

NORTHEAST UTILITIES



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

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October 3, 1991

Docket No. 50-336
A09806

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-0171

We have completed our review of an identified issue 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 this response 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 this issue was granted by the Region I Staff in a telephone conversation on September 19, 1991.

ISSUE 0171:

"A concern has been received regarding the performance of preventive maintenance on the Main Exhaust Fan 14C motor and its circuit breaker (Reference AWO M2-90-06778). Portions of the control circuit, which included time delay systems TD1, TD2, and TD3, were energized after safety tags were placed on June 24, 1991 (Reference Tags 2-1323-91). The work order caution note 'Multiple Power Supplies' should have caused the Operations Department personnel to completely isolate all power supplies."

REQUEST:

"Please discuss the validity of the above assertion. If deficiencies are found to be of a generic nature, please notify us of the corrective actions you have taken to prevent recurrence. Please provide us with an assessment of the safety significance of any identified deficiencies."

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The caution note at issue appears on the computer-generated Automated Work Order (AWO) to assist the Operations Department in establishing the tag boundaries and to caution the Job Supervisor that circuits may be energized. The note was not intended as a flag for the Operations Department to ensure that all power sources are de-energized. The objective of the note was to prompt a discussion of the tagging boundaries before the work is begun so that the proper work method and tagging boundaries can be established. The note on the AWO and a similar note on the tag sheet are indications that not all the circuits have been de-energized.

The electrical schematic for Main Exhaust Fan, E34C, indicates that there are interlocks between all three Main Exhaust Fans. De-energizing F34C by opening the power supply circuit would not de-energize all of the contacts associated with these interlocks. In addition, there are contacts associated with annunciator and logic circuits which would remain energized after opening the fan power supply circuit breaker. From a plant operations standpoint it would not be practical to de-energize all the Main Exhaust Fans simultaneously; therefore, no additional tagging was provided for the work.

If after discussion with and review by the Operations Department additional tagging is not practical or cannot be provided, either of the following alternatives could have been agreed upon:

1. Obtain permission from the Control Room to remove the starter from the cubical and complete the PM activity.
2. Perform the work using proper safety equipment and devices. As a minimum, when working on or near energized equipment of 750 volts or below, electricians are instructed to wear low voltage gloves and safety glasses.

If neither of the above is acceptable, the option remains for an individual to stop the job and inform the Electrical Maintenance Supervisor of any concerns.

Department policy has been that any individual not feeling that maintenance can be performed safely on equipment with some auxiliary contacts remaining energized is not to work on jobs that he does not believe are safe. No one has been pressured to work with energized circuits.

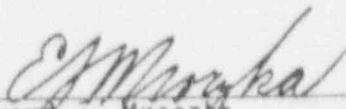
Since the procedures and guidance are in place to support the above discussion, there are no deficiencies in the tagging procedures and no corrective action is required. Since the work can be performed safely by following the electrical maintenance guidance, and no one is pressured to work on energized circuits, there is no adverse impact on safety.

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

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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
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