

# NORTHEAST UTILITIES



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

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May 6, 1991

Docket No. 50-336  
A09453

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-0033

We have completed our review of identified issues concerning activities at Millstone Unit No. 2 (RI-91-A-0033). 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.

## Issue

There are no backup flow indicator instruments for the 10CFR50 Appendix R storage locker. When the instruments are removed for calibration (under EN 21199), there are no controls in place to locate or otherwise provide instrumentation, if needed. There is no RBCCW total flow instrument, no gauge, no backup. Additionally, there are no procedures in place to install the instruments if required by AOP 2579AA. (This issue was provided to Mr. J. Keenan (Millstone Unit 2) on February 1, 1991 in a telephone conference with Mr. D. Haverkamp (NRC)).

Please discuss the validity of the assertions. Please discuss the availability and controls in place to install the flow indicators if needed, including occasions when the instruments are removed from the storage locker for calibration.

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1. This statement was not included in the original letter received from the NRC but was revised by the NRC during subsequent telephone conversations.

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Item 1

There are no backup flow indicator instruments for the 10CFR50 Appendix R storage locker when the instruments are removed for calibration (under EN 21199) and there are no controls in place to locate or otherwise provide instrumentation if needed.

Response

EN 21199 does not exist; however, EN 21199A, Rev. 0, effective July 8, 1987 does exist. The flow indicators which consist of ITT Barton gauges are an enhancement to the Appendix R program and are not required to be installed to meet the requirements of Appendix R.

The Appendix R program depends on the manual alignment of pump discharge valves to preclude the possibility of pump runout or loss of suction pressure. The operators agreed with this operating philosophy, however, they asked if gauges could be installed to verify flow and pressure. Millstone Unit No. 2 Engineering agreed and the operating procedure AOP 2579AA was revised to install the gauges in place of the existing transmitters which the fire destroyed. The Appendix R storage locker inventory surveillance was revised to add the local gauges. The gauges in question would not be installed until backfeed power was established which would be four hours into the fire, therefore, accessibility into the area where the gauges are to be installed is not a concern.

The Appendix R storage cage and the Hot Shutdown storage locker which are each located in a different fire area and are not affected by the same fire have duplicate sets of gauges which can be used.

In summary, the gauges in question are not required for an Appendix R fire and are not taken credit for in the Appendix R analysis. They were added to the operating procedure and stocked in the Appendix R storage locker as an enhancement for operations. Therefore, the removal of the gauges for calibration has no affect on the Appendix R program.

Item 2

There is no RBCCW flow instrument, no gauge, nor backup.

Response

The Millstone Unit No. 2 Appendix R safe shutdown analysis does not require the availability of RBCCW flow instrumentation to achieve shutdown after a fire. Manual repositioning of RBCCW valves will assure proper system alignment and acceptable flow rates. NNECO Operations recently requested that the option to install a local RBCCW flow gauge be provided to enhance the post-fire shutdown process. The Appendix R procedures will be updated to reflect the installation of the gauges and two new gauges will be added to the Appendix R storage locker. Two additional gauges will also be added to the Hot Shutdown Panel storage locker for the RBCCW system.

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Item 3

There are no procedures in place to install the instruments if required by AOP 2579AA.

Response

The Appendix R procedure AOP 2579AA directs the installation of pressure and flow gauges in various locations in the plant to enhance the operators ability to verify flow and pump discharge pressures. The gauges would be installed after backfeed power is established which is four hours into the fire. Due to the fire, the control room would be evacuated which would activate the emergency plan calling all on-call personnel to report to their assigned areas. Instrumentation and Control personnel would be part of the reporting team which would be directed to install the associated gauges.

The installation of the local instrumentation gauges is well within the capabilities of an Instrumentation and Control technician. A procedure for this task is not warranted.

After our review and evaluation, we find that none of these items 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. Mroczka

Senior Vice President

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