

# NORTHEAST UTILITIES



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

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(203) 665-5000

August 16, 1991

Docket No. 50-336  
A09660

RE: Employee Concerns

Mr. 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-0069

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:

In the past, failure to adequately purge and/or sample for hydrogen when performing calibration activities on RM 9095 has resulted in hydrogen explosions in the radiation monitor cabinet. Specifically, Surveillance Procedure SP 2404AH, Revision 2, does not provide the necessary details to appropriately establish or accomplish a hydrogen purge when performing calibrations on RM 9095. Additionally, surveillance procedure SP 2404AG does not mention the need to sample for hydrogen, and this sampling is necessary when the detector is removed from the "pig".

## Request:

Please discuss the validity of the above assertions. If deficiencies are identified in the applicable 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.

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Background:

SP 2404AH Revision 2 contains the guidance for purging the radiation monitor pig and for verifying by chemistry sample that no hydrogen is present. SP 2404AG governs the functional test for the radiation monitor and does not specify removal of the detector from the pig. If any calibration activities are required as a result of the functional test, the user is directed to procedure SP 2404AH.

Response:

The assertion that the surveillance procedure does not contain the necessary level of detail is not accurate. The required steps are included in the procedure and the level of detail is appropriate for the I&C personnel using the procedure. The actual purging activity is performed by Operations personnel. They are aware of the need to properly purge the system to ensure that all residual hydrogen is removed.

The assertion that SP 2404AG specifies removal of the detector from the pig, and therefore also requires guidance on sampling for hydrogen, is not accurate. The procedure governs functional testing activities which do not include detector removal.

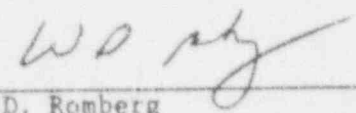
After our review and evaluation, we find that this issue does not present any indication of a compromise of nuclear safety. We were not aware of this issue prior to receipt of the NPC letter on this subject. We appreciate the opportunity to respond and explain the basis of our actions. Please contact 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