

# 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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September 9, 1991

Docket No. 50-336  
A09703

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-0165

As requested in our 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 these issues was granted by the Staff in telephone conversations on August 12 and August 30, 1991.

ISSUE 1:

Twenty of the twenty-four valves and regulators within the Cryogenic Liquid Nitrogen Converter Package (H-43) are not labeled.

Request:

Please discuss the validity of the above assertions. If deficiencies are found in Station drawings and/or equipment identification tagging, please notify us of the corrective actions you have taken to prevent recurrence. Please provide us with an assessment of the significance with regard to safety of any identified deficiencies.

Response:

This issue is valid. Many of the component tags have deteriorated or been lost due to years of unprotected exposure to the elements.

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Mr. Charles V. Hehl, Director  
U. S. Nuclear Regulatory Commission  
A09703/Page 2  
September 9, 1991

This condition was previously brought to the attention of Millstone Unit No. 2 Management and was under investigation at the time the allegation was received. All component tags have been reviewed by Millstone Unit No. 2 Operations personnel and the Liquid Nitrogen Converter Package has been given a priority rating for tag replacement utilizing the new enhanced tagging system. A walk-down of the Cryogenic Liquid Nitrogen Converter Package (H-43) was performed by Millstone Unit No. 2 Engineering and verified against the most current revision of P&ID 25203-26033, N2, H2, and CO2 System. The P&ID was found to be accurate and to reflect the plant as-built configuration and it will be the basis for the valve tag replacement efforts.

The Cryogenic Liquid Nitrogen Converter Package is a low use system and as such there was no safety significance involved. If a label or labels are discovered missing, the appropriate P&ID and a knowledgeable operator are used to provide identification.

ISSUE 2:

An evacuation pump appears to be permanently connected to the Cryogenic Liquid Nitrogen Converter system, but is not depicted on Station Drawing 25203-26033, Location F6, 7, and 8.

Request:

Please discuss the validity of the above assertions. If deficiencies are found in Station drawings and/or equipment identification tagging, please notify us of the corrective actions you have taken to prevent recurrence. Please provide us with an assessment of the significance with regard to safety of any identified deficiencies.

Response:

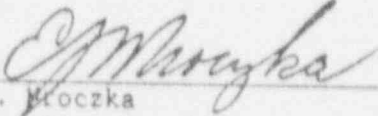
An evacuation pump has been mounted to the system via the designated N<sub>2</sub> evacuation flange/union connection. The pump is used on an as needed basis and is disconnected when not in use. The pump evacuates the annulus portion between the inner Cryogenic vessel and the outer vessel which is exposed to ambient conditions. The annulus portion between the two vessels is filled with an insulation material and is maintained at a high vacuum to reduce heat loss. The pump is used to periodically evacuate the space, but does not interconnect with the plant N<sub>2</sub> system. No changes to the P&ID's are considered necessary nor warranted. This condition was previously brought to the attention of Northeast Nuclear Energy Company (NNECO) management and was under investigation at the time the allegation was received.

Mr. Charles W. Behl, Director  
U. S. Nuclear Regulatory Commission  
A09703/Page 3  
September 9, 1991

After our review and evaluation of these issues, we find that this issue did not present any indication of a compromise of nuclear safety. Perhaps the concern expressed was based on a lack of awareness of the action taken to address the previously identified problem. We appreciate the opportunity to respond and explain the basis of our action. Please contact my staff if there are further questions on these matters.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

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