

NOV 02 1987

50-423  
RI-87-A-65

MEMORANDUM FOR: Alan Shropshire, Compliance and Allegation Assistant  
FROM: Ebe C. McCabe, Jr., Chief, RPS-1B  
SUBJECT: CLOSEOUT OF ALLEGATION NO. RI-87-A-0065 AT MILLSTONE 3

This allegation on Certified Material Test Reports (CMTRs) is closed. The Region's findings are documented in the enclosed portion of Inspection Report No. 50-423/87-17, issued on October 14, 1987. A Resident inspection determined this allegation to be unsubstantiated by showing, on a sampling basis, that the alleged widespread illegibility of material test certificates did not exist. The sample taken indicated an illegibility proportion of less than 2 of 1000 CMTRs.

Ebe C. McCabe, Jr.  
Chief, RPS-1B

Enclosure: As stated

cc:  
J. Strosnider, DRS

D/4

9202260423 910607  
PDR FOIA PDR  
GUILD91-162

Of these eight, the last four are bypassed in accident conditions. Trips 5 - 8 are in service only when the diesel has been started from either the "maintenance" or "test start" position. The accident conditions that bypass these trip signals are Loss of Power (LOP), Safety Injection Actuation (SIS) or Containment Depressurization (CDA) Signals. Any one of these conditions will, by design, prevent the shutdown relay from being energized.

Testing of these features is in accordance with T.S. 4.8.1.1.2.f.6.C., which requires the bypass feature to be tested to ensure that the first four trips listed above remain in effect and the last four trips are bypassed during a LOP with a concurrent SIS.

Although the EDG Protective trip bypass tests meet technical specification requirements, the tests do not appear to individually check the three signals which, by design, bypass certain EDG trips. The EDG trip bypass for the CDA condition was not found to be required to be tested. Bypassing of EDG trips was found to be tested for an LOP concurrent with an SIS. This indicates that inability of the CDA signal to cause an EDG trip bypass may not be detected. Also, inability of either the LOP or SIS signal to cause a trip may be masked by the other signal. These concerns will be pursued further during subsequent NRC inspection.

#### 8.0 Allegation RI-87-A-0065; Acceptability of Certified Material Test Reports

The inspector received information from NRC Region I regarding allegedly widespread illegibility of certified material test reports (CMTRs) associated with Millstone Unit 3 purchase orders. On July 30, 1987, this matter was discussed with the Unit 3 Superintendent, who stated that purchase order files would be reviewed.

The licensee stated that there was no easy way to estimate the total number of CMTRs associated with site purchase orders. However, the licensee completed a random sampling review of purchase orders from the Unit 3 Nuclear Records file to search for illegible CMTRs. Purchase orders (POs) PO-001 through 032 and POs 2472.110-186 through 2412.400-255 on microfilm rolls S2160 and S1933 were reviewed, which covered about 101 Westinghouse and Stone and Webster purchase orders, along with about 230 associated certified material test reports. Hard copies of twenty-five CMTRs were provided for inspector review. Of the total CMTRs reviewed, the licensee found one that was illegible. Based on that sampling, the licensee concluded that illegibility of CMTRs for Unit 3 purchase order records was not a generic issue.

The inspector reviewed the licensee's assessment by a sampling review of CMTRs from purchase orders on microfilm rolls S2160 and S1933. Additionally, the inspector independently reviewed 220 additional CMTRs selected at random from a listing of Unit 3 purchase orders for the years 1984-1985. Based on the combined review of 450 CMTRs (230 + 220), a total of 2 illegible test reports were identified. The inspector noted that, based on the statistical sampling methodologies of MIL-STD-105D, the above inspection results could be representative of a total CMTR "lot size" of up to 100,000 reports, and would be indicative of a quality level of 0.2%, or, less than 2 defective test reports in 1000. Based on the above, the inspector concluded that there was no concern regarding the generic acceptability of certified material test reports. The inspector noted further, based on discussions with licensee personnel, that methods existed whereby the licensee might obtain a legible copy of an illegible CMTR (e.g. licensee or vendor hard copy files). The inspector had no further comments on this item.

#### 9.0 Committee Activities

The inspector attended meeting 87-114 of the Plant Operations Review Committee (PORC) on July 30, 1987 and reviewed the minutes for PORC meetings 87-114 and 87-115, and for Nuclear Review Board meeting 87-9. The inspector noted by observation and/or from the written record that committee administrative requirements were met for the meetings, and that the committees discharged their functions in accordance with regulatory requirements. The inspector observed a thorough discussion of matters before the PORC during meeting 87-14 and a good regard for safety in the issues under consideration by the committee. No inadequacies were identified.

#### 10.0 Review of Licensee Event Reports (LERs)

Licensee Event Reports (LERs) submitted during the report period were reviewed to assess LER accuracy, the adequacy of corrective actions, compliance with 10 CFR 50.73 reporting requirements and to determine if there were generic implications or if further information was required. Selected corrective actions were reviewed for implementation and thoroughness as documented elsewhere in this report. The LERs reviewed were:

- 87-31, Reactor Trip Due to Turbine Trip on Low Lube Oil Header Pressure, June 14

The reactor tripped due to a turbine trip. The turbine tripped on low lube oil header pressure about 9 seconds after the autostart of the turning gear oil pump (TGOP). The TGOP did not cause the trip since the primary source of oil pressure at the time was the shaft driven pump. The root cause of the trip was not identified. The licensee stated that a supplemental report would be submitted on or

Allegation Package for Section Chiefs

ALLEGATION RECEIPT REPORT

Date/Time Received: JUNE 8, 1987/ 1500

Allegation No. \_\_\_\_\_  
(leave blank)

Name: NOT IDENTIFIED

Address: \_\_\_\_\_

Phone: \_\_\_\_\_

City/State/Zip: \_\_\_\_\_

Confidentiality Requested: Yes \_\_\_

No \_\_\_ Implied X

Allegor's Employer: NOT IDENTIFIED BUT

Position/Title: \_\_\_\_\_

PROBABLY NOT NORTHEAST UTILITIES

Facility: MILLSTONE UNIT 3

Docket No.: 50-423

Allegation Summary (brief description of concern(s)): THE ALLEGOR HAD INDIRECT KNOWLEDGE OF INADEQUATE "MILL TEST REPORTS" WHICH WERE TURNED OVER TO NORTHEAST UTILITIES FROM STONE & WEBB.

Number of Concerns: ONE (For Allegation Panel Only)

Employee Receiving Allegation: JENN T. SHERLOFF  
(first two initials and last name)

Type of Regulated Activity: (a) X Reactor (d) \_\_\_ Safeguards  
(b) \_\_\_ Vendor (e) \_\_\_ Other: \_\_\_\_\_  
(c) \_\_\_ Materials (Specify)

Materials License No. (if applicable): \_\_\_\_\_

Functional Area(s): \_\_\_ (a) Operations \_\_\_ (e) Emergency Preparedness  
X (b) Construction \_\_\_ (f) Onsite Health and Safety  
\_\_\_ (c) Safeguards \_\_\_ (g) Offsite Health and Safety  
\_\_\_ (d) Transportation \_\_\_ (h) Other: \_\_\_\_\_

D/1

Detailed Description of Allegation: The allegor called the Millstone Resident Office at 1500, June 8, 1987; he did not ask for a specific individual but inquired if we ever "look at mill test reports for the number three unit." I responded that although I did not personally have the background to review these documents, they are reviewed on a sampling basis by others from the NRC during inspections of plant construction because they certify the chemical properties of steel used for safety related plant systems.

When I inquired about his concerns, he stated that through conversations with others, it had been difficult for Stone and Webster QC to read many of these test reports; that people were hired from Manpower Company in an attempt to correct these records and the records were such a mess that his contact had left and gained employment with Northeast Utilities at Millstone Unit 2.

He evidently did not have direct contact with this type of report and could not tell me specifically what was wrong with the reports or for which type of material or systems the reports were defective. I relayed to him what I believed to be the significant nature of the reports. But because of the large number of these reports, I told him that it would be very helpful to know which material or reports were involved or to have his friend who had the initial concern to contact us directly. I explained that because of the large number of these reports, which were probably filed with purchase orders or receipt inspections, that additional information would be helpful.

He agreed but indicated that this may not be possible since the other person was now with Northeast Utilities. To that I informed him that the Utility had a clear policy which requested that anyone with safety concern contact the appropriate persons within their company or that they contact the NRC directly.

There has not been any additional contact.

ALLEGATION PANEL DECISIONS

Priority: Low

Safety Significance: No

An allegation panel met on 6/15/87 regarding RI-87-A-0065 at Millstone 3 where it was alleged that the alleged had indirect knowledge of reputedly inadequate "Mill Test Reports" which were turned over to Northeast Utilities from Stone & Webster.

Attendees:

S. Collins

Panel Chairman

E. McCabe

Action Office Contact

A. Shropshire

Office Allegation Coordinator

-----  
FOLLOW-UP ACTIONS:

- 1) The AOC will contact DRS to satisfy that the Region does inspect these areas and will document the findings in closeout information to the OAC.
- 2) The AOC will send a closeout memo to the OAC (ECD 7/1/87).

Section Chief concurrence required for closeout.  
-----

A. Shropshire

A. Shropshire, OAC

E. McCabe Jr

E. McCabe, AOC

S. Collins 6/23/87

S. Collins  
Panel Chairman

cc:

J. Allan

J. Gutierrez

C. White, OI:RI

W. Johnston

E. Wenzinger

E. McCabe

Allegation File

D/2





UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION I  
631 PARK AVENUE  
KING OF PRUSSIA, PENNSYLVANIA 19406

17-65

14 OCT 1987

Docket/License: 50-423/NPF-49

Northeast Nuclear Energy Company  
ATTN: Mr. Edward J. Mroczka  
Senior Vice President, Nuclear  
Engineering and Operations  
P.O. Box 270  
Hartford, Connecticut 06101-0270

Gentlemen:

Subject: Millstone 3 Routine Inspection 50-423/87-17 (7/11/87-9/21/87)

This refers to the routine NRC resident safety inspection by Mr. W. J. Raymond on July 11 - September 21, 1987 at the Millstone Nuclear Power Station, Unit 3. The inspection results are described in the enclosed report and were discussed with Mr. C. H. Clement of your staff.

No violations were cited during this inspection and no reply to this letter is required.

Detail 6 of and Appendix I to the enclosed report notes the findings of the Regional Administrator's tour of the Millstone site on August 17-18, 1987. Overall, that tour noted generally good material condition.

Additionally, on September 22, 1987, Mr. Raymond provided Mr. Clement an evaluation of licensee event report (LER) quality, Appendix II to the enclosed report, which was used as input to NRC Region I assessment of Unit 3 LERs. The LER evaluation was made using the basic methodology presented in NUREG-1022, Supplement 2.

Your cooperation with us is appreciated.

Sincerely,

Lee H. Bettenhausen, Chief  
Projects Branch No. 3  
Division of Reactor Projects

Enclosure: NRC Region I Inspection Report 50-423/87-17

D/B

~~97-10210-174~~ 2pg

14 OCT 1987

cc w/encl:

Mr. W. D. Romberg, Vice President, Nuclear Operations  
Mr. S. E. Scace, Station Superintendent  
Mr. E. R. Foster, Director, Generation Construction  
Mr. R. M. Kacich, Manager, Generation Facilities Licensing  
Mr. D. O. Nordquist, Director of Quality Services  
Mr. V. Papadopoli, Supervisor, Engineering Assurance  
Public Document Room (PDR)  
Local Public Document Room (LPDR)  
Nuclear Safety Information Center (NSIC)  
NRC Senior Resident Inspector  
State of Connecticut

bcc w/encl:

Region I Docket Room (with concurrences)  
Management Assistant, DRMA (w/o enclosures)  
DRP Section Chief  
B. Ferguson, L'M, NRR  
Robert J. Bores, DRSS  
M. Shanbaky, DRSS  
A. Shropshire  
R. Summers, DRP



U.S. NUCLEAR REGULATORY  
REGION I

Report No. 50-423/87-17

Docket No. 50-423

License No. NPF-49

Licensee: Northeast Nuclear Energy Company  
P.O. Box 270  
Hartford, CT 06101-0270

Facility Name: Millstone Nuclear Power Station, Unit 3

Inspection A+: Waterford, Connecticut

Inspection Conducted: July 11-September 21, 1987

Inspectors: W. J. Raymond, Senior Resident Inspector  
G. S. Barber, Resident Inspector  
E. L. Conner, Project Engineer

Approved by: E. C. McCabe, Jr. 10/9/87  
E. C. McCabe, Chief, Reactor Projects Section 3B Date

Inspection Summary: Inspection on July 11 - September 21, 1987 50-423/87-17

Areas Inspected: Routine resident inspection on day and back shifts of: actions on previous inspection findings; physical security; plant operations, including operational status reviews and facility tours; bypass of non-essential diesel generator trips (RI TI 87-04); followup of Allegation RI-87-A-0065 on certified material test reports; review of committee activities; and followup of IE Bulletin 87-01 and licensee event reports (LERs). The inspection involved 197 hours.

Results: No violations were cited. No unacceptable conditions were identified. Licensee followup is warranted on the findings resulting from the facility tour by the Region I Administrator during the period of August 18-19, 1987 (Detail 6.1). The question of whether individual emergency diesel generator trip bypass features should be individually tested was identified for further evaluation (Detail 7). Promptness of repair of faulty indicators affecting technical specification compliance and supplementary monitoring while such indicators are inoperable were also identified for evaluation (Detail 10).

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Of these eight, the last four are bypassed in accident conditions. Trips 5 - 8 are in service only when the diesel has been started from either the "maintenance" or "test start" position. The accident conditions that bypass these trip signals are Loss of Power (LOP), Safety Injection Actuation (SIS) or Containment Depressurization (CDA) Signals. Any one of these conditions will, by design, prevent the shutdown relay from being energized.

Testing of these features is in accordance with T.S. 4.8.1.1.2.f.6.C., which requires the bypass feature to be tested to ensure that the first four trips listed above remain in effect and the last four trips are bypassed during a LOP with a concurrent SIS.

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Licensee Event Reports (LERs) submitted during the report period were reviewed to assess LER accuracy, the adequacy of corrective actions, compliance with 10 CFR 50.73 reporting requirements and to determine if there were generic implications or if further information was required. Selected corrective actions were reviewed for implementation and thoroughness as documented elsewhere in this report. The LERs reviewed were:

- 87-31, Reactor Trip Due to Turbine Trip on Low Lube Oil Header Pressure, June 14

The reactor tripped due to a turbine trip. The turbine tripped on low lube oil header pressure about 9 seconds after the autostart of the turning gear oil pump (TGOP). The TGOP did not cause the trip since the primary source of oil pressure at the time was the shaft driven pump. The root cause of the trip was not identified. The licensee stated that a supplemental report would be submitted on or

ALLEGATION DESCRIPTION

Millstone Unit 1  
(Site or Licensee)

50-245  
(Docket No.)

Allegation RI-87-A-0066 was received on 6/10/87 at 12:00 p.m. by T. A. Rebelowski.

Characterization of the 3 concern:

- 1) Failed to receive an unescorted badge due to discriminatory practices by CN Flagg, and was fired because he refused to take the urinalysis.
- 2) Allegor stated that his badge was improperly used by another individual.
- 3) A hanger for an electrical conduit was not properly installed at Unit 1.

Confidentiality: No  
Employer: CN Flagg  
Position: Electrician

Type of Regulated Activity: Reactor  
Functional Area(s): Safeguards

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DETAILS: (Timeframe of Allegation: Current )

Concern No. 1

On April 29, 1987, the allegor was hired by CN Flagg Power Co., at Millstone. When background information was requested, the allegor stated, on May 5, 1987, that he had refused to submit to a urinalysis test at the Vogtle I Nuclear Plant on July 7, 1986. The reason for the Vogtle request for a urinalysis was a safety concern "Hot Line" phone call that stated the the allegor was a drug user. The allegor had been employed at Vogtle for seven months during the construction phase and was previously employed at various chemical plants. He was fired from Vogtle for not taking the urinalysis.

Based on the allegor's May 5, 1987, statement, on May 7, 1987, the Northeast Utilities security coordinator requested, of CN Flagg, a completed background investigation prior to allowing the allegor unescorted access. The allegor remained on-site at Millstone, under escort, until June 10, 1987. He was then asked to take urinalysis testing per the CN Flagg Fitness for Duty Program which became effective on June 1, 1987. The allegor refused the urinalysis and was dismissed on June 10, at 12:00 noon. His written statement states that he is fighting this firing with the help of the ACLU.

The allegor requested an interview with the NRC concerning his firing. At that interview, which he attended with a security escort on July 10, 1986, he stated that the utility had unjustly discriminated against him by delaying processing his unescorted badge to after June 1, putting him under new Flagg Fitness for Duty requirements that required urinalysis.

D/S



The allegor stated that he had never used drugs and did submit to routine searches at this site and the Vogtle site with no adverse findings. He stated that his personal rights were being violated because of his refusal to take a drug test and the dismissal which resulted from that refusal.

On June 10, 1987, the allegor was orally informed of the Department of Labor's responsibilities on discriminatory practices and that he could obtain the proper forms locally. Also, the procedures for filing a discrimination complaint with the Department of Labor were mailed to the allegor at both his local and permanent addresses on June 10, 1987.

#### Concern No. 2

The allegor stated that, during his time on-site on June 3, he was unable to enter the plant because his issued badge (requiring escort) was not on the security badge issuance boards. He stated that the guards said that "the badge was given out to someone else," that his badge number was 1957, and that he was issued a temporary badge. He also stated that his foreman had an expired badge.

The resident inspector asked the licensee's security supervisor to provide information on security area entries for Badge No. 1957 on June 3, 1987, and to review the foreman's badge status.

#### Concern No. 3

The allegor stated that, a few weeks ago, he was a helper for installing a hanger for a 4" electrical conduit that was overhanging a UniStrut mounting support. He believes this hanger was improperly hung because it was forced (hammered) into place. The allegor said that CN Flagg quality assurance and an engineer (both unidentified) had informed him that the hanger was acceptable. He did not know the system or area, but stated it was never a machine shop. (There are about 6 machine shops.) The allegor apparently did not identify this concern to the licensee or his management, other than in the discussion identified with QA and an engineer.

The inspector obtained the allegor's foreman's name (McCurrie) from the allegor. No further follow-up was initiated, pending allegation panel review.

1. Obtained the following references send by FAX, 6/11.
  - a. Urinalysis Testing - CN Flagg Power Procedure
  - b. Utility's request for full background investigation 5/7/87.
  - c. The allegor's statement on 5/5 for 5-year background check.





UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION I  
631 PARK AVENUE  
KING OF PRUSSIA, PENNSYLVANIA 19406

16 OCT 1987

Docket/License: 50-245/DRP-21; 50-336/DRP-65

Northeast Nuclear Energy Company  
ATTN: Mr. Edward J. Mroccka  
Senior Vice President, Nuclear  
Engineering and Operations  
P.O. Box 270  
Hartford, Connecticut 06101-0270

Gentlemen:

Subject: Millstone 1 & 2 Routine Inspections 50-245/87-25 (9/9/87-9/25/87);  
50-336/87-19 (8/18/87-9/25/87).

This transmits the report of the above subject inspections by Mr. T. Rebelowski of this office. The inspection findings have been discussed with Mr. S. Scace of your staff.

No violations were identified during this inspection and no reply to this letter is required.

Thank you for your cooperation.

Sincerely,

Lee H. Bettenhausen, Chief  
Projects Branch No. 1 B  
Division of Reactor Projects

Enclosure: NRC Region I Inspection Report 50-245/87-25; 50-336/87-19

cc w/encl:

W. D. Romberg, Vice President, Nuclear Operations  
S. E. Scace, Station Superintendent  
E. R. Foster, Director, Generation Construction  
R. M. Kacich, Manager, Generation Facilities Licensing  
D. O. Nordquist, Director of Quality Services  
Public Document Room (PDR)  
Local Public Document Room (LPDR)  
Nuclear Safety Information Center (NSIC)  
NRC Senior Resident Inspector  
State of Connecticut

D/L

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U.S. NUCLEAR REGULATORY COMMISSION  
REGION I

Report No. 50-245/87-25; 50-336/87-19  
Docket No. 50-245; 50-336  
License No. DPR-21; DPR-65  
Licensee: Northeast Nuclear Energy Company  
P.O. Box 270  
Hartford, CT 06101-0270  
Facility: Millstone Nuclear Power Station, Units 1 & 2  
Inspection At: Waterford, Connecticut  
Dates: 8/18/87 - 9/25/87  
Inspectors: Theodore A. Rebelowski, Senior Resident Inspector  
Eben L. Conner, Projects Engineer

Approved by: *E. C. McCabe, Jr.* 10/15/87  
E. C. McCabe, Chief, Reactor Projects Section 1B Date

Summary: Report 50-245/87-25 (9/9-25/87); 50-336/87-19 (8/18-9/25/87)

Scope: Routine NRC resident (89 hours) and region-based (6 hours) inspection of operational safety, previously identified items, an allegation, housekeeping, Unit 1 control room Halon testing, failure of a Unit 2 Emergency Diesel Generator to load, Unit 2 control rod Anomalies, maintenance, and periodic and special reports.

Results: No violations or unacceptable conditions were identified. The Licensee's performance of Unit 1 Control Room Halon testing was assessed as excellent.

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### 3. Results

The inspector reviewed the analyzer results immediately after the test. The results indicated a concentration of 7% Halon, decaying to 6% over a ten-minute period. That met acceptance criteria. At the inspector's request, equipment recalibration was performed. One channel did not respond to the test gas mixture (three channels on one analyzer were satisfactory and two channels were satisfactory on the second analyzer).

### 4. Conclusion

The licensee demonstrated an acceptable Halon system in the Control Room. Testing was conducted with good communication and with control room professionalism evident. The inspector found the testing excellent and had no further questions.

### c. Non-Destructive Testing Vendor Qualification Review

The licensee used an outside non-destructive testing organization to verify qualification of system piping repairs and new piping installations.

The inspector reviewed the vendor personnel records to verify that the two individuals used on site met the criteria of SNT-TC-1A. Both individuals were qualified as Level II for Visual Testing (VT), Radiographic Testing (RT), Magnetic Particle Testing (MT), and Liquid Penetrant Testing (PT). Examination records included certification of examination scores by the American Welding Society.

In addition, review of the Material License (06-20755-01) for the use of an Iridium-192 and two Cobalt-60 sources for industrial radiography was conducted with acceptable results.

Storage of the sources was proper and in acceptable locations. Surveys indicated no exposed sources. The inspector had no further questions in this area.

### 6. Allegation of Improperly Installed Conduit Hanger (RI-86-A-0066)

On June 12, 1987, the resident inspector's office was visited by a tradesman and a union official to present an allegation that there were improperly installed hangers on conduits encasing electric cabling. The alleged could not identify the conduits of concern. Based on a review of the job assignments during his employment at the Millstone site, it was concluded that the concern was for six new supports and associated hangers for electrical conduit for the Unit 1/2 electrical backfeed modification. The alleged had worked on this modification onsite.

On June 17, the licensee examined the six conduit supports and identified no discrepancies. The hangers that support the conduit and the conduits were scheduled to be fireproofed. The conduit had been previously completed in 1983 and was supported by suspended tie rods. This conduit was now to be incorporated into a 10 CFR 50, Appendix R modification that electrically ties Unit 1 and Unit 2 together to support equipment on a complete loss of power to either unit. Appendix R requires a three-hour fire barrier for conduit supports. That increases loading on the supports. Six new supports were installed to support the added loading.

All six supports (C 51A, 52A, 53A, 54A, 55A and 56A) were fabricated offsite and installed by welding to existing support columns. On June 22, the inspector walked down the system, prior to fireproofing. The supports had been painted, limiting visual examination. Nonetheless, the welds appeared to meet required installation tolerances. The inspector examined the conduits and no indentations or crushing were observed. This addressed the concern expressed by the allegor.

The straps that tie the conduit to the supports are standard 5" pipe straps (Part No. 2.558-50), 3" pipe straps (Part No. P-1119), and 5" split Pipe straps (Part No. 1123); all were manufactured by Unistruct. The inspector noted that the bolts used to tie down one conduit pipe strap were bottoming out due to longer than necessary bolts. In addition, the strap length to the support varied from 0 to 3/8". These two items were discussed with licensee management and corrected. They did not, however, relate to the allegation or cause support inadequacy.

No inadequacies were observed. Inspector review did not substantiate the allegation. The inspector had no further questions on this matter.

## 7. Unit 2 Activities

### a. Reactor Trip - September 2, 1987

On September 2, at 8:15 pm, a reactor trip occurred due to low level in the No. 1 Steam Generator. The immediate cause was closure of the No. 1 Feedwater Regulating Valve, which also failed to respond to the operator's manual electrical signal. All systems responded satisfactorily to the trip and the unit was placed in hot standby.

#### Investigation of the Event

The No. 1 Feedwater Regulating valve was opened and the valve stem and plug were found to have separated. Normal assembly should have included placing the threaded stem into the valve plug and then placing a "C" pin to prevent rotation between the valve stem and valve plug. This "C" pin was missing. All threads on the stem and plug were galled and flattened. The inspectors witnessed the disassembly and reassembly, and reviewed the vendor drawings and

*to Refuse!*  
*page 1*

C.N. FLAGG POWER  
URINALYSIS TESTING  
NOTICE TO EMPLOYEE

Urinalysis testing is a requirement for unescorted access for all employees working at Northeast Utilities Nuclear Facilities. The urine sample that you provide will be screened for the presence of certain drugs.

Please list on the test form all medications (prescription or over-the-counter) that you have taken in the last month. This is important, because such medications can appear on the drug screening report.

The results of this urinalysis will be reported to the C.N. Flagg Power Security Department and you will be notified accordingly. All information will be treated with the utmost confidentiality.

Enclosed for your information is a copy of C.N. Flagg Power's implementation procedure and an information sheet. Thank you for your cooperation.

D/7



C.N. FLAGG POWER  
URINALYSIS INFORMATION

The following is a summary of the detailed urinalysis testing procedures. A full copy is available in the C.N. Flagg Power Security Office.

1. Sample will be collected in privacy unless CNP has reason to believe that the employee may tamper with the specimen.
2. Employee must confirm that all information on specimen container and test form is correct.
3. Employee must present photo identification.
4. Employee must remove outer garments (coats, etc.) and leave any purses, briefcases, and lunch boxes outside of the rest room.
5. Employee must wash his or her hands prior to urination.
6. Employer should not flush the toilet after providing the sample.
7. The container must contain at least 60 milliliters of urine.
8. The temperature of the sample will be tested. The sample will be marked with the same number that is on the form. It must also be sealed, dated and initialed by the employee.
9. The sample number will be recorded in the testing company's record book.



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# C. N. FLAGG POWER, INC.

## NORTHEAST UTILITIES - FITNESS FOR DUTY PROGRAM IMPLEMENTATION PROCEDURES

### FITNESS FOR DUTY REQUIREMENTS FOR EMPLOYEES WITH UNESCORTED ACCESS TO NORTHEAST UTILITIES

#### I. INTRODUCTION AND PURPOSE

This program has been developed in compliance with the Fitness for Duty Requirements of Northeast Utilities, (NU). NU believes that employees who abuse drugs or alcohol, on or off the job, may create an increased risk to their own safety, to the safety of other employees and to the public. In addition, NU is concerned with the adverse impact that the use of drugs or alcohol by contractor employees may have upon their health and productivity, as well as the public's confidence in NU's ability to safely and efficiently carry out its responsibilities.

These Fitness for Duty Requirements have been specifically developed, consistent with Nuclear Regulatory Commission and Institute of Nuclear Power Operators guidelines, to strengthen and broaden policies and actions with respect to drug and alcohol abuse by employees who have unescorted access to nuclear power facilities. Because many of the functions performed by nuclear workers are of a complex and sensitive nature, requiring alertness and mature judgement, it is mandatory that all employees occupying such positions be able to perform their duties safely, efficiently and in accordance with the trust that has been placed in them.

The importance of the drug and alcohol abuse issue cannot be over emphasized. It is essential that each employee covered by this policy carefully read and understand the following provisions.

#### II. SCOPE

This policy applies to all CNFP employees who have unescorted access to Northeast Utilities nuclear facilities.

#### III. POLICY

##### A. Fitness for Duty Program

CNFP has implemented this Fitness for Duty Program for all employees who have unescorted access to Northeast Utilities nuclear facilities. The objective of the policy is to create and maintain a safe, secure, productive and healthy work environment and to increase the awareness of all personnel regarding the hazards and consequences of substance abuse in the work place.

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# C. N. FLAGG POWER, INC.

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## NORTHEAST UTILITIES - FITNESS FOR DUTY PROGRAM IMPLEMENTATION PROCEDURES

### III. POLICY (cont'd)

#### B. Training and Education

All supervisors of employees who have unescorted access to Northeast Utilities nuclear facilities will be required to participate in a training program which is designed to:

1. Recognize abnormal behavior generally observed in individuals who abuse alcohol, drugs and other mood-altering substances;
2. Recognize methods used and symptoms displayed by abusers of alcohol, drugs, and other substances;
3. Provide information to facilitate discussion with an employee(s) who is suspected of being unfit for duty, and;
4. Provide a procedure to remove an employee(s) from duty and access to protected areas of a NU nuclear facility in the event the employee is determined to be unfit for duty.

All other employees who have unescorted access to Northeast Utilities nuclear facilities will be required to participate in a training program which is designed to:

1. Inform employees of the requirements of NU's Fitness For Duty Program and provide appropriate information on alcohol, drugs and other mood-altering substances; and
2. Inform employees of the possible consequences of violating NU's Fitness For Duty and other associated policies.

#### C. Screening Requirements

1. All prospective employees will be screened for substance use prior to being granted unescorted access to a nuclear power facility.
2. Those individuals who have unescorted access at the time this program is implemented will be screened for substance use prior to renewal of their access authorization.

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## NORTHEAST UTILITIES - FITNESS FOR DUTY PROGRAM IMPLEMENTATION PROCEDURES

### C. Screening Requirements (cont'd)

3. The continued fitness of employees requiring unescorted access to Northeast Utilities nuclear facilities will be assessed annually by means of an appropriate screening process, which will include drug testing.
4. Employees who appear to be unfit for duty will be evaluated as needed.
5. Employees involved in work related accidents will be subjected to screening for drug and alcohol use as soon as practicable after the accident. Such screening may take place at the work site, at the treatment facility or at a separate testing laboratory as directed by CNFP supervision.
6. Employees who are returning to work after a drug or alcohol related absence must provide evidence that they have satisfactorily completed an appropriate treatment program and shall be screened as new applicants for unescorted access. Additionally they shall be subject to monthly screening for the first six months after their return.
7. Employees returning to work after an absence will be required to meet all plant security screening requirements in effect at the time of their return.

### D. Removal From Job Assignment

1. Employees who are identified as not fit for duty, or who are arrested for substance abuse or possession or sale of illegal drugs on or off duty, will immediately be removed from their job assignments with all unescorted access privileges suspended pending completion of an appropriate investigation. Such investigation may include a drug screening test.
2. Employees who (1) fail to satisfy the drug screening requirements of this program, (2) are convicted of a drug or alcohol related offense or (3) are found to be using drugs or to be under the influence of alcohol as the result of a probable cause investigation will have their unescorted access revoked for a period of not less than one year.

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11.2	APP
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## NORTHEAST UTILITIES - FITNESS FOR DUTY PROGRAM IMPLEMENTATION PROCEDURES

### D. Removal From Job Assignment (cont'd)

3. Employees who possess unescorted access clearance and who refuse to submit to a reasonable medical examination and/or who refuses to provide a urine, blood, and/or breath sample shall have their unescorted access clearance revoked for a period of not less than one year.
4. CNFP is under no obligation to provide alternate employment for those employees who are denied unescorted access.

### E. Appeal of Test Results

1. Employees whose test results indicate the presence of drugs (except those designated as requiring automatic disqualification), may be granted unescorted access by providing a report from the program's Medical Review Officer. Such a report must state that the drugs are lawfully prescribed. It must also describe the physician's basis for recommending access, and must describe any restrictions that are to be placed on the type of work assigned to the individual.
2. CNFP will make reasonable accommodation consistent with work requirements for employees who are under a doctor's care. Due to the nature of work performed by CNFP, "light or restricted" work assignments are usually not available.

### F. Employee Responsibility

1. Employees are strongly urged to avoid all activities which would create an apparent conflict with the intent of this policy (such as the consumption of any alcohol or controlled substance prior to normal work periods).
2. All employees are encouraged to notify CNFP supervision in the event the use or presence of alcohol or illegal drugs is discovered on the work site. Employees are also encouraged to notify supervision if they suspect an individual is unfit for duty at the work site.

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## NORTHEAST UTILITIES - FITNESS FOR DUTY PROGRAM IMPLEMENTATION PROCEDURES

### G. Law Enforcement Agencies

A working liaison among CNFP, NU, and law enforcement agencies will be maintained to assure open communications in the event illegal drugs are discovered on company or a client's property.

### IV. EMPLOYEE ASSISTANCE

CNFP recognizes that alcohol and/or drug abuse may be an illness for which treatment and rehabilitation programs are available. Employees who have an alcohol or drug abuse problem and who ask for help will immediately be referred to the appropriate agency. CNFP will aid the employee in identifying an appropriate treatment program. The employee will bear the cost of such treatment. Questions regarding insurance coverage may be referred to the CNFP Benefit Program Coordinator or to the appropriate union representative. Voluntary participation in a drug or alcohol treatment program will be treated on a confidential basis. A request for assistance, or participation in a drug or alcohol treatment program may not be used by an employee as a means of avoiding imposition of disciplinary action when a violation of this policy is clearly indicated.

### V. CONFIDENTIALITY

All information concerning an employee's alcohol or drug related problems must be treated confidentially by management and only shared with others on a strict "need to know" basis.

#### A. Return to Work

All employees returning to work following treatment or rehabilitation for a fitness for duty problem must be seen by a company physician prior to assignment.

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## NORTHEAST UTILITIES - FITNESS FOR DUTY PROGRAM IMPLEMENTATION PROCEDURES

### C.N. FLAGG POWER, INCORPORATED FITNESS-FOR-DUTY CERTIFICATION

The undersigned hereby certifies that I have reviewed the results of a drug screening test conducted on \_\_\_\_\_, 19\_\_\_\_ concerning \_\_\_\_\_/Social Security # \_\_\_\_\_ and that it \_\_\_\_\_ does/does not \_\_\_\_\_ meet the requirements set forth in the Northeast Utilities Fitness-For-Duty Program dated \_\_\_\_\_.

The undersigned acknowledges that this Certification is intended to be used by C.N. Flagg Power to obtain authorization for these individuals to have unescorted access in the performance of work at the nuclear generating facilities located at Millstone Point, Waterford, Connecticut and the Connecticut Yankee Atomic Power Company, Haddam, Connecticut.

CERTIFYING PHYSICIAN OR  
LABORATORY DIRECTOR:

Address: \_\_\_\_\_  
 Town: \_\_\_\_\_  
 State: \_\_\_\_\_  
 Zip Code: \_\_\_\_\_  
 Dated: \_\_\_\_\_



June 3, 1987

This is to certify that I have received C.N. Flagg Power, Incorporated:

1. Urinalysis Testing Notice to Employee
2. Urinalysis Information
3. Northeast Utilities - Fitness for Duty Program Implementation Procedures

I have read and understand the above.

\_\_\_\_\_  
Employee

\_\_\_\_\_  
Date

Enclosure 3

Allegation Package for Section Chiefs

ALLEGATION RECEIPT REPORT

Date/Time Received: 7/23/87 11335

Allegation No. RE-87-A-0091  
(leave blank)

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Phone: \_\_\_\_\_

City/State/Zip: \_\_\_\_\_

Confidentiality Requested: Yes \_\_\_\_\_

No \_\_\_\_\_ Implied

Alleger's Employer: Not Sure

Position/Title: \_\_\_\_\_

Facility: Millsstone 1

Docket No.: 57-245

Allegation Summary (brief description of concern(s)): Radiactive Material in Unlabeled Box Outside Rad Area in Turbine

Number of Concerns: 1 (For Allegation Panel Only)

Employee Receiving Allegation: T A Rebelowski  
(first two initials and last name)

Type of Regulated Activity: (a)  Reactor (d) \_\_\_\_\_ Safeguards  
(b) \_\_\_\_\_ Vendor (e) \_\_\_\_\_ Other: \_\_\_\_\_  
(c) \_\_\_\_\_ Materials (Specify)

Materials License No. (if applicable): \_\_\_\_\_

Functional Area(s): \_\_\_\_\_ (a) Operations \_\_\_\_\_ (e) Emergency Preparedness  
\_\_\_\_\_ (b) Construction  (f) Onsite Health and Safety  
\_\_\_\_\_ (c) Safeguards \_\_\_\_\_ (g) Offsite Health and Safety  
\_\_\_\_\_ (d) Transportation \_\_\_\_\_ (h) Other: \_\_\_\_\_

D/S

## Detailed Description of Allegation:

At 1335 on 7/23/87, Ted Rebelowski received a call on the plant phone line from an unidentified man. He alleged that there was radioactive material in an unmarked box at the far end of the turbine hall. No other data was provided.

## Follow-up Action:

Monte Conner responded by requesting Eric Laine (acting Unit <sup>HP</sup> supervisor) and a HP technician go with him to investigate. The three of them surveyed the clean areas adjacent to the turbine hall. No box of rad material, not properly marked, was found. In addition, the rail entrance area at ground level was surveyed. The area surveys took over one hour. Nothing out of the ordinary was found, so this allegation is unsubstantiated.

ALLEGATION DESCRIPTION

Millstone 1  
(Site or Licensee)

50-245  
(Docket No.)

Allegation RI-87-A-0091 was received on 7/22/87 at 1335 by T. A. Rebelowski.

Characterization of the concern:

Radioactive material in unlabeled box outside radiation area in turbine.

Confidentiality: No (Anonymous call came in on the plant phone line.)

Employer: N/A

Position: N/A

Type of Regulated Activity: Reactor

Functional Area(s): Onsite Health and Safety

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DETAILS: (Timeframe of Allegation: Current)

The alleged stated that there was radioactive material in an unmarked box at the far end of the turbine hall. No other information was provided.

Follow-up Actions:

Monte Conner responded by requesting Eric Laine (acting Unit 1 HP supervisor) and a HP technician go with him to investigate. The three of them surveyed the clean areas adjacent to the turbine hall. No box of rad. material, not properly marked, was found. In addition, the rail entrance area at ground level was surveyed. The area surveys took over one hour. Nothing out of the ordinary was found, so this allegation is unsubstantiated.

D/9

U.S. NUCLEAR REGULATORY COMMISSION  
REGION I

Report No: 50-245/87-12

Docket No: 50-245

License No: DPR-21

Licensee: Northeast Nuclear Energy, Inc.,  
P. O. Box 270  
Hartford, Connecticut 06141-0270

Facility: Millstone Nuclear Power Station, Unit 1

Inspection at: Waterford, Connecticut

Dates: June 23, 1987 through August 10, 1987

Inspectors: Geoffrey E. Grant, Resident Inspector  
Eben L. Conner, Project Engineer

Approved by: *E. C. McCabe*  
E. C. McCabe, Chief, Reactor Projects Section 3B

8/20/87  
Date

Summary: Report No. 50-245/87-12 (June 23 to August 10, 1987)

Areas Inspected: This inspection included routine NRC resident (104 hours) and region-based (79 hours) inspection of previously identified items, plant operations, surveillance, maintenance, radiation protection, physical security, fire protection, allegations, a wide variety of outage activities and various ESF actuations.

Results: No violations were identified. The licensee's fulfillment of a commitment to the NRC regarding IEB 84-03 supplemental information is an unresolved item (see Detail 4.4). The licensee has taken additional correction action on previously identified licensee event reporting discrepancies (see Detail 12). The inoperability of the Standby Gas Treatment System on July 24 demonstrated a lack of recognition of the effects of maintenance actions on interrelated systems (see Detail 13). The worker contamination by a hot particle on August 4 demonstrated a weakness in personnel frisking techniques and radiological cleanliness (see Detail 15). Three Unresolved Items, deriving from Potential Enforcement Findings identified in IR 50-245/87-09, are opened in this Inspection Report pending further licensee analysis and documentation (see Detail 23).

87-09010097-2pp.

D/10

The AC-10 limit switch is interlocked to prevent drywell or torus radioactivity from entering the secondary exhaust plenum. That interlock requires AC-10 to be closed before SG-1A and/or SG-1B can be opened.

System inoperability was discovered when manual SGTS operation was attempted during outage maintenance on the normal ventilation system. The licensee was requested to review this event for SGTS vulnerability to single failure. No safety-related purpose for the AC-10 interlock was found. Any radioactivity that went from the drywell or torus into the exhaust plenum would be held in the plenum and detected by radiation monitors causing automatic isolation before release. Additionally, the release of drywell pressure buildup via AC-10 is an infrequent evolution. Based on the licensee's investigation, corrective actions were to defeat the AC-10/SG-1A, SG-1B interlock using a jumper. A permanent correction under the design change program is being processed for implementation at a later time. The licensee is reviewing reportability under 10 CFR 21. Additionally, an operator is to be assigned to AC-10 valve control during all periods when it is open. These actions will effectively remove SGTS vulnerability to a potential single failure while maintaining control of possible cross-contamination between the drywell/torus and the reactor building.

The licensee's test demonstrated that, for the circumstances existing when AC-10 was removed, the SGTS could have effectively maintained a negative pressure in secondary containment. Also, the ability to actuate normal secondary containment isolation was not affected. The ability to maintain negative pressure and isolate normal ventilation effectively negated the potential for higher than expected radiation releases and releases from other than prescribed routes. This data, plus the fact that the problem was licensee-identified, appropriately reported, immediately corrected, and not connected to any previous violation, resulted in the determination that no Notice of Violation will be issued in this instance.

#### 14. Allegation of Improperly Labeled Box of Radioactive Material

On July 23, 1987, the Resident Inspector's Office received an anonymous call on the plant line. The individual alleged that there was an unmarked box containing radioactive material at the far end of the turbine hall. No other data could be elicited. The inspector, the acting Unit 1 HP Supervisor, and an HP technician then surveilled the clean areas adjacent to the turbine hall. All containers of radioactive material observed in these areas were properly marked. Turbine components and tools in the roped-off contaminated work area were numerous. However, control of contamination in this and surrounding areas was good. HP technicians were permanently assigned to this area during the turbine overhaul. In addition, the rail entrance area at ground level was examined. About one hour was spent on these checks. Nothing out of the ordinary was found. This allegation was not substantiated.