### II. S. NUCLEAR REGULATORY COMMISSION REGION I

Report No. 50-423/ 84-25

Docket No. 50-423

CPPR-113 License No.

Priority -- Category B

Licensee:

P. O. Box 270

Hartford, Connecticut 06101

Northeast Nuclear Energy Company

Millstone Nuclear Power Station, Unit 3 Facility Name:

Inspection at: Waterford, Connecticut

Inspection Conducted: November 11, 1984 to January 7, 1985

Inspectors:

Theodal a. lebelanki. Senior Resident Inspector Rebelowski.

D. Lipinski, Resident Inspector

Reactor Engineer

Approved by:

mecale Che E. McCabe, Chief, Reactor Projects Section 3B, DPRP

Inspection Summary: Inspection 50-423/84-25(11/11/84 to 1/7/85)

Areas Inspected: Routine resident (192 hours) and region-based (30 hours) inspection of preoperational testing, previous identified inspection findings, control room practices, plant tours, control rod drive fabrication review, minor fire in containment, I & E Information Notice review, implementation of security measures, steam binding of AFW pumps, audit activities, fire protection testing, hazards review program, changes to plant management positions, and status of Tubeco repairs.

Results: No violations or unacceptable conditions were identified. One hundred twelve NRC Information Notices were closed based on completion of licensee actions or incorporation of open aspects in other action items.

1-24-85 date signed

2/6/85 date signed

2/6/85 date signed

#### DETAILS

#### 1. Persons Contacted

During the course of this inspection several members of Northeast Utilities Service Company (NUSCO) and Stone and Webster (S&d) including engineers, technicians, and craftsmen were contacted.

#### 2. Action on Previously Identified Inspection Findings

(Closed) Unresolved Item (84-12-01): The licensee has been aware of possible NDE problems with Titeflex flexible metal hose assemblies since August 1983. Further discussions identified problems with the bellows attachment joint design. The problems were with the type of NDE and with a full penetration to edge weld design. The licensee had written a nonconformance report and did discontinue all fabrication of assemblies in September 1983. The NDE employed by Titeflex was a radiographic and visual examination of the subject welds. ASME III, Section NC 5700 specifies that the bellows attachment welds be examined by liquid penetration examination.

The licensee initially reviewed the radiographs and visually examined a sample of attachment welds. Although the prescribed liquid penetrant examination was not performed, no indication of unacceptable weld quality was found by the inspection methods performed at that time. In addition, the subject joints passed the ASME flexural and destructive testings, and no failures of shop hydro were identified. Therefore, the identified condition, had it remained undetected, would not have caused a safety concern.

Additional reviews revealed an internal root weld condition involving abrupt density changes and lack of proper location markers. Three hundred and ninety five assemblies were shipped for rework. Other assemblies were downgraded to be used on Class II and III applications. The licensee verified that no improper Class I applications exist. Twelve assemblies have not been located and are believed to have been scrapped as a result of construction damage. This unresolved item is closed.

(Closed) Unresolved Item (83-02-03): Concerns in the areas of bolting material and S&W BZ-600 series drawings were identified. The licensee did identify both concerns in Audit A 40618, "Instrumentation." Corrective action included the assignment of bolting as <u>temporary</u> with replacements required. A review of standards for drawings indicated that drawings under NEAM-19, Revision 10 did not require PE stamps and are prepared for construction as erection/installation aids. These items are closed.

#### 3. Control Room Practices

Observations included the following:

- The Control Room continues to be manned with a full operating crew. Discussions with Shift Supervisory Control Operators indicated that the methods of identifying the systems undergoing testing continue to be acceptable.
- -- A random sample of 24 danger (red) tags were audited for completeness, accuracy of placement, and accountability. No deficiencies were noted.
- Provisions for freeze protection were observed and methods were discussed with supervisory personnel. Systems deemed vulnerable to cold weather damage have been designed to incorporate "heat tracing" circuits. These circuits are automatically energized when outdoor temperature falls below 40 degrees. The circuits are continually monitored for under-temperature, over-temperature, ground faults, and loss of power by modular monitoring panels located in the Auxiliary Building, the Fuel Building, the Waste Disposal Building, and Turbine Building. Anomalies in these panels are annunciated on the main control boards of the Control Room. Testing of the heat tracing circuits for systems requiring cold weather protection is conducted during system "turnover" from the A/E to the applicant.

No unacceptable conditions were identified.

#### 4. Plant Tours

During tours, the inspector observed activities in progress, completed work and construction status for defects, violations of regulatory requirements, and compliance with the SAR. No unacceptable conditions were identified.

- Emergency Diesel Generator Enclosures A & B: The inspector observed temperature detector checks and the cleaning of the fuel drive shaft in preparation for Phase II testing. Work was in progress to protect cables in the lower level from fire.
- -- "B" Charging Pump Enclosure: Witnessed blocking out of the enclosure. The inspector discussed a concern over the cleanliness of internal pipe surfaces, and concluded that planned flushing was sufficient to assure cleanliness.
- -- Spent Fuel Pool: Embedment support channels were examined for proper placement of toggle supports and spring extensions. No concerns were identified.
- -- Containment: During a tour, excessive leakage was noted at a temporary flush pot used for flushes on CVCS lines. Test personnel were already attempting to minimize the leakage when the inspector located the source of the water. There was no equipment damage.
- -- During this inspection, pipe stand supports in Cubicle "C" in containment were inspected for proper placement of Hilti Bolts prior to grouting. No discrepancies were found.

- Containment, Waste Disposal, Auxiliary, Service, Screen House, and Fuel Buildings were toured at various times by the inspector. No unacceptable practices were observed.
- The fence line separating the construction site from the operating unit was confirmed to be free of breaches or obstructions on a weekly basis. An inspector effort to identify uncontrolled pathways into the operating units found no such pathways.

#### 5. Possible Control Rod Drive Fabrication Error

The inspectors independently pursued a potentially significant deficiency reported by similar facilities, Catawba 1 & 2 and McGuire 2. The deficiency involved a control rod drive breech lock fabrication error which resulted in the failure of a control rod to insert during a scram. The specific rod drive mechanisms involved were determined to be unique to plants using boron carbide absorber in the control rods. Millstone 3 uses lighter weight hafnium absorber control rods. The Model L106A control rod drives used at Millstone 3 to accommodate the hafnium control rods are sufficiently diverse from those at Catawba as to prevent a similar failure (i.e., no breech guide screw locking pin is installed). This item is closed.

G. Minor Fire in Containment - November 12, 1984

At approximately 3:12 a.m. on November 12, 1984, a small fire developed inside containment. The fire was confined to a small area of scaffolding at approximately the +51 foot elevation of the pressurizer cubicle and to cables serving temporary lighting in the area. The cause of the fire is believed to have been a short in the temporary lighting cables due to inadvertent crimping of the cables by scaffold planks. The fire was extinguished using available shift personnel by 3:31 a.m. A reflash watch was stationed.

The resident inspector arrived on the scene shortly after the fire was extinguished to assess damage. No discoloration indicative of high surface temperature (in excess of 500 degrees) was observed on the pressurizer shell or piping in the vicinity. Two temporary plastic pipe hangers showed some damage. One, located almost directly over the center of the fire, showed charring and surface melting over about 1 foot of its 1½ foot length. The other, located approximately 10 inches from the first, showed heat effects over only a small portion (about 2 square inches) of its surface. Paint on the cubicle walls and on permanent structures was not discolored. The scaffold planks showed surface charring only. The insulation on the temporary lighting cables was extensively damaged and led to the discarding of the string of temporary lights and associated extension cords. In summary, no permanent plant equipment was damaged during the fire and damage to temporary items was very limited. Soot and debris were removed by November 31, 1934.

The inspector assessed the applicant's response to the event through report review and personnel interview. Normal access to the containment had been secured earlier during the morning of November 12 due to radiography. The fire was reported to security personnel at approximately 3:12 a.m. and shortly thereafter to the Control Room based on the smell of smoke. The fire was located at approximately 3:30 a.m. The delay reflects the small size of the fire and its location in scaffolding within a shielded cubicle. The fire was extinguished within five minutes of its discovery. Fire brigade efforts used both portable fire extinguishers and a pressurized fire hose. A reflash watch was stationed for several hours after the fire was extinguished. Following a major fire during September 1981, the applicant established a program of using only wood which had been treated with a fire retardant inside containment. It was clear to the inspector on the scene that a critical element in limiting the scope of the fire was the fact that the wooden scaffold planks charred but did not burn extensively. The applicant's fire protection and response actions in this event are deemed to have been effective. An inspection of other temporary power cords and lighting strings disclosed no further cable chaffing. This item is closed.

#### 7. Status of Recent Information Notices and Circulars

The inspectors reviewed a total of 115 Information Notices for the years 1982, 1983, and 1984. Based upon this review, no issues relating to Notices from 1982 remain outstanding, 9 issues relating to Notices from 1983 remain outstanding or under analysis, and 42 issues relating to Notices from 1984 remain outstanding or under analysis. Details of the issues resolved are attached as Appendix A to this report.

No Circulars have been issued during 1982, 1983, or 1984 affecting Millstone Unit 3.

#### 8. Initial Implementation of Security Measures

The applicant implemented security precautions for selected vital areas for the first time during late November. Access controls have been established and site personnel have been briefed on these measures. Security procedures and methods will be addressed in detail during a future security inspection.

Burns International Security Services has replaced Globe Security Systems Incorporated as the Millstone 3 site security contractor.

#### 9. Followup of a Generic Issue

#### Steam Binding of AFW Pumps

Generic Issue 93 concerns steam binding of Auxiliary Feed Pumps due to leakage of hot feedwater or steam from the steam conversion system to the Auxiliary Feedwater (AFW) system. NRC Information Notice 84-06 discusses these everts. The AFW system at Millstone 3 incorporates three thermal detectors located at the discharge piping of the three AFW pumps. Temperatures are monitored by the process computer for display and alarm of incipient steam binding conditions. Further discussion of this capability is contained in the Appendix A to this report referencing IE Information Notice 84-06.

#### 10. Independent Audit Activities

A comprehensive audit of the Millstone 3 project began on November 15, 1984 under the sponsorship of the Connecticut Department of Public Utility Control. The Nielsen-Wurster Group of New York is leading the audit team which also includes principal members from QED Incorporated of Palo Alto, CA; Lubow, McKay, Stevens, and Lewis of Kansas City, MO; and Acres American of Buffalo, NY. The audit is being conducted on two levels - a project level, and a corporate management and finance level. The stated goal of the audit is to determine the prudence of Northeast Utilities investment in and management of Millstone 3. The audit is expected to be completed in May 1985.

#### 11. Fire Protection System Testing Review (RI-84-A-53)

The inspector reviewed test procedures conducted by Bete Fog Nozzle Inc. and Stone & Webster Corp. for fire protection piping for charcoal filters. The tests were to demonstrate the structural integrity and functional capabilities of the system.

Bete Fog Nozzle Inc. performed a hydrostatic test on a prototype sample of the deluge header. Additionally, pressure was cycled rapidly from 60 to 230 psig by starting and stopping the test pump. No damage or distortion was noted to the header or pressure fit nozzles.

MTP 3.10 was a functional test of fire protection piping for charcoal filters using the installed system pumps as a pressure source. The piping was inspected for leakage at normal system pressure and flow to each filter was verified individually.

No inadequacies were identified.

#### 12. Hazard Review Program

The Hazard Review Program addresses the method by which safety concerns for non-seismic fire protection piping hung over seismic piping are identified. An Inspector Follow Item (IFI) 84-06-06 (RI-84-A-0053) applies.

The program was developed "to provide instructions to verify the adequacy of the plant design in accepting postulated pressure boundary failures, rotating machinery failures, and earthquake induced interactions with safety-related equipment." A review is to be conducted on each area containing safe shutdown systems and components. After area construction is completed, a final walkdown will be performed to verify that previous concerns have been resolved and no new interactions have been developed.

The Hazard Review Program adequately addresses the non-seismic over seismic fire piping concern, and IFI 84-06-06 is closed. The implementation of this program will be reviewed as specific Hazard Reports are developed. Also, checks of the potential for non-seismic pipe (other than fire system pipe) affects upon seismic piping will be inspected. This is an unresolved item (423/84-25-05).

### 13. Changes in Plant Management and Organization

On November 15, 1984 the applicant revised both the Northeast Utilities Service Company (NUSCO) and Northeast Nuclear Energy Company (NNECO) site organizations involved in system turnover and startup testing. The new structure is task-oriented while the preceding organizational structure was disciplineoriented. The changes were formally documented in a memorandum (NNECO 3-2446) on December 7, 1984. A revision to the Startup Manual to reflect the re-orientation is in preparation (IFI 423/84-25-06).

Stone and Webster Engineering Company (SWEC) promoted Mr. C. Sprouse to General Superintendent of Construction for Millstone 3. He succeeds Mr. A. Dasenbrock, who has assumed duties at Beaver Valley 2.

### 14. Tubeco Radiographs Film Review

The licensee is conducting an ongoing program of review of Tubeco radiographs. A status review is conducted on a weekly basis and involves 23 systems with approximately 2800 film packages. At the conclusion of this report period (1/7/85), the licensee had reinspected the majority of film packages and identified approximately forty (40) rejected welds that will require rework.

The program, which has required reshoot of approximately 1300 film packages, is continuing. The evaluation of safety significance of rejected welds is to be included in the final Tubeco report on Significant Deficiency 84-00-07.

#### 15. Initial Start of Emergency Diesel Generator (EDG) "B"

On December 15, 1984 the initial start of EDG "B" was witnessed. Before the test, a review of prerequisite Phase I test procedures was conducted.

a. Emergency Diesel Generator (EDG) Phase I Tests

The following Phase I tests were reviewed to verify that the licensee followed the procedures for review, evaluation, and acceptance of test results.

T3346A1E01	EG Rocker Arm Pre-Lube Oil Pump (3EGO-PIA, B)
T3346A1E02	EG Pre-Lube/Filter Oil Pump (3EGO-P4A, 4B)
T3346A1E03	EG Moisture Detector Pump (3EGO-P5A, 5B)
T3346A1E04	Emergency Diesel Jacket Heaters
T3346A1E05	EDG Air Compressor
T3346A1E07	EG Standby Jacket Coolant Pump
T3346A1E12	EG Lube Oil Heater
T3346A1E13	EG Space Heater
T3346A1E14	EG Barring Device Motors
T3346A1I01	EG Lube Oil Instrumentation
T3346A1I02	EG Air Start System Instrumentation
T3346A1I03	EG Exhaust, Combustion Air, Crankcase VAC Instruments

T3346A1I04EG Cooling Water Instrumentation and Local AnnunciatorT3346A1M04Diesel Generator Water Cooling ValvesT3346A1M05EDG Exhaust, Combustion Air, Crankcase Vacuum Valves

Test data was verified to be within the established acceptance criteria. All deviations to the acceptance criteria and test deficiencies were properly recorded, reviewed, and dispositioned in accordance with the Startup Manual. The deficiency forms were included in the completed test package for information.

Changes to test procedures were properly reviewed, approved, and annotated in the test procedure. The inspector verified that none of the changes had changed the basic objectives of the test.

The recommended valve lineup for four of these tests were compared to the official tagout log in the control room to verify that tags had been hung to support the test. No discrepancies were identified.

Deficiencies identified during Phase I testing of the "B" EDG were reviewed during a PORC meeting attended by the Senior Resident Inspector. A discussion of these items by the licensee indicated that identified deficiencies would not impact the Phase II test schedule of "B" EDG.

#### b. Observation of EDG Phase II Test

The inspector observed the following actions at the EDG "B" enclosure.

- -- A test engineer did review all outstanding items involving EDG "B".
- A briefing was conducted to familiarize test personnel with their duties/functions.

The initial roll on air was satisfactory. Indicator cocks were dry, indicating no moisture in the cylinders. The licensee noted the following concern.

- -- The turbo blower lubrication appeared marginal. (This item was closed by priming lube oil pumps.)
- -- A porous bearing cap was identified and a replacement was ordered.

The test was conducted in a planned and properly scheduled manner.

The inspector has no further questions at this time.

#### 16. Unresolved Items

Unresolved items are matters about which more information is required in order to ascertain whether they are acceptable items, items of noncompliance, or deviations. The unresolved item disclosed during the inspection is discussed in Paragraph 12.

# 17. Management Meetings

At periodic intervals during the course of this inspection, meetings were held with senior plant management to discuss the scope and findings of this inspection.

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# APPENDIX A

# STATUS OF RECENT INFORMATION NOTICES (IEN'S)

82-01	This Notice addresses potential Auxiliary Feedwater (AFW) motor pump "lock-out" resulting from Westinghouse Type W-2 switch modifi- cations. Millstone 3 does not use Type W-2 switches in its AFW system. This switch has been listed on the A/E's Excluded Equipment List (EEL) and the applicant's Deficient Item List (DIL). This Notice is closed.
82-02	This Notice addresses Westinghouse Type NBFD relay in Reactor Pro- tective System applications. These relays are not used in the solid state RPS used at Millstone. This type of relay has been placed on the A/E's EEL. This Notice is closed.
82-05	This Notice discusses drug related incidents. Both the applicant and the A/E has substance abuse programs in place and appear to be sensitive to potential substance abuse problems. This Notice has been received and reviewed by cognizant managers. This Notice is closed.
82-06	This Notice describes failures in steam generator (S/G) manway clo- sure studs. The applicant has received and evaluated this Notice. The S/G primary closures use bolts rather than studs and nuts. The applicant's analysis indicates that bolting will better facilitate inspection and replacement of the closure fastening. This Notice is closed.

- 82-07 This Notice addresses common deficiencies in security screening of personnel. The applicant has reviewed this Notice and has addressed this topic in its Physical Security Plan. The Safety Evaluation Report (SER) Section 13.6 addresses this issue. This Notice is closed.
- 82-09 This Notice addresses a problem unique to B&W reactor designs. The applicant has reviewed this Notice and deemed it not to apply to Millstone 3. This Notice is closed.
- 82-10 This Notice discusses management philosophy. The applicant has reviewed this Notice and states that, where appropriate, elements have been incorporated into managers' performance appraisals. This Notice is closed.
- 82-12 This Notice addresses piping system hydraulic snubbers manufactured by Bergen-Patterson. The applicant has reviewed and analyzed the information in the Notice. Millstone 3 uses only mechanical snubbers in piping applications and in safety-related systems. Hydraulic snubbers are used as equipment supports in safety-related systems. Those hydraulic snubbers were manufactured by Monroe and have been judged adequate for their application by the licensee. This Notice is closed.

## IEN No. Discussion

82-13

This Notice addresses defects in General Electric Type HFA relays. These concerns have been amplified and expressed in Bulletin 84-02. The applicant has found the subject HFA relays at Millstone 3 and has committed to replace the affected "Lexan" bobbin relays in a letter from W. Ccunsil (NU) to Dr. T. Murley (NRC, RI) dated July 30, 1984 (Serial A-03864). The inspectors will follow this issue under Bulletin 84-02. This Notice is closed.

- 82-14 This Notice describes special corrosion and chemistry problems identified at Three Mile Island. The applicant has reviewed this Notice and has addressed 4 specific concerns with internal letter NNEC-31512 dated August 3, 1982. These include: (1) inadvertent addition of sulfuric acid to the reactor coolant chemical addition tank via the wesse neutralization tank; (2) inadvertent addition to sodium thiosulfate; (3) unplanned release of sulfonic ion exchange resins; and (4) makeup system malfunctions. The inspector reviewed the applicant's analysis in each of these areas and has no further questions. This Notice is closed.
- 82-15 This Notice promulgates new telephone numbers for the NEC Operations Center. The applicant has reviewed this Notice and revised the appropriate lists, SF-127, and SF-130, accordingly. This Notice is closed.
- 82-16 This Notice describes events unique to BWR's. The applicant has reviewed it and found it not to apply to Millstone 3.
- 82-18 This Notice addresses the assessment of the intake of radioactive materials by workers. The Notice has been reviewed by the applicant. Safety Evaluation Report (SER) Sections 12.4 and 12.5 address this issue. This Notice is closed.
- 82-19 This Notice addresses gas binding of high head safety injection pumps with suction pulse dampener accumulators. The applicant has reviewed this Notice and determined the information does not apply to Millstone 3. Millstone 3 uses centrifugal high head injection pumps without suction accumulators. This Notice is closed.
- 82-21 This Notices describes problems unique to fuel facilities. This Notice is closed.
- 82-22 This Notice addresses failures in main turbine extraction steam piping. The applicant has reviewed this Notice and plans to conduct pipe wall surveillances on high energy systems at Millstone 1 and 2. This Notice is closed.
- 82-23 This Notice addresses problems unique to BWR's. This Notice is closed.

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82-24 This Notice addresses problems unique to enrichment facilities. This Notice is closed.

- 82-25 This Notice addresses failures in Hiller Air Operated Valve (AOV) actuators. The applicant has reviewed this Notice and determined that Hiller AOV actuators are not used in safety-related systems at Millstone 3. The equipment has been entered into the applicant's Deficient Items List (DIL). This Notice is closed.
- 82-26 This Notice addresses a problem unique to BWR's. This Notice is closed.
- 82-27 This Notice addresses potential fuel rod damage from flow impingement at Westinghouse Reactors. The applicant has reviewed this information and has resolved the issue with respect to Millstone 3 with Westinghouse. The inspector has reviewed the disposition. This Notice is closed.
- 82-28 This Notice discusses hydrogen safety during evolutions conducted near an open Reactor Coolant system (RCS). The applicant has reviewed this Notice and routed it for information to Operations Department and Maintenance Department supervisors. The inspector reviewed the document control records on which individuals certified their awareness of the material. Hydrogen safety during periods when the RCS is open is included as a precaution in Procedure OP-3250, "Removal of Systems for Maintenance," Section 6.1.2. This Notice is closed.
- 82-30 This Notice generically addresses the failures of thermal sleeves at certain Westinghouse Reactor Plants. The applicant has reviewed this Notice and determined it to apply to Millstone 3. The applicant has reported the specific concerns with respect to Millstone 3 in accordance with 10 CFR 50.55(e) as CDR 82-00-11 (SD-24). The inspectors will follow the specifics relating to Millstone under CDR 82-00-11. This Notice is closed.
- 82-31 This Notice discusses incidents of over-exposures to divers in fuel pools. The applicant has reviewed the Notice and routed it to cognizant supervisors for information. This Notice is closed.
- 82-32 This Notice discusses the potential for the introduction of organic cleaning solvents into the Reactor Coolant System. The applicant has reviewed this Notice and assessed the vulnerability of the Millstone 3 RCS to such events. Millstone Administrative Procedure MAO 5.08 addresses solvent control of all three Millstone units. This Notice is closed.
- 82-33 This Notice addresses incidents at medical facilities. The applicant has reviewed this Notice and deemed it not to apply to Millstone 3. This Notice is closed.

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82-35 This Notice addresses failures in Velan 2½ inch check valves in High Pressure Safety Injection (HPSI) piping at a B&W unit. The applicant has reviewed this Notice and determined that the stop check valves used in an analogous application at Millstone 3 were manufactured by Walworth. These stop check valves have been assessed to be of sufficiently diverse design as to not be subject to the same failure mode as the Velan valves. Velan 2½ inch check valves have been placed on the applicant's Deficient Item List. This Notice is closed.

- 82-36 This Notice addresses a particular model of Self-Contained Breathing Apparatus (SCBA) manufactured by Survivair. The applicant has reviewed this Notice and determined that the subject equipment has not been purchased for Millstone 3. SCBA for escape use has been purchased from Lear-Siegler. The survivair SCBA has been placed on the arplicant's Deficient Items List. This Notice is closed.
- 82-37 This Notice provides information regarding Steam Generator (S/G) shell cracking at Indian Point. The applicant has reviewed and analyzed this occurrence. The applicant and Westinghouse have concluded that the problems at Indian Point are not likely to be common to the Type F S/G's used at Millstone 3. The inspector has reviewed this analysis. This Notice is closed.
- 82-38 This Notice discussed a change in the distribution of Bulletins and Notices. The applicant has received and reviewed this Notice. It is closed.
- 82-39 This Notice addresses corrosion problems unique to BWR's. The applicant has reviewed this Notice and deemed it to be not directly applicable to Millstone 3. This Notice is closed.
- 82-40 This Notice addresses deficiencies in containment electrical penetration assemblies manufactured by Bunker-Ramo. The applicant has reviewed this Notice and determined that no Bunker-Ramo assemblies are used at Millstone 3. The CONAX assemblies used at Millstone 3 have been assessed as being of sufficiently different design to make a similar failure unlikely. Bunker-Ramo containment penetration assemblies have been placed on the A/E's Excluded Equipment List. This Notice is closed.
- 82-41 This Notice addresses a deficiency unique to BWR's. It has been reviewed by the applicant and found not to be applicable to Mill-stone 3. This Notice is closed.
- 82-42 This Notice addresses defects in Panasonic Model 801 and 802 Thermoluminescent Dosimeters (TLD's). The applicant has reviewed this Notice and determined that Panasonic Model 801 and 802 dosimeters have not been obtained for use at the Millstone Station. These are discontinued models. This Notice is closed.

## IEN No. Discussion

- 82-43 This Notice describes deficiencies in air filtration and ventilation systems leading to the spread of radioactive contaminants. The applicant has reviewed this Notice and has determined that the Millstone 3 systems meet the requirements of Regulatory Guide 1.52 and 1.140 as cited by the Notice. The Safety Evaluation Report (SER) Section 9.4 addresses issues in Heating, Ventilation, and Air Conditioning (HVAC) with no items outstanding. This Notice is closed.
- 82-44 This Notice clarified emergency plan exercise requirements. The applicant has received this Notice and routed it to cognizant staff members. This Notice is closed.
- 84-46 This Notice described problems with defective and obsolete padlocks. The applicant has reviewed this Notice, surveyed and discarded the affected padlocks, and placed their manufacturer and model numbers on the Deficient Items List. This Notice is closed.
- 84-47 This Notice discusses the transportation of Type A quantities of radioactive materials. Preparation of radioactive shipments is conducted by the Station Services organization, which is common to all Millstone units. The applicant has reviewed this Notice and disseminated the information to cognizant individuals. This Notice is closed for Millstone 3.
- 82-48 This Notice addressed deficiencies in a particular model of time delay relays (AGASTAT CR0095). The applicant has reviewed this Notice and determined that these relays are not used in safety-related applications at Millstone 3. The subject relays have been placed on the A/E's Excluded Equipment List and the applicant's Deficient Items List. This Notice is closed.
- 82-49 This Notice addresses deficiencies in gaseous effluent monitoring systems and practices. The applicant has reviewed this Notice and determined that the Hastings Air Mass Flow Transducers used at Millstone 3 are capable of accurately measuring mass flow without manual correction for gas pressure and temperature. FSAR Section 11.5.2.2 discusses these provisions in greater depth. Safety Evaluation Report (SER), Sections 11.3 and 11.5 also address these issues. This Notice is closed.
- 82-50 This Notice discusses the misapplication of various series of Solid State AC Undervoltage Relays Type ITE-27. The applicant has reviewed this Notice and determined that the subject relays are used at Millstone 3. The applications have been analyzed and the analyses subjected to peer review within the site, corporate, and A/E organizations. The conclusion is that the applications are proper. The inspector reviewed the documentation of these analyses. This Notice is closed.

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82-51 This Notice addressed over-exposures in PWR cavities. The applicant has reviewed this Notice and routed it for discussion to operations department supervisors. The inspector reviewed document control records on which these individuals certified awareness of the material. Precautions for entrance to high radiation areas are included as precautions in Procedure OP 3250, "Removing Systems for Maintenance." This Notice is closed.

- 82-52 This Notice provides an update on the results of a series of environmental qualification tests. The applicant has reviewed this Notice and disseminated the test results to cognizant staff members. This Notice is closed.
- 82-53 This Notice describes seven main transformer failures at a variety of nuclear stations. The applicant has reviewed this Notice and routed it for comment to appropriate individuals. A comparative analysis of methods to reduce the likelihood of similar failures at Millstone 3 has been conducted. The "Inertaire" system of oil preservation for the main transformer was replaced by a "Constant Oil Pressure" preservation system. This is the method suggested in the Notice. This Notice is closed.
- 82-54 This Notice identifies further failure in Westinghouse Type NBFD relays in safety-related aprlications. The applicant has reviewed this Notice and reconfirme at Westinghouse Type NBFD relays are not used at Millstone 3. In is similar to Notice 82-02. This Notice is closed.
- 82-56 This Notice discusses failures in Robertshaw thermostatic flow control valves used in Emergency Diesel Generators (EDGs). The applicant has reviewed this Notice and determined that these valves are used on the EDGs at Millstone 3. This has been reported as a potentially significant deficiency in accordance with 10 CFR 50.55(e) as CDR 82-00-10 (SD-22). This problem is being followed, as it specifically relates to Millstone 3, as CDR 82-00-10. This Notice is closed.
- 83-01 This Notice provided initial information regarding fraudulent products sold by Ray Miller, Inc. These concerns were later expanded and communicated as Bulletin 83-07 with supplement. The applicant has determined that no material was purchased from Ray Miller, Inc. for Millstone 3. The applicant responded to this Bulletin in a letter from W. G. Counsil to Dr. T. Murley dated May 23, 1984 (Serial F0531B). This response was evaluated and accepted in Inspection Report 50-423/84-18. Upon this basis, this Notice is closed.

83-02 This Notice describes a potential problem with mechanical stops on small sizes of Limitorque valve operators. The applicant has reviewed this Notice and determined that large numbers of these valve

# IEN No. Discussion

operators are used at Millstone 3. The applicant is implementing Procedure GPM-61, "Motor Operated Valves - Mechanical Portion," as part of Phase I testing. Section 7.3 of that procedure requires check of the specific stop nuts referenced in the Notice. This Notice is closed.

83-07

This Notice provides initial notification of deficiencies in piping supplied by Tube Line, Inc. These concerns were later expanded into Bulletin 33-06. The applicant has responded to the Bulletin in a letter from W. G. Counsil to Dr. T. Murley dated March 30, 1984 (Serial F0506A). These concerns are being tracked under Bulletin 83-06, therefore this Notice is closed administratively to avoid duplication of effort.

- 83-08 This Notice addressed DC component failures when operated for extended periods at elevated voltages. The applicant has reviewed this Notice as well as past events at Millstone 1 (inadvertent ATWS trips) involving operation of DC systems at elevated voltages for short times during battery equalizer charges. Based upon these reviews, the applicant has designed DC components for operation in the range of 90 to 140 volts. The Safety Evaluation Report (SER) Section 8.3.2.1 discusses the topics in greater depth and accepts adequacy of this design. This Notice is closed.
- 83-11 This Notice addresses possible seismic vulnerability of old storage batteries. The applicant has reviewed this Notice id has prepared a monthly surveillance inspection of the physical dition of battery cells. The procedure, SP3780A, is intended dentify incipient physical degradation as discussed in the N. ice. This Notice is closed.
- 83-12 This Notice alerts facilities to incorrect boron chemical standards prepared by J. T. Baker Chemical Company. The applicant has reviewed this Notice and determined that existing Chemistry Department procedures, namely CP-3805C, "Boron Analysis by Titration," require verification of each lot of standard solutions purchased. This Notice is closed.
- 83-15 This Notice discusses falsified pre-employment screening records for security forces. The applicant has reviewed and considered the issues addressed in this Notice. The inspector has observed internal memoranda confirming this review. The applicant has shown sensitivity to these concerns. This Notice is closed.
- 83-16 This Notice addresses the contamination of approximately 100 tons of molten steel due to an improperly scrapped Cobalt source. The applicant has reviewed this Notice and has assessed its source control program to be adequate to protect against this type of event. This Notice is closed.

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83-18

This Notice disseminates a summary of Bulletin 83-01 and 83-04 responses from licensees. The applicant has reviewed this Notice and has identified four main areas of response. These include:

- Alternate means of tripping the breakers; that is, implementation of a shunt trip. Confirmation of the installation is identified as an IFI (423/84-25-01).
- (2) Analysis of methods to track breaker performance. Review of this analysis is identified as an IFI (423/84-25-02).
- (3) Implementation of a maintenance program for reactor trip breakers. Review of this program is identified as an IFI (423/84-25-03).
- (4) Implementation of a post-trip review procedure. Review of this procedure is identified as an IFI (423/84-25-04).

This Notice is closed.

83-19

83-23

This Notice addresses the adjustment of General Electric Type HFA Relays. The applicant has reviewed this Notice and has implemented a procedure for adjustment (PT 1403L'21403L/31403L) of these relays. The adjustment of these relays was reviewed by a Region I specialist inspector in Inspection 50-423/83-18 and resulted in an Inspector Follow Item, 423/83-18-01. This Notice is closed. The remaining relay adjustment issue will be tracked under the IFI number to prevent duplication of effort.

This Notice generically addresses mechanical snubber attachment interference problems. The applicant has reviewed this Notice and found it to apply to Millstone 3. The applicant has reported the specific deficiency in accordance with 10 CFR 50.55(e) as CDR 83-00-03 (SD-34). The resolution of the specific deficiencies affecting Millstone 3 will be tracked under CDR 83-00-03; therefore, this Notice is closed.

> This Notice discussed several events involving the loss of safetyrelated containment atmosphere sensing systems. The applicant has reviewed this Notice and has determined that inadequate procedures or inadequate procedure implementation exist. Station Administrative Control Procedure ACP-Q1-3.02, "Station Procedures and Forms," requires that specific step: for the restoration of systems to operability be incorporated into procedures for all three Millstone units. Administrative Control Procedure ACP-QA-2.12, "System Valve Alignment Control," requires independent verification of valve positions following maintenance and surveillance manipulations of safety-related system valves. The applicant has deemed these measures to address these issues. This Notice is closed.

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83-25 This Notice discusses heater setpoints in Standby Gas Treatment (SBGT) Systems at BWR's. This Notice has been reviewed by the applicant. While Millstone 3 does not use a SBGT system, the gaseous radioactive waste system has been found to include similar features. The specific components have been analyzed and found to be designed for the appropriate conditions of humidity and temperature. This Notice is closed.

83-27 This Notice discusses responses to sabotage. The applicant has reviewed this Notice and has incorporated measures to identify and mitigate the effects of sabotage into Emergency Plan Implementing Procedure EPIP 4112, "Incident Communications," Revision 1. This Notice is closed.

- 83-30 This Notice describes the misapplication of emergency operating procedures to conditions other than those for which the procedures had been prepared. The applicant has reviewed this Notice and has provided a specific "entry conditions" section describing the applicability of the procedure to emergency procedures. The requirement to provide such guidance is incorporated into Administrative Controls Procedure ACP-3.02, Attachment C, "Station Procedures and Forms." This Notice is closed.
- 83-31 This Notice describes a computer program, ADLPI which was found to contain errors which could affect the integry of piping systems analyzed using a particular version of the program in certain situations. The applicant and the A/E have conducted investigations into the use of the affected program and found that it was not used at Millstone 3. This Notice is closed.
- 83-34 This Notice recommends use of a specific "Event Notification Worksheet" when transmitting information to the NRC Operations Center. The applicant has promulgated this worksheet as Station Form SF-149. This Notice is closed.
- 83-36 This Notice describes measures to minimize the impact of security practices on safe operations. The applicant has reviewed this Notice and determined that all four recommendations have already been implemented (ref. Memo Serial NNEC3-1953) for Millstone 3. This Notice is closed.
- 83-67 This Notice describes difficulties with a particular model of Rexnord respirators. The applicant has reviewed this Notice and determined that this type of respirator has not been purchased for use at Millstone 3. The subject respirators have been placed on the applicant's Deficient Items List. This Notice is closed.
- 83-72 This Notice provides updated information regarding the results of recent environmental testing of electrical equipment. The applicant has received this Notice and routed it to cognizant staff members. This Notice is closed.

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83-80

This Notice describes potential omissions in piping stress analysis of Class I systems when "stiff" pipe clamps are used. applicant and the A/E have reviewed this Notice and determined that such clamps are not used on Class I systems. Several hundred such clamps have, however, been procured for use in Class II and III piping. The A/E has prepared a report, EMTR617, to address the issues of the Notice as they apply to clamp use in these systems. This Notice is closed.

83-83

This Notice discusses possible spurious transient effects on electronic controls due to the use of portable radio transmitters in their vicinity. The applicant has reviewed this Notice and has prohibited the use of portable radio transmitters in the control room and related instrument rooms. This item will be kept open pending verification of incorporation in operating and security directives (IFI 423/84-25-07).

- 84-01 This Notice addresses excess internal cable lubricant in Okonite cables. The applicant has reviewed this Notice and determined that no Okonite cable manufactured during the period of excess lubrication was purchased for use at Millstone 3. The seepage of lubricant as described in this Notice has not been observed at Millstone 3. This Notice is closed.
- 84-03 This Notice discusses operator fitness for duty and related medical issues. The applicant has reviewed the Notice and distributed it to Operations Department supervisors and alternates. The inspector reviewed the document control records on which individuals certified their awareness of the material. This Notice is closed.
- 84-04 This Notice discusses failures in butterfly-type valves using elastomer seats manufactured by Allis-Chalmers. The failures involved through seat leakage in applications in which the valves were infrequently operated. The applicant has reviewed this Notice and determined that such valves have not been purchased for use at Millstone 3. The applicant will monitor containment isolation valves during containment leak rate testing in accordance with 10 CFR 50 Appendix "J". This Notice is closed.
- 84-05 This Notice discusses changes in Emergency Preparedness exercise requirements. The applicant has received and reviewed this Notice. This Notice is closed.
- 84-06 This Notice described the potential for steam binding in Auxiliary Feedwater (AFW) pumps due to backleakage through system check valves. The applicant has reviewed this Notice and implemented measures to monitor for backleakage as described. A temperature sensor has been installed near the discharge of each AFW pump (TE 50A, TE 50B, TE 50C on Piping and Instrument Diagram 25212-26930, Sheet 2 of 3). These temperature sensors are inputs to the process

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	computer which provides indications and alarms. Section 10.4.9.5 of the FSAR describes the instrumentation of the AFW system in greater detail. The use of a discharge temperature monitor to aler operators to possible binding problems is recommended in an AEOD study "Steam Binding of Auxiliary Feedwater Pumps," dated July 23, 1984. This Notice is closed.
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- 84-07 This Notice discusses issues involving security from terrorist activities. The applicant has reviewed this Notice. This Notice is closed.
- 84-08 This Notice discusses certain labor relations issues. The applicant has received and reviewed this Notice. This Notice is closed.
- 84-09 This Notice provides "lessons learned" during fire protection inspections of safe shutdown systems. The applicant has received this Notice and routed it to cognizant staff members. An inspection of fire protection provisions is planned for Summer 1985. This Notice is closed.
- 84-10 This Notice addresses erroneous setting of torque switches for Limitorque motor valve operators. The applicant has prepared Phase 1 preoperational tests (GPM-61, Rev. 2 and GPR-24, Rev. 2) which included initial checks of torque switch settings for motor operated valves. These tests are conducted very early in system test schedules. The inspector reviewed the maintenance procedure MP 3782EF, Revision 0, "Limitorque Motor Operator Repair." That procedure provides specific checks and adjustments for torque switches including sketches of the switches to guide the maintenance technician. This Notice is closed.
- 84-11 This Notice discusses weaknesses observed in operator training programs. The Notice has been received by the applicant and reviewed by the applicant's training organization. This Notice is closed.
- 84-12 This Notice addresses failures of Anchor-Darling Valve Company softseated check valves. The applicant has reviewed this Notice and determined that the subject valves are not used in safety applications at Millstone 3. The valves have been placed on the applicant's Deficient Item List. This Notice is closed.
- 84-13 This Notice addresses thermal overload logic for Motor Operated Valves (MOV's). The applicant has reviewed this Notice. The applicant has analyzed the events described and the design of circuits at Millstone 3. The results indicate that the logic is sufficiently diverse from that described in the Notice to preclude similar events. This Notice is closed.
- This Notice highlights changes to radioactive material transporta-84-14 tion regulations. This Notice and the described changes have been reviewed by the applicant. Radioactive material transportation ac-

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tivities for all three Millstone units are conducted by the Station Services organization. The applicant has stated that procedures and training plans have been updated to reflect the new regulation. This Notice is closed.

84-15

This Notice addresses the reporting of radioactive effluent releases and provides new telephone numbers. The applicant has reviewed this Notice and added the telephone numbers to the applicable lists. This Notice is closed.

84-16

This Notice discusses failures of Model C Automatic Sprinkler System valves manufactured by the Automatic Sprinkler Corporation of America (ASCOA). The applicant has investigated the issue and has concluded that no valves manufactured by ASCOA have been issued at Millstone 3. Model C valves manufactured by ASCOA have been placed on the applicant's Deficient Item List. The applicant's analysis also indicated that the equivalent valves used at Millstone are of a sufficiently diverse design as to preclude similar failure. This Notice is closed.

- 84-17 This Notice discusses the failure of a vent header in a Boiling Water Reactor (BWR) containment due to impingement of liquid nitrogen. Although the containment at Millstone 3 is not inerted, liquid nitrogen is used onsite. The applicant has implemented measures to assure that liquid nitrogen has fully vaporized prior to being introduced into piping within buildings housing safety equipment. This is addressed in FSAR Section 9.5.9.2. The inspector has no further questions regarding this Notice. This Notice is closed.
- 84-19 This Notice discusses several event which involved unauthorized access to Pressurized Water Reactor cavities. The applicant has reviewed this Notice with Operations Department and Health Physics Department supervisors (see resolution of IEN 82-51, preceding, also). This Notice is closed.
- 84-21 This Notice provides advice to research reactors concerning shutdown margin. It has been reviewed and deemed not applicable to Millstone 3.
- 84-22 This Notice discusses deficiencies in Model K-III and K-IV catalyst beds manufactured by Comsip, Inc. for use in Containment Gas Monitoring Systems (CGMS). Millstone 3 does not use a Comsip CGMS. An Exo-Sensor CGMS is used. Comsip Model K-III and K-IV monitors have been placed on the applicant's Deficient Items List. This Notice is closed.
- 84-24 This Notice discusses an incident involving the collapse of an individual while wearing respiratory protection. The Millstone Station Respiratory Protection Program is described in detail in procedures ACP-6.05, "Respiratory Protection/Breathing Air Program," HP433-4, "Medical Screening Program for Respirator Users." This

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program specifically includes initial and periodic medical checks of individuals as well as training in actions to be taken upon sensations of distress while using respiratory equipment. This Notice is closed.

- 84-25 This Notice describes violations involving radiography licensees. The applicant has reviewed this Notice and deemed it to not apply to Millstone 3. This Notice is Closed.
- 84-26 This Notice discusses violations involving moisture density gauge license holders. The applicant has reviewed this Notice and deemed it not to apply to Millstone 3. This Notice is closed.
- 84-27 This Notice discusses violations involving medical licensees. The applicant has reviewed this Notice and deemed it not to apply to Millstone 3. This Notice is closed.
- 84-28 This Notice discusses violations involving well logging license holders. The applicant has reviewed this Notice and deemed it to not apply to Millstone 3. This Notice is closed.
- 84-29 This Notice describes failures in General Electric Magne-Blast circuit breakers due to excessive wear in teflon bearings. The Notice referred addresses to GE Service Advice Letters (SAL's) 318.1, 318.1A, and 318.2. Millstone 3 uses GE Magne-Blast circuit breakers in both 6900 and 4160 volt applications. The applicant has reviewed this Notice and applicable SAL's and has implemented the advice. The applicar's has confirmed that all its Magne-Blast breakers currently use aluminum-bronze bearings. This Notice is closed.
- 84-30 This Notice addresses generic deficiencies observed in air handling units manufactured by Flakt-Bahnson. The applicant has determined that similar deficiencies exist at Millstone 3. These deficiencies have been reported under 10 CFR 50.55(e) as CDR 83-00-13 (SD-44) and CDR 84-00-13 (SD-62). Specific deficiencies identified at Millstone 3 will be followed by the inspectors in accordance with the CDRs and open item 50-423/84-01-02. This Notice is therefore closed.
- 84-31 This Notice describes degradations to Bellis actuators due to lubrication with an incompatible grease (Mobil 28). The applicant has reviewed this Notice and has determined that Bettis actuators are not used at Millstone 3 and that Mobil 28 grease had not been ordered. Compatibility of lubricants is addressed in the applicant's Planned Maintenance Management System. This Notice is closed.
- 84-32 This Notice describes the potential for damage to the Auxiliary Feedwater Spargers and pipe hangers due to water-hammer events. The applicant has reviewed this Notice and determined that its con-

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cerns are addressed adequately in FSAR Section 10.4.9. The inspector also reviewed document NEC-6723 which further supplements the FSAR in this matter. This Notice is closed.

84-34 This Notice discusses defects in a particular type of Self Contained Breathing Apparatus (SCBA). The applicant has reviewed this Notice and determined that the affected model has not been purchased for use at Millstone 3. The subject SCBA has been placed on the applicant's Deficient Item List. This Notice is closed.

- 84-35 This Notice describes a problem unique to BWR's. It is not applicable to Millstone 3.
- 84-36 (with This Notice addresses a potentially generic problem involving Limisupplement I) torque Model SMB-4 motor operators. The applicant has reviewed this Notice and determined that Model SMB-4 operators are not used at Millstone 3. In response to Circular 79-04, which addressed locking nuts in general, the applicable specification 2280.000-968, has been revised to require inspection of all Limitorque valve operators and correction of discrepancies. This Notice is closed.
- 84-38 This Notice discusses potential problems arising from errors in the design, maintenance, and operation of offsite power systems at Turkey Point Nuclear Station. The applicant has reviewed this Notice and determined that the circumstances are essentially unique to Turkey Point. Safety Evaluation Report (SER) Section 8.3.11 addresses the issue of interactions between offsite and onsite circuits. This Notice is closed.
- 84-40 This Notice discusses common misunderstandings involving emergency radiation dose limits. The applicant has reviewed this Notice and routed it to Health Physics department managers for information. The inspector reviewed the document control record by which each individual certified awareness of the material. This Notice is closed.
- 84-41 This Notice provides information regarding BWR's only. This Notice is not applicable to Millstone 3.
- 84-42 This Notice describes a breakdown in the control of system status during a major outage. The applicant has reviewed this material and has deemed his program of outage management to be adequate to minimize chances for a similar breakdown in management controls. This Notice is closed.
- 84-43 This Notice addresses unique medical applications of radionuclides. This Notice is not applicable to Millstone 3.

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84-45

This Notice discusses the reversal of differential pressure transmitter sensing lines at a B.M. This Notice has been reviewed by the applicant and routed to all Instrumentation and Control Department technicians for information. The inspector reviewed the completed document acknowledgement records on which individuals certified awareness. This Notice is closed.

84-46

This Notice addresses errors in electrical circuit breaker positioning, specifically "racking-in" draw-out type high voltage breakers. The applicant has reviewed this Notice and determined that such breakers are widely used in 6900, 4160, and 480 volt applications. The applicant has revised the procedure for these breakers, OP3370, "480 Volt Load Center, 4160 and 6900 Volt Breaker Procedure," to specifically address the verification of breaker positioning. This Notice is closed.

84-47 This Notice discusses the results of NRC sponsored research which indicated the potential degradation of electrical terminal blocks in harsh post-accident environments. The applicant has reviewed this Notice and states that: terminal blocks have not been used in external applications in potentially harsh environments due to the inability to qualify such blocks; only inline mechanical butt splices which are environmentally sealed are used in Category I penetrations and primary system temperature detectors (RTD's); and individual instruments with internal terminal strips have been individually qualified. (Ref. letter NNEC 3-2321 of July 1, 1984.) Routine inspector checks have identified no external terminal blocks or inadequate splices in spaces subject to harsh post-accident conditions. NRC examination of the environmental qualification of electrical equipment is in progress as documented in the Millstone 3 Safety Evaluation Report (NUREG 1031) Section 3.11. Ongoing NRC inspection checks will routinely cover the integrity of junction and terminal enclosures in spaces potentially subject to harsh post-accident conditions. This Notice is closed.

84-49 This Notice addresses failures in steam generator tubes during hydrostatic testing. The applicant has reviewed this Notice and routed it to key members of the startup and engineering groups. The inspector reviewed the document acknowledgement records on which individuals certified their awareness of this material. This Notice is closed.

84-53 This Notice discusses misapplications of Loctite adhesive sealants. The applicant has reviewed this Notice, has stated that no maintenance procedures require use of such sealants (Ref. NNEC letter 3-2430 of November 15, 1984), and placed the subject adhesive sealants on the Deficient Items List. This Notice is closed.

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84-56 This Notice addresses deficiencies in a particular type of Self-Contained Breathing Apparatus (SCBA). The applicant has reviewed this Notice, found that the subject SCBA has not been purchased for use at Millstone 3, and placed the specific SCBA on the Deficient Items List. This Notice is closed.

84-58

This Notice addresses inadvertent defeat of safety functions due to human error. The applicant has reviewed this Notice and routed it to appropriate members of the Operations Department. The inspector has reviewed the document control records on which individuals certified their awareness of this information. This Notice is closed.

84-59

This Notice addresses serious events involving deliberate violations of health physics procedures. The applicant has reviewed this Notice and conducted a management evaluation of station practices to identify and reduce the susceptibility of programs to deliberate violation. The inspector has reviewed the results of the analyses conducted by both site and corporate managers (Ref. NE-84-RA-1347 of October 18, 1984 and MP-S-4012 of November 19, 1984) and has no further questions. This Notice is closed.