

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 16, 1991

Docket No. 50-336
A09657

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
RI-91-A-0118

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 1:

On May 27, 1991 a manual work order 2-91-10 was prepared to lift leads and install jumpers in accordance with OPS Procedure 2207, Section 4.9.2. The purpose for this activity was to remove the S.I.A.S. open capability of MOV's 2-SI-615, 625, 635 and 645. No training had been provided to the technician assigned the task. Further, the procedure calls for leads #3 and #9 to be lifted on terminal board TH. In actuality, these leads have designations #21 on the face of the terminal board. Similarly, on THD and TDA, the procedure calls to lift leads #4 and #9 but they are marked #21. Further, the procedure calls for jumpers to be installed on terminal #2 to #4, and #8 to #10 on terminal board TH but the numbers on the terminal board are #12 and #22, and #12 and #32, respectively. Therefore, the procedure cannot be performed as written. No training was provided to ensure that proper actions are taken during the work.

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Response:

The NNECO procedure is correct as written. It provides the necessary technical details for a qualified electrician to remove the S.I.A.S. open capability from the four (4) LPSI injection valves. The procedure identifies the valve, schematic, cable, terminal board, location on the terminal board, and the wire color to be lifted for each valve. The procedure was developed in cooperation with the Generation Test Service Department and verified prior to PORC approval.

The designations on the face of the terminal board discussed in Issue 1 are the wire number designations on the corresponding schematic. These designations were installed by Bechtel as part of the original plant equipment. As such, they are extra numbers not discussed in the procedure.

In response to this question, the procedure was again reviewed and walked through by the Millstone Unit No. 2 Electrical Maintenance Supervisor and the Millstone Unit No. 2 Generation Test Services Supervisor. The procedure was found to be within the normal job skills of a qualified electrician without any further training.

ISSUE 2:

Work Order M2-91-05370 received a department approval authorization by an individual with no or very little knowledge of Unit 2 systems, operations, or activities. Further, the authorizing individual has received no system training which would be required prior to authorizing work on a category 1 system.

Response:

Automated Work Order (AWO) M2-91-05370 was written to replace a defective solenoid valve on the air operator for the "B" Enclosure Building Filtration System (EBFS) Filter Discharge Control Damper, 2-EB-42. Subsequent to preparing this AWO, the problem was discovered to be in the positioner and not the solenoid valve. The positioner was repaired by Northeast Nuclear Energy Company (NNECO) under a separate work order, and M2-91-05370 was canceled. Canceled work orders are not required to be kept for record purposes; therefore, the hard copies of the AWO were discarded prior to receiving this concern.

Since the hard copy of M2-91-05370 is not available, NNECO is unable to confirm or deny any alleged deficiencies in the work authorization. Since no work was performed under M2-91-05370, there was no adverse impact on safety.

ISSUE 3:

Individuals temporarily upgraded to foreman or assigned as "job supervisor" in accordance with ACP 2.02C have not been provided fitness-for-duty (FFD) training normally required for a foreman. Neither have these individuals been provided supervisory training or training to deal with aberrant behavior. Further, other than basic system training, job supervisors have

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never been trained on system interaction and the effects of system interaction on plant operation and public safety. This practice of temporary upgrade should be discontinued as it places the public in danger.

Response:

Maintenance personnel are assigned as Job Supervisors based on their job qualifications as specified on the training qualification matrix and their experience with the equipment with which the job is associated. The Job Supervisor is the lead person actually performing work in the field. No special supervisory or Fitness-For-Duty training is required for assignment as Job Supervisor. Although Maintenance Supervisors are occasionally referred to as "Foreman," there are no "Foreman" job positions at the Millstone Station.

Maintenance and I&C personnel are assigned as upgraded Maintenance and I&C supervisors during periods when the actual supervisor is unavailable due to vacation, training, sickness, etc., or when projects are of a size and duration to warrant the assignment of a temporary supervisor. Selection for upgrade to maintenance or I&C supervisor is based on an individual's experience. The practice of upgrading personnel to serve in temporary supervisory roles is an accepted management practice which allows senior working level personnel to gain supervisory experience.

No additional training is offered to experienced individuals who may be selected for upgrade positions. Maintenance and I&C supervisors do receive two days of training on recognizing behavior patterns and detecting aberrant behavior as part of our approved FFD program. This training is designed for permanent supervisory personnel (e.g. individual observations over extended periods of time) and would be of little use to a person who is a temporary upgrade to supervisor. Since the upgrade positions are for short intervals, additional supervisory awareness training is not needed. If any questions arise regarding a particular individual's behavior, these questions are referred to other management personnel on site.

NNECO has a highly competent technical staff to assist the Job Supervisors and Maintenance and I&C supervisors in the performance of their work. Neither the Maintenance nor I&C supervisors nor the temporary upgrades are expected to know all the effects of system interactions on plant operations. They are expected to know their limitations in these areas and seek proper assistance when it is appropriate. Experienced individuals with sufficient time in the department are selected for upgrade supervisors to ensure they are capable of exercising proper judgment, and knowing from whom they may obtain proper assistance when necessary.

The assertion described in Issue 3 above is not valid. There is no adverse impact on public safety from the practice of temporary supervisory upgrades.

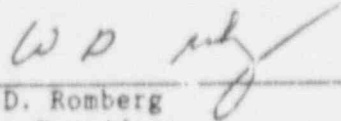
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After our review and evaluation, we find that these issues did not present any indication of a compromise of nuclear safety. None of these issues were identified to us prior to receipt of your letter. We appreciate the opportunity to respond and explain 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

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