

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 • Selden Street, Berlin, Connecticut)

P.O. BOX 270
HARTFORD, CONNECTICUT 06141-0270
(203) 665-5000

August 16, 1991

Docket No. 50-336
A09661

RE: Employee Concerns

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

Dear Mr. Behl:

Millstone Nuclear Power Station, Unit No. 2
RI-91-A-0145

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 this response 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:

On June 12, 1991, preventive maintenance action was authorized on an environmentally qualified component without the proper quality controls. A Non-QA work order (two page AWO) was used to perform work on the motor operator for the "B" Shutdown Cooling Heat Exchanger to "C" HPSI Pump Suction Valve (2-SI-662) in violation of Administrative Control Procedure ACP-QA-2.16. Specifically, the inspection governed by 2701J-7, 2701J-10 and 2701J-11 may require the addition of grease or other consumables. The addition of grease or other consumables, if not properly controlled as would be done using QA work orders, disqualifies the equipment qualification.

Please discuss the validity of the above assertion. Were the EEQ boundaries affected by this preventive maintenance activity? If deficiencies are found in work control and/or procedures, please notify 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.

Mr. Charles W. Behl, Director
U. S. Nuclear Regulatory Commission
AO9661/Page 2
August 16, 1991

Response:

The Automated Work Order (AWO) in question was M2-90-06370. The AWO was issued as a non-QA AWO in accordance with the clarification to the Environmental Qualification Program provided via a memo from the Generation Engineering Department relating to preventive maintenance on EEQ components. Based on the concerns of the Job Supervisor and the Quality Services Department (QSD) regarding work on EEQ components without a QA work order, the work was not performed. Since no work was performed, no EEQ boundaries were affected and the assertion stated in the above issue is not valid.

Subsequent to this job, NNECO has re-evaluated its guidance on the conduct of EEQ Maintenance and has elected to withdraw the guidance memo referenced above. Therefore, all maintenance performed on EEQ equipment will be performed on QA or three-page work orders.

The QA Lubrications Program is currently being incorporated into applicable administrative procedures for Millstone Station. When the revisions to these procedures have been completed and approved, NNECO will review the Maintenance Forms associated with the Preventive Maintenance Program and revise these forms as necessary.

After our review and evaluation, we find that this issue did not present any indication of a compromise of nuclear safety. We were aware of this concern as a result of the Job Supervisor bringing the issue to management's attention. Actions were taken to address the issue and maintain appropriate control over EEQ boundaries. We recognize the need to strive for a higher level of performance while performing EEQ Maintenance and we are aggressively working towards this objective. 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