

NOTICE OF VIOLATION

Northeast Nuclear Energy Company
Waterford, Connecticut
Millstone, Unit 3

Docket No. 50-423
License No. NPF-49
EA 92-008

During an NRC inspection conducted between November 27 and December 20, 1991 violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1991), the violations are listed below:

- A. 10 CFR Part 50, Appendix B, Criterion XVI, Corrective Actions, requires, in part, that measures shall be established to assure that conditions adverse to quality, such as failures, deficiencies and deviations, are promptly identified and corrected.

Contrary to the above, between June 9, 1991 and July 2, 1991, a condition adverse to quality existed at the Millstone Unit 3 facility, and the condition was not promptly identified and corrected. Specifically, a common mode failure occurred, which rendered both trains of the Supplemental Leak Collection and Release System (SLCRS) inoperable, when the fusible links for the Train "A" and Train "B" melted closing the fire dampers. During that time period, the licensee identified, on June 17, 1991, that the SLCRS Train "B" was inoperable because of a failed surveillance test. The licensee did not properly diagnose the root cause of the test failure as a part of their corrective actions in that the licensee attributed the failure of the fusible link to a mechanical failure, rather than the melting of the link. In addition, the licensee failed to check whether a similar problem existed on the "A" Train, and therefore, that condition adverse to quality, namely, the inoperability of the "A" train of SLCRS, existed for an additional 15 days (June 17, 1991 to July 2, 1991).

- B. Technical Specification Limiting Condition for Operation (LCO) 3.6.6.1 requires that whenever the plant is in Modes 1, 2, 3, or 4, two independent Supplemental Leak Collection and Release Systems (SLCRS) shall be operable. The Technical Specification (LCO) Action Statement requires that with one Supplemental Leak Collection and Release System inoperable, restore the inoperable system to operable status within 7 days or be in at least hot standby within the next 6 hours and in cold shutdown within the following 30 hours.

Technical Specification LCO 3.0.3 requires, in part, that when a LCO is not met, except as provided in the associated action requirements, within 1 hour action shall be initiated to place the unit in cold shutdown within the subsequent 24 hours.

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Contrary to the above, between June 9, 1991 and June 17, 1991, while the plant was in either Modes 1, 2, or 3, both the "A" and "B" trains of SLCRS were inoperable in that the fire dampers in each of the trains were closed, thereby stopping the flow of air in the system, and action was not taken to place the plant in the cold shutdown condition. In addition, the "A" train of SLCRS remained inoperable from June 17, 1991 to July 2, 1991, exceeding the 7 day action statement by 8 days, and action was not taken to place the plant in the cold shutdown condition.

These violations have been categorized in the aggregate as a Severity Level III problem (Supplement I).

Pursuant to the provision of 10 CFR 2.201, Northeast Nuclear Energy Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region I, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order or a demand for information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time. Under the authority of Section 182 of the Act, 42 U.S.C. 2232, this response shall be submitted under oath or affirmation.

Dated at King of Prussia, Pennsylvania
this 21st day of February 1992