

NORTHEAST UTILITIES



THE CONNECTICUT LIGHT AND POWER COMPANY
WESTERN MASSACHUSETTS ELECTRIC COMPANY
MICHIGAN WATER POWER COMPANY
NORTHEAST UTILITIES SERVICE COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY

General Offices • Selden Street • Berlin, Connecticut

P.O. BOX 270
HARTFORD, CONNECTICUT 06141-0270
(203) 665-5000

January 31, 1991

Docket No. 50-336
B13717

Mr. E. C. Wenzinger, Chief
Projects Branch No. 4
Division of Reactor Projects
U. S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, Pennsylvania 19406

Dear Mr. Wenzinger:

Millstone Nuclear Power Station, Unit No. 2
RI-90-A-0202

In reviewing our response to RI-90-A-0202, dated December 21, 1990, ⁽¹⁾ it was noted that our response to Issue 2, Item d could be subject to some different interpretations and further clarification might be helpful to ensure the completeness of our response. The following additional material is provided to address the points that we have investigated as part of the response to this allegation. For ease of review, the original issue and our response is repeated below. Our response does not contain any personal privacy, proprietary, or safeguards information. The material contained in this response may be released to the public and placed in the NRC Public Document Room at your discretion. The NRC letter and our response have received controlled and limited distribution on a "need to know" basis during the preparation of this response.

d. Was there a QC hold point or similar review that should have prevented the deficiency in the original termination.

Response

The deficiency with the original termination was that there was unqualified braided material covered by the Raychem splices which in turn caused the splices to be unqualified from an EEO standpoint. An inspection plan with a specific inspection sheet for this type of Raychem splice was included in the AWO for the original termination. The inspection sheet specified under cable preparation that there be, "1. No braided jacket or non-qualified material...". This attribute was signed off satisfactorily with no open items by a QC inspector.

9209140060 920218
PDR FOIA
QUILD91-162 PDR

K/40

1. E. J. Mroczka letter to E. C. Wenzinger, "Millstone Nuclear Power Station, Unit No. 2, RI-90-A-0180 and RI-90-A-0202" dated December 21, 1990.

Mr. E. C. Wenzinger, Chief
U. S. Nuclear Regulatory Commission
B13717/Page 2
January 31, 1991

Supplementary Response

This inspection point specified in our procedures is considered to be sufficient to ensure that Raychem splices are made in conformance with station procedures for this type of work. If followed completely, the inspection plan is sufficient to prevent this deficiency.

Upon investigation it was determined that the QC inspector did not personally verify that this configuration existed prior to the splices being completed. The inspection was signed off without the inspector personally verifying the configuration of the splice.

The inspector provided the following summary of the events surrounding this particular work order:

- o In preparing for the inspection, he overlooked the procedure requirement to ensure that the insulating braided material was stripped back outside the Raychem splice area.
- o The work was being completed in an area of high local ambient temperature. The assigned electricians and inspector assigned were interested in completing the job in the most efficient manner consistent with procedure requirements to avoid any heat stress problems.
- o The electricians assigned had a history of completing work in accordance with procedure requirements and in a timely and professional manner. In past dealings with the two electricians the inspector had verified that they routinely followed procedure requirements and at all times showed an interest in completing their work in a quality manner.

There was a desire to have this work completed and return the system to service. This particular work assignment had originally been started by two electricians who estimated that they would not be able to complete the work during their normal work day and that some overtime would be needed to finish the job that day. One of the electricians had a family commitment that evening and had declined an offer of overtime to complete the work. Due to this situation, two other electricians agreed to work overtime to complete the work. They were assigned to this work during their lunch break and replaced the original crew. The original crew was assigned other work.

Late in the afternoon, the original crew was in the general area and visited the job location to inquire as to the status of the work. They found neither member of the second crew of electricians at the job location. The job had progressed to the point that the heat shrink tubing was partially installed prior to being heat shrunk into place. They noted that the braided material had not been stripped back as required by the procedure. They went back to finish up their assignment as it was near quitting time.

Mr. E. C. Wenzinger, Chief
U. S. Nuclear Regulatory Commission
B13717/Page 3
January 31, 1991

After completing their work and on the way back to the shop, they met the inspector and the electricians assigned to the job. It was at this point that they were told that the work had been completed.

During the discussions, the original crew of electricians asked how the job had went and if the braided material had been removed from the wire prior to the heat shrink splice jackets being applied. The crew performing the work responded that it had been in all cases.

This question resulted in the inspector reviewing his documentation for the work. It was at this point that he discovered that he had missed a step in the procedure. He had not verified that the insulating braided material had been stripped away on the wires from the area of the Raychem splice. He could not remember if the braided material has indeed been removed by the electricians.

The inspector privately questioned the electricians who had done the work about removal of the braided material. They indicated to him that the braided material had been stripped back by them prior to making each splice. The inspector signed-off on the inspection step at this time without personally verifying that the braided material had been removed.

One of the electricians who was originally assigned to the work was concerned that sufficient time had not passed from the time that he had seen the splice partially assembled incorrectly and the time that the second crew had completed the work to have allowed the insulation to be removed and the work completed correctly. Recall that it was this crew that believed there was not sufficient time available that day to complete the work without overtime.

The electrician took this concern to his management for guidance and resolution. The Department Manager recognized that if there was any concern about the quality of the job that it should be verified. The only way to do this for this particular configuration was to reopen the junction box and inspect each splice.

A work order was written to inspect and rework the connections as needed to complete each splice in full compliance with the station procedure. An inspector was requested to be present for the entire work evolution.

Visual inspection of the splices indicated that the braided material appeared to be under the Raychem sleeve on two of them. Each of the defective splices was cut out and replaced in full conformance with station procedures. A subsequent destructive examination of one of the removed splices confirmed that the non-qualified braided material was indeed part of the entire splice. The second splice was not cut open, but clearly showed the braided material passing into the Raychem sleeve itself.

Mr. E. C. Wenzinger, Chief
U. S. Nuclear Regulatory Commission
B13717/Page 4
January 31, 1991

The inspector was counseled by his supervisor with regard to the need to personally verify that quality attributes have been achieved in the conduct of work prior to his signing off that they are complete. Job conditions, schedules and prior experience working with specific individuals are not an acceptable reason for not personally verifying the quality of a job. Based on these discussions and our evaluation of the circumstances associated with this incident, it was judged that this oversight was a singular event. The inspector has a satisfactory work record and there is no reason to question other work which he has inspected.

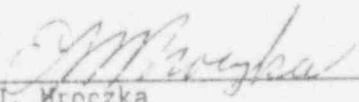
As indicated in our original response, the job supervisor for this work was also counseled regarding the need to follow procedure requirements at all times. His work performance history has been satisfactory.

We have provided this additional information for the purpose of ensuring completeness of our response. We believe that the actions that have been taken are appropriate for the situation.

Please contact my staff if you have any further questions.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



E. J. Wroczka
Senior Vice President

cc: W. J. Raymond, Senior Resident Inspector, Millstone Unit Nos. 1, 2,
and 3

Memo To: File RI-90-A-0202

From: JS Stewart

Subj: Licensee Corrective Actions Update: EQ Splice Issue

I received a call today from Bill Hutchins - NUSCO Licensing concerning additional corrective actions taken in regard to the faulty EQ splice:

- (1) All QSD inspectors and supervisors have been made aware of issue and reminded to actually verify work performed, Do not rely on discussions with workers.
- (2) A review of quality work performed by individuals involved in splice is underway
- (3) Issue is not closed, investigation/review is continuing

JS Stewart
2/25/91

cc: Wenzinger
Haverkamp
Pakins RI-90-A-0202

K/41



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
476 ALLENDALE ROAD
KING OF PRUSSIA, PENNSYLVANIA 19406

FEB 22 1991

Docket No. 50-336
File No. RI-90-A-232

Northeast Nuclear Energy Company
ATTN: Mr. Edward C. Mrocza
Senior Vice President
Nuclear Engineering and Operations
P.O. Box 270
Hartford, Connecticut 06141-0270

Dear Mr. Mrocza:

The U.S. Nuclear Regulatory Commission recently became aware of certain activities at Millstone Unit 2 which we have determined to require your review and followup. The details of these activities are enclosed.

We request that the results of your review and disposition of this matter be submitted to Region I within 30 days of the date of receipt of this letter. We request that your response contain no personal privacy, proprietary, or safeguards information so it can be released to the public and placed in the NRC Public Document Room. If necessary, such information shall be contained in a separate attachment which will be withheld from public disclosure. The affidavit required by 10 CFR 2.790(b) must accompany your response if proprietary information is included. Please refer to file number RI-90-A-232 when submitting your response.

The enclosure to this letter should be controlled and distribution limited to personnel with a "need to know" until your investigation of the matter has been completed and reviewed by NRC Region I. The enclosure to this letter is considered Exempt from Public Disclosure in accordance with Title 10, Code of Federal Regulations, Part 2.790(a). However, a copy of this letter excluding the enclosure will be placed in the NRC Public Document Room.

The response requested by this letter and the accompanying enclosure are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

RI-90-A-232
46

~~9103130157~~
2pp

K/42

OFFICIAL RECORD COPY

Your cooperation with us is appreciated. We will gladly discuss any questions you may have concerning this information.

Sincerely,

Original Signed By

James Wiggins for
Charles W. Helms, Director

Division of Reactor Projects

Enclosure: Details

~~(10 CFR 2.790(a) INFORMATION)~~

cc w/o encl:

S. E. Scace, Station Director, Millstone

Public Document Room (PDR)

Local Public Document Room (LPDR)

State of Connecticut

bcc w/encl:

W. Raymond, SRI Millstone

M. Perkins, RI-90-A-232

J. Stewart, DRP

~~10 077 2.700~~

~~LIMITED DISTRIBUTION - NOT FOR PUBLIC DISCLOSURE~~

ENCLOSURE

The following problems have been identified concerning biennial procedure review and work on a main feedwater pump coupling.

1. A potential confusion exists in the I&C department concerning the biennial review of department procedures, specifically with the requirements of a new I&C department instruction 3.02 which deals in part with technical specification applicability. An individual was recently tasked with biennial review of IC 2417C, which was to be used in the replacement of excore nuclear instrumentation. During the review, a question arose concerning technical specification applicability. A memo to department supervision was generated addressing the question to the I&C department head.

Has there been adequate training on the performance of biennial reviews so that the individuals tasked with this responsibility can properly fulfill their responsibilities? Is the generation of a memo to the department head appropriate means of communication for questions dealing with the completion of biennial reviews? Please discuss.

2. Maintenance work was completed on a main feedwater pump coupling without appropriate tagout controls. This work was accomplished during restoration from the recent outage. The shift supervisors involved were (*). A decision was made not to remove the feed pump from service during the coupling replacement.

Please discuss the validity of the above assertions. Please discuss if any procedural non-compliances were involved in the feed pump coupling replacement and if the tagout control was adequate. Please include any generic deficiencies which may have been identified in your review.

The identity of (*) may be obtained from the senior resident inspector.

~~10 077 2.700~~

~~LIMITED DISTRIBUTION - NOT FOR PUBLIC DISCLOSURE~~

NORTHEAST UTILITIES



THE CONNECTICUT LIGHT AND POWER COMPANY
WESTERN MASSACHUSETTS ELECTRIC COMPANY
NEW YORK WATER POWER COMPANY
NORTHEAST UTILITY SERVICE COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY

General Offices • Selden Street, Berlin, Connecticut

P.O. BOX 270
HARTFORD, CONNECTICUT 06141-0270
(203) 665-5000

April 26, 1991

Docket No. 50-336
A09351

Mr. Charles W. Hehl, Director
Division of Reactor Projects
U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, Pennsylvania 19406

Dear Mr. Hehl:

Millstone Nuclear Power Station, Unit No. 2
RI-90-A-232

We have completed our review of an allegation concerning activities at Millstone Unit No. 2 (RI-90-A-232). As requested in your transmittal letter, our response does not contain any personal privacy, proprietary, or safeguards information. The material contained in this response may be released to the public and placed in the NRC Public Document Room at your discretion. The NRC letter and our response have received controlled and limited distribution on a "need-to-know" basis during the preparation of this response. Based upon our request on March 15, 1991, Region I personnel extended the due date for this response to April 26, 1991. Additional time was requested to support the ongoing INPO evaluation and to prepare for an Enforcement Conference held on March 27, 1991 involving an ongoing allegation-related matter.

Issue 1

A potential confusion exists in the I&C Department concerning the biennial review of department procedures, specifically with the requirements of a new I&C Department Instruction 3.02 which deals in part with technical specification applicability. An individual was recently tasked with biennial review of IC 2417C, which was to be used in the replacement of excore nuclear instrumentation. During the review, a question arose concerning technical specification applicability. A memo to department supervision was generated addressing the question to the I&C Department head.

9105310085

300.

K/43

Mr. Charles W. Hehl, Director
U.S. Nuclear Regulatory Commission
A09351/Page 2
April 26, 1991

Has there been adequate training on the performance of biennial reviews so that the individuals tasked with this responsibility can properly fulfill their responsibilities? Is the generation of a memo to the department head appropriate means of communication for questions dealing with the completion of biennial reviews? Please discuss.

Background

The subject of procedure review is addressed by Unit 2 I&C Department Instruction 3.01. This instruction provides the necessary department-specific procedure format and review process information. Department Instruction 3.02 addresses department forms and includes Form 3.02-3, which provides a checklist of items that are appropriate to review as part of the biennial review process. This checklist includes the requirement to check the satisfaction of the referenced technical specification.

During the review of the I&C procedure referenced, an employee raised questions concerning his capability to perform the review with the PMMS Planner. (The planner coordinates the performance of the reviews.) During this discussion, the point of the employee asking for additional assistance from engineering personnel when performing a procedure review was made. A memo was written from the planner to the department head to document and summarize the discussions held. No questions were raised by it.

Response

No specific training activities on biennial reviews have been conducted. Adequate procedural guidance exists in the department instruction and ACP to conduct the review when combined with the existing experience and knowledge level of the Unit 2 I&C Department instrument specialists. All Unit 2 I&C specialists are involved in the procedure development and maintenance process on a continuing basis. If they identify a question they cannot resolve at their level, they have the ability to request additional assistance from other personnel. This point was reviewed between the employee and the PMMS Planner.

The memo from the planner to the department head was initiated to document what began as a conflict between the employee and the planner. As subsequent discussions resolved the conflict on their own, the memo only served to document the discussions that took place. The use of a written memo to document these events is appropriate under the circumstances, but is not necessary for routine resolution of questions arising during biennial reviews.

Issue 2

Maintenance work was completed on a main feedwater pump coupling without appropriate tagout controls. This work was accomplished during restoration from the recent outage. The shift supervisors involved were (*). A decision was made not to remove the feed pump from service during the coupling replacement.

Mr. Charles W. Hehl, Director
U.S. Nuclear Regulatory Commission
A09351/Page 3
April 26, 1991

Please discuss the validity of the above assertions. Please discuss if any procedural noncompliances were involved in the feed pump coupling replacement and if the tagout control was adequate. Please include any generic deficiencies which may have been identified in your review.

The identify of (*) may be obtained from the Senior Resident Inspector.

Background

The "B" Steam Generator Feed Pump (SGFP) was removed from service and adequately tagged during pump coupling, following overspeed testing of the "B" SGFP turbine on November 9, 1990. After the overspeed test, the "B" SGFP was tagged under Clearance #2-2744-90 to the AWO M2-88-02626 ("B" SGFP overhaul), which was still active at the time and was used to finish up other work on the pump on November 9, 1990.

Response

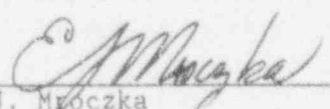
The maintenance supervisor verified that the pump was tagged, but he apparently did not actually verify the tag clearance number against both of the AWOs written for this work. The maintenance supervisor did not realize that AWO M2-89-05948, which stated that the pump coupling was properly lubricated and coupled, was never released by operations and never tagged. A clearance was written by the Operations Department (2-1599-90) for this AWO. This clearance was not used, and was canceled and subsequently destroyed. There is no further record of this documentation.

The work in question was performed safely; however, the resurrection of complete and accurate documentation of this maintenance activity is not possible. The issue has been discussed with the maintenance supervisor and he has been counseled to properly verify that the specific activity being performed is covered under a specific tagging clearance.

After our review and evaluation, we find that none of these issues taken either singularly or collectively present an indication of a compromise of nuclear safety. We appreciate the opportunity to respond and explain the basis for our actions. Please contact my staff if there are any further questions on any of these matters.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



E. J. Mroczka
Senior Vice President

cc: W. J. Raymond, Senior Resident Inspector, Millstone Unit Nos. 1, 2,
and 3
E. C. Wenzinger, Chief, Projects Branch No. 4, Region I

TO: Scott Stewart, RPB No 4

FROM: Tom SINGALOSH

6 PAGES (INCLUDING THIS PAGE)

Scott,
2 New Allegations &
Larry Briggs' Follow up to
NU Letter Dated 4/24/91
for RI-90-A-232

Tom

K/44

ALLEGATIO. RI-A-232-01

I performed a review of the I & C Department Instructions referenced in the licensee's April 26, 1991 letter to W. Hehl. The instructions referenced do provide adequate guidance to enable a qualified individual to perform a satisfactory biennial procedure review. One minor deficiency was noted during the review. Instruction 3.01 addresses the biennial review in Section 5.2 which addresses procedure format, but it does not refer to Instruction 3.02 Form 3 which addresses the specific items to be evaluated during a biennial review. This could lead to confusion if an individual was not aware of the form in Instruction 3.02.

JS for
Larry Briggs - DRS

SAMPLE RECORD OF ALLEGATION PANEL DECISIONS

SITE: Millsme 2
 ALLEGATION NO.: 91-A-0063
 DATE: 4/3/91 (Mtg. 1 2 3 4 5)
 PRIORITY: High Medium Low
 SAFETY SIGNIFICANCE: Yes No Unknown
 CONCURRENCE TO CLOSEOUT: DD BC SC
 CONFIDENTIALITY GRANTED: Yes No
 (See Allegation Receipt Report)
 IS THEIR A DOL FINDING: Yes No
 IS CHILLING EFFECT LETTER WARRANTED: Yes No
 HAS CHILLING EFFECT LETTER BEEN SENT: Yes No
 HAS LICENSEE RESPONDED TO CHILLING EFFECT LETTER: Yes No

PANEL ATTENDEES:
 Chairman - Jo Wiggins
 Branch Chief - Not in Attendance
 Section Chief (AOC) - E. Kelly
 Others - R. Kenning

ACTION:

- 1) turnover to licensee; turn question: 1) did the contractor have (on 4/1/91) access; and 2) available data to the
- 2) respond to Alena's question on 3/28 post-SARP meeting (note: Kelly answered turn/allegation on 4/2/91)
- 3) turnover the rad monitor issue to licensee.

NOTES:

SAMPLE RECORD OF ALLEGATION PANEL DECISIONS

SITE: Millstone 2

PANEL ATTENDEES:

ALLEGATION NO.: R1-91-A-0064

Chairman - Wiggins

DATE: 4/11/91 (Mtg. 1 2 3 4 5)

Branch Chief - _____

PRIORITY: High Medium Low

Section Chief (AOC) - Kelly

SAFETY SIGNIFICANCE: Yes No Unknown

Others - STEWART

CONCURRENCE TO CLOSEOUT: DD BC SC

White informed (did not attend)
by copy of package

CONFIDENTIALITY GRANTED: Yes No
(See Allegation Receipt Report)

IS THEIR A DOL FINDING: Yes No

IS CHILLING EFFECT LETTER WARRANTED: Yes No

HAS CHILLING EFFECT LETTER BEEN SENT: Yes No

HAS LICENSEE RESPONDED TO CHILLING EFFECT LETTER: Yes No

ACTION:

- 1) Issue 1 - Ack letter to allegor stating no action intended
- Issue 2 - T/O to licensee
- 2) Issue 3 - T/O to licensee
- Issue 4 - T/O to licensee
- 3) Issue 5 - include w/ #3, second example
- Issue 6 - Same as #1 - return to allegor, more detail
- 4) required
- 5) _____

NOTES:

K/46