

NORTHEAST UTILITIES

THE CONNECTICUT LIGHT AND POWER COMPANY
WESTERN MASSACHUSETTS ELECTRIC COMPANY
HOLYOKE 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

September 22, 1988

Docket No. 50-336

A07491

Re: Inspection 88-10

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

- References: (1) R. M. Gallo letter to E. J. Mroczka, dated August 23, 1988, Specialist Team Inspection 50-336/88-10 (May 10-17, 1988).
- (2) W. G. Council (NNECO) to J. R. Miller (NRC) letter, dated January 30, 1985, Procedure Generation Package (PGP).

Gentlemen:

Millstone Nuclear Power Station, Unit No. 2
Response to Inspection
Specialist Team Inspection 50-336/88-10 (May 10-17, 1988)

In a letter dated August 23, 1988 (Reference (1)), the NRC Staff issued an inspection report to Northeast Nuclear Energy Company (NNECO) for Millstone Unit No. 2. This action was the result of an announced special safety inspection conducted May 10-17, 1988 to review Unit 2 Emergency Operating Procedures (EOPs). Reference (1) forwarded a Notice of Deviation and also discussed a number of technical concerns and deficiencies. Pursuant to Reference (1), NNECO hereby provides the following response:

The Notice of Deviation, forwarded as Appendix A to Reference (1), has been reviewed and evaluated by NNECO. Response to the Notice of Deviation is forwarded as Attachment I, attached.

8810250137 881010
PDR ADOCK 05000336
Q PDC

Mr. W. T. Russell
A07491/Page 2
September 22, 1988

DEFICIENCY RESPONSE PLAN

Reference (1) also requested plans for corrective actions related to other stated deficiencies. In support of this request, NNECO notes that many of the observations made by the team during the inspection have already been incorporated into Unit 2 EOPs during a planned July 1988 revision.

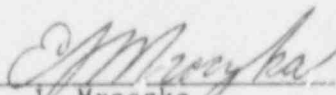
- 1) Reference (1), Section 3 - Independent Technical Adequacy Review of EOPs
 - A) The use of 30°F subcooling as an acceptance criteria for the operation of two Reactor Coolant Pumps (RCP) has been clarified via the use of a caution.
 - B) The deviation from CEN-152 with respect to Steam Generator (S/G) U-tube void elimination in EOP 2532 has been resolved. EOP 2532 and EOP 2534 are discussed further in Attachment I.
- 2) Reference (1), Section 4 - Validation and Verification, and Section 7 - Human Factors Analysis

In a telephone conversation on September 15, 1988, the NRC Staff agreed with NNECO that a separate submittal containing the balance of the above information will be submitted by October 31, 1988.

We trust the above information satisfactorily responds to your concerns.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY


E. J. Mroczka
Senior Vice President

Attachment

cc: D. H. Jaffe, NRC Project Manager, Millstone Unit No. 2
W. J. Raymond, Senior Resident Inspector, Millstone Unit Nos. 1, 2 and 3
R. M. Gallo, Region I

U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, D. C. 20555

Docket No. 50-336
A07491

Attachment I

Millstone Nuclear Power Station, Unit No. 2

Specialist Team Inspection 50-336/88-10 (May 10-17, 1988)

NRC Notice of Deviation

September 1988

NRC NOTICE OF DEVIATION (from Reference (1), Appendix "A")

NRC Generic Letter 82-33 (GL 82-33) required that licensees develop basic emergency response capabilities including the upgrade and implementation of emergency operating procedures (EOPs) using an NRC approved procedures generation package. NUREG 0899 states that the licensee's plant-specific guidelines should be based on the generic guidelines provided by the licensee's owners group and the deviations from the generic guidelines should be fully documented and justified.

By letter dated January 30, 1985, the licensee submitted the Millstone Unit 2 Procedure Generation Package (Revision 1) in which they committed to conform with the guidance provided by NUREG 0899 and the Combustion Engineering Emergency Procedure Guidelines (CEN-152), and to implement an EOP verification program to evaluate written correctness of the procedures and to ensure that applicable generic and plant-specific technical information had been incorporated properly.

CEN 152, Revision 2 provides guidance on steam generator U-tube voiding and subsequent elimination in Steps 40 and 41.d. of Section 5, "Loss of Coolant Accident Recovery Guideline" and in Steps 34 and 35.d of Section 6.0, "Steam Generator Tube Rupture Recovery Guideline."

Contrary to the above, the licensee did not incorporate this guidance into plant-specific EOP 2532, "Loss of Primary Coolant" and EOP 2534 "Steam Generator Tube Rupture" or justify the omission of this guidance from the specified procedures.

ROOT CAUSE

NNECO considers that adequate guidance existed in both EOP 2532 and in EOP 2534 when coupled with their referral to EOP 2540, "Functional Recovery," to eliminate voids and ensure the Heat Removal Safety Function was not compromised. This deviation occurred due to insufficient documentation of this position during the verification phase of EOP development required by the Unit 2 Procedures Generation Package (PGP) (Reference 2).

CORRECTIVE ACTION

To be responsive to the NRC Inspection Team's concern as stated during the inspection and exit meeting, NNECO incorporated guidance on S/G U-tube void elimination into EOP 2532 during a planned revision to the EOP's in July, 1988. Also, included in the July EOP revisions were enhancements responsive to several other observations and recommendations stated by the inspection team. These revisions became effective on August 3, 1988.

The next planned revision to the Millstone Unit 2 EOPs is targeted for February 1, 1989. Since NRC concern with EOP 2534 was not known until receipt of Reference (1), the guidance on S/G U-tube void elimination will be incorporated into EOP 2534, "Steam Generator Tube Rupture," at that time. In the interim, NNECO remains confident that sufficient guidance exists within EOP 2534 and its referral to EOP 2540, "Functional Recovery," to ensure that the Heat Removal Safety Function is not jeopardized.

ACTION TO PREVENT RECURRENCE

NNECO considers the omission of this guidance on S/G U-tube void elimination from both EOP 2532 and EOP 2534 and a lack of documentation concerning these omissions to be an isolated incident, rather than a programmatic failure. As committed to in Reference (2), NNECO performed an extensive verification and validation program to ensure that the Unit 2 EOP's were both technically accurate and practical for the operator. All steps of this program were evaluated by the inspection team and were found to be adequate. Therefore, no programmatic corrections will be implemented at this time.