

NORTHEAST UTILITIES

THE CONNECTICUT LIGHT AND POWER COMPANY
WESTERN MASSACHUSETTS ELECTRIC COMPANY
NORFOLK WATER POWER COMPANY
NORTHEAST UTILITIES SERVICE COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY

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February 26, 1992

Docket No. 50-336
A10177

Re: 10CFR2.201

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

Gentlemen:

Millstone Nuclear Power Station, Unit No. 2
Reply to a Notice of Violation
Inspection Report No. 50-336/91-29

In a letter dated January 13, 1992,⁽¹⁾ the NRC Staff transmitted the results of a special safety inspection conducted at Millstone Nuclear Power Station, Unit No. 2, from October 21, 1991, through December 16, 1991. In this inspection report, the Staff identified one Severity Level IV violation reflecting the aggregate of nine instances, organized into three groups of incidents, of individually minor problems with procedure compliance. On behalf of Millstone Unit No. 2, Northeast Nuclear Energy Company (NNECO) has elected to contest one of the three cited incidents. Information which supports the basis for contesting one of the incidents is provided in Attachment 1. With respect to the two remaining incidents, NNECO has initiated appropriate corrective action.

The information to support this request is found in Attachment 1. In its letter, the Staff also requested that NNECO respond to the Notice of Violation (NOV) within 30 days of the date of the letter transmitting the NOV. Inspection Report No. 50-336/91-29 was received on January 27, 1992. In a telephone conversation with the Region I Staff, additional time in which to respond to this NOV was granted to 30 days from receipt of the Inspection Report. Accordingly, pursuant to the provisions of 10CFR2.201, NNECO hereby provides its response to the subject NOV in Attachment 1.

(1) E. C. Wenzinger letter to J. F. Opeka, "NRC Region I Inspection Report No. 50-336/91-29," dated January 13, 1992.

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If you have any questions regarding the information provided herein, please contact my staff.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



J. F. Opeka
Executive Vice President

cc: T. T. Martin, Region I Administrator
G. S. Vissing, NRC Project Manager, Millstone Unit No. 2
W. J. Raymond, Senior Resident Inspector, Millstone Unit Nos. 1, 2, and 3
E. C. Wenzinger, Chief, Projects Branch No. 4

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Attachment 1

Millstone Nuclear Power Station, Unit No. 2

Reply to a Notice of Violation
Inspection Report No. 50-336/91-29

February 1992

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INCIDENT A

Restatement of Violation

"Millstone Unit 2 Technical Specification 6.8.1.a requires, in part, that written procedures be established, implemented, and maintained, as recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Regulatory Guide 1.33, recommends procedures for administrative control of surveillance testing.

"Administrative Control Procedure (ACP)-QA-3.02E, section 6.2, states that 'full and total compliance is expected' for those procedures used to do surveillance and testing as specified in the Technical Specifications.

"Contrary to the above, on November 13, December 4 (two instances), and December 12, 1991, the NRC observed some steps in surveillance tests 2401B-1, 2401F-1, 2404AI-1, and 2405A-1, respectively, that were either not done as specified or were done out of sequence."

1. Reason for Violation

Millstone Unit No. 2 Instrumentation and Controls (I&C) personnel were not applying a strict standard of procedure compliance, particularly with respect to step order. The personnel were knowledgeable, thorough, and familiar with the tasks. This situation has the potential to cause a high level of individual confidence in lieu of the desired level of procedure usage. The procedures are not written to allow the user any step order flexibility. The writer's guide, at the time of the violation, did not specifically address the subject of step sequence or how to designate steps that were not required to be performed in a specific sequence.

2. Corrective Steps Taken and Results Achieved

The inspection report identified that the subject surveillance tests were adequately completed, such that the noncompliance examples had no significant technical bearing on the final surveillance test results.

These examples of procedure noncompliances have been reviewed with all Millstone Unit No. 2 I&C specialists. During this review, the need to specifically comply with procedure steps and substeps was stressed. The ACP guidance of performing steps in the order written was also reviewed. ACP-QA-3.02E, "Procedural Compliance," has been revised to incorporate level of use designations for all procedures. This ACP revision and the

procedure compliance issue have been reviewed with all Millstone Unit No. 2 I&C specialists.

3. Corrective Steps to Prevent Future Violations

ACP-QA-3.02A, "Writers Guide for Millstone Procedures," for Millstone Station is currently being revised. The revision will address the subject of step sequence and how to designate steps that are not required to be performed in sequence. Procedure compliance at Millstone Station is an issue for which we have expended considerable effort to improve. These efforts include two procedure review group evaluation teams and an increase in procedure compliance surveillances. We will continue to emphasize and improve the procedure compliance issue, and we will keep the Staff apprised of these efforts.

4. Date When Full Compliance Will Be Achieved

ACP-QA-3.02A will be revised and subsequently reviewed with Millstone Unit No. 2 I&C specialists by May 30, 1992.

5. Possible Generic Implications

The ACPs apply to Millstone Unit Nos. 1, 2, and 3. The ACP revisions will address the issues identified above. At the Haddam Neck Plant, it is the current policy of the I&C Department that procedural steps be performed in the written sequence unless step sequence deviation is specifically authorized within the procedure.

INCIDENT B

Restatement of Violation

"ACP-QA-3.02D, section 6.1.1, requires a periodic, systematic review of station procedures required by ACP-QA-3.02. ACP-QA-3.02, section 6.2.3, includes 2400-series surveillance procedures (SP) and maintenance (IC) procedures.

"Contrary to the above, the biennial review of procedures IC 2402I, IC 2416G, IC 2404AN and SP 2404AZ was not done in a timely manner. In a quarterly memorandum (MP-91-918), dated November 1, 1991, Document Services identified the required biennial review due date for those procedures as December 1, 1991."

1. Reason for Violation

The biennial procedure reviews were delayed due to the rate at which procedures were being revised during the department's procedure upgrade program. The procedure upgrade program was established to upgrade procedures to a higher level of detail and improve procedure format over

a period of three years. Priority determinations for revision order during that program were not based primarily on biennial review issues. The priority was based on achieving the highest degree of benefit from the resources assigned to the procedure upgrade activities. The following criteria were established in setting priorities:

- a. Surveillance procedures.
 - (1) Technical issues
 - (2) High number of changes
- b. Radiation monitor procedures.
 - (1) Technical issues
 - (2) High number of changes
 - (3) Outstanding Radiological Assessment Branch report recommendations
- c. I&C maintenance procedures.
 - (1) Technical issues
 - (2) High number of changes
- d. Any procedures that had known issues that precluded straightforward performance.
- e. Procedures needed as a result of a modification activity.
- f. Administrative revisions required to support the documentation of the completion of biennial reviews.

The quality level of older procedures as compared to current procedure quality and review standards is a previously recognized shortcoming. It remains one of the main reasons for having undertaken the current upgrade effort. Performing a biennial review to the current criteria of ACP-QA-3.02D, "Biennial Review of Station Procedures," would typically result in generating the need for a revision.

The current method for documenting biennial reviews which have any findings requires a revision to be completed and approved before a review could be credited and documented. This ACP-QA-3.02D requirement effectively tied the biennial review completion to the procedure upgrade program revision process.

2. Corrective Steps Taken and Results Achieved

The ACP requirements, which address the biennial review of procedures that have not been through the existing upgrade process, have been revised. The cited procedures have been reviewed to these new criteria

and that review has been documented, or the procedures have been designated "do not use" until such time that the review findings can be resolved.

A review of the biennial review status of all the Millstone Unit No. 2 I&C procedures has been completed. This review identified that 106 were delinquent with respect to the requirement. Review of these procedures against the revised criteria of ACP-QA-3.02D has been scheduled to be completed by March 31, 1992. Findings identified as a result of these reviews will be resolved by a change or a revision to the procedure. Millstone Unit No. 2 I&C has revised its biennial review checklist to provide documentation of the biennial review completion.

3. Corrective Steps to Prevent Future Violations

Additional temporary resources are being added to the Millstone Unit No. 2 I&C department in 1992 to accelerate the rate at which procedure review and upgrade activities are performed. A sitewide procedure upgrade program has been initiated to raise the overall station procedure quality and consistency. A review of the method for ensuring timely biennial reviews during this project is planned as part of this program for the station as a whole.

4. Date When Full Compliance Will Be Achieved

Compliance with the biennial review requirement will be achieved on March 31, 1992. At that time, all I&C procedures will be in compliance with the biennial review requirement. Procedure revisions will be processed in a timely manner to correct identified deficiencies.

5. Possible Generic Implications

The corrective actions, as described above, will be reviewed for applicability to Millstone Unit Nos. 1 and 3 and the Haddam Neck Plant, and appropriate actions will be taken, if required.

INCIDENT C

Restatement of Violation

"ACP-QA-2.06C, section 6.2.3.3, states (in part) "Perform an independent verification of each lifted lead or jumper installed." This requirement applies to quality related systems.

"Contrary to the above, installation of jumpers in surveillance 2404AI-1 on December 4, 1991 received dual but not independent verification."

1. Basis for Disputing the Violation

Northeast Nuclear Energy Company (NNECO) does not consider this example to be a violation of ACP-QA-2.06C, "Station Bypass/Jumper Control for Troubleshooting, Red Lining and Calibration." The requirements established by ACP-QA-2.06C, Step 6.2.3, do not apply to this situation as the work activity was controlled by Procedure SP2404AI. Section 6.2.3 of ACP-QA-2.06C applies only to work activities which are not addressed by a specific procedure.

The requirements of Section 6.2.2 of ACP-QA-2.06C are applicable. Step 6.2.2 provides instructions for controlling lifted/jumper leads when using approved procedures. Step 6.2.2.1 states "Lift or reland leads and install or remove jumper as specified in the approved procedure and initial or sign for each action on the appropriate test data sheets, in the body of the procedure or on SF 235 or equivalent." It is not an ACP requirement that dual, independent verification be performed in this situation. The procedure is written such that a jumper is installed in Step 6.6.1 and its installation is recorded by two people on the data sheet.

During the NRC inspector's questioning of I&C personnel, he concluded that the I&C personnel were uncertain of independent verification requirements. In addition, the questioning established the fact that the independent verification requirements were not part of the technical training program.

2. Corrective Steps Taken and Results Achieved

The need to clarify independent verification responsibilities in the station ACPs and Millstone Unit No. 2 I&C Department procedures has been recognized. The general administrative requirements for independent verification activities will be clarified as part of the ACP upgrade project. Individual department procedure guidance will be revised to clarify the required verification activity.

3. Corrective Steps to Prevent Future Violations

Technical training on ACP requirements, including independent verification activities, has been planned for 1992.

4. Date When Full Compliance Will be Achieved

In that no procedure requirements were violated, full compliance was at all times maintained.

5. Possible Generic Implications

The ACP upgrade project, as discussed in Item 2 above, applies to all units at Millstone Station. The stationwide upgrade initiative and associated training will continue to be aggressively pursued, and the need for a similar initiative at the Haddam Neck Plant will be evaluated.