

NORTHEAST UTILITIES



THE CONNECTICUT LIGHT & POWER COMPANY
WESTERN MASSACHUSETTS ELECTRIC COMPANY
HOLYoke WATER POWER COMPANY
NORTHEAST UTILITIES SERVICE COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY

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August 16, 1991

Docket No. 50-336
A09659

RE: Employee Concerns

Hr. Charles W. Hehl, Director
Division of Reactor Projects
U. S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, Pennsylvania 19406

Dear Mr. Hehl:

Millstone Nuclear Power Station, Unit No. 2
RI-91-A-0148

We have completed our review of identified issues concerning activities at Millstone Station. As requested in your transmittal letter, our response does 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 letter and our response have received controlled and limited distribution on a "need to know" basis during the preparation of this response.

ISSUE 1:

On June 14, 1991, while attempting to replace the "Seal Tite" flexible electrical conduit and the position indicator window for No. 1 Steam Generator Main Steam Isolation Bypass Valve motor operator (2-MS-65A), it was found that the work had been done previously under AWO M2-89-01828 on March 13, 1989. However, the prints had not been updated.

Please discuss the validity of the above assertions. If deficiencies in work control or drawing control are found, please inform us of the corrective actions you have taken to prevent recurrence. Please provide us with an assessment of the significance with regard to safety of any identified deficiencies.

Response:

Automated Work Order (AWO) M2-90-13990 was written to govern replacement of damaged SealTite on 2-MS-65A. The AWO also specified that any wire which had to be disconnected be reterminated in accordance with EEO requirements. Upon inspection of the junction to which the SealTite was attached, it was found that the SealTite contained no wires. The damaged SealTite was removed and plugs installed in the conduit entrance to the junction box and the MOV.

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AWO M2-89-01828 should be AWO M2-89-04828 which was completed in April 1989. This work order governed replacement of the wiring and damaged SealTite associated with 2-MS-65A. This is not the AWO that was used to govern removal of the wires from the SealTite described above. No drawing change was required as a result of this AWO.

The wires to the position indicator were removed under AWO M2-90-13178 which was completed on November 2, 1990. This AWO implemented a Plant Design Change Record (PDCR) 2-055-90, Removal of Slide Wire Potentiometers Providing Indication for Main Steam Bypass Valves 2-MS-65A & B. The SealTite associated with these wires was abandoned in place. A drawing change request, DCR M2-P-189-90 was written to update applicable electrical drawings affected by this change. The DCR was closed out on February 12, 1991.

The assertion described in Issue 1 above is not valid. The work performed on 2-MS-65A was properly authorized and documented in the AWOs and a PDCR. When the work was completed, the as-built conditions were properly documented through a drawing change request and drawing revisions.

ISSUE 2:

On June 14, 1991, differences between a control wiring diagram and actual plant conditions were found. The wiring diagram (Drawing 25203-32020) for the No. 1 Steam Generator Main Steam Bypass Valve (2-MS-65A) Motor Operator indicates the presence of an amber light to signify when the unit has tripped on overload. This light is not installed.

Also, Contact 49, shown on Drawing 25203-32031, Sheet 42 does not exist.

Please discuss the validity of the above assertions. If deficiencies are found in plant drawings, please notify us if the corrective actions taken to prevent recurrence. Please provide us with an assessment of the significance with regard to safety of any identified deficiencies.

Response:

NUSCO Drawing 25203-32020 was revised in support of Project Assignment (PA) No. 84-063 and has been issued for construction, which is clearly marked on the drawing. The drawing is intended to be used to support the wiring changes required by PA No. 84-063 and is not intended to reflect the current as-built condition. The contact will be added in the field when the wiring changes required by P.A. No. 84-063 are completed. Upon completion of the design change, the as-built condition will be verified and the drawing will be issued as an as-built drawing.

NUSCO Drawing 25203-32031, Sheet 42 is a new drawing generated to support implementation of PA No. 84-063. This drawing has also been issued for construction.

The assertion described in Issue 2 above is not valid. The drawings have been issued for construction, which is clearly indicated on the drawing. Field changes have not yet been completed to install the contact. There are no deficiencies in the plant drawings and no adverse impact on plant safety.

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After our review and evaluation, we find that this issue does not present any indication of a compromise of nuclear safety. Issues such as these are normally handled via our corrective actions programs. We were not aware of these concerns prior to receipt of the Staff's letter. We appreciate the opportunity to respond and explain the basis of our actions. Please contact my staff if there are any further questions on any of these matters.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

FOR: E. J. Mroczka
Senior Vice President

BY:


W. D. Romberg
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
E. M. Kelly, Chief, Reactor Projects Section 4A