

**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 • Seldon Street, Berlin, Connecticut

P.O. BOX 270  
HARTFORD, CONNECTICUT 06141-0270  
(203) 666-6911

September 7, 1983  
Docket No. 50-423  
A03438

Mr. T. T. Martin, Director  
Division of Engineering and Technical Programs  
Region I  
U.S. Nuclear Regulatory Commission  
631 Park Avenue  
King of Prussia, PA 19406

Reference: (1) T. T. Martin letter to R. E. Busch, RE:  
Anonymous allegations in regard to  
Millstone Unit No. 3, dated August 8, 1983.

Dear Mr. Martin:

Millstone Nuclear Power Station, Unit No. 3,  
Response to Anonymous Allegations

Reference (1) conveyed to Northeast Nuclear Energy Company (NNECO) a number of allegations made anonymously to the NRC regarding the use of drugs and alcohol by construction workers, work practices, personnel policy, tool theft and construction costs. The NRC has noted particular concern with allegations related to fitness for duty of workers, and quality of work performed.

Reference (1) paraphrased the list of the six concerns of the anonymous allegor. The following is NNECO's response to each of these concerns.

1. Construction workers employed at the Millstone 3 facility use drugs and alcohol both on the site and prior to reporting for work.

Response:

The Millstone Point Stone & Webster work rules prohibit the use of alcohol and drugs, both within the confined site property, and on Northeast Utilities (NU) property, which includes the parking areas. Personnel, both manual and non-manual, are terminated without eligibility for rehire if they are caught using drugs or alcohol on NU property. The Stone & Webster security force has undergone training, sponsored by the Connecticut State Police, related to recognition of alcohol and drug abuse. Terminations have been effected by Stone & Webster concerning these matters.

2. Workers cut corners to get the job done.

Response:

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The existing Stone & Webster Quality Control program and Northeast Utilities Service Company (NUSCO) Quality Assurance program insure that

only quality work is accepted. Craft people, Stone & Webster/NUSCO supervisory personnel, and Quality Control/Assurance personnel attend extensive training programs to ensure that only acceptable work and work practices are performed on Millstone 3. Those personnel performing work not in accordance with specific procedures are, and have been, terminated.

3. Supervisors and work control practices are not concerned with the quality of work.

Response:

The Quality Index as measured by Stone & Webster Quality Control Trend Analysis indicates that both supervisory and craft personnel are performing work that is consistent with the NU commitment to quality. Audits performed by internal and external organizations, other than the NRC, corroborate the quality of this workmanship.

4. There are shoddy practices (union and supervisory) related to overtime of workers.

Response:

All overtime is approved by Northeast Utilities Senior Management. Overtime is not considered to be a standard practice. For specific work activities, overtime may be necessary in order to meet certain major milestones within the construction scheduling process. Northeast Utilities considers the indiscretionary use of overtime to be counterproductive and cost-inefficient.

5. Tool stealing is common.

Response:

There presently exist NUSCO-authorized Stone & Webster security procedures that provide for random search of craft individuals through the use of craft check-in stations each evening as craft workers egress the project. In addition, every fifth vehicle (vendor, commercial, or company) leaving the site is thoroughly searched. Individuals found to be stealing are immediately terminated without eligibility for rehire. In addition, NUSCO security personnel have performed audits during the craft egress through the check-in stations and have noted no major concerns.

6. Construction costs are inflated.

Response:

Northeast Utilities constantly monitors construction costs, including approval of overtime, manpower, purchase orders, and productivity rates through the use of various management measurement systems which are presently in place. The existing Millstone 3 budget forecast is being monitored and is within the proposed restraints.

In addition to the above responses to the six allegations, NNECO would like to provide the following comments related to the quality of work on Millstone 3.

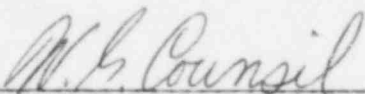
Northeast Utilities has initiated a program, which is in its second year, whereby NU Construction personnel conduct monthly interviews with randomly selected Stone & Webster craft, supervisory, and engineering personnel. Specific questions relating to the quality of the project are addressed. All inquiries are of a confidential nature. Those interviewed have not indicated a lack of quality related to the construction process. In addition, more than twenty-five percent of all foremen on the project were given a confidential, written questionnaire to complete. This survey, related to quality of workmanship, reinforced the position that Millstone 3 is being constructed according to the Quality Program.

Stone & Webster has an indoctrination program for all "new hires" which includes a videotape stressing the importance of quality. The tape includes a segment that expressly identifies a permanent NRC resident inspector to whom allegations of poor quality can be addressed on a confidential basis. Stone & Webster also has a program which encourages any employee who has an unresolved quality-related problem, to call the Assistant to the Chairman of the Board in the office of the Chief Executive. The phone call is kept in confidence and an investigation is pursued.

We trust that you will find this information responsive to the Staff's concerns on this subject.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

  
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W. G. Council  
Senior Vice President

cc: T. E. Murley, Regional Administrator