

NORTHEAST UTILITIES



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

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April 13, 1982

Docket No. 50-336
A02345

Mr. Ronald C. Haynes
Regional Administrator, Region I
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, Pennsylvania 19406

Reference: (1) J. J. Martin Letter to W. G. Counsil dated
March 8, 1982, transmitting I&E Inspection
50-336/82-03

Gentlemen:

Millstone Nuclear Power Station Unit No. 2
Response to I&C Inspection 50-336/82-03

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) which 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 the routine safety inspection conducted between January 11, 1982 and January 15, 1982.

Non-Compliance

Criterion V, Appendix B, 10 CFR50, requires activities affecting quality to be prescribed by and accomplished in accordance with documented instructions. Millstone Instruction MP-2-4987, December 4, 1981, requires that:

- Managers of various departments monitor their activities to ensure that housekeeping is adequate.
- Personnel working near the reactor pool use restraining or retrieving devices (lanyards) on tools or equipment; and
- Personnel working on jobs over or near the reactor pool maintain a strict inventory of tools.

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Contrary to the above, on January 14 and 15, 1982:

- Housekeeping near the reactor pool and the spent fuel pool was inadequate in that: Paper used to cover the walkways on the refueling machine was worn through, torn and shredded. Numerous pieces of discarded yellow tape were stuck to the walls, floor and railings adjacent to the reactor pool. Herculite used to cover the handrails and walkways were torn. Trash (including a cotton glove and numerous pieces of paper) was floating in the spent fuel pool.
- Personnel disassembling staging adjacent to, and above the reactor pool and personnel performing work on the upper guide structure over the reactor pool, were not using lanyards on their tools.
- Personnel working on the refueling machine (over the reactor pool) failed to maintain a strict inventory of tools.

Response:

The housekeeping deficiencies near the reactor pool and the spent fuel pool were corrected January 15, 1982. The worn paper and herculite were replaced with new herculite. The yellow tape and floating articles were removed and a general cleanup of both areas completed. Additionally on January 15, 1982, all unnecessary work around the refuel pool was suspended. This included the disassembly of staging and work on the upper guide structure. This work did not restart until after the reactor head was set.

At outage meetings on January 15 and 16, 1982, the requirements of administrative memo MP-2-4987 were reviewed with all department heads responsible for work in these areas. It was emphasized that the job supervisors were responsible for housekeeping, equipment control and other requirements of the memo. The senior reactor operator responsible for core alterations was designated as a job supervisor for the core alteration activities. In addition, the containment coordinator was instructed to tour the refuel pool area twice per shift to review the housekeeping and equipment control, including a review of the tool inventory status for fuel movement and the in-core instrumentation modifications. Any deficiencies identified were immediately resolved with the appropriate job supervisor. If resolution was not possible the management representative was notified. These controls continued until the vessel head was set and precluded further degradation of housekeeping or material control.

To prevent recurrence, future outage administrative memos will assign responsibilities as described above. In addition the memo will require the management representative to control activities in the refuel pool area based on the need to accomplish specific tasks during that period of time. Further, the memo will specify that these controls will be in effect from the time the reactor head is removed until it is reset.

The administrative memo will be issued prior to the next outage which requires vessel head removal.

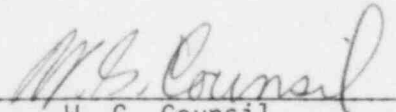
Controls in the spent fuel pool will be improved to specify a clean area in which permanent storage of equipment and personnel access will be restricted. This will prevent debris from entering the pool and will be complete by May 1, 1982.

The actions described above will improve management controls in this area. No further action is required since a generic lack of controls does not exist. A new situation developed during this refueling outage because extensive containment activities were in progress during fuel movement. This was due to the initial use of steam generator nozzle dams and the resultant ability to perform steam generator work in parallel with fuel movement. Thus the definition of responsibilities in the administrative memo for refuel house-keeping and material control were no longer adequate. However after more specific definition of responsibilities occurred, the problem was resolved.

In summary the actions specified will provide adequate management controls for the refuel pool during the period of time when the reactor head is removed and for the spent fuel pool during all periods. No other actions are required since a generic problem does not exist.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

A handwritten signature in dark ink, appearing to read "W. G. Council", is written over a horizontal line.

W. G. Council
Senior Vice President