

NORTHEAST UTILITIES



THE CONNECTICUT LIGHT AND POWER COMPANY
WESTERN MASSACHUSETTS ELECTRIC COMPANY
NEW YORK WATER POWER COMPANY
NORTHEAST UTILITIES SERVICE COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY

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January 4, 1991

Docket No. 50-336
A09187

Mr. E. C. Wenzinger, Chief
Projects Branch No. 4
Division of Reactor Projects
U. S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, Pennsylvania 19406

Dear Mr. Wenzinger:

Millstone Nuclear Power Station, Unit No. 2
RI-90-A-0205

We have completed our review of an allegation concerning activities at Millstone Unit 2 (RI-90-A-0205). As requested in your transmittal letter dated December 6, 1990, our response does not contain any personal privacy, proprietary, or safeguards information. The material contained in this response may be released to the public and placed in the NRC Public Document Room at your discretion. The NRC letter and our response have received controlled and limited distribution on a "need to know" basis during the preparation of this response.

Issue

On November 4, 1990, the motor from P5C was observed in the parking lot. The oil had not been removed from the motor as required by MP-2720D4, Step 5.1.2, which is performed prior to disconnecting the motor leads. The AVO for the motor removal did not contain MP-2720D4, and this omission is contrary to ACP-2.02C. The AVO did not contain a material accountability log as required by MP-2720C5, Step 4.4.

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Please discuss these statements and their validity. Are any of the alleged procedural compliance issues valid, and if so, do these occurrences suggest a generic procedural adherence problem?

This issue was segregated into four distinct segments, each of which is addressed in turn below.

1. Oil had not been removed from the motor prior to removing the motor.

Response

Oil should have been removed from the upper and lower bearing housings prior to removing the pump from the screenhouse. Removal of the motor is the responsibility of the Electrical Job Supervisor; however, the removal of the oil and moving the motor is actually performed by the mechanics. The procedure governing the pump overhaul does not address removing oil prior to removing the motor. The problem appears to be more a coordination problem rather than a procedure compliance problem. The procedure governing the pump overhaul will be revised to ensure better coordination between mechanics and electricians for the motor removal task.

2. Oil should have been removed from the motor prior to disconnecting the motor leads.

Response

MP-2720D4 is a generic procedure for the overhaul of 4160 volt motors. Unit 2 Maintenance is in the process of preparing specific procedures for each model of 4160 volt motors. MP-2720B2 was prepared specifically for the service water pump motors; therefore, MP-2720B2 is the procedure that governs the removal and overhaul activities for these motors. The steps associated with the removal of the motor in MP-2720B2 were resequenced so that the motor leads are disconnected prior to requiring that the oil be removed from the bearing housings. Therefore, this aspect of the issue is not a concern.

3. The AWO for the motor removal did not contain MP-2720D4 which is contrary to ACP-2.02C.

Response

The procedures that are listed in the AWO are a function of the local ID of the equipment. The AWO was prepared under the local ID for the pump rather than the local ID for the motor. Therefore, procedure MP-2720B2 was not listed. ACP-QA-2.02C states that an approved procedure is required for disassembly, repair, and reassembly of all Category 1 equipment. AWO M2-90-13312 specified disconnecting motor leads and motor removal; therefore, a procedure was not specifically required by ACP-QA-2.02C. In reviewing this event, it is evident that

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procedure MP-2702B2 should have been part of the work package. This procedure provides guidance on the sequencing of the removal of the motor. The procedures listed for the local ID for the pump have been revised to include the electrical procedures MP-2720B2 and MP-2720C5, and the pump overhaul procedure has been revised to include instruction for removal of the motor.

4. The AVO did not contain a material accountability log as required by MP-2720C5.

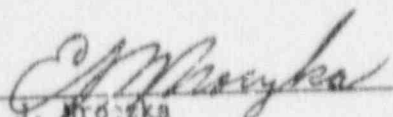
Response

The material accountability precaution was "N/A'd" and initialed by the job supervisor. Material accountability is not required for either the switchgear cubical door or the rear cable compartment cover that encloses the area where workman grounds are installed. Therefore, a material accountability log is not required to be included in the AVO. This clarification will be added to procedure MP-2720C5.

After our review and evaluation, we find that none of these issues taken either singularly or collectively present any indication of a compromise of nuclear safety. We appreciate the opportunity to respond and explain the basis for our actions. Please contact members of my staff if there are any further questions on any of these matters.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY


E. J. Wroczka
Senior Vice President

cc: W. J. Raymond, Senior Resident Inspector, Millstone Unit Nos. 1, 2,
and 3