

NORTHEAST UTILITIES



THE CONNECTICUT LIGHT AND POWER COMPANY
WESTERN MASSACHUSETTS ELECTRIC COMPANY
NORTH OREGON 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) 665-5000

May 6, 1991

Docket No. 50-336
A09448

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

Dear Mr. Hehl:

Millstone Nuclear Power Station, Unit No. 2
RI-91-A-0034

We have completed our review of the identified issue concerning activities at Millstone Unit No. 2 (RI-91-A-0034). 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

Material installed in the plant on December 7, 1990 did not have identifying markings as required. A quality control inspector documented this finding in nonconformance report 290-401.

Please provide a copy of the nonconformance report including the final disposition of this item.

Response

Work Order AVO M2-90-15187 was issued on December 5, 1990 to fabricate three spare service water strainer backwash lines. These are "non-QA" lines which flush sediment and debris from strainers during the backwash cycle. The requirement for material identification is a weld inspection procedure requirement.

During fabrication, the Quality Services Department initiated NCR 290-401 which reported that the 3-inch schedule 40 pipe material did not have material markings.

Mr. Charles F. Gahl, Director
Nuclear Regulatory Commission
Washington, D.C. 20540
Page 1
June 1, 1991

... t. ned "Use-As-Is" by Maintenance Engineering. The
... documented that one of the three spool pieces has adequate
markings to verify material identification and that all of the spool pieces
were fabricated from the same piece of pipe. The NCR disposition noted
that the markings are a dot matrix printing which is difficult to read and
is most legible when viewed from a distance of five to ten feet.

The NCR disposition includes a Polaroid photograph of the spool pieces in
which the material markings are legible. This photograph can be viewed as
part of the original NCR closure package at the Millstone Station.

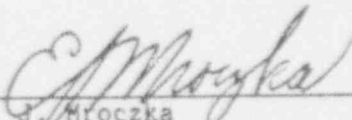
It is noted that the spool pieces have been shipped to a vendor for
application of a protective coating. Contrary to the assertion, they have
not been installed in the plant.

A copy of NCR 290-401 is attached.

After our review and evaluation, we find that this issue does not 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

Docket No. 50-336
A09448

ATTACHMENT NO. 1

MILLSTONE NUCLEAR POWER STATION, UNIT NO. 2
RI-91-A-0034
NCR 290-401

May 1991

NONCONFORMANCE REPORT

OPSS88 REV. 11-88

SEE NEC 3.06 FOR INSTRUCTIONS

SUBJECT MATERIAL IDENTIFICATION		UNIT 2
		NUMBER 290-401
COMPONENT LOCATION SHIP 14'6 INTAKE	SYSTEM SW	MFR/VENDOR USS/USX
SOURCE DOCUMENT 6WD-004	SOURCE DOCUMENT	
M7-90-15187		
DESCRIPTION OF NONCONFORMANCE/CAUSE 3" XH 40 PIPE; MAT'L ON MIF DOES NOT HAVE TYPE OF MNTL AND NO I.D. ON PIPE		
ORIGINATOR R P ROBINSON		DATE 12-7-90
OSD REPRESENTATIVE <i>[Signature]</i>		DATE 12-7-90
DISPOSITION <input checked="" type="checkbox"/> USE-AS-IS <input type="checkbox"/> REPAIR <input type="checkbox"/> INSTALL N.C. MATL <input type="checkbox"/> REWORK <input type="checkbox"/> RETURN <input type="checkbox"/> SCRAP <input type="checkbox"/> ADMIN. <input type="checkbox"/> OTHER		
DISPOSITION DETAILS See attached Disposition Details		
ENGINEER <i>[Signature]</i>	DATE 1/14/91	SUPERVISOR <i>[Signature]</i> DATE 1/14/91
UNIT SUPT. INUSCO ENGINEERING BUREAU <i>[Signature]</i>	DATE 1/22/91	SELF EVALUATION REQUIRED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
SUPERVISOR <i>[Signature]</i>	DATE 1/30/91	AWO
REMARKS: INSPECTION/VERIFICATION <input type="checkbox"/> BAT. <input type="checkbox"/> UNSAT. <input checked="" type="checkbox"/> N/A		
REVIEW OF DISPOSITION DETAILS <i>[Signature]</i>		
NCR REVIEWED & CLOSED		DATE 2/15/91

The NCR reports that the MIF for 3" sch 40 pipe issued to AWO M2-90-15187 does not identify the type of material, and there are no identification markings on the pipe. Verification of material identification/markings is a welding program requirement.

The pipe was used to fabricate three (3) service water strainer backwash lines, 3"-JGD-15. Per Pipe Class JGD, the required pipe is schedule 40 carbon steel per ASTM A 53. MEPL evaluation CD-950 has classified the line as "non-QA".

Maintenance Engineering has examined the three spoolpieces. One of the three has adequate markings to verify material identification. The pipe is stenciled "A53/A106 SCH 40". It is noted that the markings, which are a dot matrix type printing that has been subjected to scrapes and wear typical of pipe handling and fabrication, are difficult to read. The markings are clearest when viewed from a distance of 5 to 10 feet. A photograph of the pipe markings is attached.

The Unit 2 Maintenance personnel who obtained the material from the warehouse and fabricated the spoolpieces state that all three backwash lines were fabricated from a single length of pipe. Accordingly, the material markings which are legible on one of the spoolpieces are applicable for all three.

Since the correct pipe material has been verified by the markings, the material is acceptable and this NCR is dispositioned "Use-As-Is."

PL Collette 2/13/91
ja 2/13/91

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THE CONNECTICUT LIGHT AND POWER COMPANY
WESTERN MASSACHUSETTS ELECTRIC COMPANY
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203/565-5000

May 6, 1991

Docket No. 50-336
A09447

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

Millstone Nuclear Power Station, Unit No. 2
RI-91-A-0036

We have completed our review of the identified issue concerning activities at Millstone Unit No. 2 (RI-91-A-0036). 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

On February 6, 1991, a Health Physics Technician sampled the containment air by both grab sample and at the inlet to radiation monitor RM-8123A/B. The samples resulted in about 50 cpm at the radiation monitor and 2300 cpm from the grab sample. The radiation monitor may have been isolated from the containment. Recently, the hydrogen monitor was determined to be isolated from the containment as documented in plant incident report, PIR 91-16.

Please discuss the operability of radiation monitor RM-8123A/B on February 6, 1991. Was there a procedural problem that caused the two samples to differ? Please discuss the possibility of a valve control problem discussed in the PIR and [whether it] may have caused the sampling problem. If any weaknesses in either procedural compliance or valve control are determined, please discuss actions that you have taken or will take to correct the problem.

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Mr. Charles V. Hehl, Director
U. S. Nuclear Regulatory Commission
A09447/Page 2
May 6, 1991

Response

The sample station located next to RM-8123A/B takes a sample by tapping off of the lines that supply the RM-8123A/B skid. The sample is taken in parallel with the RM-8123A/B skid (see Attachment 1, Sketch #1).

Based on our review of this configuration, there is no operability, procedural, or valve control problem associated with RM-8123A/B.

The discrepancy between the samples is most likely due to the sample station being partially or totally isolated when the sample in question was taken. A review of the RM-8123A/B strip chart for the February 6, 1991 date in question indicates that RM-8123A/B was not isolated. The gaseous and particulate count rates on the strip chart were representative of the expected values and did not show any deviation that would have been experienced if RM-8123A/B had been isolated. RM-8123A/B was functioning properly during this period. There is no relationship between this issue and the event addressed by PIR 91-16.

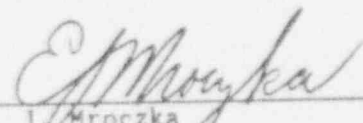
The results of the sample taken on February 6, 1991 is typical for the enclosure building atmosphere. The sample pump used for sampling is a positive displacement pump that has an automatic bypass feature. If isolated, it would draw from the surrounding atmosphere. The sample station may have been isolated partially when the sample was taken. No conclusive reason for the low sample value has been identified.

The relationship between remote and local sample results has received significant management attention. Current Health Physics requirements for sampling require local samples to be taken to eliminate any question of remote sampling accuracy. NNECO recognizes the need to evaluate improvements in sampling processes and will enhance procedures addressing sampling techniques by August 30, 1991.

After our review and evaluation, we find that this issue did not 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
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A09447

ATTACHMENT NO. 1

MILLSTONE NUCLEAR POWER STATION, UNIT NO. 2
RI-91-A-0036
RM-8123A/B - SKETCH #1

May 1991

Sketch #1

