

NORTHEAST UTILITIES

THE CONNECTICUT LIGHT AND POWER COMPANY
WESTERN MASSACHUSETTS ELECTRIC COMPANY
NEW YORK 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

September 18, 1992

Docket No. 50-336

B14237

Re: 10CFR2.201

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

Gentlemen:

Millstone Nuclear Power Station, Unit No. 2
Reply to a Notice of Violation
Inspection Report No. 50-336/92-16

By letter dated August 5, 1992,⁽¹⁾ the NRC Staff transmitted the results of the unannounced radiological controls inspection conducted from July 6-10, 1992, at the Millstone Nuclear Power Station. The NRC identified two Severity Level IV violations and requested that Northeast Nuclear Energy Company (NNECO) respond to the Notice of Violation (NOV) within 30 days of the date of the latter transmitting the notice. The subject NOV addresses the Staff's concerns related to: (1) the use of Optimair 6 Powered Air Purifying Respirators for an undetermined period of time without a training program in place and no training was provided for users of these respiratory protection devices, and (2) necessary and reasonable surveys to ensure compliance with 10CFR20.202 were not made by a radiation protection technician who waded through about 10 inches of water in the Millstone Unit No. 2 south reactor cavity. In subsequent discussions with the Staff, NNECO was granted additional time in which to respond to this NOV. Pursuant to the provisions of 10CFR2.201, NNECO hereby provides its reply to the subject NOV in Attachments 1 and 2.

250039

(1) J. H. Joyner letter to J. F. Opeka, "NRC Combined Inspection Nos. 50-245/92-19; 50-336/92-16; 50-423/92-15," dated August 5, 1992.

9209280033 920918
PDR ADDOCK 05000336
PDR

IE01
1:1

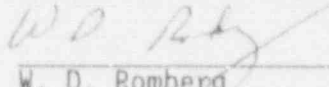
U.S. Nuclear Regulatory Commission
B14237/Page 2
September 18, 1992

If you have any questions regarding the information contained in this letter,
please contact my staff.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

FOR: J. F. Opeka
Executive Vice President

BY: 
W. D. Romberg
Vice President

cc: T. T. Martin, Region I Administrator
G. S. Vissing, NRC Project Manager, Millstone Unit No. 2
P. D. Swetland, Senior Resident Inspector, Millstone Unit Nos. 1, 2,
and 3
J. H. Joyner, Chief, Facilities Radiological Safety and Safeguards
Branch

Docket No. 50-336
B14237

Attachment 1

Millstone Nuclear Power Station, Unit No. 2
Reply to a Notice of Violation
Inspection Report No. 50-336/92-
Use of Optimair Powered Air Purifying Respirators

September 1992

Attachment 1

Millstone Nuclear Power Station, Unit No. 2
Reply to a Notice of Violation
Inspection Report No. 50-336/92-16
Use of Optimair Powered Air Purifying Respirators

I. Restatement of Violation

Technical Specification 6.11 states that procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR 20 and adhered to for all operations involving personnel radiation exposure.

Radiation Protection Procedure 4931, Selection and Use of Respiratory Protection Equipment, Revision 6, states in section 5 that prior to any person being allowed to use respiratory protection equipment, compliance with the following is required:

5.1 Training for the respiratory protection device to be used

Contrary to the above, as of July 10, 1992, and for an undetermined period of time prior to this date, Optimair 6 Powered Air Purifying Respirators were being used, but no training program was in place, and no training was being provided, for users of these respiratory protection devices.

II. Reason for the Violation

The reason for this violation was failure to upgrade the formal training program for respiratory protection to include the use of Powered Air Purifying Respirators (PAPRs).

Initially PAPRs were used on a limited basis at the site. Because of the small number of PAPRs used, individual users were provided instructional briefings on a case-by-case basis. However, with the increased usage of these devices, this training had become insufficient. The formal training program for respiratory protection was not upgraded to incorporate this new device, even though it had become available for general use.

III. Corrective Steps That Have Been Taken and Results Achieved

Instruction is now being provided to PAPR users. As immediate corrective action, on July 11, 1992, an instruction sheet outlining the use of the PAPR was developed. This instruction sheet is provided to each worker requesting a PAPR at the respirator issue window. Additionally, as of October 1, 1992, the ability to use the PAPR will be

evaluated at the time of PAPR issue for the first time the PAPR is issued to an individual. The Nuclear Training Department has also initiated a discussion on the use of this device in their formal radiation worker training program.

IV. Corrective Steps That Will Be Taken to Avoid Further Violations

The procedure establishing the respiratory protection policy at Millstone (AC 6.05) will be revised to provide additional guidance on the introduction of new devices into the respiratory protection program by October 30, 1992.

The respiratory protection training program is currently under review for additional enhancement. Upgrades will be made to ensure adequate training is given to respirator users on respiratory protection devices. These additional upgrades to the training program are scheduled for implementation by January 1, 1993, with all respirator users having completed the required training by December 31, 1993.

Long-term corrective action includes assessing the need for enhanced respiratory training program content and implementation. This assessment will be complete by December 31, 1993.

V. Date When Full Compliance Will Be Achieved

We believe that the instructions currently being provided to PAPR users meets the intent of Technical Specification 6.11 and 10CFR20. As such, all corrective actions pertinent to this violation have been completed.

VI. Generic Implications

The corrective actions, as described above, are applicable to Millstone Unit Nos. 1, 2, and 3. These corrective actions will be reviewed for applicability to the Haddam Neck Plant, and appropriate actions will be taken, if required.

Docket No. 50-336
B14237

Attachment 2

Millstone Nuclear Power Station, Unit No. 2
Reply to a Notice of Violation
Inspection Report No. 50-336/92-16
Radiation Surveys

September 1992

Attachment 2

Millstone Nuclear Power Station, Unit No. 2
Reply to a Notice of Violation
Inspection Report No. 50-336/92-16
Radiological Surveys

I. Restatement of Violation

10 CFR 20.201(b) requires that licensees make or cause to be made radiation surveys as may be necessary to comply with the regulations in 10 CFR Part 20 and are reasonable under the circumstances to evaluate the extent of radiation hazards that may be present. 10 CFR 20.201(a) defines a survey as an evaluation of the radiation hazards incident to the presence of radioactive materials and when appropriate includes a physical survey of the location of materials and measurements of levels of radiation present. 10 CFR Part 20.202 requires licensees to provide appropriate personnel monitoring equipment to individuals meeting the criteria specified therein.

Contrary to the above, on July 7, 1992 at about 8:30 p.m., necessary and reasonable surveys to ensure compliance with 10 CFR 20.202 were not made by a radiation protection technician who waded through about 10 inches of water in the Unit 2 south reactor cavity. The depth of the water prevented appropriate surveys of potential radiation exposures to the lower extremities.

II. Reason for the Violation

The reason for this violation is a failure of the contractor Health Physics technician to communicate to his supervisor that a higher than anticipated water level existed in the Millstone Unit No. 2 refuel cavity south saddle prior to proceeding with a prejob survey. The initial planning for the survey was based on an expected 1 to 2 inches of water on the saddle floor. The Health Physics technician upon reaching the area noticed a much higher water level but made an independent decision to proceed with the task.

III. Corrective Steps that Have Been Taken and Results Achieved

An evaluation of the event was initiated resulting in the following corrective actions:

- The Health Physics technician involved in this event was interviewed as to his actions and counseled on the matter.

- Millstone Unit No. 2 Health Physics technicians were briefed on the event and the need to stop work and inform supervision if conditions are different than described during job planning.
- A review of the radiological conditions present after the south saddle was drained was conducted. This review indicated that it was unlikely that any significant or unusual extremity exposure occurred as a result of this event.

IV. Corrective Steps that Will Be Taken to Avoid Further Violations

This event will be reviewed with the Health Physics technicians during the next session of continuing training scheduled to begin this month. This session of continuing training is expected to be completed by December 31, 1992.

Health Physics procedure 4905, "Radiological Surveys," will be revised to include guidance concerning work activities which involve entry into areas where special surveys are required due to water shielding. This procedure will be revised by October 30, 1992.

V. Date When Full Compliance Will Be Achieved

NNECO considers this to be an isolated event and that we are currently in full compliance with regulatory requirements.

IV. Generic Implications

The corrective actions, as described above, are applicable to Millstone Unit Nos. 1, 2, and 3. These corrective actions will be reviewed for applicability to the Haddam Neck Plant, and appropriate actions will be taken, if required.