

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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January 29, 1992

Docket No. 50-423A10071

Re: 1GCFR2.201

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

Reference: E. C. Wenzinger letter to J. F. Opeka, "Millstone Unit 3
Inspection 91-22," dated December 3, 1991.

Gentlemen:

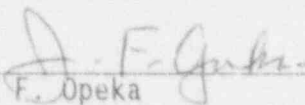
Millstone Nuclear Power Station, Unit No. 3
Reply to a Notice of Violation
Inspection Report No. 50-423/91-22

In a letter dated December 3, 1991 (reference), the NRC Staff transmitted the results of an inspection conducted on September 21 through November 15, 1991, at Millstone Unit No. 3. The NRC Staff identified one Severity Level IV violation concerning the failure to describe appropriate retests during work order preparation associated with preventive maintenance and requested that Northeast Nuclear Energy Company (NNECO) respond to the Notice of Violation within 30 days of the letter. However, per a telephone conversation with the Staff, an extension has been granted to 30 days from receipt of the letter. Inspection Report 91-22 was received on December 16, 1991. An additional two-week extension was granted for submittal of our response by January 29, 1992. Corrective actions have been taken since this event to ensure procedure compliance and understanding of requirements. These corrective actions are described in detail in Attachment 1.

If you have any questions regarding the information contained in this letter, please contact us.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



J. F. Opeka
Executive Vice President

cc: T. T. Martin, Region I Administrator
V. L. Rooney, NRC Project Manager, Millstone Unit No. 3
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, Region I.

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Attachment 1

Millstone Nuclear Power Station, Unit No. 3

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A. Restatement of Violation

"Technical Specification 6.8.1 requires that procedures covering activities in Regulatory Guide 1.33 be established and implemented. Station administrative procedure ACP 2.02B, 'Retests,' was written pursuant to the above. ACP 2.02B [sic] step 6.2.23 [sic], requires in part, that the Production Maintenance Management System (PMMS) planner or an authorized person in the lead department will create Automated Work Orders (AWOs) and specify retest requirements.

"Contrary to the above, AWO M3-91-21441, Service Water Pump Strainer, dated October 20, 1991, was prepared by the PMMS planner without retest requirements specified."

B. Reason for Violation

The cited violation was a result of the Millstone Unit No. 3 Maintenance Department and the NRC interpreting Section 6.2.24 of ACP 2.02C differently with regard to who was authorized to specify retest requirements. The reason for the different interpretation is that prior to November 1990, the ACP stated that the applicable department head was to fill in the retest based upon his knowledge of the planned work scope. A separate ACP, ACP 1.03, "Assumption of Responsibilities by Key Personnel," stated that functions like this could be delegated. General practice at that time was for an assistant department head (i.e., maintenance supervisor) to complete the section on retests.

At that time, Northeast Nuclear Energy Company (NNECO) was increasing its usage of recently developed retest matrices and generic retest guidelines for corrective maintenance work orders, and it was considered beneficial to allow the PMMS coordinator the latitude to document the retest. In December 1990, Revision 25 to ACP 2.02C was approved which allowed the PMMS coordinator or other authorized person to fill out the retest if known. This was not intended to be a requirement, but a flexibility to the work order process. Since this was not meant to be a major change in the work order process, extensive reviews of the ACP revision were not conducted. The guidance under the job functions of the first-line supervisors and Operations Department personnel were revised to specify that they review the retest requirements. Once again this wording was intended to allow flexibility with regard to who specifies the retest and who reviews the requirements.

It is not unusual for the scope of a work order to change as new information becomes available and, therefore, for the level of review to be

increased. The wording of the ACP was not meant to require two levels of review of all work orders before they left the lead department, although an independent review of the ACP could lead one to believe that this was required. As a result, NNECO does not contest the Notice of Violation and has taken steps to ensure that the ACP is followed.

C. Corrective Steps Taken and Results Achieved

To correct this procedural deficiency, Millstone Unit No. 3 Maintenance has reaffirmed the requirements of ACP 2.02C for regenerated work orders: upon closure of the original work order, the retest will be transferred to the new AWO. If no retest is required, the retest section of the AWO is marked "N/A." This will also be verified when the new AWO is printed prior to release.

Since there are scheduled preventive maintenance work orders that stretch over several years, there are regenerated work orders scheduled in the computer data base that have no retest requirements. These will be reviewed as they come up for performance, and the retests, if required, will be filled in as they are released for performance. In addition, NNECO is currently reviewing the file of scheduled work orders. All preventive maintenance work orders that are regenerated will have a retest documented or listed as "N/A" by December 1, 1992.

D. Corrective Steps Taken to Avoid Further Violations

A procedure revision is in progress that will specify the minimum number of reviews that are required for an AWO retest. It is currently anticipated that two layers of review by any of the authorized personnel in the lead department, Engineering, or Operations is adequate to ensure that a proper retest is performed.

E. Date When Full Compliance Will Be Achieved

NNECO is currently in full compliance with all requirements pertinent to this violation.

F. Generic Implication

The corrective actions, as described above, will be reviewed for applicability to Millstone Unit Nos. 1 and 2 and the Haddam Neck Plant, and appropriate actions will be taken, if required.