level at least equal to that of the check source. However, Section 6.2 of SP 2404AG specifies acceptance criteria as: "The Acceptance Criteria is that the Upscale Check is greater than Background, not that a specific increase occurs." The surveillance is therefore incomplete and the operability of the monitor may be in doubt.

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Request:

Please discuss the validity of the above assertions. If any deficiencies regarding the technical accuracy of procedures or the operability of technical specification radiation monitors are identified, please provide us with the corrective actions you have taken to prevent recurrence. Please provide us with an assessment of the significance with regard to safety of any identified deficiencies.

Response:

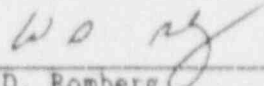
This question was reported to us via an Interoffice Memorandum dated May 4, 1991. The question was answered by a memorandum dated May 14, 1991. The acceptance criteria were reviewed and found acceptable for a source check type of surveillance. This issue had been addressed previously with NRC reviewers as part of the implementation of the Radiological Effluent Technical Specifications. The acceptance criteria were developed based on these discussions. The PORC-approved procedure takes precedence over the vendor technical manual. The technical manual contains generic recommendations that, in this case, are not applicable and have been superseded by the PORC-approved procedure. Additional review by the NUSCO Radiological Analysis Branch confirmed this assessment. There were no deficiencies identified as a result of this review.

After our review and evaluation, we find that this issue did not present any indication of a compromise of nuclear safety. We received this issue from one of our employees, evaluated the situation and provided a response to the employee within 10 calendar days. Technical specialists from NUSCO were involved in the preparation of the response. 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

FOR: E. J. Mroczka  
Senior Vice President

BY:   
W. D. Romberg  
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