



Northeast
Utilities System

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September 30, 1994

Docket No. 50-336
B14998

Re: 10CFR2.201

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

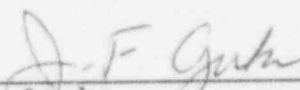
Millstone Nuclear Power Station, Unit No. 2
Reply to a Notice of Violation
Inspection Report No. 50-336/94-21

In a letter dated August 31, 1994, the NRC Staff transmitted a Notice of Violation (NOV) relating to NRC Inspection Report No. 50-336/94-21.⁽¹⁾ The report discussed the results of the safety inspection conducted from May 18, 1994, through July 9, 1994, at Millstone Unit No. 2. The inspectors concluded that, during certain maintenance activities to increase voltage on the 'B' battery charger, the scope of the work order was revised without appropriate documentation. The Staff acknowledged that the violation was of low safety significance, but the issue was cited as a Level V violation due to recurring problems in the area of procedural adherence.

The Staff requested that Northeast Nuclear Energy Company (NNECO) respond within 30 days of the date of the letter transmitting the NOV. Accordingly, Attachment 1 to this letter provides NNECO's reply to the NOV, on behalf of Millstone Unit No. 2, pursuant to the provisions of 10CFR2.201.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



J. F. Opeka
Executive Vice President

110003

cc: See Page 2

(1) J. P. Durr letter to J. F. Opeka, "Notice of Violation (NRC Inspection Report 50-336/94-21)," dated August 31, 1994.

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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

Docket No. 50-336
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Attachment 1

Millstone Nuclear Power Station, Unit No. 2

Reply to a Notice of Violation
Inspection Report No. 50-336/94-21

September 1994

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Restatement of the Violation:

Millstone Unit 2 Technical Specification 6.8.1 requires that procedures covering station activities be established and implemented. Station administrative procedure WC-1, "Work Control Program," was established pursuant to the above.

Appendix 6 of procedure WC-1 requires, in part, that any changes in the scope of work to be performed is documented using a repetitive change record sheet.

Contrary to the above, on July 7, 1994, the scope of AWO M2 94 07058, a maintenance activity on the 'B' battery charger, was revised to raise the battery charger voltage to 136 Volts, and the change in scope was not documented on a repetitive change record sheet.

1. Reason for the Violation:

On July 7, 1994, cell number 50 on the 'B' 125 volt class 1E battery was found to be less than the 2.08 volts as required by the quarterly Technical Specification surveillance test. The individual cell voltage (ICV) for Cell 50 measured 2.06 volts, but the cell's specific gravity was within the acceptable range. At approximately 1200 hours, the Shift Supervisor (SS) logged into Technical Specification Action Statement (TSAS) 3.8.2.3b, thus declaring the 'B' Battery inoperable due to its ICV being 0.02 volts lower than the TS requirement.

An Automated Work Order (AWO) was processed to check the cell, ductor connections, torque check bolts, clean connections, and read and record ICV. The AWO checks were performed and a subsequent discussion was held to consider raising the battery charger float voltage setting in an effort to increase the ICV of cell 50. A change was written to the AWO to adjust the float voltage to 135 volts, based on a note in Surveillance Procedure (SP) 2736B which stated that the setting at the DC battery terminals should be 132-135 volts DC. This change to the AWO was signed by the First Line Supervisor (FLS) and the Work Planning and Control (WP&C) Operations Department Supervising Control Operator.

The battery charger voltage was increased to 135 volts in an effort to raise the ICV of cell 50. Cell 50 ICV responded slightly, but not quickly enough to meet the two hour TSAS requirement. Soon thereafter the decision was made to increase the charger voltage one volt higher. The AWO was not revised prior to this change.

A unit shutdown was commenced at 1400 hours, with appropriate notifications made pursuant to 10CFR50.72, due to expiration of the TSAS with the ICV less than required. The cell voltage continued to increase and reached the required voltage at 1410 hours. At 1430 hours, the charger voltage was reduced to 135 volts based on discussions regarding proper voltage settings. At 2135 hours the 'B' battery was declared operable and the shutdown terminated.

NNECO initiated a Plant Information Report to investigate the issue, determine the facts, determine the cause(s), and determine appropriate corrective actions. This process has determined that the cause of the violation is:

The FLS did not follow Work Control procedure WC-1 "Work Control Process", when he did not process a second change to the AWO prior to the adjustment of the battery voltage to 136 volts. He directed that the charger voltage be increased, based on the verbal guidance of the Maintenance Electrical Engineer, who had determined that the voltage could be raised as high as 137 volts. The cause of this event is procedural noncompliance in that the FLS did not properly review the changed AWO and incorrectly assumed that he had the flexibility to raise the setting to 136 volts.

2. Corrective Steps Taken and the Results Achieved:

1. Those directly involved in this event (i.e., the FLS and maintenance electrical engineer) were counseled regarding their responsibility to process a change to the AWO if additional work is to be performed beyond that which is specified in the AWO.

During counseling, the work control process (WC-1) was reviewed with the individuals involved to ensure this event does not recur.

2. Procedure 2736A has been revised to provide guidance on adjusting the battery charger voltage.

3. Corrective Steps That Will Be Taken to Avoid Further Violations:

1. The scope of future training sessions provided on WC-1 will include a re-emphasis on the importance of carefully reviewing changes to AWOs before performing work to ensure that a change in work scope is fully addressed.
2. The Millstone Unit No. 2 FLSs and personnel that would assume upgrade responsibilities in the field will receive additional training on WC-1 in October 1994.

4. Date When Full Compliance Will be Achieved:

Millstone Unit No. 2 is presently in compliance with Technical Specification 6.8.1.