Northeast
Utilities System

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June 9, 1995

Docket No. 50-423
B15251

Re: 10CFR2.201

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Millstone Nuclear Power Station, Unit No. 3
Supplement to Reply to Notice of Violation
Issued in Inspection Report 50-423/94-31

On February 21, 1995,[1] Northeast Nuclear Energy Company (NNECO) responded to a notice of violation on behalf of Millstone Unit No. 3. The violation cites multiple failures of a control operator to verify closure of a valve which isolates makeup to the volume control tank following boron dilution of the reactor coolant system on December 7, 1994. This submittal supplements the reply, and corrects an administrative error.

Supplemental Information

Institute of Nuclear Power (INPO) Significant Operating Experience Report (SOER) 94-2, "Boron Dilution Events in Pressurized Water Reactors," contains recommendations (specifically recommendation numbers 3 and 4c) that could be germane to the prevention of a procedural violation which may contribute to an inadvertent boron dilution.

Recommendation number 3 of SOER 94-2 recommended that pressurized water reactors: "Identify those plant personnel who have the potential to affect reactor coolant system boron concentration and conduct a systematic evaluation of their initial and continuing training programs to verify that the lessons learned from these are addressed."

Recommendation number 4c of SOER 94-2 recommended that pressurized water reactors reduce the risk of an inadvertent addition of insufficiently borated water to the reactor coolant system by minimizing operating crew distractions and requiring frequent

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(1) J. F. Opeka letter to the U.S. Nuclear Regulatory Commission, "Millstone Nuclear Power Station, Unit Nos. 2 and 3, Reply to a Notice of Violation, Inspection 50-245/94-35; 50-336/94-34; 50-423/94-31," dated February 21, 1995.

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monitoring of key plant parameters while performing activities that change or have the potential to change boron concentration of the reactor moderator, reactor coolant system, or any fluid system connected with the reactor coolant system.

In our reply, NNECO denoted, as an action to avoid further violations, that an evaluation of SOER 94-2 was being conducted and that corrective actions would be developed to respond to the recommendations. NNECO stated that the applicable corrective actions should be identified by April 3, 1995.

NNECO completed its evaluation of SOER 94-2 prior to April 3, 1995. For Millstone Unit No. 3, the evaluation concluded that some of the SOER recommendations were resolved and recommended the development of corrective actions to incorporate the unresolved SOER recommendations. The evaluation discussed the procedural controls which address recommendation number 4c, and it concluded that recommendation number 4c was resolved for Millstone Unit No. 3.

The action plan to respond to the unresolved INPO SOER items was developed after April 3, 1995. It contains several actions for Millstone Unit No. 3, including an action to resolve SOER 94-2 recommendation number 3. To resolve recommendation number 3, NNECO will be developing and conducting training related to the events described in SOER 94-2. The items that have been identified for classroom training for licensed operators will include discussions of: 1) barriers that are in place to reduce the chance of human error (e.g., the Stop-Think-Act-Review process, teamwork, expectations, etc.); 2) individuals and departments who are responsible for performing activities that could affect boron concentration and core reactivity: 3) physical and human performance related problems and failed barriers that could have prevented the events described in SOER 94-2; 4) plant conditions and equipment problems contributing to actual and postulated SOER 94-2 events; 5) plant tasks, activities, and potential equipment problems that have the potential to affect core reactivity due to boron changes; and 6) the potential impact that engineering activities can have on boron concentration control. Additionally, simulator training will reinforce the use of available control room indications, procedures, and controls to recognize unanticipated boron concentration changes, identify sources, diagnose causes, stop, and mitigate boron change events. This training is scheduled to be completed by December 30, 1995.

<u>Correction of an Administrative Error</u>

NNECO's reply of February 21, 1995, stated that a lesson plan had been developed regarding the primary makeup system on March 25, 1994. This date is incorrect. The referenced date should have

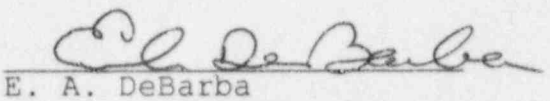
been May 25, 1994, the date the lesson plan was approved. This was an administrative error which does not affect the intent of the action. This action was included along with additional actions that had been taken prior to the event of December 7, 1994.

Should you have any questions regarding this submittal, please contact Mr. S. T. Day, Jr. at (203) 440-2075.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

FOR: J. F. Opeka
Executive Vice President

BY: 
E. A. DeBarba
Vice President

cc: T. T. Martin, Region I Administrator
V. L. Rooney, NRC Project Manager, Millstone Unit No. 3
P. D. Swetland, Senior Resident Inspector, Millstone Unit Nos. 1, 2, and 3