

NORTHEAST UTILITIES



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August 17, 1992

Docket No. 50-36
B14225

Re: Control Room
Emergency Ventilation

Mr. Richard W. Cooper, II
Director, Division of Radiation
Safety and Safeguards, Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia PA 19406

Dear Mr. Cooper:

Millstone Nuclear Power Station, Unit No. 2
Control Room Emergency Ventilation System
Response to Request for Additional Information

In a letter dated July 5, 1992,⁽¹⁾ the NRC Region I Staff requested additional information on several issues relating to the Millstone Unit No. 2 control room emergency ventilation system testing, surveillance procedures, and Plant Operations Review Committee (PORC) administrative process control within 30 days of receipt of the NRC's letter. The purpose of this letter is to provide Northeast Nuclear Energy Company's (NNECO) response, on behalf of Millstone Unit No. 2, as requested.

In the July 6, 1992, letter, the NRC Region I Staff concluded that NNECO's alternate testing method did not meet the requirements of the technical specifications, and that NNECO should have sought relief from the requirements of the technical specifications through the amendment processes. During the two conference calls cited, NNECO personnel discussed our test process and the reasoning behind our belief that the test method used was valid and why we believed that we were within the bounds of the existing technical specifications. We agree that compliance with the literal aspects of the technical specifications may not have been achieved, but that at no time was safety compromised. Additionally, we agree that, in retrospect, regulatory relief would have been appropriate.

The NRC Staff noted concern that the surveillance procedure was approved by PORC without identification of the conflict with the technical specifications

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(1) R. W. Cooper letter to J. F. Opeka, "NRC Combined Inspection 50-245/92-03; 50-336/92-02; and 50-423/92-03," dated July 6, 1992.

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and the information provided in the February 9, 1988,⁽²⁾ safety assessment in which NNECO requested an emergency technical specification change. We believe that the PORC administrative review process is very strong, and that the technical specification conflict identified by the NRC staff was an isolated event. Additionally, we believe that the PORC's efforts to ensure that the surveillance testing performed was conservative and the "best" test available may have contributed to the situation that developed with respect to literal compliance with the specification. In this regard, we believe that it is important to understand the events and the reasoning that led up to this occurrence and to understand why we believe that this was an isolated event.

In a letter dated August 3, 1987,⁽³⁾ NNECO submitted a change to the Millstone Unit No. 2 technical specifications, as requested by the NRC Staff, which added a surveillance requirement to verify that control room in-leakage be limited to 100 scfm at a delta pressure of 1/16-inch water gauge. This submittal was responsive to an NRC Staff request associated with the control room habitability modifications, Item III.D.3.4 of NUREG 0737, which was referenced in the NRC Safety Evaluation for Amendment No. 100 to DPR-65 dated June 19, 1985.⁽⁴⁾ The NRC approved this amendment request in a letter dated September 25, 1987.⁽⁵⁾ This amendment was to become effective after entry into Mode 4 during start-up from the then ongoing refueling outage.

Extensive and diligent efforts to prepare the control room for this negative pressure test, as prescribed by that surveillance, resulted in several failed attempts to meet the acceptance criteria. At that time, PORC recognized the start-up may have been in jeopardy and began investigating the possibility of performing an alternate test. Additionally, PORC recognized that the surveillance, as then written, was very conservative in that it subjected the control room envelope to a negative pressure and was not representative of the conditions expected during emergency operations; i.e., that the control room envelope would be at or near atmospheric pressure. Because NNECO realized that we may have unnecessarily penalized ourselves by proposing an overly conservative test, and in order to provide for more flexibility in testing alternatives, NNECO requested an emergency license amendment that provided more flexibility in test methods and more realistically reflected actual accident conditions.

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- (2) E. J. Mroczka letter to U.S. Nuclear Regulatory Commission, "Millstone Nuclear Power Station, Unit No. 2, Proposed Revision to Technical Specifications, Control Room Habitability," dated February 9, 1988.
 - (3) E. J. Mroczka letter to U.S. Nuclear Regulatory Commission, "Proposed Change to Technical Specifications, Control Room Habitability," dated August 3, 1987.
 - (4) D. B. Osborne letter to J. F. Opeka, "NRC Amendment No. 100 to Facility Operating License No. DPR-65," dated June 19, 1985.
 - (5) D. H. Jaffe letter to E. J. Mroczka, "NRC Amendment No. 119 to Facility Operating License No. DPR-65," dated September 25, 1987.

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The intention at that time was to perform the in-leakage test utilizing a gas dispersion method. This test was to be performed with the ventilation system operating in the emergency mode which included the fans in operation. As discussed in our February 28, 1992,⁽⁶⁾ response to the Notice of Violation (NOV), the fans were required to be placed in operation in order to assure the mixing of the tracer gas with the control room air volume. In our letter dated February 9, 1988, NNECO requested an emergency license amendment which would modify the technical specification surveillance to permit this testing. This amendment request specified that the testing method to be used would be tracer gas dispersion, fan pressurization, or other technically acceptable method. Additionally, this amendment request also reaffirmed that the existing negative pressure test was an equally valid test. The NRC approved and issued the requested license amendment in a letter dated February 12, 1988,⁽⁷⁾ and stated "The test method can be selected by the licensee."

Our intent in requesting the 1988 emergency technical specification was to provide the flexibility to perform the surveillance utilizing the most appropriate test among several different methods. At that time, we were considering the gas dispersion method and, in retrospect, may not have clearly provided the flexibility in the proposed technical specification that we intended. After several unsuccessful attempts to perform that surveillance utilizing the tracer gas method, it became obvious that another test method should be pursued. After a review of the various alternate methods available, and with the first priority being the performance of a conservative and the most optimum test available, PORC determined that the most appropriate test method at that time would be to perform the original negative pressure test, as previously approved by the NRC.

Because NNECO's intent in requesting the emergency license amendment had been to increase the flexibility of our testing options, and because the negative pressure test had been previously approved by the NRC and had been determined to be a valid and more conservative test, PORC had good reason to believe that performing the more conservative test, required by the original technical specification, was acceptable. Considering this, PORC concluded that the test method was within the bounds of the existing technical specifications in that it would demonstrate the integrity of the control room envelope when the system was operating, even though the test was to be performed with the system fans secured. This conclusion was based, in part, on the fact that it was more difficult to pass this surveillance with the fans secured, because operation of the fans could tend to mask any in-leakage during a negative pressure test. We now realize that our statements in the 1988 amendment request do not readily support this interpretation, and we acknowledge that this interpretation was flawed. We believe that it is important to point out

(6) J. F. Opeka letter to U.S. Nuclear Regulatory Commission, "Millstone Nuclear Power Station, Unit No. 2, Reply to Notice of Violation, Inspection Report No. 50-336/92-03," dated February 28, 1992.

(7) D. H. Jaffe letter to E. J. Mroczka, "Issuance of Amendment (TAC No. 67081)," dated February 12, 1988.

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that although the literal requirements of the specification may not have been met, at no time did PORC fail in its responsibility to ensure that a technically acceptable test method was utilized and at no time was safety compromised.

The NRC Staff stated that the violation identified in the NOV dated January 17, 1992,⁽⁸⁾ will remain as cited, although the test that NNECO performed may have been adequate to demonstrate the integrity of the control room envelope, because of the "significant administrative process control failure" resulting from PORC's approval of a procedure without the identification of the conflicts with the technical specification. NNECO did not intend to contest the violation, although at the time we did believe it was not warranted. As stated in our February 28, 1992, response, we agreed with the Staff's conclusion that the technical specification wording could support the argument that the system fans were required to be running. Additionally, we agree that, as written, although our intent was not to be that prescriptive, the 1988 emergency license amendment request also supports the Staff's conclusion that the fans were required to be running.

With regard to the Staff's expressed concern of "significant process control failure," we acknowledge that an error was made in the interpretation of the literal requirements of the specification, and that our previous technical specification submittal did not adequately provide us with the intended flexibility. We believe, however, based on the factors associated with the event leading up to this occurrence, that this occurrence was an isolated event and is not indicative of a significant process control failure. In this regard, however, in order to substantiate this belief, NNECO will review all technical specification surveillance procedures, against the specific requirements contained in the technical specification, to verify the adequacy of the surveillance procedures meeting the requirements of technical specifications. Due to the scope of this effort, and because of the demands of the ongoing refueling outage, we expect this effort to be completed by December 30, 1992.

In our February 28, 1992, response letter, we stated our intention to submit a technical specification wording change to clarify the issue. Since then, we are reconsidering the tracer gas dispersion test method, utilizing a different tracer gas. NNECO is presently evaluating this test method and may perform the in-leakage testing utilizing this technique. If this method is found to be acceptable, no technical specification change is anticipated. In any event, NNECO will either perform a test that will comply with the specific requirements of the existing specification or submit a license amendment request to address an alternate method.

The NRC Staff noted that corrective actions provided in our response to the NOV did not address the administrative process control aspects of this issue nor the possible "10CFR50.59 process control weakness." PORC is very much aware of its responsibility to the safe operation of the plant--to maintain

(8) J. H. Joyner letter to J. F. Opeka, "Combined Inspection 50-245/92-03; 50-336/92-03; 50-423/92-03," dated January 17, 1992.

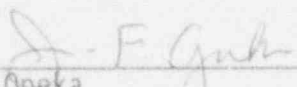
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full compliance with all regulatory requirements--and that although the literal compliance with the technical specification may not have been achieved, PORC's first and foremost responsibility--the safe operation of the plant and the health and safety of the public--as never compromised. Although we believe that this issue is an isolated event and not indicative of any significant process control weakness, in addition to the surveillance procedure verification reviews that we will be performing, we are implementing additional measures to strengthen the process to preclude this type of event from recurring. Presently, PORC reviews the procedures, after the comprehensive safety evaluation has been completed, in accordance with the corporate procedure, which follows NSAC-125 very closely. Beyond this comprehensive safety evaluation (10CFR50.59) review process, NNECO will be initiating a new "verification and validation" process as part of our overall procedure upgrades. This "process" will establish the criteria for verification that procedures meet all applicable requirements, prior to implementation, and will also provide the mechanism to validate their accuracy. Additionally, the "verification and validation" process will provide a tracking mechanism to ensure that commitments and requirements are not inadvertently compromised in future revisions. This process, now in place, is currently being implemented at all three Millstone units. Because this process will be applied to all procedures across the station, complete implementation will require several years and is being done in accordance with the associated Performance Enhancement Program Action Plan.

We believe that the information presented above is fully responsive to your concerns, and we trust that this provides the NRC Staff with the recognition that we consider matters such as these very seriously. NNECO has had, and continues to have, the utmost regard for the nuclear safety ethic, procedure compliance, and administrative process control. Furthermore, we trust that you will find our corrective actions satisfactory in this matter, and we remain available to answer any questions you may have.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



J. F. Opeka
Executive Vice President

cc: T. T. Martin, Region I Administrator
G. S. Vissing, NRC Project Manager, Millstone Unit No. 2
P. D. Swetland, Senior Resident Inspector, Millstone Unit Nos. 1, 2,
and 3

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