

JUL 23 1992

Docket No. 50-336

Mr. John F. Opeka  
Executive Vice President - Nuclear  
Northeast Nuclear Energy Company  
P. O. Box 270  
Hartford, Connecticut 06141-0270

Dear Mr. Opeka:

SUBJECT: NRC REGION I AUGMENTED INSPECTION TEAM  
REPORT NO. (50-336/91-81)

This letter refers to your letter, dated April 2, 1992, in response to our letter dated December 12, 1991, concerning the failure of a moisture separator reheater drain line elbow, which occurred at Millstone Unit No. 2 on November 6, 1991. Your letter clarified a number of statements made in the Augmented Team Inspection Report which you believe were misleading or premature. Additionally, your letter indicates that you are continuing your analysis of the piping failures and the contributing phenomenon. We encourage your continued investigation into the cause or causes of the pipe failures and a thorough understanding of the circumstances leading up to the event. We acknowledge that, based on your extensive investigations, new facts have been uncovered which were not available at the time of the inspection that may alter previous perceptions. Nonetheless, we are concerned that a root cause has not been determined nearly 9 months after the event. Therefore, we request that you provide us with your schedule for completion of the analysis and a copy of the resulting report at the earliest possible date.

We have reviewed your comments and do not feel our conclusion is misleading that the erosion/corrosion program implemented at Millstone Unit 2, prior to the November 6, 1992, event was not based on a systematic review of components vulnerable to erosion/corrosion. NRC Generic Letter 89-08, dated May 2, 1989, requested that, "Therefore, you should provide assurances that a program consisting of systematic measures to ensure that erosion/corrosion does not lead to degradation of single phase and two phase high-energy carbon steel systems has been implemented." While the Millstone Unit 2 erosion/corrosion program inspected a large number of components each refueling outage, the program did not predict and prevent the failure of a 1-1/2-inch diameter steam trap drain line on April 22, 1991, or the 8-inch diameter elbow on November 6, 1991. Therefore, the

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systematic measures which you put in place to ensure that erosion/corrosion does not lead to degradation of single phase and two phase high-energy carbon steel systems at Millstone Unit 2 were inadequate. In addition, we do not agree that the AIT Inspection Report ignores the erosion/corrosion program review and enhancement being conducted by NNECO at the time of the subject event. The inspection report clearly states in the overall conclusions and assessments section that, "However, the planned actions which were to be completed by December 31, 1991, would have identified the ruptured line for inspection and had wall thickness measurements been taken, this failure would have been prevented." Therefore, we do not feel that we ignored the erosion/corrosion program review and enhancements being implemented at the time of this failure.

We appreciate your letter clarifying our inspection report and your continued cooperation with us with regard to this matter.

Sincerely,

*Original Signed By:*  
Marvin W. Hodges

Marvin W. Hodges, Director  
Division of Reactor Safety

cc:

W. D. Romberg, Vice President - Nuclear Operations Services  
S. E. Scace, Nuclear Station Director  
J. S. Keenan, Nuclear Unit Director  
R. M. Kacich, Director, Nuclear Licensing  
D. C. Nordquist, Director of Quality Services  
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NRC Resident Inspector  
State of Connecticut SLO Designee

Mr. John F. Opeka

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bcc:

Region I Docket Room (with concurrences)

DRS/EB SALP Coordinator

DRSS SALP Coordinator

J. Joyner, DRSS

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L. Doerflein, DRP

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J. Shedlosky, SRI, Haddam Neck

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G. Vissing, PM, NRR

R. Barkley, DRP

  
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