

UNITED STATES NUCLEAR REGULATORY COMMISSION REGION I

475 ALLENDALE ROAD

KING OF PRUSSIA. FENNSYLVANIA 19408

MUS 1 1 1984

Docket No. 30-423 File R1-89-4-0071



The purpose of this letter is to inform you of our findings related to your allegation concerning work being done on the personnel air-lock hatch that possibly could have prevented personnel egress from the containment structure at Milistone Nuclear Power Station, Unit 3.

Please find enclosed a copy of the relevant parts of NRC Inspection Report 50-336/89-11, documenting a resident inspection of Millstone Unit 2. Section 11.2 of the report audresses the NRC inspection and review of your allegation and concludes that licensee controls were appropriate and that the allegation is unsubstantiated.

This allegation has been losed based upon the fact that all appropriate department heads had been informed of the limited access during the time of the work and also upon the fact that the work was being performed from inside containment and egress was always possible. The resident inspector plans further review, nowever, of licensee/contractor communications during outages. If you would like the results of that review when completed, please contact me or the resident inspector's office.

Thank you for identifying this matter to the NRC. Please contact me if you have any additional information or quastions.

Sincerely.

Donald R. Haverkamp, Offier Reactor Projects Section 4A Division of Reactor Projects

(215) 337-5120

Enclosure: As Stated

M. Perkins, DAMA, RI

9203110426 910821 PDR FOIA CUILD91-162 PDR

DAITE OFFATES

NICLEAR REGULATORY COMMISSION

REGION

475 ALLENDALE ROAD
KING OF PRUSSIA PENNSYLVANIA 19406

2 1 JUL 1959

Docket License: 50-336 'DrR-69

Northeast Nuclear Energy Company (TTN: Edward J. Mroccka

Senior Vice President - Nuclear Engineering and Operations Group

P.O. Box 270

Hartford, Connecticut 06101-0270

Gentlemen:

Subject: Millstone 2 Routine Inspection 50-336/89-11 (5/5/89 - 6/15/89)

The enclosed report refers to the above subject inspection. Inspection results were discussed with Mr. Keenan of your staff at the conclusion of the inspection.

As noted in Report Detail 6. events such as changing operating modes with an inoperable emergency diesel generator indicate lopses in operational attention to detail. While this was noted only in relation to minor safety-significant operational requirements, a need for better operational planning is indicated.

Your cooperation with us is appreciated.

Sincerely.

Edward S. Wanzinger, Chie

Projects Branch No. A Division of Reactor Projects

Enclosure: NRC Region I Inspection Report 50-036/89-11

cc w/encl:

W. D. Romberg, Vice President, Nuclear Operations

R. M. Kacich, Manager, Generation Facilities Licensing

D. O. Nordquist, Director of Quality Services

S. E. Scace, Station Superintendent

D. B. Miller, Station Superintendent, Haddam Neck

Gerald Garfield, Esquire

Public Document Room (PDR)

Local Public Document Room (LPDR)

Nuclear Safety Information Conter (NSIC)

NRC Senior Resident Inspector

State of Connecticut

-8908020354 Y

U.S. NUCLEAR REGULATORY COMMISSION REGION-1

Report to

50-336/89-11

Docket No.

50-336

License No.

DFR-65

Licensee:

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

Facility Name: Millstone Nuclear Power Station, Unit 2

Inspection At: Waterford, Connecticut

Dates:

May 5 through June 15, 1989

Reporting

Inspector:

P. J. Habighorst, Resident Inspector, Hillstone 2

Inspectors:

W. J. Raymond, Senior Resident Inspector

T. A. Rebelowski, Senior Reactor Engineer, DRS G Vissing, Licensing Project Manager, NSR P J Habighorst, Resident Inspector, Millstone 2

Approved by:

ERIC Th Call
C. McCade, Chief, Reactor Projects Section 18

7/21/8

Inspection Summary 5/5/89 - 6/15/89 (Report 50-336/89-11)

Areas Inspected: Routine NRC resident and specialist inspection (160 regular hours, 19 backshift hours, and 4 deep backshift hours), of clant operations, surveillance, maintenance, previously identified items, allegations, committee activities, evaluation of licensee self-assessment, and Licensee Event Reports (LERS).

Results: No unsafe conditions were identified.

TABLE OF CONTENTS

		PAGE
1.0	Persons Contacted	1
2.0	Summary of Facility Activities	1
3.0	Previously Identified Items (93702)	2
	3.1 (Closed) Temporary Instruction (T1) 2515/91, "Inspection follow-up to Generic Letter 83-28, Item 4.1"	1
4.0	Facility Tours (71707)	2
5.0	Plant Operational Status Reviews (71707/73752/37700)	2
	5.1 Steam Generator (SG) Tube Plugs	2 5
6.0	Licensee Event Report (LER) Review (92700)	8
7.0	Committee Activities (40500)	9
8.0	Evaluation of Licensee Self-Assessment Capability (40500)	10
9.0	Observation of Maintenance (62703)	11
	Observation of Surveillance Testing (61726)	13
	Follow-up of Employee Concerns (93702)	13
	11.1 RI-88-A-0040: Problems with the In-core Analysis Program to Measure Core Performance. 11.2 RI-89-A-0071: Concerns About Containment Work at Millstone 3 11.3 Question on Compliance with 10 CFR Parts 19 and 20	13 17 18
12.0	Management Meetings (30703)	19

has an ASI input. Both trips are developed entirely from the highest of either NI power or the calculated delta-I power derived from the hot and cold leg RIDs. The local power density trip settings in TS 2.2.1 provide for reactor shutdown if ASI reaches the relatively large values of plus or minus 20% (or 0.2 ASI units) at full power. The limiting safety system setting will provide for reactor safety so that the fuel linear heat rate design limit of 21 km/ft is not exceeded. The excores can be used to satisfy the surveillance requirements for TS 3.2.1. The PRC can perform this function acceptably with an NI input bypassed.

In summary, no safety inadequacy was found in the operations performed while an INCA program problem existed, in the 'A' RPS channel input being bypassed to the high power averaging circuitry, or in the incore/excore measurements taken before equilibrium xenon was reached.

During follow-up of these allegations, the inspector noted aspects that meet requirements but may ment evaluation in regard to licensee performance. Therefore, the inspector asked the licensee for further information on the design specifications for the PRC, on why the underlying condition for the 'A' channel bypass had not been connected for an extended period, and on why the incore/excore measurement procedure specified an equilibrium xenon concentration without specifically authorizing the near zero rate of xenon change condition utilized. These matters will be further evaluated incident to routire inspection.

11.2 RI-89-A-DO71: Concerns About Containment Work at Millstone 3

On May 31, a contractor employee called the resident office about ingress/egress from the Millstone 3 containment personnel air-lock hatch. The alleger stated that on May 29, the licensee was working or the personnel air lock inboard hatch and noted a sign saying no entrance/no exit. The alleger further stated containment access was secured between 1:30 p.m. = 2:30 p.m. on May 29.

According to the alleger, he was told by his supervisor to work inside containment during the 1:30 - 2:30 p.m. time frame on May 29. The alleger subsequently did not work in containment during this time frame.

The inspector discussed work activities surrounding the containment personnel air lock with the licensee's maintenance supervisor. The supervisor stated prior to work activities on the containment access door, all supervisors in Instrument and Controls (I&C) shift supervisors, and contractor supervisors were notified. The inspector also noted work on the access door was inside containment and appropriate licensee controls existed to remove individuals from containment on a need basis. The alleger was notified of the licensee controls and

had no further questions. Licensee controls were appropriate, and the allegation is unsubstantiated, however review of licensee/contractor communications during outages will be further reviewed.

11.3 Question or Compliance with 100FR Parts 19 and 20

A contractor supervisor contacted the inspector on May 11 regarding a cuestion of compliance with 10 CFR Part 19. This supervisor did not him from a former employee.

The contractor hired a worker in February 1989 to work during the Unit 2 outage on the steam generator (SG) tube inspections. After being on site for about one week of training, and apparently after learning about the radiation exposure involved in the SG work, the worker left the job because of concerns over the exposure. The contractor issued a termination letter to the worker indicating he had left the job voluntarily.

In a letter dated May 2, 1989, the worker asked the contractor to correct the termination letter before the New York State Department of Labor Unemployment Inservice Division to show his departure from the job was "justifiable" since the conditions of employment and radiation levels were hazardous to his health, as were his rights as provided for under 10 CFR Parts 19 and 20.

The inspector reviewed the worker's radiation exposure while at the millstone site. The worker's May 2 letter indicated he was on site morker was assigned TLDs from February 2 - 10 (the TLDs were returned to dosimetry 5 days after the worker was last on site). Dosimetry permit and no exposure was recorded on the TLDs for the time at Mill-stone station.

The inspector reviewed this matter relative to 10 CFR Parts 19 and 20 regarding Instructions to Workers and Protection Against Radiation. It is the licensee's responsibility to assure worker exposures are ments of 10 CFR Parts 19 and 20 are mat. No licensee or licensee contractor inadequacies were noted in inspector review of this materialist of control program. No further inspector follow-up is planned on this matter.



