

MAY 22 1986

Docket No. 50-423
License No. NPF-44
EA 86-15

Northeast Nuclear Energy Company
ATTN: Mr. J. F. Opeka
Senior Vice President - Nuclear
Engineering and Operations Group
P. O. Box 270
Hartford, Connecticut 06141-0270

Gentlemen:

Subject: NOTICE OF VIOLATION
(Inspection Report No. 50-423/85-74)

On January 9, 1986, an enforcement conference was held between the NRC and you and members of your staff to discuss your failure to report to the NRC in accordance with 10 CFR Part 50.55(e) an error made by your principal contractor, Stone and Webster Corporation (SWEC), in calculations associated with the design of the load path for the Reactor Coolant Pump P-1 snubber support for Millstone 3. The details associated with this error were described in the inspection report sent to you on March 7, 1986.

As discussed in the enclosed Notice of Violation, the error, which was made in 1974 during a manual calculation of the support loads, was discovered by SWEC in 1981 during a load re-analysis. During that re-analysis, P-1 snubber support loads were recalculated and found to be within the snubber's capacity but were in excess of the design capacity of the concrete embedments associated with two of the four reactor coolant loops. Subsequent calculations completed on October 10, 1984 verified that the embedments were capable of carrying the correctly calculated loads based on as-built conditions, thereby eliminating any safety issue relative to the P-1 snubber support being able to perform its intended function. However, the NRC is concerned with the handling of the error in that the error (a) involved one of the more significant snubbers in the plant, (b) indicated a significant deviation from the performance specifications, (c) required extensive evaluation to establish the adequacy of the support, (d) was not resolved until October, 1984, and (e) was not viewed as reportable to the NRC when originally identified in 1981. The failure to report the error in 1981 when it was initially identified constitutes a violation of 10 CFR 50.55(e).

In addition, it appears that SWEC did not adequately evaluate the implications of the error with regard to the adequacy of the design and review process. In particular, although SWEC verified the accuracy of calculations for other supports, there was no apparent determination of why the P-1 support was released

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for construction without the reviewer of the calculation or his supervisor discovering the error during subsequent reviews. Such analyses are important to ensure that there were no similar incorrect calculations made that could affect other plant components. The failure by SWEC to identify the error in 1974 during the design review and verification process, and the lack of adequate response by SWEC in evaluating the review process once the error was discovered, demonstrates the importance of adequate monitoring of contractors during performance of licensed activities at your facilities.

In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1985), the violation described in the enclosed Notice has been classified at a Severity Level III. Normally, a civil penalty is considered for a Severity Level III violation. However, after consultation with the Director, Office of Inspection and Enforcement, I have decided that a civil penalty will not be proposed in this case because your good prior enforcement history in the area of 10 CFR Part 50.55(e) reporting. Nonetheless, we emphasize that any similar reporting failures in the future may result in additional enforcement action.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to ensure adequate monitoring of contractors during performance of licensed activities at your facilities. After reviewing your response to this Notice, including your proposed corrective actions, the NRC will determine whether further enforcement action is necessary to ensure compliance with regulatory requirements.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and its enclosure will be placed in the NRC Public Document Room.

The responses directed by this letter and the enclosed Notice 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.

Sincerely,

Original signed by
Thomas E. Murley

Thomas E. Murley
Regional Administrator

Enclosure: Notice of Violation

cc: see next page

cc w/encl:

V. Papadopoli, Construction Quality Assurance Supervisor
E. R. Foster, Director of Generation Construction
E. J. Mroczka, Vice President, Nuclear Operations
D. O. Nordquist, Manager of Quality Assurance
R. T. Laudenat, Manager, Generation Facilities Licensing
W. D. Romberg, Station Superintendent
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NOTICE OF VIOLATION

Northeast Utilities Company
Millstone Nuclear Power Station, Unit 3

Docket No. 50-423
License No. NPF-44
EA 86-15

During an NRC inspection conducted from November 19, 1985 until January 6, 1986, NRC inspectors reviewed the circumstances associated with a design error associated with the load calculation of a Reactor Coolant Pump snubber support. The licensee informed the NRC Office of Nuclear Reactor Regulation of the error on September 12, 1984. The failure to report the error to the NRC in 1981 when it was initially discovered constitutes a violation of NRC requirements. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1985), the violation is set forth below:

10 CFR Part 50.55(e) requires, in part, that the Commission be notified of each deficiency in design and construction which, were it to have remained uncorrected, could have affected adversely the safety of operations at any time throughout the expected lifetime of the plant, and which represents a significant deviation from performance specifications which will require extensive evaluation to meet the criteria and bases stated in the safety analysis report or to establish the adequacy of the affected system.

Contrary to the above, in 1981, an error was identified in calculations performed in 1974 associated with the design of the load path for the Reactor Coolant Pump P-1 snubber support and although extensive evaluation was needed to establish that the snubber would perform its intended function, the NRC was not informed of the error until September 12, 1984.

This is a Severity Level III violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, Northeast Utilities Company is hereby required to submit to this office, within 30 days of the date of this Notice, a written statement or explanation, including (1) admission or denial of the alleged violation, (2) the reasons for the violation if admitted, (3) the corrective steps which have been taken and the results achieved, (4) the corrective steps which will be taken to avoid further violations, and (5) the date when full compliance will be achieved. Consideration may be given to extending the response time for good cause shown.

Dated at King of Prussia, Pennsylvania,
this day of May 1986