NORTHEAST UTILITIES

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October 16, 1991

Docket No. 50-336
A09849

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 1940[illegible]

Dear Mr. Hehl:

Millstone Nuclear Power Station, Unit No. 2
RI-91-A-0230

We have completed our review of identified issues concerning activities at Millstone Station. As requested in your transmittal letter, 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.

ISSUE 0230-1:

"Two (2) examples were found in which the calibration conversion factor for the condensate demineralizer waste neutralization sump radiation monitor were incorrect. The deficiencies were found during the performance of surveillance SP-2404AP, Waste Neutralization Sump Radiation Monitor (2-CND-RM-245) Functional Test; these deficiencies were documented on Instrument Calibration Review (ICR) Forms 91-065 and 91-066, which were dated August 12 and 16, respectively. They both reference automated work order (AWO) M2-91-06944."

REQUEST:

"Please discuss the validity of this assertion and discuss actions taken to prevent occurrences such as these in the future."

RESPONSE 0230-1:

This assertion is valid as stated. We were made aware of this assertion during the review of the ICR Forms on the day the AWO was performed. It was then recommended that the use of a conversion constant was unnecessary and should be deleted. This recommendatic[illegible] was reviewed by the plant radiation

monitor committee and determined to be desirable. Changes to the appropriate procedures are being developed to implement this enhancement. Eliminating the use of a conversion constant will eliminate the potential for error in its use.

There is no safety significance to this matter. The conversion constant allows the monitor to display its reading in microcuries per milliliter (uCi/ml) rather than counts per minute (CPM). The radiation monitor set points are set at 5 times and 10 times the background read by the monitor, thus the fact that the conversion constant was in error has no consequence. During the short period in which the conversion constant was in error, only clean discharges were being processed.

ISSUE 0230-2:

"Discovery of a non-metallic 'o'-rings [sic] used with fittings on the turbine hydraulic control valves. Although recognized as improper material the 'o'-rings were reused pending further investigation."

REQUEST:

"Please discuss the validity of this assertion. Please discuss actions taken to prevent the reuse of 'o'-rings of improper material in the turbine hydraulic control system."

RESPONSE 0230-2:

This assertion is not valid. The issue of the appropriateness of the fittings was raised at the time of the work activity at issue and was addressed by the job supervisor. The material of the existing "o"-rings was not identified to be improper.

Background: In the performance of restoration activities during a flush of the electrohydraulic control (EHC) system, the type of fittings used to connect the fast-acting solenoid valves to the reactor protection system (RPS) pressure switches was questioned and resolved. Although the installed fittings were of a type which did not require "o"-rings, they were installed. Since the installed fittings had shown no indication of leakage during operation or the current system flush, they were left in place for the remainder of the system flush and the proper fittings were ordered. The existing "o"-ring material was left in place also, and new "o"-rings of Viton material, the recommended material for such an installation, were ordered for use with the new fittings. New fittings with the Viton material "o"-rings were installed prior to restoring the system to service.

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

We were aware of these issues prior to the receipt of the Staff's 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

FOR: Edward J. Mroczka
Senior Vice President

BY: _____
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

0230

bcc:
RI-91-A-0262
RI-92-A-0230
RI-92-A-0113
RI-92-A-0128

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Fuhrmeister	Holody	Martin
2/24/92	1/24/92	2/26/92

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