



Northeast
Utilities System

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August 4, 1995

Docket No. 50-336
B15323

Re: 10CFR2.201
10CFR2.205

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

Millstone Nuclear Power Station, Unit No. 2
Updated Reply to a Notice of Violation and
Proposed Imposition of Civil Penalty
Inspection 50-336/95-08

PURPOSE

The purpose of this letter is to update the Reply to a Notice of Violation (NOV) and Proposed Imposition of Civil Penalty which was submitted by Northeast Nuclear Energy Company (NNECO) on behalf of Millstone Unit No. 2, dated June 27, 1995⁽¹⁾.

SUMMARY

In a letter dated June 27, 1995, NNECO provided a reply to a NOV and proposed imposition of civil penalty associated with an NRC Special Inspection. Specifically, the inspection report identified three violations and assessed civil penalties to two of those violations. The violations related to timeliness of corrective actions, not accepting and documenting procured engineering services in accordance with existing procedures, and failure to evaluate the significance of a leakage condition. NNECO had implemented each of the corrective actions which addressed the violations at the time of the reply, and requests that the NRC Staff consider these actions during the review of the reply. Since NNECO requests that the NRC Staff consider these actions, we shall consider them as commitments for the period of the next two years.

BACKGROUND

In an effort to more effectively manage regulatory commitments, NNECO recently implemented a change which added a "Commitments" section to our docketed correspondence. It is our intention to identify in this section all commitments which are made within the

(1) J. F. Opeka letter to U.S. Nuclear Regulatory Commission, "Reply to a Notice of Violation and Proposed Imposition of Civil Penalty--Inspection 50-336/95-08," dated June 27, 1995.

correspondence to clarify more precisely what new future actions NNECO will implement with respect to the subject of the correspondence. If there are no new future actions, we would indicate as such in this section. Because all of the actions required to correct and prevent recurrence of similar violations had been implemented at the time of the response, NNECO indicated that there were no new commitments made within the June 27, 1995 letter.

DISCUSSION

In discussions with the NRC Staff's Office of Enforcement, NNECO was notified that past actions taken by the licensee as well as future actions are considered commitments. Absent this designation, the Staff cannot rely on those actions during evaluation of the licensee's reply to a notice of violation. NNECO agrees with this NRC position and plans to revise our method of identifying commitments in correspondence to include past actions which NNECO intends the NRC Staff to consider when reviewing the correspondence.

For the purpose of this NOV response, NNECO intended that the NRC Staff consider the statements made in the "Corrective Actions That Have Been Taken And The Results Achieved" sections of the June 27, 1995, letter as commitments to address the conditions stated in the violations. We regret any confusion this may have caused.

COMMITMENTS

The following are NNECO's commitments made within the June 27, 1995, letter. Other statements within that letter were provided for information only.

B15270-1 NNECO has implemented the Adverse Condition Report (ACR) procedure at Millstone Station.

B15270-2 NNECO has undertaken extensive efforts to enhance Nuclear organization and plant performance. These efforts included engineering reorganization, implementation of the system engineer program, improvement of procedures and the design control process, and management efforts to strengthen individual accountability and development of a questioning attitude (Extensive guidance has been provided to NNECO employees to promote this culture).

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- B15270-3 Informal briefings have been held with the Engineering department, during which the importance of vendor control and adherence to the requirements of Nuclear Group Procedure (NGP) 6.05 has been reinforced.
- B15270-4 NGP 6.05 now includes more explicit requirements to document reviews of work performed by vendors authorized to perform quality work per NNECO's Quality Assurance Program requirements.
- B15270-5 The system engineering program has been implemented and will help to identify potential system interactions such as the one involved in this matter.

CONCLUSIONS

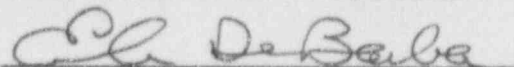
NNECO believes that the above corrective actions address the issues identified in the notice of violation and proposed imposition of civil penalty. Furthermore, NNECO agrees that these corrective actions shall be considered commitments for a period of at least two years.

Should the Staff have any questions regarding this response, please contact Mr. Michael J. Wilson at (203) 440-2081.

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
G. S. Vissing, NRC Project Manager, Millstone Unit No. 2
P. D. Swetland, Senior Resident Inspector, Millstone Unit
Nos. 1, 2, and 3