

NORTHEAST UTILITIES



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NORTHEAST UTILITIES SERVICE COMPANY
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August 18, 1989

Docket No. 50-423

A08060

Re: Inspection 50-423/89-03

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

Reference: Jacque P. Durr letter to E. J. Mroczka, "Millstone 3 Resident Inspection 50-423/89-03 (2/28/89-4/4/89)," dated May 17, 1989.

Gentlemen:

Millstone Nuclear Power Station, Unit No. 3
Response to Inspection 50-423/89-03

In a letter dated May 17, 1989 (reference), the NRC Staff provided Northeast Nuclear Energy Company (NNECO) with the results of the NRC Resident's Inspection of Millstone Unit No. 3 occurring between February 28, 1989 and April 4, 1989. In this inspection report the NRC Staff requested NNECO to provide additional information on what actions were taken to address recurring problems with fire detection surveillances and the blocking open of fire doors. The purpose of this letter is to provide the NRC Staff with the requested information. The following is a discussion of the Plant Incident Reports (PIRs) questioned by the NRC Staff in Inspection Report 50-423/89-03.

1. Fire Detection Surveillance Requirements and NRC Inspection Notes

"PIR 35-89, Missed Fire Detection Surveillance, dated 2/24/89, documented that only 22 of 28 required fire detectors were being tested per Technical Specification 3.3.3.7 Table 3.3-11. The root cause and corrective action will be reviewed when the Licensee Event Report is issued. This is a potentially significant example of a surveillance program inadequacy. The licensee reviewed all surveillance procedures in response to the last SALP but failed to detect this inadequacy. Inspector review of the surveillance program will continue."

a. Root Cause

The root cause of the event was administrative error. A late construction design change prior to initial start-up adding the six detectors inside the main control boards did not get incorporated into the surveillance procedure.

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b. Resolution/Actions to Prevent Recurrence

Licensee Event Report (LER) 89-006-0 was issued March 27, 1989, and is the basis for the following paragraphs.

A review of Surveillance Procedure SP 3641D.3 performed by the Millstone Unit No. 3 Operations Department revealed a discrepancy with the Technical Specification Table 3.11 requirements. Surveillance Procedure Form SP 3641D.3-3 listed 22 smoke detectors. An investigation showed the Surveillance Procedure was in error and did not identify six additional smoke detectors located inside the main control boards. The six detectors were installed by a late construction design change prior to initial start-up. The Technical Specification requirement for verifying system operability every six months had not been performed for these detectors.

The six detectors were installed after construction turnover of the system, at which time initial acceptance testing was being performed. The fire detectors were documented as operating satisfactorily after initial testing. There was no danger to the health and safety of the public, as there were other operable fire detectors in the area and the control room is continuously manned. The six detectors were successfully tested in the as-found condition on February 28, 1989, indicating they were fully functional throughout the duration of the event. Any fire would have been detected and suppressed.

A review of all Technical Specification surveillance requirements and their associated surveillance procedures was completed on December 15, 1988, as reported in LER 87-042-01, "Missed Intermediate Range/Power Range Surveillance." The "Fire Protection and Control System," Surveillance Procedure SP 3641D.3, was a component of this review. The engineer who performed the review has been interviewed and it has been determined that individual accounting of detectors had not been accomplished. The Technical Specification provides a table which simplistically shows a breakdown of the fire detection system to Technical Specification areas throughout the plant. The surveillance procedure provides a detailed breakdown linked to the system design, separated into individual zone panels and subdivided to the multiple zone modules, and lists the detectors linked to each module loop. The surveillance procedure details the system via 57 figures and 8 OPS form verification sheets. When the review was performed, the Technical Specification requirements were verified against the surveillance procedure as broken down to the various zone modules and the detector loops associated with the zone. However, the number of detectors within the loops were not accounted for.

SP 3641D.3 has been revised to include the missing smoke detectors.

NNECO is reviewing a proposed Technical Specification change to include all these individual detectors in the Technical Specification tables. This is expected to be submitted by September 1, 1989. Beyond that, Millstone Unit No. 3 plans to take no further action in this area.

The discrepancies associated with SP 3641D.3 appear to be an isolated issue and are not considered indicative of a weakness in the overall Technical Specification review process.

2. Fire Door Requirements and NRC Inspection Notes

"PIRs 37-89, dated 3/2/89, 43-89, dated 3/16/89, 44-89, dated 3/16/89, and 46-89, dated 3/17/89, all document instances when fire doors were either blocked open or opened without permission. A violation in Inspection Report 50-423/88-23 identified open fire doors as a generic problem. During the most recent two monthly inspections, eight instances were noted where fire doors were opened without the proper compensation. The circumstances for these eight events and the current four events are slightly different, but the number of these events indicates a lack of understanding or awareness of fire door requirements. The inspector questioned the adequacy of the corrective actions in light of previous history. Corrective action adequacy will be reviewed in future inspections."

a. Root Cause

The root cause of the subject PIRs for fire door violations is personnel error. In the past, actions to prevent recurrence have primarily consisted of educating the offending individual and/or department by means of memos and required reading.

b. Resolution/Actions to Prevent Recurrence

In order to prevent future fire door violations, the following three different areas are being addressed.

1) Door Signs

Technical Specification doors have been identified and door signs attached listing the door attributes and the following instructions:

DOOR MUST BE CLOSED AND LOCKED
DO NOT OBSTRUCT
IF DOOR MUST BE BLOCKED OPEN,
CALL CONTROL ROOM EXT. 6200

Surveillances have also been implemented to ensure Technical Specification fire doors remain properly labelled.

2) Training

General nuclear training will be emphasizing fire door requirements at new employee training, general employee training, and safety, security, and emergency plan training sessions.

3) Preventive Maintenance on Fire Doors

Fire door preventive maintenance is performed adequately under GSP 31905 by verifying the door operates freely, closes fully, and latches. In addition, Millstone Unit No. 3 is working to ensure that Security notifies Operations when responding to a Technical Specification fire door concern. This will help to accomplish maintenance if needed and to station compensatory fire watches in a timely manner.

As evidenced by self-assessments and a much reduced incidence rate, the fire door signs and other corrective actions are proving effective. From April 1, 1989 to mid-August 1989, there has been only one PIR (#89-130, dated July 10, 1989) related to a fire door. Even in that case, the door was closed, but was found unlocked when it should have been locked.

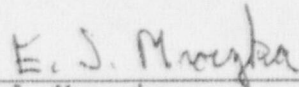
Conclusion

NNECO is committed to fire safety and to maintaining a comprehensive fire protection program. NNECO will continue to encourage documentation of any potential problems with PIRs, believing that a low reporting threshold keeps potential problems visible to management. This may result in an apparently high incidence rate of fire protection reports.

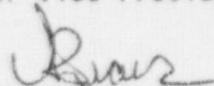
We trust you will find this information satisfactory, and we remain available to answer any questions you may have.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



E. J. Mroczka
Senior Vice President



By: C. F. Sears
Vice President

cc: D. H. Jaffe, 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, Document Control Desk