

NORTHEAST UTILITIES

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

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September 30, 1991

Docket No. 50-336
A09829

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

Dear Mr. Hehl:

Millstone Nuclear Power Station, Unit No. 2
RI-91-A-0210

We have completed our review of an identified issue 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 transmittal letter and our response have received controlled and limited distribution on a "need-to-know" basis during the preparation of this response.

ISSUE 210-1:

"Millstone 2 turbine sampling system valves with a prefix of '2-S' are not labeled in the field. In addition, the sodium analyzer 'AE 7764 A5', is incorrectly labeled as 'AE 7764 A6' on sheet 3 of drawing 25203-26025."

REQUEST:

"Please discuss the validity of the above assertion. If the above conditions are valid, please notify us why this was not previously corrected by your labeling program and what corrective actions you have taken to prevent recurrence. Please provide us with an assessment of the safety significance of any identified deficiencies, including any generic considerations."

RESPONSE 210-1:

The assertion concerning the sampling system valve labels is valid if the stated analyzer is AE7784 rather than AE 7764. We were made aware of the drawing problem in early September, 1991. The Millstone Unit No. 2 Engineering Department has identified that the Piping and Instrument Diagram (P&ID) does not agree with the as-built condition and is in the process of updating the drawings to reflect the as-built conditions.

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In March 1991, a new Administrative Control Procedure, ACP-6.22--System and Component Labeling--was written and issued to provide guidance on a standardized labeling program for the Millstone site. Also in March, a Controlled Routing (CR 8139) was issued to track the progress of each of the units in complying with the requirements of the ACP. The labeling effort includes valves, major components, and instrument and gauge labeling. The sampling system valves identified in the assertion are part of this program. The valve labeling efforts are expected to be completed by the end of 1992. Currently the Operations Department is holding discussions with other departments in the unit in an effort to establish who will normally operate and be responsible for labeling valves such as those associated with radiation monitors, sample systems, etc.

As part of the program implemented under ACP 6.22 a label request form has been generated which allows anyone finding a missing, incorrect, or deteriorating label to bring it to the attention of the label coordinator or Operations Manager for prompt action.

As part of the labeling program under ACP-6.22, the initial labeling of a system is to be verified by a complete walkdown of the system using system checklists and P&IDs to determine that all system components are labeled and that the label nomenclature matches the P&ID identification and system checklist description for each component. Thus, if other similar problems exist, they should be routinely identified and corrected as part of this program.

ISSUE 210-2:

"Circuit changes had been made to the Millstone 2 main generator hydrogen monitor without the preparation of a modification package. As a result, the calibration procedure is inadequate, and appropriate procedure and drawing changes have not made."

REQUEST:

"Please discuss the validity of the above assertion. If the above conditions are valid, please notify us of the corrective actions you have taken to prevent recurrence. Please provide us with an assessment of the safety significance of any identified deficiencies, including any generic considerations."

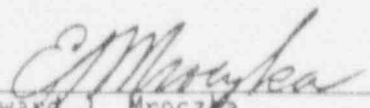
RESPONSE:

We are still investigating this matter and will respond when the investigation is complete. We currently plan to respond by October 14, 1991.

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After our review and evaluation of this issue, we find that it did not present any indication of a compromise of nuclear safety. We appreciate the opportunity to respond and explain the basis of our actions. Please contact my staff if there are further questions on any of these matters.

Very truly yours,
NORTHEAST NUCLEAR ENERGY COMPANY



Edward J. Mroczka
Senior Vice President

cc: W. J. Raymond, Senior Resident Inspector, Millstone Unit Nos. 1, 2, and 3
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