

NORTHEAST UTILITIES

THE CONNECTICUT LIGHT AND POWER COMPANY
WESTERN MASSACHUSETTS ELECTRIC COMPANY
NEW HAVEN WATER SUPPLY COMPANY
NORTHEAST UTILITIES SERVICE COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY

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December 23, 1991

Docket No. 50-336
A10020

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-0231

We have completed our review of identified issues concerning activities at Millstone Unit No. 2. As requested in your transmittal letter of November 19, 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.

ISSUE 02:

"Plant Operation Review Committee (PORC) actions are superficial. There are different calibration accuracy requirements between the Steam Generator radiation monitor functional test procedure (SP 2404A1), recently reviewed by the PORC, and a referenced source. Procedural problems also exist in the RBCCW [reactor building closed cooling water] radiation monitor calibration procedure, which was also recently reviewed."

REQUEST:

"Please discuss the validity of this assertion. Please provide assurance that the calibration accuracy requirements are correct and consistent and that procedural problems in the RBCCW are resolved."

Mr. Charles W. Hehl
A10020/Page 2
December 23, 1991

RESPONSE:

Without knowing the identification of the "referenced source," it is difficult to determine the validity of the assertion.

The procedure at issue is a functional test procedure rather than a calibration procedure so the reference to "calibration accuracy" is unclear. For the purpose of this response we have assumed the assertion was made in connection with a change made to Instrumentation and Controls (I&C) Form 2404AI-1 which is the form used by the procedure at issue.

Technicians performing this procedure in late October 1991 stopped when they noted that the procedure data sheet specified a high/fail/alert bistable set point tolerance different from the Operations Department calculation on OPS Form OP2383C-1. I&C Form 2404AI-1 specified a flat + 20 percent tolerance, while OPS Form 2383C-1 provided a tolerance that depended on the position of the set point within the decade (on a logarithmic scale). Both methods are acceptable to the NUSCO Radiation Assessment Branch (RAB) and yield tolerances that are within the 20 percent values that are expected for the radiation monitor. The I&C form was changed on October 23, 1991, to coincide with the operations specified values. Following the change, the procedure was completed satisfactorily.

There is no safety or generic significance to this assertion. We were not aware of this concern prior to receipt of notification from the NRC.

Our response to issue RI-91-A-0238 dealt with Procedure SP 2404AW for the RBCCW liquid radiation monitor.

ISSUE 04:

"The RBCCW radiation monitor (RM 6083) sample valves are not labeled. Additionally, the piping and instrumentation drawing (P&ID) 25203-26022, Sheet No. 1, does not reflect the actual installed configuration of the sample lines. (This concern is similar to issue 210-1 referred to you by letter under File Number RI-91-A-0210, dated August 22, 1991.)"

REQUEST:

"Please discuss the validity of this assertion. Please provide assurances that the RBCCW radiation monitor (RM 6083) sample valves will be labeled in the future and that piping and instrumentation drawings will reflect actual conditions."

Mr. Charles W. Hehl
A10020/Page 3
December 23, 1991

RESPONSE:

With respect to the valve labeling issue, this assertion is a statement of fact describing the normal operating practice concerning the labeling of valves internal to vendor-supplied equipment.

The radiation monitor at issue is a "skid-mounted" piece of equipment which senses radiation levels in the RBCCW process fluid and provides local and remote annunciation on high radiation. It is our standard practice that valves internal to the radiation monitor skid are not assigned unique numbers and labeled during installation. These valves are not used to operate the equipment; therefore, there is no requirement that we provide Millstone Unit No. 2 specific valve numbers or show the valves on applicable P&IDs. The valves external to the radiation monitor skid were labeled as part of our ongoing labeling project for Millstone Unit No. 2.

With respect to the P&ID sheet, this assertion is a true statement but does not represent a valid safety concern. The drawing at issue has been checked against actual system and the installed configuration of the sample lines was correct. However, a difference was found in that the lead brick shielding, which was removed when the monitor was upgraded to a unit not requiring additional shielding, is still shown on the drawing. A drawing change has been issued to eliminate the lead bricks shown on the P&ID.

We were not aware of this concern prior to notification by the NRC.

ISSUE 06:

"I&C technicians incorrectly started the Steam Jet Air Ejector (SJAE) radiation monitor (RM 5099) with the sample pump inlet valve shut. Subsequently, the motor failed to re-start. The sample pump was started by I&C Department personnel. It should have been operated by Operations Department personnel."

REQUEST:

"Please discuss the validity of this assertion and provide assurances that the stated problems with regard to the SJAE radiation monitor system operation are resolved with regard to safety requirements."

GENERAL 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."

Mr. Charles W. Hehl
A10020/Page 4
December 23, 1991

RESPONSE:

This assertion is not valid. A review of work performed on this radiation monitor over the last six months was conducted. No documented instance of the above alleged activities by I&C technicians was found. Discussions with I&C and Operations Department staff personnel identified no similar concern or generic problem. The operation of the RM-5099 radiation monitor is independently verified by the performance of Surveillance Procedure SP2404AT, "Steam Jet Air Ejector Radiation Monitor (RM-5099) Functional Test," prior to returning to service. Operations Procedure OP2383A also verifies proper start-up and operation of the sample pump, and it is performed by Operations department personnel.

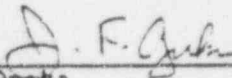
We were not aware of these assertions prior to receipt of notification from the NRC.

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



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
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