

NORTHEAST UTILITIES



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

General Offices • Selden Street, Berlin, Connecticut

P. O. BOX 270
HARTFORD, CONNECTICUT 06141-0270
(203) 665-5000

September 9, 1991

Docket No. 50-336
A09698

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-0162

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. Additional time to respond to this issue was granted by the Staff in telephone conversations on August 12 and August 30, 1991.

ISSUE:

An uncalibrated and unlabeled manometer has been temporarily attached (using cable ties) to the Millstone Unit 2 Exhaust Ventilation Duct for approximately 2 years. During this time, no action to either remove the manometer or to have it calibrated and permanently installed has been taken.

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Request:

Please discuss the validity of the above assertion. If deficiencies are found in component installation or calibration, please notify us of the corrective actions taken to prevent recurrence. If the condition is found not to be deficient, please notify why it is not. Please provide us with an assessment of the significance with regard to safety of any identified deficiencies.

Background:

The subject manometer was found connected in parallel with flow switch FS-8328, which is associated with the Millstone Unit No. 2 containment exhaust fan F34B. The manometer was installed at the existing instrument test tees to monitor the flow switch differential pressure, as the flow switch was experiencing intermittent trouble at the time. Records show that technicians routinely refilled and checked the manometer during periodic maintenance on FS-8328.

Response:

The assertion as stated is valid, however, when the manometer was installed, no formal administrative documentation requirement existed for such "temporary" mechanical gauges used for testing or monitoring. Currently, an Automated Work Order (AWO) would be used to install and remove the device during any testing activity. Additionally, the requirements of ACP-QA-2.06B, "Station Bypass/Jumper Control," may be invoked if deemed necessary by management or the Shift Supervisor if the gauge were needed on a longer term basis.

The fan (F34B) and the flow switch (FS-8328) are non-QA installations and failure of the fan or flow switch would not affect the operation of any safety system. The installation of the manometer had no effect on the safe operation of the system or the plant and its calibration status had no bearing on the functioning of FS-8328. Nylon cable ties are commonly used for the mounting of temporary monitoring instruments on non-QA equipment and are considered adequate for this installation. Therefore, there is no safety significance.

A review of Production Maintenance Management System (PMMS) history indicates that the device is no longer required. The manometer has been removed under AWO M2-91-08081 and the test tee fittings capped.


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 were not aware that the installation of this temporary device was of concern to

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anyone prior to receipt of your letter. As indicated in our response, the device was removed after determining that it was no longer needed. We appreciate the opportunity to respond and explain the basis of our action. Please contact my staff if there are further questions on this matter.

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. 1, Division of Reactor
Projects
E. M. Kelly, Chief, Reactor Projects Section 4A
J. T. Shedlosky, NRC, Millstone Nuclear Power Station