

NORTHEAST UTILITIES



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

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September 10, 1993

Docket No. 50-336
B14611

Mr. Thomas T. Martin
Regional Administrator, Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Dear Mr. Martin:

Millstone Nuclear Power Station, Unit No. 2
Independent Review Team Report

INTRODUCTION

By letter dated August 27, 1993⁽¹⁾, Northeast Nuclear Energy Company summarized its plans regarding its investigations into recent events at Millstone Unit No. 2. This letter was in confirmation of discussions with Mr. William F. Kane and others from your staff on August 24, 1993. Among other things, the August 27, 1993, letter provided information regarding the establishment of an Independent Review Team (IRT). The substantive deliberations of this IRT were completed by September 3, 1993, as originally targeted. On that day a meeting was held to present the preliminary results to the vice presidents and directors of the nuclear organization as well as the managers of Millstone Unit No. 2. The NRC Senior Resident Inspector at Millstone, Mr. Paul D. Swetland, attended the meeting. Earlier this week, the report was finalized, and it is provided as Attachment 1 to this letter.

Without question, we take this event and its resulting implications for the operation of our nuclear units with utmost seriousness. While the principal focus of the IRT effort concerned operations at Millstone Unit No. 2, the lessons learned will be applied, as appropriate, to all five nuclear units in the Northeast Utilities (NU) system.

⁽¹⁾ J. F. Opeka letter to Thomas T. Martin, "Incident Review Task Forces," dated August 27, 1993.

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PRIORITY OF THIS EFFORT

Through our routine interactions with the NRC Staff, we believe that the Staff is generally aware of the high priority we have assigned to the conduct of this investigation and the associated follow-up. In the interest of ensuring that you are aware of how that high priority has been translated into concrete action, we offer the following:

- On Friday, August 20, 1993, an evening meeting was convened at the direction of senior NU management to immediately assemble the IRT; the IRT charter was approved by me on August 24, 1993. The team comprised some of our most able and respected employees, as well as an individual external to the NU organization. The effort commanded the overwhelming majority of time invested by all nine of the team members from that date until September 3, 1993. The team worked long hours and weekends to produce a document which we view as quite frank and thorough. The schedule under which it was produced was aggressive.
- The IRT interviewed many members of the nuclear organization during the conduct of its review, and these personnel all made it a priority to make themselves available to the IRT membership as needed.
- Several management actions were taken and directives were issued very promptly, some preceding issuance of the final IRT report.
- The Corporate Responsibility Committee of the NU Board of Trustees has scheduled a meeting for September 16, 1993, specifically to discuss this matter.
- Senior nuclear group management has visibly increased its presence in the field and through face-to-face meetings, avoiding "management by memo."
- As new operational issues arise, we intend to implement a conservative philosophy through senior management involvement on a timely basis. Meaningful progress and results will be achieved only if senior management leads by example. We are committed to see that this occurs.

INITIAL MANAGEMENT ACTIONS IN RESPONSE TO IRT RECOMMENDATIONS

While we want to make the NRC Staff aware of the substance of the IRT report promptly following its issuance, we also think it equally important that you are provided with a summary of our initial actions and plans in response to its recommendations. Sections 6 and 7 of the IRT report categorize the appropriate actions into three types: Immediate Actions, Short-Term Recommendations, and Long-Term Recommendations. Each of these three types is discussed in turn below.

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Immediate Actions

As noted in Section 6 of the IRT report, a number of immediate actions have already been taken. These include direct communication to the operators of management expectations for conservative operation, delivered by Mr. Stephen Scace, the Millstone Station Vice President, and to be reinforced with the appointment of Mr. Gary Bouchard as the new Millstone Unit No. 2 Director, effective September 12, 1993. Second, improvements in the area of configuration control have been implemented; action plans to formalize the configuration control processes at the unit are in place. Third, the team's recommendations regarding the performance of safety assessments for injection repairs on any QA Category 1 reactor coolant system components have been implemented. This particular immediate action has been made applicable to all five NU nuclear units.

Short-Term Recommendations

Three specific short-term recommendations are identified in Section 7.1 of the IRT report. The implementation status of each of these three items is as follows:

1. Mr. Scace and/or I are in the process of holding face-to-face meetings with Millstone Unit No. 2 employees and appropriate support personnel to reinforce management's expectations for safe and conservative operation. With the exception of a limited number of individuals, this action is scheduled for completion by Friday, September 10, 1993. Personnel not contacted this week will be contacted next week unless unavailable. All affected personnel will be contacted as soon as practical.
2. Regarding face-to-face meetings with all Millstone Unit No. 2 license holders, Mr. Scace and/or I are in the process of holding face-to-face meetings with these individuals. With the exception of a limited number of individuals, this action is scheduled for completion by Friday, September 10, 1993. Personnel not contacted this week will be contacted next week unless unavailable. All affected personnel will be contacted as soon as practical. To illustrate the management philosophy presented during these meetings, a memorandum I sent on Friday, September 3, 1993, to all shift supervisors at Millstone Station and the Haddam Neck Plant is provided as Attachment 2.
3. A review of the interface between the work control group (I-Team) and the on-duty shift supervisor is under way. This review is scheduled for completion by September 14, 1993.

Long-Term Recommendations

Section 7.2 of the IRT report identifies nine specific long-term recommendations. By their nature, these recommendations do not lend themselves to completion and

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closure by individual, discrete actions. Rather, they address a variety of managerial and philosophical issues.

I will be meeting with senior members of nuclear management over the course of the next several weeks to ensure that we capture all the insights from the IRT report so that the corrective actions taken will be comprehensive and properly focused. We will have made meaningful progress on this effort such that we will be prepared to discuss this with you when we meet on September 24, 1993.

OTHER INITIATIVES

As the nuclear management team reflects on the insights provided by the IRT, and other input available to us, additional appropriate actions have been and will be identified and implemented. Some examples of these actions which have already been taken include the following:

1. The appointment of J. M. Solymossy, an INPO Reverse Loanee, to the position of Director - Nuclear Quality and Assessment Services. Within this department, the Plant Quality Services group has been reorganized with employees dedicated to one unit, reporting to a supervisor responsible for activities at that unit. These changes are designed to provide a fresh and independent perspective as to how the effectiveness of the department can be improved, as well as enhancing the knowledge and working relationships of its employees.
2. In order to verify our decision-making philosophy on operability and reportability determinations, a self-assessment of our performance processes in these areas was recently conducted. We are currently evaluating the recommendations resulting from that self-assessment, and plans to address those recommendations will be developed later this month.
3. The Millstone Unit No. 2 management team has developed action plans to improve performance in specific areas. These action plans are part of a performance improvement initiative, briefly described in a letter also dated September 10, 1993.⁽²⁾ We will be prepared to discuss these action plans in more detail at our September 24, 1993, meeting.
4. I have taken action to ensure that our nuclear organization is aware of the contents of the IRT report and have made clear the seriousness with which I take the report and the events which prompted its preparation. Attachment 3 is the memorandum used to widely disseminate the IRT report within the nuclear organization.

⁽²⁾ J. f. Opeka letter to U.S. Nuclear Regulatory Commission, "Millstone Nuclear Power Station, Unit No. 2, Reply to a Notice of Violation, Combined Inspection Report Nos. 50-245/93-16; 50-336/93-11; 50-423/93-13," dated September 10, 1993.

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SUMMARY

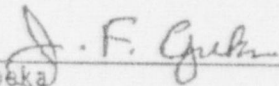
This event and the subsequent evaluations that have been completed or are under way have jolted the nuclear organization. To say that we are not satisfied with our performance leading to this event at Millstone Unit No. 2 significantly understates our frame of mind. We readily acknowledge that some important weaknesses need to be addressed, initially at Millstone Unit No. 2, and, as appropriate, throughout the entire nuclear organization.

We will be prepared to discuss these matters at the management meeting scheduled in Region I offices for Friday, September 24, 1993. We will present the IRT report to you in more detail, summarizing our improvement actions (both completed and planned), and demonstrating our sincere commitment to follow-through in order to assure that lasting changes are implemented so that an event such as this will not recur at any NU facility.

Should you have any specific questions on these matters prior to our September 24, 1993, meeting, please contact me.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



J. F. Opéka
Executive Vice President

cc: J. M. Taylor, Executive Director for Operations
T. E. Murley, Director, Office of Nuclear Reactor Regulation
J. G. Partlow, Associate Director for Projects
W. F. Kane, Deputy Administrator, Region I
G. S. Vissing, NRC Project Manager, Millstone Unit No. 2
P. D. Swetland, Senior Resident Inspector, Millstone Unit Nos. 1, 2,
and 3
D. H. Jaffe, NRC Project Manager, Millstone Station

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