

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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October 1, 1993

Docket No. 50-336
B14629

Re: 10CFR2.201

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

Gentlemen:

Millstone Nuclear Power Station, Unit No. 2
Reply to Notice of Violation
Combined Inspection Report Nos. 50-245/93-18,
50-336/93-13, and 50-423/93-14

In a letter dated August 26, 1993,⁽¹⁾ the NRC Staff transmitted to Northeast Nuclear Energy Company (NNECO) Combined Inspection Report Nos. 50-245/93-18, 50-336/93-13, and 50-423/93-14. As discussed in that report, the NRC Staff cited NNECO for an apparent violation of the Commission's regulations at Millstone Unit No. 2. Pursuant to 10CFR2.201, and in accordance with the instructions contained in the inspection report, NNECO hereby provides, as an attachment to this letter, the required information in response to the Notice of Violation.

We trust that you find this information satisfactory, and we remain available to answer any questions you may have.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

FOR: J. F. Opeka
Executive Vice President

BY: Wayne D. Romberg
W. D. Romberg
Vice President

cc: T. T. Martin, Region I Administrator
J. W. Andersen, NRC Acting Project Manager, Millstone Unit No. 1
G. S. Vissing, NRC Project Manager, Millstone Unit No. 2
V. L. Rooney, NRC Project Manager, Millstone Unit No. 3
D. H. Jaffe, NRC Project Manager, Millstone Station
P. D. Swetland, Senior Resident Inspector, Millstone Unit Nos. 1, 2,
and 3

070020

(1) J. P. Durr letter to J. F. Opeka, "Safety Inspection at Millstone Nuclear Plant Station, Units 1, 2, and 3, NRC Combined Inspection Report Nos. 50-245/93-18, 50-336/93-13, and 50-423/93-14," dated August 26, 1993.

Attachment 1

Millstone Nuclear Power Station, Unit No. 2

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October 1993

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RESTATEMENT OF VIOLATION A:

During an NRC inspection conducted on June 14-25, 1993, one violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, (1993), the violation is stated below:

Part 50, Appendix B, Criterion XI of Title 10 of the *Code of Federal Regulations* requires, in part, that "a test program shall be established to assure that structures, systems, and components will perform satisfactorily in service and is identified and performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents. Test results shall be documented and evaluated to assure that test requirements have been satisfied."

Northeast Utilities Quality Assurance Program Topical Report, Section 11.2.4 states, in part, that "documented test results are evaluated against the predetermined acceptance criteria...and the acceptance status of the test is documented."

Contrary to the above, as of June 14, 1993, dynamic tests for seventeen safety-related motor-operated valves (MOV) were performed in accordance with test procedures that did not incorporate the requirements and acceptance limits for determining operability prior to returning the tested MOV back to service. Additionally, the December 1992 test results for sixteen of these MOVs were not evaluated and documented adequately at the time of this inspection. As a result, the operability determinations for these sixteen valves remained undocumented.

This is a Severity Level IV Violation (Supplement I)

1. Reason for the Violation

The first issue of the subject violation occurred because the dynamic tests were completed prior to full implementation of the Motor Operated Valve Program Manual. Previously, a test was considered successful when the valves successfully stroked during the dynamic test. Today, operability is determined based on a number of tests and inspections. The results will document that the valve will operate through its required design conditions.

The second issue occurred after the implementation of the Motor Operated Valve Program Manual. Valve testing was in progress and the dynamic test evaluations were scheduled to occur following the outage. The documenting of a determination of operability was scheduled within the tasks associated with all the Units' MOV program needs. The resulting schedule was inconsistent with the interpretation of "timely" within the applicable Appendix B criterion.

2. Corrective Steps That Have Been Taken And The Results Achieved

Millstone Unit No. 2 performed an initial engineering assessment on the 17 dynamically tested valves and concluded they were operable. All of the valves were formally reviewed and documented as operable on July 31, 1993.

3. Corrective Steps That Will Be Taken To Avoid Further Violations

Millstone Unit No. 2 has fully implemented the Motor Operated Valve Program Manual, which provides the appropriate acceptance criteria for the dynamic testing which will ensure operability of the valves. The MOV Program Manual also requires timely evaluation of test data to determine operability.

Millstone Unit No. 2 will adopt the same type of dynamic test procedures used at Millstone Unit No. 3 and the Haddam Neck Plant.

4. Date When Full Compliance Will Be Achieved

Millstone Unit No. 2 was in full compliance with 10CFR50, Appendix B, Criterion XI on July 31, 1993, with the determination of valve operability for the Millstone Unit No. 2 test results and programmatically on June 17, 1993, with the issuance of the dynamic test evaluation methodology.

5. Generic Implications

The effect of this violation has been reviewed at the other Northeast Utilities nuclear units.

A. Haddam Neck Plant

During the recent Haddam Neck Plant refueling outage (Cycle 17 refueling outage, May 15 — July 22, 1993) additional guidance was issued. This guidance discussed the dynamic test evaluation requirement and provided the methodology package as an attachment. Engineering personnel performed final evaluations for each dynamically tested MOV. All evaluation results were acceptable and the valves were documented as operable prior to the unit entering Mode 4 during unit startup.

B. Millstone Unit No. 3

During the ongoing Millstone Unit No. 3 refueling outage, application of the appropriate dynamic test procedures has ensured operability of the valves.

The MOVs tested are considered fully operable and capable of performing their design safety function in all modes if they meet the criteria for static and dynamic VOTES tests per EN 31120, *MOV Signature Analysis*.

EN 31120 contains the dynamic test evaluation, similar to the methodology used at the Haddam Neck Plant. Dynamic test evaluations have been reviewed using this process. All evaluation results were acceptable and the valves have been demonstrated to be and documented as operable.

Millstone Unit No. 1

All valves, which have been dynamically tested, have been evaluated in accordance with the test procedure in place at the time of the test and have been determined to be operable.

Revisions to the MOV Program Manual will include the methodology detailed above. This revision will be completed prior to startup from the next Millstone Unit No. 1 refueling outage which is scheduled to begin in January 1994.