

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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December 12, 1991

Docket No. 50-336
813994

Re: IR 50-336/91-16
RG 1.97

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Gentlemen:

Millstone Nuclear Power Station, Unit No. 2
Inspection Report 50-336/91-16
Compliance With Regulatory Guide 1.97, Revision 2

The U.S. Nuclear Regulatory Commission (NRC) Staff conducted an inspection of Millstone Unit No. 2's compliance with the guidance in Regulatory Guide (RG) 1.97, Revision 2, "Postaccident Instrumentation," on June 10-14, 1991. During the course of that inspection, certain questions were raised which required commitments by Northeast Nuclear Energy Company (NNECO) to provide information to the Staff on a schedule agreed to during the inspection. These commitments were made in a June 14, 1991, (1) letter to the Staff. Subsequent conversations with the NRC project manager for Millstone Unit No. 2 have led to adjustments in the previously agreed to schedule for completion of those commitments.

- NNECO committed in our June 14, 1991, letter to provide the Staff with an updated submittal listing postaccident instrumentation and its status of compliance with RG 1.97 by December 15, 1991.

In order to provide the Staff with a complete and accurate matrix of postaccident instrumentation and its status of compliance with the guidance of RG 1.97, additional work will be required. This submittal will be made on or before March 2, 1992.

- An unresolved item (Item 50-336/91-16-01) was the use of a hand switch in the cold-leg temperature circuitry to switch from a non-Class 1E to a Class 1E circuit. The switch, if used, allows the transfer of a non-

(1) E. J. Mroccka letter to U.S. Nuclear Regulatory Commission, "Inspection Report 50-336/91-16, Compliance to Regulatory Guide 1.97," dated June 16, 1991.

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Category 1 cold-leg resistance temperature detector to provide a signal to a category 1 display device. During the inspection it was agreed that administrative controls would be put in place to prevent use of the hand switch until such time as it could be removed. Administrative controls have been in place since June 1991. This switch will be removed during the 1992 refueling outage.

- Discrepancies between control room display instrumentation and Final Safety Analysis Report (FSAR) and previous RG 1.97 submittals (Item 50-336/91-16-02) have been reviewed. The discrepancies will be resolved as follows:

<u>Display Variable</u>	<u>Discrepancy</u>	<u>Resolution</u>
Steam Generator Pressure	The engineering units of measurement are inconsistent.	The submittal will be corrected to reflect units in psia.
Wide-Range Containment Pressure	The specified range and engineering units are inconsistent.	The range and units will be corrected in both the FSAR and submittal to 0-250 psia.
Neutron Flux	The control room range was identified as inconsistent with the FSAR and submittal.	The FSAR and submittal correctly identifies the range as 10^{-6} - 150% for the wide-range nuclear instrument (WRNI) drawers. Differences between WRNI and control board display range will be provided in the FSAR and submittal.
Hydrogen Concentration	The FSAR range is inconsistent with the FSAR and submittals.	The FSAR will be corrected to reflect a range of 0-10%.
Containment Area Radiation	The lower-range value and FSAR engineering units appear inconsistent with the FSAR and submittals.	The lower-range value (1) identified in the FSAR and submittal is equivalent to that (10^0) on the display. The FSAR and submittal will be corrected to reflect 10^0 - 10^6 R/hr.

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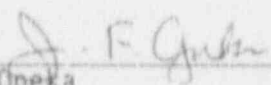
In summary:

- A complete revision of the status of compliance of postaccident instrumentation at Millstone Unit No. 2 with the guidance of RG 1.97 will be submitted by March 2, 1992.
- Cold-leg temperature hand switches will be removed during the 1992 refueling/steam generator replacement outage.
- Instrument range discrepancies have been identified and resolution plans provided in this letter.
- An FSAR change to incorporate references to RG 1.97 will be made by April 1992.

Please call if there are any questions:

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



J. F. Opeka
Executive Vice President

cc: T. T. Martin, Region I Administrator
G. S. Vissing, NRC Project Manager, Millstone Unit No. 2
W. J. Raymond, Senior Resident Inspector, Millstone Unit Nos. 1, 2, and 3