

**NORTHEAST UTILITIES**

THE CONNECTICUT LIGHT AND POWER COMPANY  
 WESTERN MASSACHUSETTS ELECTRIC COMPANY  
 HOLYOKE WATER POWER COMPANY  
 NORTHEAST UTILITIES SERVICE COMPANY  
 NORTHEAST NUCLEAR ENERGY COMPANY

General Offices • Selden Street, Berlin, Connecticut

P.O. BOX 270  
 HARTFORD, CONNECTICUT 06141-0270  
 (203) 565-5000

July 1, 1991

Docket No. 50-336  
A09557

Mr. Charles W. Behl, Director  
 Division of Reactor Projects  
 U. S. Nuclear Regulatory Commission  
 Region I  
 475 Allendale Road  
 King of Prussia, Pennsylvania 19406

Dear Mr. Behl:

Millstone Nuclear Power Station, Unit No. 2  
RI-91-A-0046

We have completed our review of identified issues concerning activities at Millstone Unit No. 2 (RI-91-A-0046). As requested in your transmittal letter, our response does not contain any personal privacy, proprietary, or safeguards information. The material contained in this response may be released to the public and placed in the NRC Public Document Room at your discretion. The NRC letter and our response have received controlled and limited distribution on a "need to know" basis during the preparation of this response. Based upon our request on June 25, 1991 with Region I personnel, a four-day extension to this letter was granted to allow for routine and proper administrative processing.

Issue:

An Instrument and Controls technician worked on RPS matrix and NI calibrations to support the Millstone 2 startup following a scram on February 16, 1991. The surveillance procedure had undergone extensive changes recently and the technician was not adequately trained on the recent revisions to the procedure. Special assistance was required for the technician to understand and complete the procedure.

Please discuss the validity of the above assertion. Please discuss any corrective actions being taken to train technicians on revisions to procedures prior to implementation.

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Background:

The need for specific training on a station procedure change or revision is considered at the time of its implementation. A prompt to consider the need for training prior to procedure change implementation has been added to the Millstone Unit No. 2 Instrument and Control (I&C) procedure routing sheets. This was done as an enhancement to the procedure review process and will accelerate any necessary immediate modifications to the on-the-job program. Unless the procedure changes are significant in nature and beyond the skills of the personnel performing the work, training does not typically take place prior to change implementation. Procedures, changes and revisions are written to a level of detail which is sufficient to ensure that the technician has the level of detail needed to perform the task.

All revisions to I&C procedures are reviewed by the Technical Training Department for the need to modify training materials or to conduct additional training.

Response:

The assertion that the personnel who performed startup support activities were not adequately trained is not accurate. The surveillance was performed correctly by the personnel assigned, without the need for special assistance to understand the procedure. The surveillance data sheets have been reviewed and the results found acceptable.

This issue had not been addressed to department management. The NRC Resident Inspector has reviewed this issue and concluded that the surveillances were properly completed as documented in NRC Resident Inspection Report 91-04 Section 7.5. Furthermore, our technicians are instructed to return instruments to a safe condition and to seek assistance if they have any difficulty understanding the action requested by procedure.

Issue 2:

Hours in excess of overtime limitation, were worked by Instrument and Controls technicians in support of the Millstone Unit No. 2 startup on February 17, 1991. One individual was "on-call" for plant support activities and was in the dual role of being "on-call" as an emergency responder. This technician worked a 10 hour shift on Millstone Unit No. 3 on February 16 and remained on duty for 24 hours keeping the pager until 0730 on February 17. This individual was overworked and could not perform his duties in support of the unit startup.

Please discuss the validity of the above assertions. Please discuss any actions taken to ensure overtime restrictions are not exceeded in cases such as that described above.

Mr. Charles W. Behl, Director  
U. S. Nuclear Regulatory Commission  
A09557/Page 3  
July 1, 1991

Background:

One person who had worked a 10 hour day was on call the night of February 16th. He was called in at 2030 to conduct instrument surveillance by the shift supervisor. Additional personnel were called in to relieve him later that same evening. There were no personnel that worked total hours in excess of established station overtime guidelines. The on-call individual was fully capable of fulfilling his emergency plan responsibilities at all times.

This issue was evaluated by the NRC Resident Inspector and concluded that the surveillances were properly completed as documented in NRC Resident Inspection Report 91-04.

This issue had not been addressed to department management.

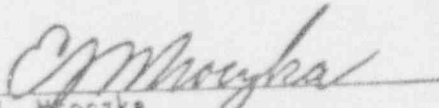
Response:

No overtime limits were exceeded by this individual. Established station on-call personnel performed their duties as required by procedures. Overtime limits do not apply to personnel when they are performing on-call responsibilities and are at home. The on-call person who was called in was relieved prior to being overworked and prior to exceeding any overtime guideline restrictions. If the emergency plan had been activated in this same interval, back-up resources would have been available in the event that the individual had not been able to perform his duties. It is the responsibility of all emergency plan responders to identify if at any time they are not capable of performing their assigned duties. No additional actions are required.

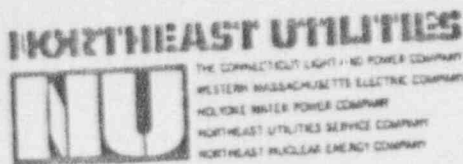
After our review and evaluation, we find that neither of these issues taken either singularly or collectively present any indication of a compromise of nuclear safety. We appreciate the opportunity to respond and explain the basis for our actions. Please contact my staff if there are any further questions on any of these matters.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

  
E. J. Wroczka  
Senior Vice President

cc: W. J. Raymond, Senior Resident Inspector, Millstone Unit Nos. 1, 2, and 3  
E. C. Venzinger, Chief, Projects Branch No. 4, Division of Reactor Projects



P.O. BOX 270  
HARTFORD, CONNECTICUT 06141-0270  
(203) 665-5217

EDWARD J. MROCZKA  
SENIOR VICE PRESIDENT -  
NUCLEAR ENGINEERING AND OPERATIONS

October 24, 1990  
NEO-90-G-292

TO: Nuclear Emergency On-Call Organization and  
their Supervisors

FROM: E. J. Mroczka *EM*  
(Ext. 5217)

SUBJECT: NUCLEAR EMERGENCY RESPONSE ON-CALL  
RESPONSIBILITIES AND UNANNOUNCED DRILLS

In your daily work, you are expected to design, operate, and maintain our nuclear plants in a safe condition so as to minimize the probability of an accident. However, nuclear power plant events can occur. They have occurred in the U.S. at a frequency of about ten or more declared events per year. At NU, we have in our operating history experienced five events at the ALERT and higher levels.

NRC regulations require an Emergency Response Organization to provide appropriate resources to handle such events. In addition, NU executive management firmly believes it is our responsibility to have an effective Emergency Response Plan to ensure we protect the health and safety of the public which we serve. This includes the On-Call Emergency Response Organization designed to be ready and available to augment the on-shift staff and assist site management at the time of a nuclear accident to mitigate plant damage and off-site consequences. On-call functions are an important part of the job requirements for employment in the Nuclear Engineering and Operations Group. Thus, there is a significant obligation and responsibility carried by the individuals who are selected to be part of the On-Call Emergency Response Organization and those who supervise them. A major commitment to this operation has been made by NU and a similar commitment is expected from those who are part of the on-call response organization.

The Supervisors and Management of On-Call Individuals are responsible to ensure and continually verify that the individuals you select to be part of the emergency on-call organization are suitable and able to fulfill their obligation and responsibility. This includes the issues of qualification, training, ability to respond within the prescribed time period and being cautious about the assignment of extended or conflicting work schedules during on-call weeks. Your planning should rotate the on-call responsibility such that an individual has the on-call responsibility at a frequency of no greater than once per four weeks, an optimum of once per five weeks is preferred.

On-Call Individuals are responsible to ensure that when you are on-call, you will respond within the prescribed time period and be fully alert and cognizant of your duties. You should recognize that when called in, you could be expected to work at a fairly intensive pace for a period of eight to twelve hours prior to being relieved. You should be knowledgeable of the radiopager range and its effectiveness in notifying you. Avoid large, steel-shell buildings and distances that diminish or prevent the radiopager signal from reaching you. Keep the radiopager either on or close to you so you are able to hear the radiopager. Ensure your radiopager is operable at all times (check operation by depressing top bar, carry a spare battery). Be aware of social or other occasions that compromise your ability to hear and/or respond in time. Follow the NU Fitness For Duty Program for employees with unescorted access to nuclear facilities, in particular, the total abstinence from alcohol during all on-call periods and for five hours prior to assuming the on-call responsibility. Turn your on-call responsibility over to another qualified person if you feel your on-call responsibility will be compromised. Exercise discretion at all times - DO NOT take chances and play the probability game. Discuss your concerns about fulfilling your obligation with your on-call supervisor/manager. When you are on-call, you should be oriented towards being able to respond on time. If you feel the need, take the time to refamiliarize yourself with your on-call function procedures. I expect this of you. Failure to comply with your on-call responsibilities will result in appropriate disciplinary action.

In order to ensure that NU can meet its moral and legal commitments to have an effective on-call response that can be relied on, it is prudent that we periodically evaluate our on-call response capability. There will be periodic unannounced drills of this important function. These drills can occur at any time and can require response, not just call-in.

Follow the guidance provided above. You cannot place yourself in a situation which will prevent you from responding within the required time when you are on-call. I am counting on each and every one of you to be there when called, and to be able to perform your duties safely, efficiently, and in accordance with the public trust that has been placed on us.

EJM/RCR/jha

cc: W. D. Romberg  
C. F. Sears  
E. A. DeBarba



# NORTHEAST UTILITIES



THE CONNECTICUT LIGHT AND POWER COMPANY  
WESTERN MASSACHUSETTS ELECTRIC COMPANY  
MILLSTONE WATER POWER COMPANY  
NORTHEAST UTILITIES SERVICE COMPANY  
NORTHEAST NUCLEAR ENERGY COMPANY

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November 7, 1990  
MP-90-1197

TO: All On-Call SEO Members

FROM:

*Steve*  
Stephen E. Scace  
Director Millstone Station  
(Millstone, Extension 4300)

SUBJECT: EMERGENCY RESPONSE ON-CALL  
RESPONSIBILITIES AND UNANNOUNCED DRILLS

The purpose of this memo is to re-emphasize your responsibilities and obligations as an on-call member of the Emergency Plan Station Emergency Organization (SEO).

NRC regulations require an Emergency Response Organization to provide appropriate resources to handle a Nuclear Power Plant event. In addition, Station Management firmly believes that it is our responsibility to have an effective emergency plan to ensure the health and safety of the public. This includes an on-call Emergency Response Organization, designed to be ready and available, to augment the on-shift staff and assist site management at the time of a nuclear event to mitigate plant damage and off-site consequences.

There is an obligation and responsibility carried by the individuals who are assigned to the on-call Emergency Response Organization. Assignment of on-call functions is an important part of your job requirements at Millstone Station.

As an on-call individual, you are responsible for ensuring that when carrying the beeper, you:

- Are able to respond within the prescribed time period.
- Are fully alert and cognizant of your duties.
- Are knowledgeable of the radiopager range and its effectiveness in notifying you.
- Ensure that your radiopager is in a location where you can hear it at all times and that it is operable.
- Follow the NU Fitness for Duty Program for employees with unescorted access, in particular, the total abstinence from alcohol during all on-call periods and for five hours prior to assuming the on-call responsibility.

If changes to the daily / weekly schedule are necessary, the scheduled on-call individual must complete the "Station Emergency Organization On-Call Change Request", SF 107B, and forward it to the Unit 1 Shift Supervisor Staff Assistant (SSSA). The person listed on the on-call program is responsible for the position coverage. If a standby is obtained and the change is not listed on the schedule, the accountability for the position remains with the scheduled individual.

Failure to comply with your on-call responsibilities will result in the appropriate disciplinary action.

In order to ensure that NU can meet its legal commitments to have an effective on-call response, there will be periodic unannounced drills to evaluate our on-call response capabilities. These drills can occur at any time and could require a response to not only call-in, but also to come in to the station.

When you are on-call, you should follow the guidance provided above. I trust that you will be there when called upon and perform your duties safely and efficiently.

What

Distribution

SF 150-1

c: List D  
E. J. Molloy  
R. C. Rodgers  
W. H. Buch

Bill  
PSTE  
FV2  
700

ALLEGATION RECEIPT REPORT

Date/Time

Received: August 9, 1991 0915

Allegation No.

91046 <sup>update</sup>

Name: {

Address: {

Phone: {

City/St./Zip: }

Confidentiality:

Was it requested? No

Alleger's Employer: NNECO

Position/Title:

Facility: Millstone Unit 2

Docket No.: 50-336

Allegation Summary: The use of personnel for "on-call" plant support when being "on-call" for emergency response is contradictory to corporate policy when the individual has already completed a full ten (10) hour work day.

(This issue relates to the licensee response to RI-91-A-0046, Issue No. 2, Mroczka letter to Hehl, serial A09557, dated July 1, 1991).

Number of Concerns: 1

Employee receiving allegation: J. T. Shedlosky

Type of regulated activity: Reactor

Functional Area(s): Operations

Detailed Description of Allegation: An Instrument and Controls technician was "on-call" for both plant support activities and for emergency response on February 16 through 0730, February 17. The technician worked a ten (10) hour shift at Millstone Unit 3 on February 16 and was recalled to the site from home to support a Unit 2 reactor start-up. The individual was overworked and could not perform his duties in support of the reactor start-up.

This issue relates to the licensee response to RI-91-A-0046, Issue No. 2, which was addressed in a letter Mroczka to Hehl, serial A09557, dated July 1, 1991.

The alleger's opinion was that it was improper to call the technician to support a reactor start-up after having worked a full ten (10) hour shift. The individual was expected to be prepared to work an additional twelve additional hours in the event of being called to fulfill emergency response actions.

The alleger provided copies of memoranda supporting his position. Those documents, signed by E. J Mroczka, serial NEO-90-G-292, dated October 24, 1990 and by S. E. Scace, serial MP-90-1197, dated November 7, 1990, are attached.

in accordance with the Freedom of Information Act, exemptions 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 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1841, 1842, 1843, 1844, 1845, 1846, 1847, 1848, 1849, 1850, 1851, 1852, 1853, 1854, 1855, 1856, 1857, 1858, 1859, 1860, 1861, 1862, 1863, 1864, 1865, 1866, 1867, 1868, 1869, 1870, 1871, 1872, 1873, 1874, 1875, 1876, 1877, 1878, 1879, 1880, 1881, 1882, 1883, 1884, 1885, 1886, 1887, 1888, 1889, 1890, 1891, 1892, 1893, 1894, 1895, 1896, 1897, 1898, 1899, 1900, 1901, 1902, 1903, 1904, 1905, 1906, 1907, 1908, 1909, 1910, 1911, 1912, 1913, 1914, 1915, 1916, 1917, 1918, 1919, 1920, 1921, 1922, 1923, 1924, 1925, 1926, 1927, 1928, 1929, 1930, 1931, 1932, 1933, 1934, 1935, 1936, 1937, 1938, 1939, 1940, 1941, 1942, 1943, 1944, 1945, 1946, 1947, 1948, 1949, 1950, 1951, 1952, 1953, 1954, 1955, 1956, 1957, 1958, 1959, 1960, 1961, 1962, 1963, 1964, 1965, 1966, 1967, 1968, 1969, 1970, 1971, 1972, 1973, 1974, 1975, 1976, 1977, 1978, 1979, 1980, 1981, 1982, 1983, 1984, 1985, 1986, 1987, 1988, 1989, 1990, 1991, 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012, 2013, 2014, 201



ALLEGATION RECEIPT REPORT

Date/Time

Received: August 16, 1991 0900 Allegation No.

Name: /

Address: {

Phone: /

Phone: /

Confidentiality:

Was it requested: No

Allegor's Employer: NNECL

Position Title: /

Facility: Millstone Unit 2

Facility: /

Allegation Summary: 1) Update to Allegation RI-91-A-114: a) Potential H&ID: Unit 3 I&C Technician in conversation with Unit 1 I&C Technician. b) Inadequate licensee response to Unit 1 Technician's concern. 2) Allegor dissatisfied with response to Allegation RI-91-046-01 & -03, hours worked by "on-call" personnel. 3) Allegor dissatisfied with response to Allegation RI-91-220-02, technicians assigned as "job supervisors." 4) Reference was made to conversations about Allegation RI-91-A-219-03, Appendix "K" power supplies.

Number of Concerns: 4

Employee receiving allegation: / Designated Resubmitted by (redacted)

Type of regulated activity: Reactor

Functional Area(s): Operations

Detailed Description of Allegation: The allegor provided additional information and documented conversations on four previously made allegations.

Allegation RI-91-A-114, Unit 3 SIT level transmitters calibration:

- 1a) The calibration concern originated with a Unit 1 I&C Technician working at Unit 3. A technician from Unit 3 questioned the Unit 1 technician if " . . . he was pulling a / on him" because of his actions. There have been no DOL H&ID complaints made on this issue either by the allegor or the Unit 1 technician.
- 1b) The allegor claims that the Unit 1 I&C Technician raised the issue with the Nuclear Concerns Task Group; but, was not pleased with the response. No technical details were provided by the allegor. Nor has the Unit 1 Technician contacted the NRC about the Task Group.

Information in this record was deleted  
in accordance with the Freedom of Information  
Act, exemptions 6, 7, 8  
FOIA - 92-162

B/13

# ALLEGATION RECEIPT REPORT

Date/Time

Received: August 16, 1991 0900 Allegation No.

Name:

Allegation RI-91-A-046-01, & -03, hours worked by on call personnel:

- 2) The allegor does not agree with the licensee response, letter dated July 1, 1991 (Serial A09557), which was forwarded to him by letter Wenzinger dated July 22, 1991. To support his position, the allegor provided copies of memoranda: E. J. Mroczka to the Nuclear Emergency On-Call Organization, dated October 24, 1990, (Serial NEO-90-G-292), and S. E. Scace to the On-Call SEO Members, dated November 7, 1990 (Serial EP-90-1197). These memos instruct those on call to be expected to work eight to twelve hours if called. The allegor believes that this conflicts with working a normal ten hour day and being recalled to support plant non-emergency activities. The on-call issue was recently addressed by C. Amato; the results will be documented in report 50-245/91-19, 50-336/91-23, 50-423/91-19.

Allegation RI-91-A-220-02, technicians assigned as "job supervisors."

- 3) The allegor does not agree with licensee management response to his issue concerning I&C technicians who are assigned as "job supervisors" or "job leaders." The allegor believes that Mr. Scace's response conflicts with a "Work Practices" document and also with the Instrument Specialist Physical Job Description.

Allegation RI-91-A-219-03, Appendix R power supplies.

- 4) The allegor documented a conversation previously held with the Resident Inspector about this issue.

## Attachments:

Allegation Receipt Report dated August 16, 1991

Memorandum to Habighorst, dated August 15, 1991

Memorandum to Habighorst, dated August 15, 1991

Memorandum Mroczka to Nuclear Emergency On-Call Organization, dated October 24, 1990

Memorandum Scace to On-Call SEO Members, dated November 7, 1990-

Memorandum Scace to [redacted] dated [redacted]

Principals of Excellence, pages 21 through 28

Physical Job Description, Instrument Specialist, dated February 1, 1983

Physical Job Description, Instrument Technician, dated February 1, 1983

Physical Job Description, Assistant Instrument Technician, dated February 1, 1983

## Inspector's Recommendation:

No additional action is required. File the information with the referenced allegations.

# ALLEGATION RECEIPT REPORT

Date/Time Received: AUGUST 16, 1991 9:00AM Allegation No. \_\_\_\_\_ (leave blank)

Name: \_\_\_\_\_ Address: \_\_\_\_\_  
Phone: \_\_\_\_\_ City/State/Zip: \_\_\_\_\_

Confidentiality:  
Was it requested? Yes \_\_\_\_\_ No ☒  
Was it initially granted? Yes \_\_\_\_\_ No ☒  
Was it finally granted by the allegation panel? Yes \_\_\_\_\_ No \_\_\_\_\_  
Does a confidentiality agreement need to be sent to allegor? Yes \_\_\_\_\_ No \_\_\_\_\_  
Has a confidentiality agreement been signed? Yes \_\_\_\_\_ No \_\_\_\_\_  
Memo documenting why it was granted is attached? Yes \_\_\_\_\_ No \_\_\_\_\_

Allegor's Employer: Northeast Utilities Position/Title: \_\_\_\_\_

Facility: Millstone 2 Docket No.: 50-336

(Allegation Summary (brief description of concern(s): ① Disagreement with NU response to previous concerns.

Number of Concerns: 2

Employee Receiving Allegation: PJ Habighorst / T Shredlosky  
(first two initials and last name)

Type of Regulated Activity (a) ☒ Reactor (d) ☐ Safeguards  
(b) ☐ Vendor (e) ☐ Other: \_\_\_\_\_  
(c) ☐ Materials (Specify)

Materials License No. (if applicable): \_\_\_\_\_

Functional Area(s): ☒ (a) Operations ☐ (e) Emergency Preparedness  
☐ (b) Construction ☐ (f) Onsite Health and Safety  
☐ (c) Safeguards ☐ (g) Offsite Health and Safety  
☐ (d) Transportation ☐ (h) Other: \_\_\_\_\_

U3 IVC

Description of Allegations

1. Memorandum Dated August 15, 1991: Allegor has become aware of third hand that the HHS ~~Safety Coordinator~~ (J. Follett) told a Unit 1 D Tech in February, 1991 if "he was pulling a

Inspector Action: The inspector informed the allegor of his right to file a complaint with the Department of Labor on August 16, if he felt that he had been harassed, or discriminated against. Allegor stated that he was unsure if he would file with DOL.

The allegor further stated that the Unit 1 D Tech had been discriminated with the Concerns Task Group response to his letter on the Millstone Unit 3 Safety Injection Tank Level indication.

Inspector Assessment: Review of past allegations indicated that the unit 3 safety injection tank level indication in allegation KI-91-114, HEC Region I located in letter to HEC dated 7/17/91, was not a 30 day response. Further, the technical issue was not indicated in the inspection report 50-423 91-17 under section 3.1. The inspection concluded HEC action was not a 30 day response to the level indicator inaccuracies.

2. Memorandum Dated August 15, 1991: Allegor disputed with HEC response of July 1, 1991 concerning allegation KI-91-114. Allegor stated that HEC response of August 19, 1991 was not a 30 day response. Allegor also stated that HEC response of August 19, 1991 was not a 30 day response to the level indicator inaccuracies.

Inspector Assessment: HEC response of August 19, 1991 was not a 30 day response to the level indicator inaccuracies.