**NORTHEAST UTILITIES**

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NORTHEAST UTILITIES SERVICE COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY

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September 30, 1991

Docket No. 50-336
A09803

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-0183

We have completed our review of identified issues concerning activities at Millstone Station. As requested in your transmitta' 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 issues was granted by the Region I Staff in a telephone conversation on September 19, 1991.

ISSUE 183-5:

"The PORC [Plant Operations Review Committee] review process is inadequate because the change to SP 2404AR to test the RM 8168/8132 interlock did not work when the test was attempted on July 8, 1991."

REQUEST:

"We request that you determine how and why the PORC review failed to detect the faulty procedure.

"In addition, we request that you evaluate your PORC review process for changes to surveillance procedures to determine that this review process adequately examines the changed procedure to assure that it will actually perform the intended function."

RESPONSE 183-5:

The assertion as stated is not valid. The PORC is tasked by the Millstone Unit No. 2 Technical Specifications to advise the unit director on all matters related to nuclear safety. One aspect of this advisory function is the review of those station operating procedures required by Technical Specifications.

At Millstone Station, the review of procedures and procedure changes is controlled by Administrative Control Procedure ACP-QA-3.02--Station Procedures and Forms. The criteria for review specified for the PORC include a review of the procedure to ensure that the procedure accomplishes its objective without endangering personnel or equipment, determining if the procedure constitutes an unreviewed safety question, and determining whether or not the procedure or procedure change requires that a change be made to the Final Safety Analysis Report (FSAR) or Technical Specifications.

It is the duty of the department which is responsible for a procedure to write procedures and changes which can be used in the field. The procedure compliance program and procedure change program at Millstone are the checks and balances put in place to ensure that any problems discovered during the performance of a procedure are corrected when they are discovered. These programs allow the work done by procedure to be stopped if a problem is discovered, the procedure changed, and the work then completed successfully. The system worked as expected for the change to Procedure SP 2404AR. The sequence of steps for the interlock testing were discovered to be incorrect, the work was stopped, and the procedure corrected. Using the corrected procedure the work was successfully performed.

Once used, a procedure might be modified to make the work go more smoothly, to add steps to provide more detail if necessary, or to correct steps which were based on best available information when they were written. The normal department process would be for the procedure change to be written by an instrument specialist, then reviewed with the person responsible for the procedure (an instrument specialist) for his concurrence, and then reviewed by the department head and presented to PORC.

In the case of procedure SP 2404AR, the change was written by a plant engineer and reviewed by an Instrumentation and Controls (I&C) engineer in the absence of the person responsible for the procedure. The change was then reviewed by the department head and approved by PORC. It was then attempted and found to be deficient. The work was stopped, a revision processed to correct and incorporate the outstanding changes developed, given the review activities warranted by the revision activity, approved, and implemented without further complication. The system of procedure controls worked as expected.

Northeast Nuclear Energy Company was not made aware of a concern about the adequacy of PORC review of this procedure prior to receipt of your transmittal letter.

ISSUE 183-7:

"The waste neutralizer radiation monitor recorder was disabled due to inadequate procedure SP 2404Q and may not have been operable during a discharge."

REQUEST:

"We request that you examine and correct as necessary SP 2404Q for potential inadequacies which may have resulted in the disabling of the waste neutralizer radiation monitor. Further, we request that you review and evaluate the process for generating surveillance procedures to assure that adequate testing is performed to detect and rectify such inadequacies in surveillance procedures."

RESPONSE 183-7:

This assertion is not valid. The procedure listed in the assertion does not exist. SP 2404AQ--Waste Neutralization Process Radiation Monitor 2CNDRM245 Calibration--has been assumed to be the procedure of concern.

A review of SP2404AQ found no procedural inadequacy which could result in rendering the recorder inoperable during a discharge. The recorder for the process radiation monitor at issue is not used in a continuous service mode. The monitor and its recorder are only used during discharges from two of the plant sumps. Step 8.5 of Procedure SP 2404AQ directs the technician that following the calibration the recorder should be turned off if it was turned on to facilitate the calibration. This was the only step found in the procedure that might cause a user to suspect that the recorder may have been "inoperable" during a discharge. As the recorder is not used in a continuous service application, these steps are appropriate.

Operations Procedure SP 2617A--Radioactive Waste Discharge--is the procedure which governs discharges in which the radiation monitor at issue is used. A review of the procedure shows that the recorder (or plant process computer) is to be verified operable prior to the discharge. Additionally, the charts on the recorder are to be marked with the start date, start time and discharge permit number for a discharge. These steps ensure that recorders are operable and that any failure would be easily detectable. If the radiation monitor is found to be inoperable, alternate instructions are provided to the operator for performing the discharge.

I&C Instruction 3.01--Preparation and Review of Surveillance and Maintenance Procedures--used for the development of surveillances, details steps requiring Technical Specification/FSAR verification by an engineer, independent technical review, Radiation Assessment Branch review, and physical walkthrough of each new surveillance procedure. Each step in this process is documented for each procedure prior to presentation to PORC. The process for developing surveillance procedures is thorough, controlled, and documented.

We were not aware that the procedure at issue was a concern prior to our receipt of the NRC transmittal letter.

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 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
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