

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 26, 1991

Docket No. 50-336
A09352

Mr. Charles W. Hehl, Director
Division of Reactor Projects
U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, Pennsylvania 19406

Dear Mr. Hehl:

Millstone Nuclear Power Station, Unit No. 2
RI-90-A-221

We have completed our review of an allegation concerning activities at Millstone Unit No. 2 (RI-90-A-221). As requested in your transmittal letter, 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. Based upon our request on March 15, 1991, Region I personnel extended the due date for this response to April 26, 1991. Additional time was requested to support the ongoing INPO evaluation and to prepare for an Enforcement Conference held on March 27, 1991 involving an ongoing allegation-related matter.

Issues

The following drawing deficiencies associated with the electro-hydraulic control (EHC) system have been identified:

1. A recent modification replaced pressure transmitter PT-4297A and added a current/voltage converter. These items were not reflected on drawing NUSCO 25203-39077, sheet 73D, although PDCR 2-88-83 did update loop diagram 25203-28500, sheet 504.
2. Drawing No. NUSCO 25203-39077, sheet 73E for the main turbine pressure demodulator identifies a wrong part number (11D9988GE1 [identified] versus 117D9988GE3 [actual]).
3. The diode function control board which processes signals to the turbine control is not reflected on NUSCO drawing 25203-39077, sheet 73E.

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Please discuss if there is any validity to the above issues and provide the details of your review. Please include any corrective actions that you have taken or may take in response to the identified deficiencies. Please discuss if any generic drawing control problems are apparent as a result of your review.

Background

The referenced drawings are vendor-supplied block diagram schematics showing the configuration of the system as supplied and are not intended to be detailed wiring diagrams. The information missing from the referenced drawings has no effect on the operation of the system, nor does it affect the ability to maintain the system. Other drawings do contain the missing information and would more likely be used to work on the system. These issues could have been easily handled by processing a drawing change request (DCR). Procedure ACP QA-3.24 provides instructions to anyone who finds a drawing in need of change or revision on how to process the proper correction.

Response

Issue 1

The referenced issues are not considered to be drawing deficiencies. The EHC system is a package system supplied by GE with these drawings to familiarize the owner with the system configuration. The missing information is not typically supplied on this type of drawing. However, the information is contained in other NUSCO controlled drawings. Technical Training is aware that GE drawings do not have a high level of detail and therefore they provide additional information during training on EHC in order to help prevent any confusion. Students are also told where to find the appropriate drawings and information. A DCR, M2-S-41891, has been initiated in accordance with ACP-QA-3.24 against NUSCO drawing 25203-28500, sheet 504 in order to provide reference to drawing 25203-39077, sheet 73D. This should eliminate any potential confusion in the future.

Issue 2

NUSCO drawing 25203-39077, sheet 73E has no part numbers identified on it. We are not able to evaluate this issue with the information available to us at this time. Please advise us if you wish us to pursue this matter further.

Issue 3

The diode function generator control board is shown on NUSCO drawing 25203-39077, sheet 73E, contrary to what is stated. It is located at coordinates A9 of that sheet. While what is represented on the drawing does not exactly duplicate the circuit board wiring, it is not intended to do so. As stated before, the drawing is a diagram intended to give a general

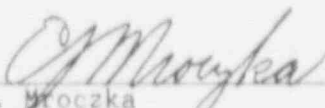
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representation of the system configuration. Circuit card inputs, outputs, test points, and points of adjustment are accurately depicted on the diagram. The details of the make-up of the circuit card are not shown in order to improve the drawing clarity. These details are provided on another vendor drawing (GE 996D336).

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 my staff if there are any further questions on any of these matters.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY


E. J. Mroczka
Senior Vice President

cc: W. J. Raymond, Senior Resident Inspector, Millstone Unit Nos. 1, 2,
and 3
E. C. Wenzinger, Chief, Projects Branch No. 4, Region I