

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

General Offices • Selden Street, Berlin, Connecticut

P.O. BOX 270
HARTFORD, CONNECTICUT 06141-0270
(203) 665-5000

Ray's file Kelly/04

September 5, 1991

Docket No. 50-336
A09738

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-91-A-0178

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. Additional time to respond to this issue was granted by the Staff in a telephone conversation on August 27, 1991.

ISSUE:

During performance of a functional surveillance test on radiation monitor RM 8132, it was discovered that a recent change to OP 2314A had changed the instrument alarm setpoint and that the required alarm setpoint did not agree with the setpoint on the instrument's calibration sticker. Surveillance Procedure 2404E (sic) required the technician to verify that the required setpoint from OP 2314A agrees with the setpoint on the calibration sticker.

Request:

The concern is that the procedure for making changes to procedures requires a review by the PORC but, in this case, they apparently failed to see that this change to an operations procedure also affected some surveillance procedures.

Response:

The radiation monitor calibration sticker does not provide an indication of the instrument's setpoint. The setpoint is provided on a separate setpoint sticker which indicates the instrument number, setpoint, and date.

9412050153 931115
PDR FOIA
HUBBARD92-162 PDR

m/s/c

Mr. Charles W. Behl, Director
U. S. Nuclear Regulatory Commission
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September 5, 1991

Surveillance procedure SP 2404AE does not require the person performing the surveillance to verify the setpoint with the calibration sticker, but the procedure does require as part of the functional test that the setpoint be looked up in the applicable operations procedure (in this case OP 2314A). Based on these conditions, the issue stated above does not appear to be valid.

The following addresses the request concerning the function of the Plant Operations Review Committee (PORC) in reviewing procedure changes.

Administrative Control Procedure ACP-QA-3.02 Station Procedures and Forms establishes the requirements for controlling the review, approval, changes, and revisions to station procedures required under Technical Specifications. As part of this procedure, the cognizant department head is responsible for review of a procedure with respect to satisfaction of Technical Specifications, correlation between parent and subordinate procedures and verification that the procedure or changes agree with plant configuration and appropriate technical documentation.

The membership of the PORC, consisting of the department heads for the four functional groups of the unit, i.e., Operations, Engineering, Maintenance and Instrumentation and Controls (I&C), helps to ensure that these areas of expertise are brought to bear on the procedures and changes brought before the committee. Thus, a procedure or change originating in one functional area of the plant is exposed to review by the other functional areas in a manner intended to provide a broad review of the possible impact of any procedure or change.

For example, this process was applied to procedures OP 2314A and SP 2404AE in the following manner.

I&C procedure SP 2404AE Rev. 0 - "Unit 2 Stack Gaseous Process Radiation Monitor, RM-8132B Functional Test" was approved in PORC meeting #2-86-11 and became effective February 20, 1986. Procedure SP 2404AE provides instructions in Section 7.3.2 directing the person performing the surveillance to "Refer to Operations Procedure 2314A and obtain the current 'Process Monitor Radiation Hi Hi' alarm setpoint" The individual performing the surveillance is specifically directed to "Refer to Section 8, the alarms and malfunctions section of OP 2314A."

Change #2 to procedure SP 2404AE, approved at PORC meeting #2-90-10 and signed by the Unit Superintendent on January 24, 1990, directs the procedure user to Section 6 of the Operations procedure for the reason that "Ops procedure format was changed." Change #3 to the surveillance data form IC 2404AE-1 redirected the form user in step 7.3.2 by changing the procedure reference to read "2314A, Section 6.3.1."

In both the procedure providing instructions for the surveillance activities and the form used to record data, instructions are provided which direct the user to the proper location in the operations procedure to obtain the Millstone Unit No. 2 Stack Gaseous Monitor setpoint.

Mr. Charles W. Hehl, Director
U. S. Nuclear Regulatory Commission
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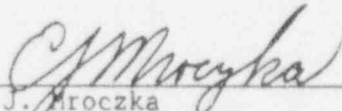
In June 1990 Operations procedure OP 2314A was revised to move the setpoint of RM8132B in a more conservative direction from its previous value of 500(+0, -300) CPM to a new value of 400 (+100) CPM. This Operations procedure change did not require a change to the I&C surveillance procedure which tells the user where to find the necessary setpoint value.

As discussed above, a revision to the Operations procedure format resulted in a subsequent change to the I&C procedure and its associated form. The PORC functions as the focus for review of such departmental interactions to ensure coordination between department procedures.

After our review and evaluation of this issue, we find that this issue did not present any indication of a compromise of nuclear safety. A note in the comments section of the surveillance cover sheet made us aware of the difference between setpoint sticker and procedure setpoint value. The setpoint was within the previous range and a new setpoint sticker has been placed. We appreciate the opportunity to respond and explain the basis of our actions. Please contact my staff if there are 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, Division of Reactor Projects
E. M. Kelly, Chief, Reactor Projects Section 4A
J. T. Shedlosky, NRC, Millstone Nuclear Power Station

COTRAP LETTER # Ad9738

DATE OF LETTER :

J. R. Himmelwright	W218
R. M. Kacich	W218
R. T. Laudenat	Millstone
L. M. Perzanowski	W218
E. M. Richters	E217
P. F. Santoro	Old Lyme
R. J. Schmidt	RH B3F3
R. P. Zysk	Old Lyme
N. S. Reynolds	Winston & Strawn
R. K. Walker	Winston & Strawn

COTRAP File (Blue Sheet Only)

Additional Distributions:

COMMITMENT / ACTION TRACKING INFORMATION

Full/Partial Response To: COTRAP # or Ad9738
 MRC COMMITMENTS) PORCOM # _____
 Number of Calendar days in Advance (+) or Late (-) of Commitment: _____

SIGNIFICANCE FACTORS ESTIMATION: To be completed by respective support groups; initial under - High, Low or N/A)	IMPACT ON	SIGN-OFF BY	HIGH	LOW	N/A
	External Requirement (Regulatory)	GFL	_____	_____	_____
	Plant Operations (Outage)	Superintendent	_____	_____	_____
	Safety Issues (PRA/ALARA)	Discipline ()	_____	_____	_____
	Resources (Cost/P. A. Needed)	Discipline ()	_____	_____	_____

COMMENTS _____

FL Lead	Discipline Lead	Input Due GFL (or) Action Completion Due	Response Due Date	DESCRIPTION
	N/A			

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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September 5, 1991

Docket No. 50-336
A09738

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475 Allendale Road
King of Prussia, Pennsylvania 19406

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RI-91-A-0178

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Request:

The concern is that the procedure for making changes to procedures requires a review by the PORC but, in this case, they apparently failed to see that this change to an operations procedure also affected some surveillance procedures.

Response:

The radiation monitor calibration sticker does not provide an indication of the instrument's setpoint. The setpoint is provided on a separate setpoint sticker which indicates the instrument number, setpoint, and date.

Mr. Charles W. Behl, Director
U. S. Nuclear Regulatory Commission
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September 5, 1991

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The following addresses the request concerning the function of the Plant Operations Review Committee (PORC) in reviewing procedure changes.

Administrative Control Procedure ACP-QA-3.02 Station Procedures and Forms establishes the requirements for controlling the review, approval, changes, and revisions to station procedures required under Technical Specifications. As part of this procedure, the cognizant department head is responsible for review of a procedure with respect to satisfaction of Technical Specifications, correlation between parent and subordinate procedures and verification that the procedure or changes agree with plant configuration and appropriate technical documentation.

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Change #2 to procedure SP 2404AE, approved at PORC meeting #2-90-10 and signed by the Unit Superintendent on January 24, 1990, directs the procedure user to Section 6 of the Operations procedure for the reason that "Ops procedure format was changed." Change #3 to the surveillance data form IC 2404AE-1 redirected the form user in step 7.3.2 by changing the procedure reference to read "2314A, Section 6.3.1."

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Mr. Charles W. Behl, Director
U. S. Nuclear Regulatory Commission
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September 5, 1991

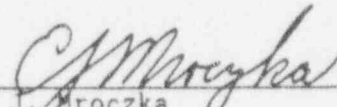
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Very truly yours,

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, Division of Reactor Projects
E. M. Kelly, Chief, Reactor Projects Section 4A
J. T. Shedlosky, NRC, Millstone Nuclear Power Station

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September 5, 1991

Docket No. 50-336
A09738

Casey's file

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

Dear Mr. Behl:

Millstone Nuclear Power Station, Unit No. 2
RI-91-A-0178

*9/12 Kelly
Re: and letter:
• Request DRSS Review
(Boxes / Jang)
using Hehl to Knapp
new
• NO more inspection*

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Request:

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Response:

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1. Cal Stickers

9412050153

Mr. Charles W. Behl, Director
U. S. Nuclear Regulatory Commission
AO9738/Page 2
September 5, 1991

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Mr. Charles W. Behl, Director
U. S. Nuclear Regulatory Commission
A09738/Page 3
September 5, 1991


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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, Division of Reactor Projects
E. M. Kelly, Chief, Reactor Projects Section 4A
J. T. Shedlosky, NRC, Millstone Nuclear Power Station

Kottan

RECORD OF ALLEGATION PANEL DECISIONS

SITE: Millstone PANEL ATTENDEES:

ALLEGATION NO.: RI-91-A-0178 Chairman - Wiggins

DATE: 18 Sep 91 (Panel No. 1 2 3 4 5) Branch Chief -

PRIORITY: High Medium Low Section Chief (AOC) - Kelly

SAFETY SIGNIFICANCE: Yes No Unkn Sr. Allegation Coord (SAC) Fuhrmeister

CONCURRENCE TO CLOSEOUT: DD BC SC OI Representative -

CONFIDENTIALITY GRANTED: Yes No (Other) Kottan Conner (T)
(See Allegation Receipt Report)

IS THERE A HARASSMENT/DISCRIMINATION ISSUE: Yes No

IF YES,

1) has the individual been informed of the DOL process and the need to file a complaint within 30 days Yes No

2) has the individual filed a complaint with DOL Yes No

3) has a letter been sent to the complainant seeking any safety concerns Yes No

IS A CHILLING EFFECT LETTER WARRANTED: Yes No

IF YES, HAS IT BEEN SENT Yes No

HAS THE LICENSEE RESPONDED TO THE CHILLING EFFECT LETTER: Yes No

ACTION:

RESP ECD

- 1) DESS to review Wd response on rad monitor ERPS 0991
Surveillance
- 2) _____
- 3) _____
- 4) _____
- 5) _____

NOTES

The Response Letter from the licensee is good
and accurate.

Sept 20, 1991

Jason C. Jang

m/87

from the desk of

9/13

TO: Bill

GENE KELLY

Subject: Smarter Attack in Melbourne
Allegations

Re: 9/5 NCR response to Allegation 91-178
Unit 2 Stick Gas Monitor - Alarm Setpt.

We should formally request DRSS
review of this response, particularly
in light of Tang's recent inspection
and their expertise. It should
address:

- use of cal. brother stickers
- POKE review of procedures
- adequacy of alarm setpoint.

I'd also request DRSS prepare
a response to allegations...

Gene

Note