

NORTHEAST UTILITIES

THE CONNECTICUT LIGHT AND POWER COMPANY
WESTERN MASSACHUSETTS ELECTRIC COMPANY
NEW LONDON WATER POWER COMPANY
NORTHEAST UTILITY SERVICE COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY

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September 16, 1991

Docket No. 50-336B13926

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-0137

In earlier correspondence on this issue we requested additional time to complete our investigation relating to Issue 4. Our investigation is now complete and we provide the following response. 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 transmittal letter and our response have received controlled and limited distribution on a "need to know" basis during the preparation of this response.

ISSUE:

On June 7, 1991, inadequate tagging was identified during Work Order M2-91-05870. The specific work for which the tagging was incomplete involved adjusting the limit switch for the closed valve position on the "D" Condensate Demineralizer inlet isolation motor operated valve (2-CND-170 or MOV23D). The only electrical tag in place was on the breaker for 2-CND-23D. Operations records and the P&ID show that additional electrical tag are required at the outlet valve breaker (2-CND-192 or MOV-37D) as it is interlocked with the inlet valve, at the demineralizer inlet isolation solenoid bypass valve (2-CND-171 or SOV 221D), and at the limit switch fuses in Cubicle 1.

Request:

Please discuss the validity of the above assertions. If any deficiencies in tagging, including procedures or implementation are identified, please provide us with the corrective actions you have taken or will be taking with regard to these deficiencies.

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Response:

The assertion is valid as stated. The P&ID indicates that there is an interlock between the influent and effluent valves. During the performance of the work for Automated Work Order (AWO) M2-91-05870 the need for an additional tag on MOV-37D was identified by Operations Department personnel and a tag was hung. Additional investigation into the electrical circuits has revealed that one contact from the #2 rotor is used for remote interlocking purposes. From the vendor diagrams of panel CUB1 (Cubicle 1) it was determined that power for the limit switch contact is provided from Fuse F-25 in the panel. Inadvertently, this fuse was not pulled as part of the tagging for AWO M2-91-05870. However, by using normal precautions associated with working on energized 120 volt circuits the job was completed safely.

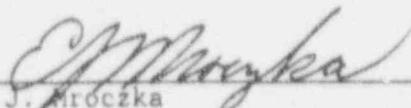
Because the existing drawings were, in some cases, hard to read, drawing changes have been initiated by the Engineering Department to clearly indicate the multiple power sources for the contacts at issue and power feeds from the fuses in CUB1. The fuses in CUB1 have been labeled to make them easier to identify.

Having identified this interlock, and the power feed from Fuse F-25, the necessary additional tagging can now be employed for future maintenance activities. Information concerning the power feeds from the fuses in panel CUB1 which was sent to the Operations Department will also be sent to the Maintenance Department by the Engineering Department so that the need for additional tagging can be specified in future maintenance activities.

After our review and evaluation of this issue, we find that this issue did not present any indication of a compromise of nuclear safety. We appreciate the opportunity to respond and explain the basis of our actions. Please contact my staff if there are 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
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