

## 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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April 27, 1983  
Docket No. 50-423  
AEC-MP3-315  
A03151

U.S. Nuclear Regulatory Commission  
Thomas T. Martin, Director  
Division of Engineering and Technical Programs  
Region I  
631 Park Avenue  
King of Prussia, PA 19406

Reference: (1) T. T. Martin letter to W. G. Counsil, IE  
Inspection No. 50-423/83-04, dated March 28, 1983.

Gentlemen:

Millstone Nuclear Power Station, Unit No. 3  
IE Inspection 50-423/83-04

The NRC Office of Inspection and Enforcement conducted a routine safety inspection of selected areas of Millstone Nuclear Power Station, Unit No. 3, on February 8, 9, and 10, 1983. As a result of that inspection, Reference (1) was transmitted to us for response. That transmittal contains essentially two parts, Appendix A, Notice of Violation, and IE Inspection Report No. 50-423/83-04.

Pursuant to the provisions of 10 CFR 2.201, Northeast Nuclear Energy Company (NNECO) is hereby submitting a response to the Notice of Violation, Appendix A, paragraphs A and B.

### APPENDIX A, PARAGRAPH A, VIOLATION (83-04-01)

10 CFR 50, Appendix B, Criterion XIII, requires that measures shall be established and performed to prevent damage or deterioration during storage. Limatorque storage procedure dated August 13, 1976, requires that the electrical contacts of the Motor Operator Valves (MOVs) be sprayed every 1-2 years with a preservative during the storage period.

Contrary to the above, as of February 9, 1983, the MOVs received since January 1977 have been only sprayed upon receipt and have not been protected with the CRC #2-26 preservative since the receiving date.

### CORRECTIVE ACTION

All equipment storage history cards are being updated to reflect vendor requirements on spraying electrical contacts every two years with CRC #2-26. The estimated completion date is May 2, 1983.

All Limitorque valves received at the Millstone 3 site to date have been visually inspected. The limit switch compartments were opened and inspected. Electrical contacts were sprayed and inspection results documented.

The Field Construction Procedure (FCP 121) will be updated to reflect the requirements on the equipment storage history cards. The estimated completion date is June 1, 1983.

#### PREVENTIVE ACTION

The Materials Preventive Maintenance and Storage Group will comply with the equipment storage history card requirements on the spraying of the electrical contacts every two years. This function will be documented on the history card when it is performed.

#### APPENDIX A, PARAGRAPH B, VIOLATION (83-04-02)

10 CFR 50, Appendix B, Criterion XIII requires that measures shall be established and performed to prevent damage or deterioration during storage and installation. Stone and Webster Construction Methods Procedure (CMP) 1.3 and Limitorque storage procedure dated August 13, 1976, requires that during installation of the MOV's that the limit switch compartment must be maintained clean with cleaning to be performed to minimize ingress of foreign materials during and after installation work in the limit switch compartment area.

Contrary to the above, on February 9, 1983, MOV 102B and MOV 102D installed in the Intake Structure, had dirt inside the limit switch compartment. In addition, components were corroded and the gasket damaged on the MOV 102D compartment.

#### CORRECTIVE ACTION

Nonconformance and Disposition reports 2108, February 16, 1983, and 2252, April 14, 1983 have been issued to correct the discrepancies for MOVs 102B and 102D. The dispositions are to clean the limit switch compartment and spray the contacts for valve MOV 102B, and return the valve control section of MOV 102D to the manufacturer.

#### PREVENTIVE ACTION

The Materials Preventive Maintenance and Storage Group has initiated a monitoring program for all Limitorque valves with a visual surveillance performed on a semi-annual basis.

This will include checking the packaging, plugs, covers, dryness, cleanliness and proper heat source (when used). This function will be documented on the equipment storage history card. When deviations to the above requirements are found, the limit switch compartment will be opened and inspected. The inspection will be documented and corrective action taken as directed by the site engineering group.

Cable pulling and termination work required for Limitorque valves is being coordinated by construction to minimize the duration and number of times valve limit switch compartments are opened. Cables will be coiled at the last raceway near the valve and will be tailed in and terminated in one operation.

We trust these corrective actions satisfactorily respond to the violations cited in Reference (1).

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

*W. G. Council*

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W. G. Council  
Senior Vice President

*C. Frederick Sears*

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By: C. F. Sears  
Vice President Nuclear and  
Environmental Engineering