



**Northeast
Nuclear Energy**

Rope Ferry Rd. (Route 156), Waterford, CT 06385

Millstone Nuclear Power Station
Northeast Nuclear Energy Company
P.O. Box 128
Waterford, CT 06385-0128
(860) 447-1791
Fax (860) 444-4277

The Northeast Utilities System

JAN - 5 2001

Docket No. 50-336
B18287

RE: 10 CFR 2.201

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Millstone Nuclear Power Station, Unit No. 2
Facility Operating License No. DPR-65
Reply to a Notice of Violation
Inspection 05000336/2000-011

This letter is a reply to a Notice of Violation dated December 6, 2000.⁽¹⁾ The Notice of Violation presented the results of the significance determination of the preliminary white finding identified during the NRC inspection conducted between August 13, 2000, and September 20, 2000. This preliminary white finding, described in the subject inspection report previously sent to Northeast Nuclear Energy Company (NNECO) on October 30, 2000,⁽²⁾ was discussed in a Regulatory Conference at Region I headquarters on November 28, 2000.

Attachment 1 provides NNECO's responses to the violation pursuant to the provisions of 10 CFR 2.201.

There are no commitments contained within this letter.

⁽¹⁾ NRC Letter to R. P. Necci, "FINAL SIGNIFICANCE DETERMINATION FOR A WHITE FINDING AND NOTICE OF VIOLATION AT MILLSTONE UNIT 2," dated December 6, 2000.

⁽²⁾ NRC Letter to R. G. Lizotte, "NRC's INSPECTION REPORT NOS. 05000336/2000-011 AND 05000423/2000-011," dated October 30, 2000.

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Should you have any questions regarding the information contained herein, please contact Mr. David A. Smith at (860) 437-5840.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



Robert G. Lizotte
Master Process Owner - Assessment

Attachment (1)

cc: H. J. Miller, Region I Administrator (2 copies)
J. I. Zimmerman, NRC Project Manager, Millstone Unit No. 2
S. R. Jones, Senior Resident Inspector, Millstone Unit No. 2

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Attachment 1

Millstone Nuclear Power Station, Unit No. 2

Reply to a Notice of Violation
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Restatement of Violation

During an NRC inspection conducted from August 13, 2000, to September 30, 2000, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violation is listed below:

10 CFR 50, Appendix B, Criterion XVI, "Corrective Action," requires, in part, that conditions adverse to quality be promptly identified and corrected. For significant conditions adverse to quality, the cause must be identified and corrective actions taken to preclude recurrence.

Contrary to the above, between August 23, 2000, and September 20, 2000, with the reactor operating at 100% power, the licensee failed to promptly correct a significant condition adverse to quality involving the turbine-driven auxiliary feedwater (TDAFW) pump. Specifically, during a routine monthly surveillance test of the TDAFW pump on August 23, 2000, plant operators identified unresponsive and erratic speed control of the pump. At that time, licensee personnel failed to take prompt corrective action to identify and correct, consistent with its importance to safety, the degraded condition of the TDAFW pump, as evidenced by a lack of troubleshooting or additional testing. As a result, during the next regularly scheduled surveillance test performed on the TDAFW pump on September 20, 2000, plant operators were unable to increase its speed from a starting speed of about 1400 rpm. The discharge pressure of the TDAFW pump operating at this speed was insufficient to provide feedwater to the steam generators. As a result, the licensee declared the TDAFW pump inoperable.

This violation is associated with a White Significance Determination Process finding.

NNECO's Response

As indicated in our November 28, 2000, Regulatory Conference slides⁽¹⁾ NNECO agrees with the violation. Our presentation described that NNECO had initiated several recent internal investigations for lack of meeting management expectations for the Corrective Action Program (CAP) and human performance issues. When this event occurred, it confirmed our previous insight for necessary CAP improvements was well-founded. As a result of our review of this and the other concerns with the CAP, we have taken the actions described below.

⁽¹⁾ NRC Letter to R. P. Necci, "FINAL SIGNIFICANCE DETERMINATION FOR A WHITE FINDING AND NOTICE OF VIOLATION AT MILLSTONE UNIT 2," dated December 6, 2000.

Reason for the Violation

NNECO has determined the causes of the violation to be inadequate management oversight of Corrective Action Program implementation, lack of aggressive closure of assigned corrective actions to resolve issues, and corrective action plan implementation not being consistent with probabilistic risk insights.

Corrective Steps Taken and Results Achieved

The turbine-driven auxiliary feedwater pump was repaired and returned to service. Subsequent monthly surveillance tests have been satisfactory.

During the past month the Corrective Actions Department reviewed completed Level 1 corrective action assignments, from early in the year 2000 to the present, for closure adequacy. While eleven minor administrative deficiencies were identified that require correction out of a population of approximately 400 assignment closures reviewed, there were no major concerns.

Station management has reinforced Corrective Action Program expectations with the management team to ensure the management team was aware of the significance of this notice of violation and the need to enforce accountability with respect to program implementation.

Station management has raised expectations for Process Owner attendance at daily Condition Review Team meetings to ensure proper representation is present to evaluate CRs for significance and appropriate assignment. Process Owners from Operate the Asset, Manage the Asset (Engineering) and Maintain the Asset are required for a quorum. This has the effect of improving the urgency of assignments based on risk significance as well as engaging line management in the Corrective Action Program implementation.

New metrics (Performance Indicators) have been developed for senior management to better show closure rate and implementation efficiency for Level 1 and Level 2 corrective actions and corrective actions associated with risk significant systems. This also enhances accountability.

Corrective Steps That Will Be Taken to Avoid Further Violations

There are no further corrective steps required at this time, however, Human Performance Improvement Plan 2001 is in the process of implementation to establish clear ties and expectations for human performance relative to the corrective action program.

Operations leadership continues to be strengthened through key personnel moves to improve the operational focus in Operations and Work Control.

System Engineering management continues to reinforce ties to risk significance and ensuring extent of condition is investigated.

Date When Full Compliance Will Be Achieved

Millstone is currently in full compliance.