

NORTHEAST UTILITIES



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WESTERN MASSACHUSETTS ELECTRIC COMPANY
HOLYOKE WATER POWER COMPANY
NORTHEAST UTILITIES SERVICE COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY

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April 10, 1992

Docket No. 50-423

A10271

Re: 10CFR2.201

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Reference: J. P. Durr letter to J. F. Opeka, "NRC Inspection Report
No. 50-423/91-27," dated March 4, 1992.

Gentlemen:

Millstone Nuclear Power Station, Unit No. 3
Reply to a Notice of Violation
Inspection Report No. 50-423/91-27

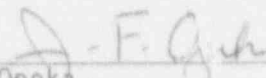
In a letter dated March 4, 1992 (Reference), the NRC Staff transmitted the results of the service water system inspection conducted on December 9-13, 1991, and February 13, 1992, at Millstone Unit No. 3. The NRC Staff identified one Severity Level IV violation concerning a failure to update the Millstone Unit No. 3 Final Safety Analysis Report (FSAR) to reflect the changes made in the service water system flow requirements for various safety related components.

NNECO recognizes the importance of the FSAR updates. We have been updating the Millstone Unit No. 3 FSAR annually beginning in 1987 as required by 10CFR50.71(e). As indicated in Attachment 1, an FSAR change has been initiated and is being processed internally. This change will be included in the next annual FSAR update submittal which is currently scheduled for June 1992. The corrective actions are described in Attachment 1.

If you have any questions regarding the information contained in this letter, please contact us.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



J. F. Opeka
Executive Vice President

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U.S. Nuclear Regulatory Commission
A10271/Page 2
April 10, 1992

cc: T. T. Martin, Region I Administrator
V. L. Rooney, NRC Project Manager, Millstone Unit No. 3
W. J. Raymond, Senior Resident Inspector, Millstone Unit Nos. 1, 2,
and 3
J. P. Durr, Chief, Engineering Branch, Division of Reactor Safety,
Region I

Docket No. 50-423
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Attachment 1

Millstone Nuclear Power Station, Unit No. 3
Reply to a Notice of Violation

April 1992

Millstone Nuclear Power Station, Unit No. 3
Reply to a Notice of Violation

I. Restatement of Violation

"10 CFR 50.71(e) states in part that, 'Each person licensed to operate a nuclear power reactor pursuant to the provisions of 50.21 or 50.22 of this part shall update periodically, as provided in paragraphs (e)(3) and (4) of this section, the final safety analysis report (FSAR) originally submitted as part of the application for the operating license, to assure that the information included in the FSAR contains the latest material developed.'"

"Contrary to the above, as of December 13, 1991 the licensee did not update the final safety analysis report (FSAR) Table 9.2-1, 'Service Water System Flow Requirements,' was not updated when the licensee revised the minimum service water flow requirements in 1985 to assure that the information included in the FSAR contained the latest material developed."

II. Reasons for the Violation

A. Background

The FSAR minimum required flow values in Table 9.2-1, with the exception of the containment recirculation coolers, have not been changed from their design flow rates specified prior to commercial operation. During the Millstone Unit No. 3 Service Water Phase II start-up testing, actual test results differed from original design flow rates for several safety-related components. Resolution of these differences were documented in Design Deficiency Reports (DDR) 590 and 611 by Stone & Webster and DDR 986 by Northeast Utilities (NU), and was considered adequate at the time. However, the Millstone Unit No. 3 Nuclear Review Board review of the DDR dispositions required a more detailed review of the service water systems. A detail service water system computer model "PEGISYS" was established to predict service water system parameters. This effort to establish a computer model which reflects the actual service water system installation and the improvements made since plant startup have resulted in several changes to the computer program. The present model has been compared to recent system test data, with favorable results. This modeling effort is still ongoing and expected to be completed by the end of 1992.

Because of this ongoing effort to establish a detailed service water system computer model, NNECO has not changed the FSAR each time a calculation was performed to determine the minimum required service water flow rates to various safety-related components. However,

NNECO did update FSAR Table 9.2-1 when Stone & Webster revised the containment recirculation spray coolers from 6190 gpm to 5900 gpm in March 1987.

B. Root Cause

Adequate procedural guidance is available in the NEO procedures to initiate an FSAR change as a result of the design modifications or plant operating procedure changes. However, the failure to initiate an FSAR change to reflect the design basis calculation changes in the service water system flow requirement was due to insufficient guidance in NEO 5.06, "Design Analysis and Calculations." Specifically, NEO 5.06 did not direct the personnel to take necessary action to initiate an FSAR change whenever the revised design basis calculations affect the FSAR. In addition, the failure to initiate the above FSAR change was due to insufficient and/or inappropriate personnel training.

III. Corrective Actions that have been taken and Results Achieved

The corrective action consisted of having submitted an FSAR change which reflects the current service water system flow requirement. This FSAR change will be included in the next annual FSAR update submittal to the NRC which is currently scheduled for June 1992.

IV. Corrective Steps that will be taken to avoid Future Violation

Procedural enhancements will be implemented encompassing a proposed procedure change to the calculation checklist contained in NEO 5.06, "Design Analysis and Calculations," to include a verification as to whether calculation results affect changes to the FSAR, Technical Specifications, or Plant Operating Procedures. Also, additional training staff has been added to help address engineering training adequacy and consistency.

Since the discovery of this issue in late 1991, an additional internal memorandum was issued to Nuclear Engineering and Operations (NE&O) managers and supervisors to reemphasize that they are responsible for the accuracy of the FSAR sections assigned to them. In addition, these managers/supervisors were requested to help implement NEO Procedure 4.03, "Changes and Updates to Final Safety Analysis Reports for Operating Plants," by ensuring personnel under their direction are cognizant of the need for and do initiate FSAR changes whenever ongoing or completed activities affect the content of the FSARs in their areas of responsibility. A change to NEO 4.03 was also initiated to procedurally identify the responsibility for maintaining the assignment list under the Director, Nuclear Licensing.

NE&O Department Managers/Supervisors will discuss this specific example with their personnel in the respective department meetings to increase their awareness that they are responsible to assure that the information included in the FSARs contains the latest material developed and to take necessary action to initiate any required changes in accordance with NEO Procedure 4.03.

V. Date When Full Compliance Achieved

As stated above, the FSAR change will be submitted to the NRC as a part of the next annual update submittal which is currently scheduled for June 1992.

VI. Generic Implications

The corrective steps that will be taken to avoid future violations, as described above, are also applicable for Millstone Unit Nos. 1 and 2 and the Haddam Neck Plant.