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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

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

January 13, 1992

Docket No. 50-336
A10069

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-0289

We have completed our review of an identified issue concerning activities at Millstone Unit No. 2. As requested in your transmittal letter of December 9, 1991, 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.

ISSUE:

"Data for flow transmitter 2-CND-FIT-246, associated with monitoring the effluent from the Condensate Polishing Facility neutralizing waste tank, is missing from the applicable instrument 'loop folder'. In addition, the instrument is not entered in the PMMS [Production Maintenance Management System] computer data base."

REQUEST:

- o "GENERAL: Please provide your review of the above issue. If the above information is valid, notify us of the corrective actions you have taken to prevent reoccurrence. Also, provide us with an assessment of the safety significance of any identified deficiencies, including generic considerations.

Mr. Charles W. Hehl
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- o "SPECIFIC: How is the updating of instrument 'loop folders' formally controlled, since they appear to be relied upon frequently by technicians during the performance of both safety-related and non-safety related work?"

RESPONSE:

This assertion is not valid. The flow transmitter at issue (2-CND-FIT-246) does not exist. If we assume the assertion refers to Transmitter 2CNDFT246, the assertion is nevertheless invalid as this instrument was identified in the PMMS database on June 29, 1983. Its ID remains valid at this time and its loop folder is current with the latest update: November 6, 1991.

The loop folder system was developed in the 1970s to provide a place to collect historical maintenance and calibration information based on equipment ID. Copies of calibration and maintenance information were placed in these loop folders to allow personnel seeking information about the maintenance history on a piece of equipment to readily obtain that information. When the PMMS computer database was conceived and implemented in the 1980s, the computer database became the controlled information source, but the loop folder system was maintained as a supplemental historical collection system. The system (consisting of approximately 2000 folders) is administered under Instrumentation and Controls Department Instruction 1.10. The system provides an uncontrolled source of instrument information that is available to anyone, without the necessity of computer system access.

The concept of the loop folder was developed as an effective job aid to exist within the framework of the formal, controlled information systems. There is no safety related information uniquely contained in loop folders. Such information is contained on controlled drawings and in procedures.

Information contained in loop folders supplements, but does not replace, the necessary reliance on controlled documents and the PMMS database. The PMMS ID sheet in the front of the loop folder contains primarily equipment location, nameplate, and reference information for the user. This sheet is printed from data contained in the PMMS ID database and is updated as any new or changed information becomes available. Reference to controlled documents (drawings, vendor manuals, procedures, Material & Equipment Parts List evaluations, etc.) may be found on these sheets. The user of these referenced documents must use an actual controlled copy or check revision indices for proper revision levels prior to use.

The quality of loop folder information was enhanced in 1990. The folders were purged of unnecessary information and upgraded to four-part folders so that each folder, in addition to the PMMS ID Summary Sheet, could contain sections on drawings, calibration data, equipment maintenance history and miscellaneous documents. Updated loop drawings are replaced as new revisions are issued. A

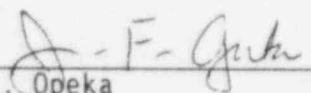
Mr. Charles W. Hehl
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second phase of this upgrade is planned to develop and include additional vendor manual cross-reference information in the database and loop folder data sheets.

After our review and evaluation of this issue, we find that this issue did not present any indication of a compromise to nuclear safety. We were not aware of this concern prior to receipt of your letter. 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



J. F. Opeka
Executive 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



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

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November 13, 1991

Docket Nos: 50-245
50-336
50-423
50-213

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

Dear Mr. Opeka:

On November 8, 1991, Northeast Nuclear Energy Company terminated the employment of two individuals who worked at the Millstone, Unit 2, facility. As you are aware, these two individuals have filed several complaints with the NRC and the U.S. Department of Labor alleging harassment, intimidation and discrimination for engaging in protected activities. In view of the above, the NRC needs to understand the basis for your termination of employment of these two individuals, and also needs to understand the actions you have taken or planned to ensure that your actions with respect to these two individuals does not have a chilling effect on other employees.

Therefore, you are requested to provide this office, within 30 days of the date of this letter, a response which:

1. Provides the basis for the termination of employment of the two former employees and includes a copy of any investigation reports you have regarding the circumstances of these actions; and
2. Describes the actions taken or planned to assure that the termination of employment of these individuals does not have a chilling effect which discourages other licensee or contractor employees from raising perceived safety concerns.

After reviewing your response, the NRC will determine whether action is necessary at this time to ensure compliance with regulatory requirements.

Please indicate in your response whether any of the information that you provide should be withheld from public disclosure based on the provisions of 10 CFR 2.790(a). Please cite the specific provision of this regulation that is applicable or other basis for nondisclosure.

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In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter will be placed in the NRC Public Document Room.

The response directed by this letter is not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Pub. L. No. 96-511.

Sincerely,



Thomas T. Martin
Regional Administrator

cc:

W. D. Romberg, Vice President, Nuclear Operations
S. E. Scace, Nuclear Station Director
J. S. Keenan, Nuclear Unit Director
R. M. Kacich, Manager, Nuclear Licensing
D. O. Nordquist, Director of Quality Services
Gerald Garfield, Esquire
Nicholas Reynolds, Esquire
Public Document Room (PDR)
Local Public Document Room (LPDR)
Nuclear Safety Information Center (NSIC)
NRC Resident Inspector
State of Connecticut