

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 9, 1983

Docket No. 50-336
A03180

Mr. James M. Allan
Acting Regional Administrator
Region I
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

- References: (1) Thomas T. Martin letter to W. G. Counsil dated April 11, 1983 transmitting I&E Inspection 50-336/83-07.
- (2) D. L. Ziemann letter to W. G. Counsil, dated July 19, 1979.

Gentlemen:

Millstone Nuclear Power Station, Unit No. 2
Response to I&E Inspection 50-336/83-07

Pursuant to the provisions of Section 2.201 of the NRC's "Rules of Practice", Part 2, Title 10, Code of Federal Regulations, this report is submitted in reply to Reference (1).

Reference (1) informed the Northeast Nuclear Energy Company (NNECO) of an apparent Severity Level V violation as a result of an item of non-compliance noted during a special safety inspection conducted March 5, 1983 through March 9, 1983.

Technical Specification 6.2.2 requires that the facility organization shall be as shown in Figure 6.2-2. Figure 6.2-2 shows the facility organization as revised by Amendment Number 54, dated July 19, 1979. Figure 6.2-2 indicates that the Health Physics Supervisor position reports to the Station Services Superintendent.

Contrary to the above, the facility organization from January 1, 1983 thru March 9, 1983, was not as shown on Figure 6.2-2 of the Technical Specifications, as revised by Amendment 54, in that the position of the Health Physics Supervisor does not report directly to the Station Services Superintendent.

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

Response

Technical Specification Figure 6.2-2 properly represents the services organization and is in full compliance with Technical Specification 6.2.2. Figure 6.2-2 is designed purposely to indicate the functions administered by the Station Services Superintendent, it is not intended to show the actual reporting chain. Reference (2), Amendment No. 54 to License No. DPR-65 for Millstone Unit 2, recognized this and specifically stated:

"... a proposed Facility Organization Chart, Figure 6.2-2, would delete the detailed organizational information relating to individuals within the purview of the Engineering Supervisor, Maintenance Supervisor, Instrument and Control Supervisor and the Station Services Superintendent. The proposed changes would conform to the plant organization guidance contained in Regulatory Guide 1.33, Quality Assurance Program Requirements (Operation), are administrative in nature, would not decrease the effectiveness of management or safe operations of Millstone Unit Nos. 1 and 2, and are, therefore, acceptable".

This past Staff acceptance further substantiates our conclusion that Figure 6.2-2 is indeed in full compliance with Technical Specifications and as such, the basis for the proposed violation is unwarranted. Further, we believe that minor administrative matters with no safety significance should not be elevated to the level of a violation with the commensurate need for increased manpower expenditure by both the Staff and the licensee. One of the motives behind our amendment request which culminated with the issuance of Reference (2) was the elimination of excessive detail in the Technical Specifications. Such an approach eliminates the need for both licensees and the NRC to process license amendment requests to implement minor organizational changes which do not warrant treatment as license amendments from a safety standpoint. In this regard, we invite your attention to a proposed rule (47 FR 13369) designed to create a bi-level system of specifications in place of the existing Appendix A concept. A pertinent excerpt from the Federal Register Notice is as follows:

"The proposed changes would reduce the volume of technical specifications that are made part of an operating license, thereby reducing the number of change requests which licensees would have to submit to the NRC. The proposed changes, if adopted, are expected to produce an improvement in the safety of nuclear power plants through more efficient use of NRC and licensee resources."

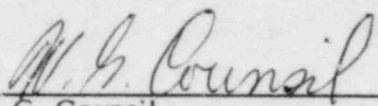
We are of the opinion that this proposal is worth pursuing, and have so commented to the NRC in previous correspondence. In the interim period, we

believe that the NRC should implement the spirit and intent behind this proposed rule within the confines of the existing framework.

We trust this resolves the Staff's concerns identified in Reference (1), and we remain available to discuss this matter further should you desire. If you do not concur with our position that this alleged violation should be withdrawn, please contact us.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



W. G. Council
Senior Vice President

cc: V. Stello, Jr.
D. G. Eisenhut
R. A. Clark
D. M. Crutchfield