

Northeast
Utilities System

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September 13, 1994

Docket No. 50-336
B14950

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

Millstone Nuclear Power Station, Unit No. 2
Commitment to Replace the X-182 Heat Exchanger

The purpose of this letter is to inform the NRC staff that a commitment made by Northeast Nuclear Energy Company (NNECO) associated with Millstone Unit No. 2 was not completed as planned. This letter also discusses the actions that NNECO is taking in light of this.

In a letter dated June 28, 1991⁽¹⁾, NNECO provided details pertaining to a temporary repair that was made to the lower 4.16 kV switchgear area cooling coils (X-182 heat exchanger) at Millstone Unit No. 2. This letter indicated that the X-182 heat exchanger, and other coolers of this type, would be replaced by December 28, 1991. NNECO has identified that these actions were not accomplished.

NNECO has investigated why this action was not completed as committed. Two processes, the Non-Conformance Report (NCR) system and the Commitment Tracking System, did not function as intended. An NCR was initiated to identify the leak; the NCR disposition provided instructions to temporarily repair the tube, and specified cooler replacement during an upcoming outage. The NCR disposition should have prompted initiation of a work order to replace the cooler. However, a work order was not initiated, and the NCR was closed. In retrospect, the NCR should have remained open until a permanent repair was made. It is noted that a work order was initiated in December 1993, apparently unrelated to this NCR, which directed the replacement of the cooler during the upcoming refueling outage.

The second process error that contributed to NNECO not implementing this commitment is that this commitment was not identified as a commitment in NNECO's internal tracking system. When a letter is

(1) E. J. Mroczka letter to the U.S. Nuclear Regulatory Commission, "Temporary Repair to X-182 Heat Exchanger Tube," dated June 28, 1991.

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issued to the NRC, commitments to the NRC are specified. These commitments are entered into a tracking system and provide reminders regarding commitments and their completion dates. In this particular letter, no commitments were identified.

Since this letter was issued, the Nuclear Group (NG) Procedure that controls the NCR process has been enhanced. This enhancement requires that all temporary modifications, such as the temporary repair to the X-182 heat exchanger, be included on the jumper and lifted lead log. Had this requirement been in place when the NCR was generated, it is unlikely that the commitment to replace the cooler would have been overlooked.

The failure to identify this action as a commitment within the commitment tracking system was due to personnel oversight. All letters issued to the NRC six months prior to and after this event for which this particular individual had primary responsibility were reviewed to ensure all other technical commitments to the NRC were properly identified. No additional errors were found.

The commitment to replace the X-182 heat exchanger was initiated because NNECO did not have an acceptable method of plugging tubes in the cooler. During the past year, a method and the necessary tools were developed to mechanically plug tubes in this type of heat exchanger. The leaking tube in the X-182 heat exchanger has recently been plugged using this method, making wholesale replacement of the heat exchanger unnecessary. Nonetheless, NNECO has ordered new heat exchangers, which have been redesigned and are expected to prevent the types of leaks experienced by the current heat exchangers. These heat exchangers (X-181A, X-181B, X-182 and X-183) are now tentatively scheduled to be replaced during the October 1994 refueling outage.

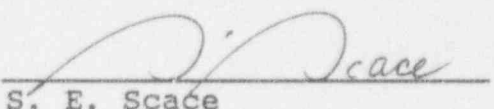
NNECO initiated a reportability evaluation for this topic and has concluded that this event is not reportable.

If you should have any questions on the above, please contact Mr. R. H. Young at (203) 440-2073.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

FOR: J. F. Opeka
Executive Vice President

BY: 
S. E. Scafe
Vice President

cc: See Page 3

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cc: T. T. Martin, Region I Administrator
G. S. Vissing, NRC Project Manager, Millstone Unit No. 2
P. D. Swetland, Senior Resident Inspector, Millstone Unit
Nos. 1, 2, and 3