

0262

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NORTHEAST UTILITIES



THE CONNECTICUT LIGHT AND POWER COMPANY
WESTERN MASSACHUSETTS ELECTRIC COMPANY
HOLYoke 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

December 5, 1991

Docket No. 50-336
A09963

Re: Employee Concerns

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

Dear Mr. Hehl:

Millstone Nuclear Power Station, Unit No. 2
RI-91-A-0262

We have completed our review of an identified issue concerning activities at Millstone Station. 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 transmittal letter and our response have received controlled and limited distribution on a "need-to-know" basis during the preparation of this response. The response to this allegation was originally due on December 4, 1991. Two Additional weeks in which to respond were granted in a telephone conversation with the Region I Staff on December 2, 1991.

ISSUE:

"It was alleged that, on or about October 2, 1991, the Unit 2 I&C [Instrumentation and Controls] Department library did not have the correct technical manual for the Unit 2 Emergency Diesel Generator local PANALARM units. It was further alleged that an I&C technician obtained (from the Unit 1 I&C Department library) the Instruction and Operating Manual for the Unit 1 PANALARM Model 11P Panagard Temperature Monitor. There was no allegation that a vendor manual applicable to Unit 1 was actually used for Unit 2 work activities."

REQUEST:

"Please provide your review of the above assertions. If the above conditions are valid, notify us of the corrective actions you have taken to prevent recurrence. Also provide us with an assessment of the safety significance of any identified deficiencies, including generic considerations.

"In addition to the above general request, please provide your review of the following specific questions.

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Mr. Charles W. Hehl
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December 5, 1991

- "a. Should a controlled copy of the vendor manual for the Unit 2 Emergency Diesel Generator local PANALARM units be in the Unit 2 I&C Department library?
- "b. Under what circumstances would it be appropriate to use vendor manuals from different Millstone Units that apply to apparently similar components?
- "c. What administrative controls at Millstone Station govern procurement, verification and use of vendor manuals?"

RESPONSE:

The concern is valid as stated. The I&C vendor manual library did not have a copy of the applicable PANALARM manual for the diesel generator alarm panel.

On October 2, 1991, an instrument specialist notified the I&C Department vendor manual custodian via a three-part memo that the correct diesel room alarm panel vendor's manual was not present in the technical library. The memo also stated that a copy of the correct manual from the Millstone Unit No. 1 I&C Department had been obtained for temporary use and a copy of the correct manual was included with the memo.

That same day the department custodian of vendor manuals installed a temporary copy of the manual in the Millstone Unit No. 2 I&C vendor manual library. A permanent copy was then requested from the Vendor Manual Control office, which maintains the master set of manuals for the site, and an SF350, "New Manual Review and Approval Checklist," was processed. The permanent copy was received and installed in the I&C library on October 7, 1991.

The technician and custodian followed the correct procedures in identifying and obtaining a new manual as soon as the need was identified.

We find no significant safety or generic issues associated with these actions.

Response to specific questions contained in Request Section:

- a. "Should a controlled copy of the vendor manual for the Unit 2 Emergency Diesel Generator local PANALARM units be in the Unit 2 I&C Department library?"

Response:

Yes, a controlled copy of the appropriate manual should be in the Millstone Unit No. 2 I&C library.

- b. "Under what circumstances would it be appropriate to use vendor manuals from different Millstone Units that apply to apparently similar components?"

Mr. Charles W. Hehl
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December 5, 1991

Response:

After verification that the manual matches the installed plant equipment, the manual may be immediately used with the approval of the department manager. Station Form SF350 is then processed through the Nuclear Records Department to make the manual a permanent part of the Millstone Unit No. 2 vendor manual system.

- c. "What administrative controls at Millstone Station govern procurement, verification and use of vendor manuals?"

Response:

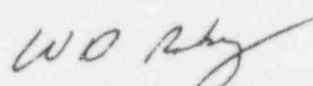
ACP-QA-3.23, "Control of Vendor Technical Manuals," establishes a system by which the content of vendor technical manuals and their use are to be controlled at Millstone Station. This procedure provides that manuals purchased for test equipment, calibration equipment, and other support equipment may be controlled by the requirements of the procedure at the discretion of the responsible department manager. I&C Department Instruction 1.08, "Vendor Technical Manuals," assigns Millstone Unit No. 2 I&C Department responsibilities and procedures for implementing ACP-QA-3.23.

After our review and evaluation of this issue, we find that this issue did not present any indication of a compromise of nuclear safety. 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

FOR: J. F. Opeka
Executive Vice President


BY: W. D. Romberg
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, U.S. Nuclear Regulatory Commission, Millstone

RECORD OF ALLEGATION PANEL DECISIONS

SITE: Millsstone 2 PANEL ATTENDEES:
ALLEGATION NO.: EI-91-A-0262 Chairman - Wryms
DATE: 90CT91 (Panel No. 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) Anderson Barkley Conner
(See Allegation Receipt Report) Shedlosky (1) Frenette
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) Refer to NU, issues to be covered in letter: DEP 250741
No tech manual for annunciator in U2 IEC Library, a
- 2) manual for an apparently similar component obtained from U1 for library
1) should there have been a copy of the manual in the
- 3) U2 IEC library
2) was obtaining a manual for similar component at
- 4) U1 (by IEC Technician) appropriate corrective action
3) what are the controls on vendor documents
- 5) procurement, verification, and use?

NOTES:

5/2/9

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ENCLOSURE

Concern RI-91-A-0262:

It was alleged that, on or about October 2, 1991, the Unit 2 I&C Department library did not have the correct technical manual for the Unit 2 Emergency Diesel Generator local PANALARM units. It was further alleged that an I&C technician obtained (from the Unit 1 I&C Department library) the Instruction and Operating Manual for the Unit 1 PANALARM Model 11P Panagard Temperature Monitor. There was no allegation that a vendor manual applicable to Unit 1 was actually used for Unit 2 work activities.

Request:

Please provide your review of the above assertions. If the above conditions are valid, notify us of the corrective actions you have taken to prevent recurrence. Also provide us with an assessment of the safety significance of any identified deficiencies, including generic considerations.

In addition to the above general request, please provide your review of the following specific questions. Should a controlled copy of the vendor manual for the Unit 2 Emergency Diesel Generator local PANALARM units be in the Unit 2 I&C Department library? Under what circumstances would it be appropriate to use vendor manuals from different Millstone Units that apply to apparently similar components? What administrative controls at Millstone Station govern procurement, verification and use of vendor manuals?

~~LIMITED DISTRIBUTION - NOT FOR PUBLIC DISCLOSURE~~

ALLEGATION RECEIPT REPORT

Date/Time Received: 1/27/92

Allegation No. 1140.HES
91-230; 91-262
(leave blank)

Name of Allegor: _____

Address: _____

Phone: _____

City/State/Zip: _____

Confidentiality:

Was it requested?

Yes _____ No ☒

Was it initially granted?

Yes _____ No ☒

Was it finally granted by the allegation panel?

Yes _____ No _____

Does a confidentiality agreement need to be sent to allegor?

Yes _____ No _____

Has a confidentiality agreement been signed?

Yes _____ No _____

Memo documenting why it was granted is attached?

Yes _____ No _____

Allegor's Employer: Unemployed

Allegor's Position/Title: N/A

Facility: Phill's Inc

Docket No.: _____

[Allegation Summary: brief description of concern(s)] _____

Food bank on recently received complaint
letters (dated) 1/13 and 1/21/92. Allegations
that either a) licensee lied to NRC in their
responses to NRC or b) licensee was aware some
inaccurate, inadequate and NRC didn't
fully investigate to find otherwise

Number of Concern: _____

Employee Receiving Allegation: _____

(first two initials and last name)

5/22/92

Detailed Description of Allegation:

1) 91-230-02; 1/13/92 absent letter, 10/16/91 NRC response letter
 EHC fittings issue.

- NU "lied" in their response... no further detail.

2) 91-262; 1/21/92 absent letter, NU response
 Diesel Harms Tech Manual issue. A09965

- Lack of tech manuals is a generic problem, and
 all other takes exception to NU's response... no further detail.

3) The all other refused to give any specifics; he stated
 that he wouldn't talk to us without a court
 recorder and an OI representative present.

He did state that NRC "already has all
 of this". His request is based on lack of

ACTION:

- 1) Response from NRC to similar past issues
 wherein NU's actions are not accurate or
 adequate, and we (NRC) buy them
- 2) "hook, line and sinker".
- 3)

Recommendations:

- a) possible IGO referral
- b) "strategy" for contesting without specifics
- c) re-examine closure of 91-230 & 262

NOTES

ALLEGATION RECEIPT REPORT

RJ-91-A-0012 RJ-91-A-0230
RJ-91-A-0113 RJ-91-A-0262
RJ-91-A-0120
(leave blank)

Date/Time Received: 12 Feb 92 / 9:20 am

Allegation No. RJ-91-A-0120
(leave blank)

Name of Allegor: _____

Address: _____

Phone: _____

City/State/Zip: _____

Confidentiality:

Was it requested?	Yes	_____	No	_____
Was it initially granted?	Yes	_____	No	_____
Was it finally granted by the allegation panel	Yes	_____	No	_____
Does a confidentiality agreement need to be sent to allegor?	Yes	_____	No	_____
Has a confidentiality agreement been signed?	Yes	_____	No	_____
Memo documenting why it was granted is attached?	Yes	_____	No	_____

Allegor's Employer: None

Position/Title: _____

Facility: Millstone

Docket No.: 50-295, 336, 423

Allegation Summary (brief description of concern(s): Ed Wenzinger and I called the individual to arrange for a transcribed meeting to elicit details of his disputes of allegation closeouts. He stated that he is not interested, he has already done it and hasn't gotten anywhere. He further stated that the information he has provided is not being addressed. He will sit down with his congressmen and provide the information to them, and let them explain to him why we are doing this. If we feel he has information he is not providing

Number of Concerns: 1

Employee Receiving Allegation: R. L. Fuhrmeister
(first two initials and last name)

Type of Regulated Activity (a) ☒ Reactor (d) _____ Safeguards
(b) _____ Vendor (e) _____ Other: _____
(Specify)
(c) _____ Materials

Materials License No. (if applicable): _____

Functional Area(s): (a) Operations (e) Emergency Preparedness
(b) Construction (f) Onsite Health and Safety
(c) Safeguards (g) Offsite Health and Safety
(d) Transportation ☒ (h) Other: Allegation Closeouts

5/229

Detailed Description of Allegation: we can subpoena him. when he gets
a subpoena and we bring him before a judge, his lawyer and the
press will be there. we take information from him, and
when he needs it, we bury it. He's not getting any information,
he can't fight his case. He's not going to play our game
anymore. "You people haven't done anything for 4 years, and
now you're under some pressure and we'll bring it all out the
hearings, and we will have hearings." "I have given you
many, many legitimate concerns and you've whitewashed them.
"You've got to get into the business of regulating nuclear
power, not promoting it, that's your problem." "If you had
done your job 3 years ago, I wouldn't be out on the street
now. I would have fought my first Doh case, and it would
have been allowed."

ALLEGATION RECEIPT REPORT

RI-91-A-0052 RI-91-A-02:
RI-91-A-0113 RI-91-A-02:
RI-91-A-0126 (leave blank)

Date/Time Received: 12 FEB 92 / 9:20 am

Allegation No. _____

Name of Allegor: _____

Address: _____

Phone: _____

City/State/Zip: _____

Confidentiality:

Was it requested?	Yes _____	No _____
Was it initially granted?	Yes _____	No _____
Was it finally granted by the allegation panel	Yes _____	No _____
Does a confidentiality agreement need to be sent to allegor?	Yes _____	No _____
Has a confidentiality agreement been signed?	Yes _____	No _____
Memo documenting why it was granted is attached?	Yes _____	No _____

Allegor's Employer: None

Position/Title: _____

Facility: Millstone

Docket No.: 50-295,336,423

Allegation Summary (brief description of concern(s): Ed Wenzinger and I called the individual to arrange for a transcribed meeting to elicit details of his disputes of Allegation closeouts. He stated that he is not interested, he has already done it and hasn't gotten anywhere. He further stated that the information he has provided is not being addressed. He will sit down with his congressmen and provide the information to them, and let them explain to him why we are doing this. If we feel he has information he is not providing

Number of Concerns: 1

Employee Receiving Allegation: R. L. Fuhrmeister
(first two initials and last name)

Type of Regulated Activity (a) ☒ Reactor (d) _____ Safeguards
(b) _____ Vendor (e) _____ Other: _____
(Specify)
(c) _____ Materials

Materials License No. (if applicable): _____

Functional Area(s): (a) Operations (e) Emergency Preparedness
(b) Construction (f) Onsite Health and Safety
(c) Safeguards (g) Offsite Health and Safety
(d) Transportation ☒ (h) Other: Allegation Closeouts

5/225

Detailed Description of Allegation: we can subpoena him, when he gets
a subpoena and we bring him before a judge, his lawyer and the
press will be there. we take information from him, and
when he needs it, we bury it. He's not getting any information,
he can't fight his case. He's not going to play our game
anymore. "You people haven't done anything for 4 years, and
now you're under some pressure and we'll bring it all out the
hearings, and we will have hearings." "I have given you
many, many legitimate concerns and you've whitewashed them."
"You've got to get into the business of regulating nuclear
power, not promoting it, that's your problem." "If you had
done your job 3 years ago, I wouldn't be out on the street
now. I would have fought my first POH case and it would
have been allowed."



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PENNSYLVANIA 19406 1415

MAR 04 1992

Docket No. 50-423

Mr. John F. Opeka
Executive Vice President - Nuclear
Northeast Nuclear Energy Company
P. O. Box 270
Hartford, Connecticut 06141-0270

Subject: NRC Inspection Report No. 50-423/91-27

Dear Mr. Opeka:

This letter refers to the service water system inspection conducted by Mr. James Trapp of the office on December 9-13, 1991 and February 13, 1992 at Millstone Unit 3. The service water system is vital in that it provides cooling water for safety-related systems that protect the health and safety of the public. Discussions of our findings were held by Mr. Trapp with Mr. Scafe of your staff at the conclusion of the inspection.

Areas examined during this inspection are described in the NRC Region I Inspection Report, which is enclosed with this letter. The inspection consisted of a review of design documentation, startup testing, deficiency reports, and the Generic Letter 89-13 tests results for the Millstone Unit 3 service water system. In addition the inspectors reviewed the enhancements currently being made to the secondary piping erosion/corrosion inspection program.

The service water system documentation reviewed indicates that the system was designed, fabricated, constructed and tested in accordance with applicable requirements. However, the failure by NNECO to implement certain recommendations of the Nuclear Safety Engineering Group, made during plant construction, resulted in service water system leakage and the failure to detect significant biofouling during subsequent plant operation. The issue of service water system biofouling was addressed by the NRC in Enforcement Action EA 91-107. The improvements currently being made to the erosion/corrosion program were acceptable.

9203160031

U. S. NUCLEAR REGULATORY COMMISSION
REGION I

Report No. 50-423/91-27

Docket No. 50-423

License No. NPF-49

Licensee: Northeast Nuclear Energy Company
P.O. Box 270
Hartford, Connecticut 06141-0270

Facility Name: Millstone Nuclear Power Station, Unit 3

Inspection At: Waterford, Connecticut

Inspection Conducted: December 9-13, 1991 and February 13, 1992

Inspectors: R. Harris, NDE Technician
H. Kaplan, Sr. Reactor Engineer
K. Kolaczyk, Resident Inspector Millstone

J. Trapp
J. Trapp, Sr. Reactor Engineer,
Engineering Branch, DRS

2/20/92
Date

Approved by: P. K. Eapen
Dr. P. K. Eapen, Chief, Systems
Section, Engineering Branch, DRS

2/20/92
Date

Areas Inspected: This inspection reviewed the Millstone Unit 3 service water system. Specific areas inspected are the American Society of Mechanical Engineers (ASME) code certification, pre-operational system testing, Design Deficiency Reports (DDRs), selected Northeast Utilities Significant Event Reports (NUSOER), and the results of the Generic Letter 89-13 testing. In addition, the current erosion/corrosion program enhancements were reviewed.

9203160047

Inspection Results: The service water system was adequately designed, fabricated, constructed and tested as evidenced by the documentation reviewed. However, the failure by NNECO to implement the recommendations of the Nuclear Safety Engineering Group prevented timely detection of system biofouling and leakage due to erosion. The erosion/corrosion program enhancements exceed Nuclear Utility Management and Resource Council (NUMARC) guidelines.

3.0 Carbon Steel Trunion - Copper-Nickel Piping Weld Problem

The inspector reviewed a previous welding problem involving carbon steel trunion attachments to copper-nickel (Cu-Ni) service water (SW) system piping. The problem which surfaced in October 1983 during construction involved two areas of concern; excessive distortion and melt-through (penetration into the pipe wall) that occurred when fillet welding the carbon steel trunion to the relatively thin schedule 10 (.134" wall) Cu-Ni pipe. On the basis of a review of engineering correspondence and discussions with the assigned welding engineers, the inspector concluded that the welding problem had been corrected in an acceptable and effective manner. The corrective actions consisted of three actions: (1) eliminating supports with trunion attachments where possible, (2) replacing other trunion attachments with non-integral attachments, and (3) where welded trunions were required, carbon steel trunions were replaced with Cu-Ni trunions. In the latter case, the existing pipe/trunion assembly was removed and replaced with a short, shop fabricated spool assembly (pup piece) that consisted of a heavier schedule 40 Cu-Ni pipe welded to a Cu-Ni trunion/Cu-Ni base plate/ steel buffer plate subassembly. The new Cu-Ni/carbon steel assembly was installed in the field utilizing a carbon steel to carbon steel attachment weld to the existing base plate with appropriate ASME IX welding procedures.

3.1 Service Water Pipe Integrity

The inspector reviewed a comprehensive report entitled, "Millstone 3 Service Water Piping Pressure Boundary Inspection and Report," dated November 25, 1991. The report, which was thoroughly discussed with key personnel, focused primarily on an assessment of the above ground large bore piping 14" NPS and larger. The pipe was fabricated from 90-10 copper-nickel roll bond clad carbon steel plate. The smaller bore underground piping was fabricated from solid 90-10 copper nickel pipe. Except for isolated systems which were not subject to flow conditions, 100% of the internal surfaces were visually inspected. The inspection revealed extensive cladding damage, and in some cases base metal damage that occurred in the component cooling primary (CCP) heat exchanger return lines in the auxiliary building, and cross connect lines at the 24' elevation. Significant cladding degradation was also detected in the "B" train supply piping in the SW access enclosure of the intake bay area. The greatest damage was found in areas upstream and downstream of orifice plates, near flanges, longitudinal and circumferential welds, changes in flow direction and branch line connections. In addition, the four 30 inch rubber lined butterfly (Pratt) valves were found to have extensive damage underneath the rubber lining as well as in the flanged areas adjacent to these valves. Damage was also found in the turbine plant component cooling water (TBCCW) supply and the recirculation spray system (RSS) piping in the engineered safety feature system (ESF). Except for a 45° elbow, the buried solid Cu-Ni piping was generally found in good condition. The report

concluded that the cladding degradation was most likely caused by erosion due to flow disturbance as the result of the presence of orifice plates, flanges, and welds. Once the cladding deteriorated the carbon steel wastage occurred by galvanic corrosion between the carbon steel and Cu-Ni cladding.

To correct and/or monitor the above conditions the licensee generated thirty-one nonconformance reports of which seventeen resulted in weld repairs to restore the wasted carbon steel to the required minimum ASME design thickness. A polymeric (Arcor) coating was applied to the inside surface after weld repairs, and to those areas in which the damage was limited to the cladding. The licensee selected Arcor because of their previous experience with the product. The coating was applied in accordance with Procedure MP3710AG. The inspector reviewed several of the aforementioned nonconformance reports (391-311, 391-250, 391-343) and attendant repair plans. In those cases where repair of base metal was employed, a magnetic particle or liquid penetrant inspection was used followed by hydrostatic testing. The 30" butterfly valves were returned to Pratt for repair. Several rusted ASTM 193 B7 bolts which were used with 3" and under silicone bronze flanges were examined by the inspector. After checking with maintenance, the licensee's metallurgist stated that the site had never experienced any bolt failures.

The licensee is preparing to develop a plan to inspect the SW system in the next refueling outage (RF04). The base line data for this plan will be the findings and recommendations generated in the aforementioned November 25, 1991 inspection report.

Except for one pin hole leak in a cast pump discharge elbow of low stress, and an emergency diesel generator bellows expansion joint which is currently under review by the NRC, all leaks in the SW system have been repaired in accordance with Section XI requirements.

3.2 N-5 Data Report Review

The inspector selected one of thirteen N-5 packages prepared by Stone & Webster, the ASME Code certificate holder and the licensee's agent. The N-5 package was identified as SWP-03. The review focused on spool piece 3SWP-20-2-23, a carbon steel, nickel-copper roll bonded (30 inch diameter - 13 ft x 11 7/8 inch long) spool piece which was fabricated by Southwest Fabricating and Welding Co. The package contained various documents such as the Design Certification Report, Piping Material Specification, material and filler material certifications, related NDE reports, and various certificates of compliance. No deviations or deficiencies were noted in this review.

3.3 Class 1 Pipe Restraints

The inspector visually examined three randomly selected, safety related, seismically designed, small bore restraints in the high pressure safety injection system. The welded restraints were identified as 3-S1H-1-PSR-339, 334, and 344. The subject restraints were found to conform dimensionally to the appropriate drawings. Although the restraints were painted which prevented a meaningful inspection of the quality of the fillet welds, no evidence of paint spalling or cracking was observed. The lack of spalling or cracking strongly suggests that these joints had not been subjected to any excessive force. The licensee also provided the appropriate stress calculations for each of these restraints. In addition, a computer check revealed no open deficiencies associated with these items.

4.0 Millstone Erosion/Corrosion Program

The inspector reviewed the enhancements made to the erosion/corrosion program following the November 6, 1991 failure of a moisture separator reheater drain line at Millstone Unit 2. The erosion/corrosion inspection program measures the wall thickness of non-safety related secondary system pipe to identify and replace degraded components prior to failure.

The Northeast Utilities erosion/corrosion program provides a systematic evaluation of pipe wall thinning inspection locations using Electric Power Research Institute (EPRI) CHEC/CHECMATE computer programs, plant specific experience, industry and engineering experience. In order to select plant systems to include in the erosion/corrosion program, each system in the plant is individually screened for susceptibility to erosion/corrosion wear. Locations are then selected for inspection based upon relative wall thickness wear ranking by CHEC/CHECMATE, time to minimum wall thickness based on CHEC/CHECMATE, and known problem areas from site specific and industry experience.

An independent review was conducted by the Northeast Utilities engineering group, prior to plant restart, to assure the quality of the erosion/corrosion program. This review verified that the inspection locations were correctly identified, identified locations were inspected and inspection results were adequately dispositioned.

The inspector reviewed the licensee's program against the EPRI and NUMARC standards. The licensee is committed to a long term program that exceeds NUMARC recommendations for E/C program. The inspector observed a team of licensee personnel reviewing ultrasonic test data, and concluded that the licensee is adequately implementing the CHECMATE program.

No violations or concerns were identified by the inspector.



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UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PENNSYLVANIA 19406

OCT 29 1991

Docket Number: 50-336
File Numbers: RI-91-A-0232 and RI-91-A-0263

Northeast Nuclear Energy Company
ATTN: Mr. John F. Opeka
Executive Vice President - Nuclear
P.O. Box 270
Hartford, Connecticut 06141-0270

Dear Mr. Opeka:

The U.S. Nuclear Regulatory Commission recently received information concerning activities at Millstone Unit 2. Enclosed are the details for your review and followup.

We request that the results of your review and disposition of these matters be submitted to Region I within 30 days of the date of receipt of this letter. We request that your response contain no personal privacy, proprietary, or safeguards information so it can be released to the public and placed in the NRC Public Document Room. If necessary, such information shall be contained in a separate attachment which will be withheld from public disclosure. The affidavit required by 10 CFR 2.790(b) must accompany your response if proprietary information is included. Please refer to file numbers RI-91-A-0232 and RI-91-A-0263 when providing your response.

The enclosure to this letter should be controlled and distribution limited to personnel with a "need to know" until your investigation of the concern has been completed and reviewed by NRC Region I. The enclosure to this letter is considered Exempt from Public Disclosure in accordance with Title 10, Code of Federal Regulations, Part 2.790(a). However, a copy of this letter excluding the enclosure will be placed in the NRC Public Document room.

The response requested by this letter and the accompanying enclosure are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Your cooperation in this matter is appreciated. We will gladly discuss any questions you have concerning this information.

Sincerely,

Charles W. Hehl, Director
Division of Reactor Projects

5/227

4411150202

Northeast Nuclear Energy Company

2

OCT 29 1991

Enclosure: 10 CFR 2.790(a) Information
Issues and Requests

cc w/o encl:

Public Document Room (PDR)

Local Public Document Room (LPDR)

State of Connecticut

bcc:

Allegation Files, RI-91-A-0232 and RI-91-A-0263

E. Connor

T. Shedlosky

W. Raymond

E. Kelly

Contractors Office File (REAGAN)

Concurrence:

RI:DRP

R. Barkley

10/___/91

RI:DRP

G. Kelly

10/___/91

10/22

RI:DRP

E. Wenzinger

10/25/91

10/29

0263

33

NORTHEAST UTILITIES



THE CONNECTICUT LIGHT AND POWER COMPANY
WESTERN MASSACHUSETTS ELECTRIC COMPANY
MOLYNEE 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

December 19, 1991

Docket No. 50-336
A09664

Re: Employee Concerns

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

Dear Mr. Hehl:

Millstone Nuclear Power Station, Unit No. 2
RI-91-A-0232 and RI-91-A-0263

We have completed our review of identified issues concerning activities at Millstone Unit No. 2. As requested in your transmittal letter of October 29, 1991, our responses do not contain any personal privacy, proprietary, or safeguards information. The material contained in these responses may be released to the public and placed in the NRC Public Document Room at your discretion. The NRC transmittal letter and our responses have received controlled and limited distribution on a "need-to-know" basis during the preparation of these responses. The responses to these issues were originally due on December 4, 1991. An additional two weeks in which to respond were granted in a telephone conversation with the Region I Staff on December 2, 1991.

ISSUE A-0232-01/A-0263-01:

"There were two examples of alleged inadequate control and maintenance of equipment spare parts. First, that a spare power supply in the warehouse (SPM 798, revision 16, item 34) for the 'B' RCP [reactor coolant pump] lower oil reservoir level alarm unit allegedly did not receive a capacitor change out, as did the in-service power supply units. Allegedly, PMMS [Production Maintenance Management System] item M2-02-ENV-PWR-X-20 (Serial No. 10521) typified a maintenance history record for a power supply replacement. Second, that an RPS [reactor pressure system] spare component, the Auxiliary Logic Drawer identified in Concern RI-91-A-0263-02, allegedly lacked a modification (three versus four amber indicating lamps)."

REQUEST:

"Please provide your review of the above assertions. If the above conditions are valid, notify us of the corrective actions you have taken to prevent

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recurrence. Also provide us with an assessment of the safety significance of any identified deficiencies, including generic considerations."

RESPONSE:

The assertion is partially valid. During the 1989 refueling outage a decision was made to change out the electrolytic capacitors in the GEMAC Model 570 power supply assemblies, including the spare power supply assemblies stored in the warehouse. The decision to change out capacitors was a preventive maintenance action based upon the length of time these power supply assemblies had been in service. As the result of an oversight on our part, the circuit board at issue, and two other circuit boards which were also not contained in the spare power supplies, were not changed out.

The auxiliary logic drawer at issue was not intended for use as a spare, and therefore did not require modification as asserted. This is discussed further in response to issue 0263-02 below.

Background:

As part of troubleshooting and maintenance activities, the individual involved is trained to check the equipment being installed against the equipment it is to replace and resolve any differences in configuration. Equipment is tested and proven completely functional before it is placed in service. This evaluation and testing process functioned as desired. The circuit board did not have the same capacitor installed as the board it was to replace. Investigation of the difference between cards revealed that the in-service units had had their capacitors changed out. Based on the results of the investigation, the capacitor was changed out on the card before it was tested and installed. We were informed of the capacitor concern after the spare power supply at issue had been modified by installation of the proper capacitor and the power supply card successfully tested and installed in troubleshooting the alarm.

When we were initially informed of the capacitor concern by the individual performing the work on the power supply assembly, all warehouse spare circuit boards (a total of two) with the old-style capacitors were subsequently tested and found to operate properly.

Use of the old-style spare part would not have resulted in failure of the power supply. While the assertion that the spare circuit boards did not receive a capacitor change out is correct, it has no safety significance in that the equipment would have operated normally, as shown by our testing, had the card at issue been installed without change out of the electrolytic capacitor.

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ISSUE RI-91-A-0263-02:

"Allegedly, a spare RPS Auxiliary Logic Drawer was used to support troubleshooting, on or about October 1, 1991, of a power supply relay failure within the same drawer in RPS channel 'D,' but was not installed in place of the failed drawer. Allegedly, the spare RPS Auxiliary Logic Drawer lacked some original parts (three lamps)."

REQUEST:

"Please provide your review of the above assertions. If the above conditions are valid, notify us of the corrective actions you have taken to prevent recurrence. Also provide us with an assessment of the safety significance of any identified deficiencies, including generic considerations."

RESPONSE:

This assertion is not valid. The alleged "spare" RPS auxiliary logic drawer that was used to support troubleshooting was actually a "parts" drawer. Necessary spare quality assurance (QA) parts have been taken from this drawer to support maintenance of the operating drawers. In this instance a relay socket was found broken in the operating drawer and a replacement was taken from the "parts" drawer to complete the repair. Since the function of the "parts" drawer is to provide a rapid means of obtaining parts when necessary, the condition in which some original parts are missing is to be expected. There was never any intention of using the "parts" drawer as a replacement for an operating drawer in the plant. Personnel working on RPS auxiliary logic drawers are not allowed to work on equipment without training on that equipment and the knowledge of equipment configuration that such training brings. As a result, the personnel working on these drawers know that the "parts" drawer is not to be used as a replacement drawer.

We were not aware that the parts drawer was a concern prior to receipt of the NRC letter, and we find no safety significance to this concern.

ISSUE RI-91-A-0232-02:

"On or about August 16, 1991, Loop Folders for the 'B' RCP oil reservoir alarm instruments allegedly did not reflect the actual physical location of specific power supplies. Allegedly, some boards had five separate power supplies within the power supply unit."

REQUEST:

"Please provide your review of the above assertions. If the above conditions are valid, notify us of the corrective actions you have taken to prevent recurrence. Also provide us with an assessment of the safety significance of any identified deficiencies, including generic considerations."

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RESPONSE:

The assertion that the RCP-B loop folders did not contain power supply location information is not valid. NUSCO drawings in each folder clearly indicate the location of Power Supply X-21 as C04R, slot BDU.

The GEMAC Model 570 power supply contains five circuit boards in one housing. Each circuit board, by design, provides power to a single instrument loop. The assertion that some boards had five separate power supplies within the power supply unit is a simple statement of fact. There is no safety or generic significance to these items.

We were not aware that the loop folder contents or power supply configuration was a concern prior to the receipt of the NRC letter.

ISSUE RI-91-A-0232-03:

"On or about August 16, 1991, Loop Folders for the 'B' RCP allegedly did not provide information regarding which additional instrument loads [were] powered from each power supply. For example, power supply X-21 supplied several other instrument loops in addition to the 'B' RCP upper and lower oil sump levels. The individual doing the work believed this information was considered essential to preclude the loss of power to other instrumentation when performing maintenance on an instrument loop component."

REQUEST:

"Please provide your review of the above assertions. If the above conditions are valid, notify us of the corrective actions you have taken to prevent recurrence. Also provide us with an assessment of the safety significance of any identified deficiencies, including generic considerations."

RESPONSE:

The assertion is not valid. Power Supply X-21 is clearly identified as an individual component on the loop drawing found in the instrument loop folders for this pump. The X-21 loop folder contains the following precaution: "Verify effects on loops powered by this power supply before de-energizing." We concur that it is essential to know what other loads are serviced by multiloop power supplies before working on them. Such information was, and is, readily available to technicians.

As is indicated in response to specific question Item 'e' below, loop folders do not necessarily contain all the information needed to do a job. The PMMS ID base and applicable drawings list the instruments powered from this supply. The information was promptly supplied to the technician performing this work by the PMMS group.

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ISSUE RI-91-A-0232-04:

"On or about August 16, 1991, Instrument Record Sheets for the 'B' RCP upper and lower oil reservoir level transmitters (LT-176 & LT-177) allegedly were missing from the Instrument Loop Folders."

REQUEST:

"Please provide your review of the above assertions. If the above conditions are valid, notify us of the corrective actions you have taken to prevent recurrence. Also provide us with an assessment of the safety significance of any identified deficiencies, including generic considerations."

RESPONSE:

We are unable to establish the validity of the assertion as stated. If the information record sheets, which are uncontrolled documents, are discovered missing, the information they contain can be easily obtained from NUSCO drawings and the PMMS ID system by any Instrumentation and Controls (I&C) technician prior to the start of a job.

On or about August 17, 1991, a technician requested new instrument record sheets for the L-176/177 loop folder. The records were provided by the PMMS group and inserted into the loop folder as the technician requested. It could not be independently determined whether or not record sheets were actually missing.

Obtaining information by such approved alternate means is of no safety consequence to the worker or the equipment; therefore, there is no safety or generic significance to this issue.

ISSUE RI-91-A-0232-05:

"There were allegedly nuisance alarms, associated with the 'B' RCP upper and lower oil reservoirs, caused by mechanical action within the RCP oil reservoirs (reference AWO [Automated Work Order] M2-91-08614)."

REQUEST:

"Please provide your review of the above assertions. If the above conditions are valid, notify us of the corrective actions you have taken to prevent recurrence. Also provide us with an assessment of the safety significance of any identified deficiencies, including generic considerations."

RESPONSE:

The assertion is correct in stating that the AWO at issue was written to investigate frequent low-level alarms for the oil reservoir on the 'B' RCP.

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The nature of the alarm instrumentation for the reservoir is such that the low-level alarm is conservative in nature. Oil is added to bring the oil reservoir to the proper level based on a marked indication on the oil reservoir (sight glass) rather than adding oil to clear the alarm. Experience has shown that when oil is added to the reservoir, less oil is added than would have been expected based on the existence of the alarm.

We do not consider the occasional existence of low-level alarms to be a mechanical problem and because of the conservative nature of the alarm instrumentation, we find no nuclear safety concern associated with this issue. The Millstone Unit No. 2 Engineering Department is aware of the alarm sensitivity versus actual oil level and has contacted the pump manufacturer. The situation remains under investigation.

SPECIFIC QUESTIONS:

"In addition to the above general request, please provide your review of the following specific questions. (a) Are spare parts, that are either located in the warehouse(s) or used for troubleshooting, controlled and maintained in accordance with the NU QA Program? (b) Is there a mechanical problem with RCP oil sump levels? (c) Does Unit 2 administratively control I&C documentation in a manner consistent with the methodology used for Units 1 and 3 and with the NU QA Program? (d) Is Departmental Instruction 2-I&C-10.03, Establishing and Maintaining Instrument Records, adequate for administrative control of I&C documentation? (e) In general, do loop folders adequately identify instrument loads for each power supply?"

RESPONSES TO SPECIFIC QUESTIONS:

- a. QA parts are processed and used in accordance with provisions of the NU QA Program. Non-QA parts are processed in accordance with ANSI Standard N45.2.2 (Level B). No specific program requirements exist for handling Non-QA parts during troubleshooting. There are no safety or generic issues associated with this item.
- b. NNECO does not believe there is a mechanical problem with the RCP oil sump levels. NNECO has been in contact with the pump manufacturer and the issue of sensitivity of the alarm circuitry remains under investigation.
- c. Generally, Millstone Unit No. 2 administratively controls I&C documentation under the same procedures and QA program as Millstone Unit Nos. 1 and 3. I&C documentation is governed overall by the site Administrative Control Procedures (ACPs) and various internal department instructions. The handling of work orders and work-related documents is governed by ACP-QA-2.02C. ACPs govern most other administrative aspects of department business including vendor manual control, nuclear records transmittals, procedures, correspondence, etc. In these respects the three units' administrative controls are the same for QA and Non-QA documents.

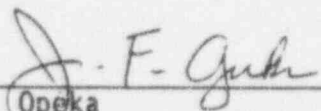
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Administrative areas that do differ are minor. All three units maintain loop folders and drawings, although the content and control of these documents may vary as provided by individual unit instructions. The Millstone Unit No. 2 I&C Department instructions govern such areas as loop folders, maintenance history, and the use of drawings and vendor manuals. The administrative controls are consistent with the Northeast Utilities QA Program as documented in the NUQAT.

- d. Department Instruction 2-I&C-10.03 was canceled several years ago and a newer version is now in effect. These department instructions are provided at the discretion of the department manager to give employees additional information for the implementation of the requirements contained in applicable ACPs and policies. Department instructions do not supersede the requirements of existing station procedures and are adequate for the administrative control of I&C documentation.
- e. Loop folders are not designed to provide technicians with all the information they need for every job; they typically only contain a loop drawing and references to other drawings. Instrument loads are identified in the PMMS ID system and applicable NUSCO drawings. All personnel in the department have the access and training to obtain such information from the PMMS computer or by asking the PMMS group directly. In this particular case, the list of loops powered by this supply were provided to the technician by the I&C PMMS group as soon as they were requested.

After our review and evaluation of these issues, we find that these issues did not present any indication of a compromise of nuclear safety. 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



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