

NORTHEAST UTILITIES



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

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(203) 665-5000

October 3, 1991

Docket No. 50-336
A09807

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, PA 19406

Dear Mr. Hehl:

Millstone Nuclear Power Station, Unit No. 2
RI-91-A-0170

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 these responses 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. Additional time in which to respond to these concerns was granted by the Region I Staff in a telephone conversation on September 19, 1991.

ISSUE 0170-1:

"On June 26, 1991, the Millstone Unit 2 channel 'C' of the Wide Range Nuclear Instrument could not be calibrated using procedure IC 2417I, an approved station procedure. A similar problem had occurred earlier with channel 'A', and had only been corrected after the vendor recommended a discriminator voltage of 75 millivolts versus the 15 millivolts as required in the procedure. This vendor recommendation has not been incorporated in the procedure."

REQUEST:

"Please discuss the validity of each of the above assertions. If deficiencies are found to be of a generic nature, please notify us of the corrective actions you have taken to prevent recurrence. Please address incorporation of vendor recommendations - in general - as part of your overall Station Procedure Upgrade Program. Please provide us with an assessment of the safety significance of any identified deficiencies".

RESPONSE 0170-1:

The assertion does not appear to be valid. A review of the drawer calibration Procedure IC 2417I and vendor information does not reveal any 75 millivolt or 15 millivolt requirement associated with the discriminator voltage setting.

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It is difficult to determine exactly what the concern is about from the information given; however a review of the documentation involved with the job indicates that the spare drawer was installed and adequately retested. Response of the drawer during plant operation has been excellent.

ISSUE 0170-2:

"Calibrations were not performed for Wide Range Instrument channels 'A' and 'C' after the instrument drawers for those channels were exchanged during the last refueling outage (approximately November 1990). The exchange was made after spikes were observed in channel 'C' output."

REQUEST:

"Please discuss the validity of each of the above assertions. If deficiencies are found to be of a generic nature, please notify us of the corrective actions you have taken to prevent recurrence. Please address incorporation of vendor recommendations - in general - as part of your overall Station Procedure Upgrade Program. Please provide us with an assessment of the safety significance of any identified deficiencies."

RESPONSE 0170-2:

In stating that the instrument drawers for the "A" and "C" wide-range instrument channels were exchanged during the 1990 refuel outage, the assertion is valid. The statement that calibrations were not performed is not valid. As documented in Automated Work Orders M2-90-12034 and M2-90-12035, the "A" and "C" wide range drawers were calibrated on November 2, 1990 using Instrument and Controls Procedure IC 2417--Wide Range Channel Drawer Calibration.

After our review and evaluation of this issue, we find that these issues did not present any indication of a compromise of nuclear safety. We were not aware of any of these issues prior to the receipt of the MRC letter. 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



Edward 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
E. M. Kelly, Chief, Reactor Projects Section 4A
J. T. Shedlosky, U.S. Nuclear Regulatory Commission, Millstone