

NORTHEAST UTILITIES



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

General Offices • Selden Street, Berlin, Connecticut

P.O. BOX 270
HARTFORD, CONNECTICUT 06101
(203) 666-6911

October 14, 1982

Docket No. 50-336
A02777

Mr. R. W. Starostecki, Director
Division of Project and Resident Programs
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, Pennsylvania 19406

References: (1) R. W. Starostecki letter to W. G. Council
dated September 14, 1982 transmitting I&E
Inspection 50-245/82-15 and 50-336/82-16.

Gentlemen:

Millstone Nuclear Power Station, Unit 2
Response to I&E Inspection 50-336/82-16 Notice of Violation

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). Reference (1) informed the Northeast Nuclear Energy Company (NNECO) of two apparent Severity Level IV violations as a result of items of non-compliance noted during the routine safety inspection conducted June 27 through August 7, 1982.

1. Technical Specification 6.8.1 and Regulatory Guide 1.33 dated November 3, 1972, require that written procedures be established, implemented, and maintained for startup, operation, and shutdown of safety-related systems, including the containment cleanup system and that control of plant status be maintained through such administrative measures as log entries.

Item 1a

Operating Procedure OP2314B, "Containment and Enclosure Building Purge", revision 5, requires in step 7.1.4e that valve 2-AC-8 be verified closed prior to initiating containment purge operations.

8304050462 830329
PDR ADOCK 05000336
Q PDR

Contrary to that requirement, valve 2-AC-8 was not verified closed on July 23, 1982 prior to initiating contained purge operations. The valve was, in fact, open and its position contributed to an unplanned release of radioactive material on July 23 and 24, 1982.

Response

As stated above, Procedure OP2314B, Revision 5 requires valve 2-AC-8 to be closed and verified closed. The operators performing the purge evolution determined that pulling the fuses to this valve would be a more positive means of valve closure than using the valve handswitch. However, the valve has a fail-open design and this was not recognized at the time by operations personnel. In addition, pulling the fuses results in loss of remote (control room) indication. Consequently, 2-AC-8 position was not verifiable in the control room.

Following the incident, the use of procedures was discussed by the Operations Supervisor with all operations personnel. The requirement to follow procedural steps was strongly emphasized. In addition, the need to verify the "fail" position of valves prior to de-energization was stressed.

Item 1b

Operating Procedure OP2314B, "Containment and Enclosure Building Purge", revision 5, requires in a note to section 7 that the times of starting and stopping containment purge be recorded in the Shift Supervisor's log.

Contrary to the above, no entry appears in the Shift Supervisor's log regarding securing containment purge.

Response

Although the containment purge supply fan was secured on July 24, 1982, containment purge continued until July 27, 1982. During this time, at least one Enclosure Building Filtration System fan was in continuous operation exhausting from the containment. Securing of containment purge was correctly posted in the Shift Supervisor's log at 0055 hours on July 27, 1982.

Item 1c

Administrative Control Procedure ACP 10.05, "Log Book Requirements (Control Room)", revision 1, requires that the Shift Supervisor's log contain a record of "unit operating information", including "radiation hazards", "deviation in operation", "damage or malfunction of any major equipment, process system."
.. "and other significant events and evolutions.

Contrary to the above, the Shift Supervisor's log does not provide information regarding the unplanned and uncontrolled release of radioactivity on July 23 and 24, 1982.

Response

The requirement to ensure that the Shift Supervisor's log contain information as specified in Administrative Control Procedure ACP 10.05, "Log Book Requirements (Control Room)" was discussed with Operations personnel at the meetings referenced in the response to Item 1a. The Operations Supervisor emphasized the need to have factual entries available to document plant operations and allow management to evaluate and reconstruct all evolutions.

2. Title 10, Code of Federal Regulations, part 50.72(a)(8), requires that the Nuclear Regulatory Commission Operations Center be notified within one hour of the occurrence of "any accidental, unplanned, or uncontrolled radioactive release."

Contrary to the above, on July 23, 1982, the Nuclear Regulatory Commission Operations Center was not notified of an unplanned radioactive release until approximately 16 hours after it occurred.

Response

Administrative Control Procedure ACP-QA-10.01, Revision 15, "Plant Incident Report", specified in section 4.1.1.8 an immediate (within one hour) report be made to the NRC in the event of "any accidental, unplanned or uncontrolled radioactive release." Section 4.1.1.8 further states, "Normal or expected releases from maintenance or other operational activities are not included." Attachment A to ACP-QA-10.01 provides criteria to allow evaluation of operational activities. This criteria was transmitted to the NRC in a letter from W. G. Council and W. F. Fee to B. Grier, dated March 27, 1981. Attachment 1 to this letter identified as reportable (per 10CFR50.72) unplanned releases defined as "Any increase in noble gas release rates which is greater than 1500 mCi/sec above the normal (existing) release rate and this increase is not due to a planned or expected event as listed in Table 1." Section B to Table 1 lists "Scheduled activities which cause a direct release of gaseous activity from a closed volume." Item 1 of Section B is "Purging or venting the containment or drywell."

Subsequent to the initiation of containment purging on July 23, 1982, the on-shift operators observed an increase of greater than 1500 mCi/sec in the Unit 2 Stack gaseous radiation monitor. They attributed the increase to the on-going purge evolution and secured the containment purge supply fan and started a second enclosure building exhaust fan to minimize any further release. At this time, they were not aware of the mispositioned valve (2-AC-8). The Shift Supervisor discussed the increase

with the on-call Duty Officer (a management representative during backshifts and weekends) who concurred at the time with the decision that the incident was not reportable based on ACP-QA-10.01 guidance.

The next shift discovered that 2-AC-8 was open and not closed. Based on this information, plant management reevaluated the incident upon arrival at the plant on July 24, 1982. Following this review, it was determined that the release was, in fact, unplanned due to the mispositioning of 2-AC-8. Consequently, required notifications were made within one hour of this determination. Based on this sequence of events, NNECO does not believe there was a violation of 10CFR50.72 (a) (8).

Nevertheless, NNECO recognizes that this incident illustrates the need for better communications between the operating staff and the Duty Officer. The Shift Supervisors have been instructed to discuss significant occurrences and related decisions in detail with management personnel to provide a second, independent assessment. The criteria in ACP-QA-10.01 and their basis were reviewed in detail with operations supervisory personnel to assure their awareness of the application of the criteria.

NNECO recognizes the sensitivity associated with radiation releases of any magnitude and that evaluations must be made promptly and correctly. NNECO believes the actions taken should prevent recurrence of an incident of this type.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

W. G. Council
W. G. Council
Senior Vice President

By: J. F. Opeka
J. F. Opeka
Vice President
Nuclear Operations

STATE OF CONNECTICUT)

) ss. Berlin

COUNTY OF HARTFORD)

October 14, 1982

Then personally appeared before me W. G. Counsil, who being duly sworn, did state that he is Senior Vice President of Northeast Nuclear Energy Company, a Licensee herein, that he is authorized to execute and file the foregoing information in the name and on behalf of the Licensees herein and that the statements contained in said information are true and correct to the best of his knowledge and belief.

Sheila M. Cates
Notary Public

My Commission Expires March 31, 1986