

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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May 19, 1988

Docket No. 50-423

A07194

Re: 10CFR2.201

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

Reference: (1) L. H. Bettenhausen letter to E. J. Mroczka, Millstone 3
Routine Inspection 50-423/88-05 (2/23/88 - 4/4/88), dated
April 25, 1988.

Gentlemen:

Millstone Nuclear Power Station, Unit No. 3
Response to Notice of Violation
Region I Inspection 50-423/88-05

In a letter dated April 25, 1988 (Reference 1), the NRC Staff informed Northeast Nuclear Energy Company (NNECO) of the results of their routine resident safety inspection conducted at the Millstone Nuclear Power Station from February 23, 1988 to April 4, 1988. Reference (1) stated that one of our activities was not considered in full compliance with NRC requirements. Pursuant to the provisions of 10CFR2.201, NNECO hereby provides the following response to the "Notice of Violation" contained in Reference (1).

Requirement

Technical Specification 6.8.1 requires implementation of administrative procedures for equipment control (e.g., locking and tagging) as specified in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Administrative Control Procedure ACP-QA-2.12 requires that system alignments be verified to be in accordance with their valve lineup. The Operating Procedure OP-3322 valve lineup for auxiliary feedwater specifies that Manual Suction Isolation Valve 3FWA*V2 be "locked open."

Finding

Contrary to the above, ACP-QA-2.12 was not acceptably implemented as of 3:30 p.m., March 4, 1988, in that Valve 3FWA*V2 could have been operated without being unlocked. The valve was, however, in the required open position and was locked open promptly when the inspector notified the control room of the valve's status.

This is a Severity Level IV Violation.

Admission or Denial of Violation

NNECO does not contest the violation as set forth in the Notice of Violation.

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Root Cause

The "A" motor-driven Auxiliary Feedwater Pump Suction Isolation Valve 3FWA*V2 was verified locked open by two plant equipment operators on December 6, 1987. Since that time, no work was performed on the auxiliary feedwater (AFW) system equipment that required tagging or repositioning of the valve. It is assumed that the root cause of 3FWA*V2 being improperly locked was personnel error. However, firm evidence linking this incident to the lineup performed on December 6, 1987 could not be established.

Corrective Action

Valve 3FWA*V2 was promptly locked open when the inspector notified the control room of the valve's status. At the time of the inspection, the valve was in its required position.

A valve lineup was performed on the A and B Trains of the AFW system. In addition, all valves located outside the containment structure which are in safety-related systems and are required to be locked were checked and confirmed to be properly locked. The following system valve lineups were performed:

- o High-Pressure Safety Injection
- o Quench Spray
- o Recirculation Spray
- o Chemical and Volume Control
- o Service Water
- o Charging Pump Cooling
- o Safety Injection Pump Cooling
- o Postaccident Sampling
- o Emergency Diesel Generator


Action to Prevent Recurrence

A description of the event and a caution to verify valves are locked by physically inspecting the locking mechanisms and to ensure that valve operation is properly restrained after verifying correct valve position has been distributed among all the plant operating shifts.

We trust that the above information satisfactorily responds to your concerns.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY


E. J. Mroczka
Senior Vice President

cc: R. L. Ferguson, NRC Project Manager, Millstone Unit No. 3
W. J. Raymond, Senior Resident Inspector, Millstone Unit Nos. 1, 2, and 3

U.S. Nuclear Regulatory Commission
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