

February 11, 1992

Docket No. 50-336
License No. DPR-65
EA 91-188

Northeast Nuclear Energy Company
ATTN: John F. Opeka
Senior Vice President - Nuclear
Engineering and Operations
Post Office Box 270
Hartford, Connecticut 06141-0270

Dear Mr. Opeka:

SUBJECT: ENFORCEMENT DISCRETION FOR MAIN STEAM LINE BREAK RE-ANALYSIS

This refers to NRC inspection (No. 50-336/91-28) conducted at Millstone between September 29 and November 15, 1991, as described in the associated inspection report issued on December 5, 1991. The report addressed the nonconservative analysis identified by your staff and reported to the NRC which led to the operation of Unit 2 since initial licensing in 1975 in a condition outside the design basis. Specifically, in the event of a main steam line break accident at full power with the continued injection of feedwater (due to a feedwater regulating valve failure), the containment design pressure and temperature would potentially be exceeded.

The nonconservative analysis was identified during a re-analysis of the plant's design basis, so as to support the Unit 2 steam generator replacement project, scheduled for April 1992. During that re-analysis, you determined that the worst case accident was different than that assumed during the initial licensing of the facility, and that in the event of the newly analyzed accident, the peak containment pressure and temperature would potentially be exceeded. This problem was potentially significant because this accident could result in the failure of the containment due to over-pressure, as well as an impact upon the environmental qualification of electrical equipment inside containment because of temperatures in excess of qualified profiles.

Normally, enforcement action is considered for such a condition because it involved the plant operating outside of its design basis. However, after consultation with the Commission, I have decided to exercise discretion, pursuant to Section V.G of the NRC's Enforcement Policy, and to not issue enforcement action in this case because (1) the condition was identified by your staff during this self-initiated re-analysis and promptly reported to the NRC; (2) such identification was not likely by either your staff or the NRC during routine inspection, review, surveillance, or QA activities; and (3) comprehensive corrective actions were initiated within a reasonable time period following identification of this issue. Subsequent corrective actions included recent completion of permanent modifications to automatically close the main feedwater block valves given a Containment Isolation Actuation signal.

OFFICIAL RECORD COPY

9202190050 920211
PDR ADOCK 05000336
PDR

LEO
1/10

While this discovery did demonstrate the importance of proper verification of initial analyses to support the design basis for the facility, your actions in identifying, re-analyzing, reporting and correcting this problem demonstrated a high regard for safety. However, your original analysis was erroneously confirmed during a re-evaluation of this accident as part of your response to NRC Bulletin No. 80-04 in 1980. Therefore, we also understand that you will be undertaking a review of Bulletins and other responses to the NRC in the 1980 timeframe so as to independently assure that similar erroneous design basis analyses were not made. Please provide us, within 30 days, a schedule for your staff's completion of that task.

Sincerely,

Original Signed By:
Thomas T. Martin
Thomas T. Martin
Regional Administrator

CC:
W. D. Romberg, Vice President, Nuclear Operations
S. E. Scace, Nuclear Station Director
J. S. Keenan, Nuclear Unit Director
P. M. Kacich, Manager, Nuclear Licensing
D. O. Nordquist, Director of Quality Services
Gerald Garfield, Esquire
Nicholas Reynolds, Esquire
Public Document Room (PDR)
Local Public Document Room (LPDR)
Nuclear Safety Information Center (NSIC)
NRC Resident Inspector
State of Connecticut

Northeast Nuclear Energy Company

DISTRIBUTION:

PDR

SECY

CA

JMTaylor, EDO

JSniezek, DEDR

HThompson, DECS

JLieberman, OE

TMartin, RI

JGoldberg, OGC

TMurley, NRR

JPartlow, NRR

Enforcement Coordinators

R₁, RII, RIII, RIV, RV

Fingram, GPA/PA

BHayes, OI

VMiller, SP

DWilliams, OIG

EJordan, AEOD

OE:Chron

OE:EA

DCS

OFFICIAL RECORD COPY

cc:
SECY
OGC

RI:OE
Holody

12/16/91

RI:DRP
Kelly

12/16/91

RI:DRP
W. C. Zinger

12/16/91

RI:DRP
Hehl

12/19/91

RI:RC
Smith

12/20/91

RI:DRP
Kane

12/20/91

RI:RA
Martin

12/23/91

OE
Lieberman

12/ /91

DEDS
Sniezek

12/ /91

E DO
TAYLOR

2/ /92

Commission

2/ /92

RECEIVED CONCURRENCE
By PHONE FROM
J. LUETTMAN 2-7-92
10:00am.