

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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P.O. BOX 270
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April 6, 1990

Docket No. 50-336

A08642

Re: 10CFR2.201

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

- References: (1) E. C. Wenzinger letter to E. J. Mroczka, dated March 9, 1990, on NRC Region I Inspection No. 50-336/89-24.
- (2) S. E. Scace letter (MP-90-322) to U.S. Nuclear Regulatory Commission, dated April 2, 1990, Millstone Unit No. 2 Updated LER #89-009-01.

Dear Mr. Martin:

Millstone Nuclear Power Station, Unit No. 2
Response to Notice of Violation
Inspection Report No. 50-336/89-24

In Reference (1), the NRC Staff transmitted the results of their routine resident safety inspection conducted at Millstone Unit No. 2 from December 5, 1989 through January 19, 1990. The NRC Staff identified one Severity Level IV Violation and requested that Northeast Nuclear Energy Company (NNECO) respond within 30 days. Pursuant to the provisions of 10CFR2.201, NNECO hereby provides Attachment 1 as the response to the Subject Notice of Violation.

In Reference (1), the NRC Staff also requested additional information about two Millstone Unit No. 2 Licensee Event Reports (LER): LER 89-009 and LER 89-011. The reporting timeliness issues associated with LER 89-011 will be addressed by a separate submittal in conjunction with a similar request to Millstone Unit No. 3. The issues associated with LER 89-009 are addressed below.

LER 89-009

1. LER Accuracy

There were two inaccuracies in LER 89-009. The first was the total time a radiation monitor was not available for service. The LER noted 19 hours which was incorrect. The total time a radiation monitor was not operable was 52 hours. Of the 52 hours, the containment purge was isolated for 33 hours.

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The second inaccuracy was the omission of a Technical Specification Limiting Condition of Operation (LCO). The LER omitted LCO 3.3.2.1 titled "Engineered Safety Feature Actuation System Instrumentation." The LCO requires the containment purge valves to be closed.

These items are more fully explained in an update LER (Reference 2) submitted on April 2, 1990. The root cause of these inaccuracies was human error. The time interval error was a misinterpretation of the specification and interrelation of the associated components. The missed LCO was an oversight.

2. Assessment of Plant Vulnerability

During the time period that Radiation Monitors RM 8262 and 8123 were not operable, Health Physics personnel were conducting routine outage grab samples of the containment atmosphere. This process would have identified any unexpected changes in the containment. Also, an area radiation monitor on the refuel bridge continuously monitored the containment area.

Had a loss of shutdown cooling event occurred during this time, Operations Department procedures were in place that would have adequately ensured that the purge valves were closed as a portion of the steps required to establish containment integrity. The need for containment integrity was not required during this time period as the plant remained in Mode 5.

As the closure of the purge valves is only one portion of the steps that have to be manually taken to establish containment integrity, the unavailability of the auto-closure feature had little overall effect on the plant's vulnerability.

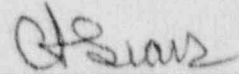
If you have any questions regarding the information contained in this letter, please contact us.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

FOR: E. J. Mroczka
Senior Vice President

BY:


C. F. Sears
Vice President

cc: E. C. Wenzinger, Chief, Projects Branch No. 4, Division of Reactor Projects
G. S. Vissing, NRC Project Manager, Millstone Unit No. 2
W. J. Raymond, Senior Resident Inspector, Millstone Unit Nos. 1, 2, and 3

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

STATE OF CONNECTICUT)
COUNTY OF HARTFORD) ss. Berlin

Then personally appeared before me, C. F. Sears, who being duly sworn, did state that he is Vice President of Northeast Nuclear Energy Company, a Licensee herein, that he is authorized to execute and file the foregoing information in the name and on behalf of the Licensee herein, and that the statements contained in said information are true and correct to the best of his knowledge and belief.

Symon M. Sheridan
Notary Public

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A08648

Attachment 1

Millstone Nuclear Power Station, Unit No. 2

Response to Notice of Violation
Inspection Report No. 50-336/89-24

April 1990

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Millstone Nuclear Power Station, Unit No. 2
Response to Notice of Violation
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Description of Violation (From NRC Notice of Violation)

Plant Technical Specification 3.3.2.1, "Engineered Safety Feature Actuation System Instrumentation," Table 3.3-3, Item 7a, requires one operable containment radiation gaseous and particulate monitor for Mode 5 (cold shutdown) plant operation.

Contrary to the above, from October 24 at 1:10 p.m. until October 25 at 6 p.m., no containment radiation gaseous or particulate monitor was operable in that the monitors were isolated from the containment.

Root Cause

NNECO considers the root cause of this event to be personnel error as originally indicated in LER 89-009.

Corrective Action

The initial corrective action was to open Isolation Valve 2-AC-82, restoring sample flow, which restored Radiation Monitor RM 8262 to operable status. The error of making changes to procedures prior to restoring the system to original condition was discussed with the personnel involved.

Action to Prevent Recurrence

1. Steps that were taken to prevent recurrence included an Instrumentation and Control Department discussion at a department meeting on November 22, 1989, and changes to Surveillance Procedures SP 2404AL and SP 2404AM. These changes included guidance to ensure that positive sample flow indication exists with no alarms and also incorporated a valve lineup as part of the restoration. These changes were made on November 22, 1989.
2. On March 20, 1990, NNECO approved a revision to ACP-QA-3.02, "Station Procedures and Forms," to add guidance on the timing of procedure changes. This is to ensure that work in progress is halted for procedure changes only if necessary for correct operation.

Date of Full Compliance

Full compliance to the Technical Specification was achieved on October 25, 1989.

Our cover letter addresses additional questions related to LER 89-009.