



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PENNSYLVANIA 19406

Docket No. 50-336
File RI-87-A-0113

MAY 20 1988

Dear [REDACTED]

This refers to your January 13, January 19, and April 25, 1988 inputs to Mr. William J. Raymond, our Millstone Senior Resident Inspector.

You alleged that an unqualified Barney Company welder did Category 1 welding in Containment. We found that the Barney Company is not used for safety-related welding. The licensee stated that Barney laborers have welded on gates and in outside plant buildings. That is not nuclear safety-significant, and we plan no further action on this item.

You also alleged impropriety between the Barney Company and a licensee supervisor, based on an apparent personal affluence, prior employment, and information on purchase orders. No safety inadequacy was alleged, nor was any identified by our evaluation. We referred this matter to the licensee and do not plan to pursue it further.

Your third concern was the alleged termination of two workers without whole body counts. We are addressing this matter and will inform you of its disposition.

Your input about non-nuclear tagging was confirmed by the licensee and evaluated as safe but not in conformance with the non-nuclear tagging procedure. The licensee directed adherence to the procedure and plans to include alternate safe practices in it or to impose nuclear tagout requirements. We will follow completion of that. On parking lot light installation without using mounting butt templates, the licensee found that a registered professional engineer's judgement was applied and acceptable. Nuclear safety was not involved and we plan no further action on this item. We will inform you of our conclusions on the other work issues you identified when our follow-up is complete.

Our follow-up on your allegations has, as yet, identified no safety inadequacy. If you have additional information or questions, please contact me.

Sincerely,

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in accordance with the Freedom of Information
Act, exemptions b7C
FOIA 91-162

Ebe C. McCabe Jr.
Ebe C. McCabe, Jr., Chief
Reactor Projects Section 1B
Division of Reactor Projects
Tel: (215) 337-5231

9212210323 920608
PDR FOIA
GUILD91-162 PDR

N/S

PITTMAN, SHEEHAN, SOLOMON & SWAINE

Attorneys at Law
105 Court Street - Suite 400
P.O. Box 1828
New Haven, Connecticut 06509-1828

Patty Jenkins Pittman
Michael O. Sheehan
Robert A. Solomon
James E. Swaine

(203) 624-1513
Telefax (203) 562-6288

March 14, 1990

The Honorable John Breaux
Chairman, Senate Subcommittee
on Nuclear Regulations
Committee on Environmental and Public Works
United State Senate
Washington, D.C.

Re: [REDACTED] v. Connecticut Light & Power, d/b/a Northeast
Utilities

Dear Senator Breaux:

In the November 8, 1989 Congressional Record you entered certain information you received from Bill Ellis, Chairman and Chief Executive Officer of Northeast Utilities, concerning its offer of settlement to [REDACTED]. The offer included language to discourage reporting safety violations to the Nuclear Regulatory Commission. As noted in documents supplied by Northeast Utilities, I represent [REDACTED].

Mr. Ellis and Northeast Utilities have assured you that Northeast has corrected the offending language appearing in the offer to [REDACTED]. While I have no knowledge as to the treatment of other whistle-blowers, nothing could be further from the truth insofar as Northeast Utilities' treatment of [REDACTED] is concerned.

Prior to submitting a written agreement to [REDACTED] I reached an oral agreement with Northeast Utilities' attorney as follows:

- 1) Connecticut Light & Power, d/b/a Northeast Utilities and W.J. Barney Corporation (a co-defendant in the case) would [REDACTED]
- 2) All parties would keep the terms of the settlement confidential;

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in accordance with the Freedom of Information
Act, exemptions [REDACTED]
FOIA- 91-162

N/9

- 3) [REDACTED] would share his safety concerns with Connecticut Light & Power representatives;
- 4) The litigation would be withdrawn.

Subsequent to this, Connecticut Light & Power's attorneys submitted a lengthy settlement agreement with onerous (and perhaps illegal) restrictions on [REDACTED] First Amendment rights and, in his view, duty to report safety violations to the N.R.C. Because of this, [REDACTED] refused to sign the agreement. We suggested changes, still hoping to settle the litigation on the agreed upon terms. Connecticut Light & Power's only response to us was that the settlement offer was withdrawn and we should proceed with litigation.

In a May 4, 1989 internal memorandum to Northeast Utilities's Officers, Northeast Utilities, by E.J. Mroczka stated that "settlement discussions have proved unsuccessful... Northeast Utilities plans to vigorously defend itself..." in the litigation. Since then, [REDACTED] has undergone three full days of depositions. As his attorneys, we expended numerous hours representing [REDACTED] resulting in large legal bills for which [REDACTED] an hourly worker, is obligated. All of this was necessitated by Connecticut Light & Power's refusal to enter into a written agreement consistent with the earlier oral agreement. Of course, if we go to trial, we will expend a much greater amount of time.

Contrary to Mr. Ellis' assurances, Connecticut Light & Power never offered to remove the offending language from the agreement or to substitute any alternative language. In fact, through its refusal to settle this matter on agreed upon terms and its use of superior resources to litigate beyond [REDACTED] financial resources, Connecticut Light & Power is now punishing [REDACTED] precisely because he has made public the contents of the agreement. Thus, not only has Connecticut Light & Power not corrected its actions, but it continues to act punitively toward [REDACTED] for his role as a whistle-blower, including his role in bringing this issue to your attention.

[REDACTED] a professional electrician, will continue to speak out on safety issues. He is not anti-industry. He worked at a

The Honorable John Breaux
March 14, 1990
Page 3


nuclear site for two years, but believes in systems to avoid the human errors which could result in a catastrophe. Apparently, this is not acceptable to all members of the industry, including Connecticut Light & Power.

Very truly yours,

Robert A. Solomon

Robert A. Solomon
Attorney at Law

RAS/lb

cc: Richard K. Walker, Esq.


JUN 28 1989

MEMORANDUM FOR: S. Collins, Deputy Director, DRP
FROM: J. Durr, Chief, Engineering Branch, DRS
Subject: Telephone Conversation with [REDACTED]

On June 28, 1989, I received a collect telephone call from [REDACTED] one of the Millstone allegeders. [REDACTED] called to request a copy of his statement made to the allegation team during the interviews of the Millstone allegations conducted on [REDACTED]

During the conversation, [REDACTED] requested that the current allegation team address his allegations from the 1987 time frame regarding following procedures. He believes that the current allegations made by [REDACTED] are directly related to his allegations. I told him that the current allegation team was not chartered to review his allegations and a formal request should be submitted to the allegation panel to reopen his case. I suggested that his request should be directed to you as the chairman of the allegation panel.

Jacque P. Durr
Jacque P. Durr, Chief
Engineering Branch, DRS

cc: Allegation Coordinator
B. Boger, DRS
W. Johnston, DRS
E. Wenzinger, DRP

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in accordance with the Freedom of Information
Act, exemptions b1, b7c
FOIA 91-142

N/12

June 27, 1989

Memo to: Ebe McCabe, Chief, RPS 1B

From: B. Raymond, SRI, Millstone

Subject: Telephone Call with [REDACTED] 6/27/89

[REDACTED] called me today on two issues: followup on his statement to the allegation review team during the interviews on [REDACTED] and to request further NRC investigation of his concerns covering work activities at the site in 1987 and identified to the NRC in 1988.

1. [REDACTED] learned from a conversation with [REDACTED] that he was not going to get a transcript of the statement given during the interviews. [REDACTED] wanted to know why.

[REDACTED] stated that statement was made under stressful circumstances and he apparently did not get on the record all that he has to say on the matter.

I informed [REDACTED] that he needed to address that question to Jack Durr. [REDACTED] said he would call Jack.

2. [REDACTED] stated he understood that the NRC team was only going to address issues from 12/88 forward. I acknowledged that.

[REDACTED] made a formal request that the NRC team re-open the investigation of all his issues as well; particularly those identified in the July 1988 inspection report: 50-336/88-13, Allegation RI-A-0113 "Contractor Work Activities".

[REDACTED] stated the basis of his request was that the NRC followup of his issues has since been proved improper. Had NRC followup of his issues in 1988 been proper (dealing with failure to follow procedures in the plant outside areas) then the issues now being raised by [REDACTED] would not have occurred. [REDACTED] stated that my inspection followup of the warehouse breaker tagging issue and the multitude of examples noted in the report on failure to follow the tagging procedure for installation of the high rad area gate lights were ineffective in preventing the present problem in the station of procedures not being followed generally, as documented in the allegations by [REDACTED]

I told [REDACTED] that the resident staff is out of the picture in followup of the allegations, that the inspection team has lead, and that it is up to the team to decide what issues warrant further follow. In response to my inquiry, [REDACTED]

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Act, exemptions

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91-162

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203 443 5893

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stated he had no new information about any of the old issues, and no new issues.

3. [redacted] repeatedly requested (but did not demand) that NRC provide him with a written response to his formal request that his issues be re-investigated. He stated that he was recording the request in his log book. He stated the response should either acknowledge that his issues would be re-investigated, or an explanation be given as to why the inspections in IR 88-13 were a proper followup to his concerns. He is expecting a letter from the Region.

4. The conversation with [redacted] was generally congenial, and the rapport I have with him is still intact. However, the conversation became strained at several times when he and I failed to reach agreement on what was "nuclear safety". At one point I cut him off when he began (what I'll call) a lecture on my responsibilities to guard the public trust and to protect public health and safety.

5. The conversation ended with my promise to get back to him on what will be done to re-open his issues and how NRC will respond to his request. I invited [redacted] to contact me on any additional information he feels the NRC should know about.

6. In a prior conversation with Lynn today, [redacted] made reference to Dan Berkowitz and the senate subcommittee followup of resolution of worker safety concerns. [redacted] made no mention of this in conversation with me, but he did make some vague reference to followup by someone to the effectiveness of NRC reviews of concerns at Millstone.

Bill

cc:

Jack Durr
Norm Blumberg

JUL 12 1989 09:56 NRC MILLSTONE OFFICE P02

203 443 5893

To: Guy Vissing, NRR

From: Ebe McCabe, RI

ALLEGATION RI-87-A-113 SUMMARY [REDACTED]

This memo summarizes the allegations by [REDACTED]

- A Unit 3 Electrician allegedly had to replace all underwater lamps in the spent fuel pool and received excessive exposure; the job allegedly should have been done when the pool was empty. NRC follow-up found that these lights are periodically replaced with minimal exposure to workers based on the design of the the fixtures and the radiation levels in the area. The alleged was informed that no further NRC follow-up was planned.

- Work orders reportedly were issued to replace 300 solenoid valves that were being replaced as they burned out. NRC review concluded that the licensee had replaced the valves in response to NRC Information Notice 84-68, which identified solenoid valve applications that might be subject to premature insulation aging. The licensee found no degradation, but replaced the valves based on a calculation of reduced lifetime. The alleged was informed that this matter had previously been identified by the NRC and acceptably and safely responded to by the licensee.

- Sixteen pole-mounted lights in the Simulator parking lot were allegedly installed without using a template for the mounting bolts. This non-nuclear issue was referred to the licensee, who found the statement true and the actual installation acceptable based on the professional judgement of a registered professional engineer.

- Work to remove temporary security lighting allegedly wasn't coordinated. Security lighting adequacy was not questioned (Inspection 50-336/87-20 had identified a discrepancy in lighting adequacy.) This allegation was referred to the licensee, who found two work groups had been ordered to remove the temporary lighting, and that the work order for the alleged's company had been cancelled. A licensee memo cautioned Security to avoid work duplication in the future. The alleged was informed that adequacy of security lighting was already being addressed by the NRC, and that no additional action was deemed necessary based on the alleged's input.

- Work on high radiation area gates was allegedly performed inefficiently, causing unnecessary radiation exposure. NRC follow-up found the work was performed in areas which did not involve high exposures (about 3 mrem/hr for Unit 1 and 2 work, no exposure for Unit 3 work, based on licensee data). No unacceptable conditions were identified.

- 480V circuit breakers in a warehouse were alleged to have been manipulated, to troubleshoot an air conditioning problem, without a work order or tags. This non-nuclear activity was

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Act, exemptions 6 & 7C
FOIA: 91-162

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referred to the licensee, who concluded that the breaker was being used as a switch, with no work done on live circuits, and no tagout was required or needed. On this matter, the licensee's version and the alleged's version differed. The alleged was recontacted and provided no information to show that there was any work on live circuits involved. No further NRC action was taken.

- It was alleged that an electrical wire in a warehouse wall was moved without tags or a work order. The wire was moved for installation of a window in an exterior wall of the maintenance shop. The alleged obtained a work order and safety tags for the work. The tags were hung the day after the wire was moved, by licensee personnel, at the suggestion of the alleged's employer's superintendent. [REDACTED]

[REDACTED] This allegation was referred to the licensee, who concluded that the work controls for this activity were adequate and in accordance with station procedures governing outlying buildings. No further NRC review was undertaken.

- Two workers the alleged knew reportedly worked at Millstone in 1983-1984 and did not get a whole body count (WBC) on termination. One of the two did not want to be involved and was not identified. The other had his last period of employment at Millstone from [REDACTED]. Seven previous termination exposure reports had been mailed to this worker at 5 different addresses. Licensee records showed a WBC on [REDACTED] the date of the beginning of the last employment period for this individual, with an NRC Form 4 dated [REDACTED] on file and properly reflecting previous exposure. The licensee stated that the individual would be provided a duplicate of the last report if he requested one. His last employment required no WBC because no airborne exposure hours were involved. WBCs dated [REDACTED] and [REDACTED] showed no significant uptakes. Exposure records showed no above-limit exposures. Review of Radiation Work Permits the individual worked under showed no radiological airborne conditions requiring respirator use. No incident involving contamination of the individual was identified. The allegation was closed.

- An unqualified welder allegedly did Category 1 welding in Containment. NRC follow-up found that the company involved is not used for safety-related welding. The licensee stated that this company had welded on gates and in outside-the-plant buildings. The alleged was advised that this was not nuclear safety-significant and that no further NRC action was planned.

- Impropriety between the alleged's employer and a licensee supervisor was alleged to exist based on an apparent personal affluence, prior employment of the individual by the alleged's employer, and information on purchase orders. No safety inadequacy was alleged, or identified by NRC evaluation. The

allegation was referred to the licensee for consideration; the
allegor was informed that no additional NRC action was planned.

[redacted] also recently alleged that his employer
tried to gag him. He has provided the NRC with a copy of the
agreement he said he refused to sign. (His allegation was then
reopened for evaluation of this input.) That copy specifically
states that nothing in the agreement shall be construed to
prohibit [redacted] from communicating to the NRC, and to anyone
who is on the NRC staff and is acting on behalf of the NRC, any
information acquired by him during employment at Millstone and
which he believes in good faith could adversely affect the public
health and safety, as long as the purpose is to provide the NRC
with information necessary to ensure that nuclear power plants
are constructed and operated safely. The proposed agreement also
calls for [redacted] refrain from communicating to the NRC in
a manner calculated or likely to bring the fact or substance of
the communication to the attention of any party other than the
NRC, except for disclosures made by the NRC (unless he
affirmatively induces such disclosures).

In addition to [redacted] allegations, there are
allegations by [redacted] a licensee employee. Mr.
[redacted] has made numerous allegations about facility
activities, with NRC follow-up having identified no significant
safety inadequacy. [redacted] has also filed several
harassment complaints with the Department of Labor, and NRC
disposition of his concerns awaits DOL disposition. In Mr. [redacted]
[redacted] case, the individual did not file a DOL complaint, but
did file suit against the licensee.

NRC letters to [redacted] on the status of NRC actions on
his allegations are dated 10/16/87, 10/30/87, 5/20/88, and
7/25/88. The last two sentences of the 7/25/88 letter were: "In
summary, our followup on your allegations identified no safety
inadequacies. If you have any additional information or
questions, please contact me directly." That letter was signed
by me as the projects section chief. Between that time and his
present allegation about gagging, [redacted] occasionally
contacted the senior resident inspector, but did not provide any
additional allegations.

The senior resident inspector believes that Mr. [redacted] is
sincere. I know of no reason to dispute that sincerity.

Ebe McCabe
Ebe McCabe
5/2/89

[illegible]

PANEL ATTENDEES:

Chairman = S. COLLINS

Branch Chief - J. Duane

Section Chief - E. McCABE

S. BARR, ^{REPORTOR} CHAIRMAN

J. GUTIERREZ, AC

M. PERKINS, OAC

- 1) AOC TO REFER ALLEGATION THRU J. GUTIERREZ, RC TO OGC FOR OPINION (EO 5/19/99).
- 2) ACR LTR FROM AOC TO ALLEGOR INVOLVING REGION 1 ACTION AND PROVIDING DOL COMPLAINT GUIDANCE (EO 5/12/99).
- 3)
- 4)
- 5)
- 6)

M15

MEMORANDUM FOR: Ebe McCabe, Chief, Reactor Projects Section 1B
FROM: Bill Raymond, SRI, Millstone
Subject: Telephone call from [REDACTED] - January 6, 1989

[REDACTED] called me today with a followup request for information in response to the Unit 2 Inspection Report (50-336/88-13) issued in July 1988 that addressed his concerns (reference allegation RI-A-B7-0113). [REDACTED] requested I send him a copy of all memos and procedures, etc., referenced in the report that demonstrate licensee responses and corrective actions taken in response to the concerns he raised. [REDACTED] stated he heard from workers at the site that there have been a lot of changes to policies and practices in the areas he raised concerns (principally in Station Services Engineering) and he feels he has the right to know the details of how issues were resolved. I concurred with [REDACTED] general right to know and obtain detailed information directly from me on how his concerns were addressed, so long as he was not involved in a legal action where such information must be provided only in accordance with "discovery" rules. [REDACTED] stated there was no legal action in process and the information was requested for his personal interest. I told [REDACTED] I would get back to him after checking my files to see what references were available. I plan to mail him the pertinent information.

[REDACTED] stated, as a result of his actions against NU, he is being discriminated against by the union hall in that since he has been out of work since [REDACTED] he has not been offered any "preferred" positions as a supervisor or general foreman. He apparently has been offered a job for steam generator work in an upcoming outage at Millstone (Unit 2?), but has not taken the job.

[REDACTED] offered new information about the electrical work done in September, 1987 on the Unit 2 maintenance shop where no tags were used to relocate a live electrical wire during construction of an internal wall. Followup licensee review of this issue, accepted by NRC inspection, found that although the tagging procedure was not followed in that case, the job was done safely since an alternately acceptable "operator-in-attendance" (OIA) method of tagging was used. [REDACTED] was terminated based, in part, on a dispute with the Barney Co. Superintendent on how this job was handled, particularly in regard to how well station procedures were followed (or, not followed in this case).

[REDACTED] has recently become aware of actions by Unit 2 personnel (whom he identified [REDACTED] against NU and he feels it is notable they share similar concerns as he has expressed. He stated based on discussions with someone in Unit 2 maintenance that he is 100% sure no operator (person) was stationed at the breaker panel during the subject incident. [REDACTED] challenged me to identify the person used as the OIA, which I could not since my inspection of this issue did not interview the workers assigned to the job, but relied instead on licensee reviews of the incident. [REDACTED] declined to provide further information about his source of information that would allow further NRC followup. [REDACTED] stated that NU had lied to the NRC and that the truth would be revealed in the near future to embarrass the utility.

W116

I thanked [REDACTED] for the information and asked him to reconsider my request for further information on the Unit 2 job. I stated I would call him back when I have further information about the requested inspection references.


William J. Raymond

cc:

L. Bettenhausen

A. Shopshire

Allegation File RI-A-0113

FROM:

William J. Raymond, SR1, Millstone

SUBJECT:

Telephone Conversation with [REDACTED] 6/13/88

REF:

ALLEGATION NO. RI-87-A-0113

[REDACTED] called me at 9:30 a.m. to follow up on some questions I asked him last week about the control of tagging activities during the MRA gate job. We also talked about other issues, as noted below. A new issue is described below involving containment cables.

1. Tagging [REDACTED] wrote tag orders. If a work order called for no tags, they were working several gates from one tag order due to a common power source. [REDACTED] was not sure about operator in attendance tagging but suggested I check with [REDACTED] read the full tagging procedure process and noted for the first time that SF 210 is needed. Use of OIA w/o SF 210 violated the procedure. I acknowledged this as it applied to the warehouse job to move the wire.
2. [REDACTED] gave my name and phone number to an electrician who worked at the site previously. [REDACTED] said the electrician will call me about the GFF lights and alleged shoddy cable designs he saw between the containment walls. (new item) I asked for the name of the other worker but [REDACTED] declined and said I would be called. [REDACTED] had no further specifics. [REDACTED] asked if I had talked to [REDACTED] vel. (re breakers). I said no.
3. [REDACTED] said he contacted his union hall and talked to a business agent he knew well to see where [REDACTED] was. The agent did not know. [REDACTED] thought something very strange was going on since he doesn't understand why [REDACTED] isn't employed at Barney anymore. And it is not that after he identified [REDACTED] in this investigation no one knows where he is. I pointed out that [REDACTED] left the site [REDACTED] ago but was only identified in the investigation last week (6/9). [REDACTED] still felt something was wrong.
4. [REDACTED] said he had not yet received a letter or call from INU to set a meeting. I asked him to contact me at the end of the week if no contact is made since (NU) Space told me a meeting would be held to address licensee internal issues outside the scope of those items under NRC jurisdiction.

I recommend we take no further actions at this time other than for work in progress on previously identified issues. The new information is too general to allow fruitful followup on any valid technical issue.

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Act, exemptions [REDACTED]
FOIA: 91-162 [REDACTED]

William J. Raymond
6/16/88

cc:
Al Shopshire

I agree with Bill R - we need to write [REDACTED]
a letter thanking him for his additional input, stating
that it is not specific enough for practicable follow-up,
and that we will respond to the specifics of the
concerns if/when the individuals with knowledge
contact us as we asked.

Etc

W117

MEMORANDUM FOR:

Ebe C. McCabe, Chief, RPS 1B
Lee H. Bettenhausen, Chief, RPB 1B

FROM:

William J. Raymond, SRI, Millstone

SUBJECT:

Telephone Conversation with [REDACTED] 6/16/88

REF:

ALLEGATION NO. RI-87-A-0113

[REDACTED] called me at 9:35 a.m. on 6/16/88 with the following information:

1. He received a letter from Northeast Utilities on Monday and will call today (after talking to lawyer) to set up a meeting with Scace. I told [REDACTED] I had not yet talked to [REDACTED] to see if he could corroborate the story on manipulating air conditioning breakers.
2. He had no further information on SFP lights. I explained my followup on SFP lights and my conclusion that no high radiation exposure occurred based on less than 0.2 mR/hr and 5E-4 uCi/ml. I plan no further followup without additional information that could explain how higher exposures were received. [REDACTED] did not know when the electrician would call me.
3. [REDACTED] stated a former CN Flagg general area foreman, who worked at site for 6 years and left in [REDACTED] would be calling me to explain all the problems he knows of at the site. [REDACTED] had no specifics but referred generally to problems involving each work group having their own procedures and how in ^{one} case proposed work involving the need to ground an electrical power circuit was to be done under vastly different electrical standards by 2 contractors bidding for the job. [REDACTED] also referred to violation of license laws wherein crafts personnel are allowed to do work outside of their disciplines. I told [REDACTED] I would talk to the contractor foreman to hear his concerns.

I received no new specific information on alleged inadequacies during the conversation. I still owe [REDACTED] followup information on the issue involving LTVs on SFP. A concern expressed during the LVB meeting based on observations by an electrician who worked at the site during the MPT outage noted the licensee was processing work orders to replace 300 SOVs that were undersized and were being replaced as they burned out. I've turned this issue over to NNECO for review to see if we can connect the issue with a known problem. The concern possibly refers to ASCO SOVs with an ED problem the licensee is addressing in response to IN 84-68. [REDACTED] seemed satisfied with my followup on the SFP light issue.

William J. Raymond
6/17/88

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Act, exemptions b7C
FOIA 91-162

cc:
Al Shopshire

W/18

UNITED STATES
NUCLEAR REGULATORY COMMISSION
MILLSTONE STATION RESIDENT OFFICE
Waterford, CT

MEMORANDUM

May 16, 1980

FOR: A. Shropshire, Allegation Coordinator
THRU: E. McCabe, Chief, RPS-1B
FROM: W. J. Raymond, SRI, Millstone Station

SUBJECT: [REDACTED] Allegation RI-87-A-0113 Update

Record of Telephone Conversation

[REDACTED] called 9:45-10:15 a.m. He wanted to know status of our inspections. [REDACTED]

[REDACTED] He has not been contacted by NU, and he feels NU is just covering their tracks. We discussed the tagging issue again. He pointed out that his tags had been hung for the warehouse job and MP2 Maintenance must have operated breakers with tags hung and probably without a work order. He stated that even if site management re-enforced tagging rules, they still have the same people doing work at site who feel they are above procedures.

Quotes:

- a. Project Manager: "You [REDACTED] are not going to buy MP2 Maintenance for this one."
- b. Project Manager: "I don't have time for paper work."
- c. Project Manager: "I don't come under anyone's rules."
- d. Vice President: "Do whatever Project Manager says."

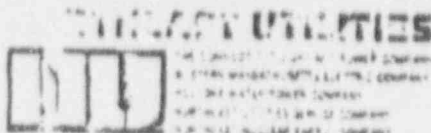
Regarding the issue of workers who terminated without whole body counts, [REDACTED] and the second individual don't want to get involved. [REDACTED] stated he, as [REDACTED] during work for MP2 outage, observed instances where workers left their TLD/dosimetry in low radiation areas in order to minimize their recorded exposures. [REDACTED] did not have further specific information.

I repeated my previous commitment to [REDACTED] to meet with him (about end of May) when the inspections on his issues are done (about the end of this week). [REDACTED] is clearly very upset by NNECO's refusal to meet with him to address his issues and concerns.

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Act, exemptions (b)(7)C
FOIA- 91-162

William J. Raymond
WJR

Background Info: Licensee Follow-up record



May 19, 1988
MP-S-QSS-88-28
CONFIDENTIAL

TO:

[REDACTED]
Station Services Superintendent
Millstone Nuclear Power Station

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Act exemptions b7C
FOIA 91-162

FROM:

[REDACTED]
Quality Services Supervisor
Millstone Nuclear Power Station
Extension 4304

SUBJECT: Report of Investigation into Allegations Made by [REDACTED]

Various allegations have been made by [REDACTED] a former employee of the W. J. Barney Company, concerning improper work practices within the Station Services Engineering Department, including work performed by W. J. Barney employees in support of that department. There have been several sources of information beginning with the letter dated October 16, 1987 from [REDACTED] to you. This memorandum will summarize all of the elements of the allegations that I have investigated, my findings, and any corrective action that has been taken or is being taken.

In addition, the following correspondence is attached, (Attachment 1), which documents the actions that were completed during November 1987.

- Letter to [REDACTED] from [REDACTED] dated October 16, 1987.
- Memo to [REDACTED] from [REDACTED] dated November 5, 1987 with its attached Investigation Report by [REDACTED] dated about October 28, 1987.
- Letter from [REDACTED] to [REDACTED] dated November 17, 1987 acknowledging his October 16, 1987 letter.
- Letter to [REDACTED] from [REDACTED] dated November 19, 1987.

Allegation 1 (Welding in Containment): An uncertified welder from W. J. Barney Company is performing QA Category I welding in Containment.

Findings: (1) Financial Control Department was consulted to determine which departments used W. J. Barney to perform work. Attachment 2 lists those departments. Most of the Barney work is performed for the Station Services Engineering Department. Those that might have used Barney for work in the plant were contacted with the following results:

N/20

Unit 1 I&C - No Category I work. Only building structural work in the shop.

Unit 1 Maintenance - No work by Barney.

Unit 2 Engineering - No Category I work. Work was performed in the Old Maintenance Electrical Shop to convert it to an RCP Seal Rebuild Room.

Unit 2 Maintenance - Used Barney laborers under a Unit 2 job supervisor for shield block work. Other jobs were not Category I. No Barney electricians were used in Containment.

Unit 2 I&C - Used Barney for shop modifications. No Category I work.

Unit 3 Operations - Barney personnel were used in Containment under NNECO supervision for material accountability work.

Generation Construction - No Category I work. All Barney jobs are site related rather than plant related.

Station Services Engineering - Barney was used for non-Category I work in plant buildings for the High Radiation Area Door/Gate Alarm installations and modifications. Carpenters were used to modify and reinforce many gates. This work required welding in many cases. The welding was usually performed in an area designated for welding with appropriate ventilation and other precautions. No welding was performed on Category I structures or components. The work was authorized by work order.

- One Barney electrician has performed two non-Category I welds outside plant buildings.
- The Barney electrical foreman reports that all union electricians receive welding training during their apprenticeship.

Corrective Action: None.

Allegation 2 (Parking Lot Lights): Pole lights were installed in the Training Building Parking Lot without using the required template.

Findings: The template was not required. The Barney Superintendent, Mr. [REDACTED] a certified professional engineer, civil discipline, discussed the installation with the manufacturer of the lights. Four bolts on a ten-inch bolting circle was acceptable. [REDACTED] removed the bolts before the cement was poured and was subsequently terminated. He was reinstated after a discussion with the Barney Vice President.

Corrective Action: None. This was an internal W. J. Barney Company matter.

Allegation 3 (480 Volt Breaker Tagout): On August 17, 1987, [REDACTED] the Barney Superintendent, operated 480 volt circuit breakers without a properly authorized tagout. The breakers were in the Unit 2 Maintenance Shop.

Findings: The details are contained in my November 5, 1987 memo that is in Attachment 1. [redacted] and [redacted] of Kenyon Air Conditioning were investigating a report that the building air conditioning was not operating. The circuit breaker was found in the "off" position. When the circuit breaker was positioned "on", the air conditioning operated. As a separate, unrelated action, this new air conditioner was connected to the panel in the Unit 2 Maintenance Shop earlier using a plug-in circuit breaker. A tagout was not required.

Corrective Action: None. Operation of these circuit breakers did not require a tagout. Had there been danger in their operation, it is presumed that the person aware of the danger would have initiated a tagout.

Allegation 4 (Cable Removal Tagout): A cable was removed in the Unit 2 Maintenance Shop without following proper tagging procedures. The work was done by in-house personnel even though [redacted] was issued a work order.

Findings: The details are set forth in the attachment to my memo of November 5, 1987 in Attachment 1.

(1) Concerning the cable removal without proper tagging element of the allegation:

- Unit 2 Maintenance electricians performed the work using the concept of the "Operator in Attendance" tagging permitted by ACP-QA-2.06A, Section 6.1.9. However, the Tag Log Sheet, SF-210 was not used, as required by the procedure.
- This abbreviated form of "Operator in Attendance" tagging is common practice in the Maintenance Department outside of the plant.

(2) Concerning the element of the allegation in which work was done by in-house personnel even though [redacted] was issued a work order.

- [redacted] the Barney Superintendent, acted properly in arranging for Unit 2 Maintenance personnel to perform the cable removal work.
- [redacted] failed to follow the proper procedure for Barney performing work. The governing procedure was the August 20, 1987 "Control of Electrical Work" flowpath that [redacted] included in his letter of October 16, 1987. The work order issued was an "advance copy for planning" for the electrical foreman. [redacted] was not expected to tag the job and perform work until so assigned by [redacted] the "Construction Supervisor". According to [redacted] he went directly to the Maintenance Supervisor for authorization, bypassing the Barney Superintendent.
- [redacted] was occasionally in-charge of work performed by Barney when the superintendent was not present on-site. At

those times, he performed the work assignment duties of the superintendent. I have surmised that [redacted] may have proceeded independently with the Unit 2 Maintenance Supervisor because he had occasionally been expected to act independently in the past. (Note that other KNECo departments arrange for Barney to perform work under the Blanket Purchase Order in the Station Services Engineering Department).

- The meeting between [redacted] and [redacted] to discuss the work assignment degenerated into an argument between [redacted] and [redacted]. [redacted] did not accept Mr. [redacted] authority to assign his work, nor the plant's discretion to assign work in-house or to contractors. As a result, [redacted] was terminated.

Corrective Action: (1) Concerning the cable removal without proper tagging element of the allegation:

- ACP-QA-2.06A, Section 6.1.9, "Operator in Attendance" tagging appeared to have been written for in-plant situations. The Industrial Safety Department was requested to review the procedure used in the given situation. [redacted] memo dated January 4, 1988, included as Attachment 3, reported the result of that review as "... safety was not compromised and that the assumed risk was reasonable and controlled." A change to ACP-QA-2.06 to allow similar accomplishment of non-plant systems maintenance work was recommended.
- The Station Superintendent issued Controlled Routing 6916, "Control of Tagging in Outlying Buildings" to his Staff Engineer in order to resolve [redacted] recommendation. The due date for the CR is July 15, 1988.
- The Station Superintendent promulgated memo MP-11440 dated January 29, 1988 to emphasize the need to follow ACP-QA-2.06A as the only acceptable process for safety tagging. A copy is included as Attachment 4.

(2) Concerning the element of the allegation in which Mr. [redacted] had a work order to perform work that was done by in-house personnel:

- The situation in which the Barney Superintendent being the only Barney management assigned to Millstone for Barney work was reviewed by myself and [redacted]. This situation resulted in a craft foreman being in charge of Barney work whenever [redacted] was absent due to illness, vacation, etc. It was our evaluation that this situation in which [redacted] was occasionally in charge for Barney may have contributed to his acting independently of [redacted] during the cable removal job.

- At Mr. [REDACTED] request, W. J. Barney has added an Assistant Superintendent to their Millstone staff. This ensures that a member of Barney management can always be present on-site to supervise Barney work.
- The argument was discussed with [REDACTED] to evaluate his attitude toward complying with station procedures. [REDACTED] accepts the need to so comply. He appears to clearly differentiate between his authority as the Barney Superintendent over craft personnel and his relationship with NNECo and our procedures.

Allegation 5 (High Radiation Area Gate Controls): Several problems were alleged in a large task to install alarms and warning lights on some 70 doors and gates to high radiation areas. These problems included:

- (1) Needless radiation exposure during the first two weeks of the job due to:
 - The assignment of an inexperienced engineering technician.
 - The use of blackboard designs to provide inadequate guidance and direction.
 - The use of components that were not needed.
- (2) The initial design was aborted, and a \$6,000 restock charge was incurred for lights that were not used.

Findings: (1) Attachment 5 is a chronological listing of events.

(2) Concerning the inexperienced technician, it is believed that this allegation may be based on initial work coordination problems and design changes for ALARA considerations. The technician is Mr. [REDACTED] a W. J. Barney employee working directly for Mr. [REDACTED] the Station Services Engineering Supervisor.

- Prior to his current assignment one-and-a-half years ago, Mr. [REDACTED] had worked for three years for Stone and Webster as a field engineering technician during Unit 3 construction and startup. In that capacity, he was involved in switchgear testing and gained considerable experience in working with major electrical components, formal installation and test procedures, and a complex, formal nuclear power plant work environment.
- [REDACTED] explained some difficulties that he had with administratively coordinating the preparations for the first high radiation area gate job in Unit 1. The difficulties concerned allowing insufficient lead time to process tagouts and radiation work permits (RWP) so that work could start on time, the shortfall stemming from his inexperience with these administrative proceedings. He stated that the work proceeded smoothly when he allowed the required lead time. This experience did not appear to contribute to unnecessary radiation exposure.
- Both Myrock and W. J. Barney electricians recognized the opportunity for wiring changes to the original design. The changes reduced the number of cable connections, thus reducing the potential time working in a radiation control area. The changes

were approved, pre-fabricated, and bench tested in the shop satisfactorily before installation in the plant. It is noteworthy that the changes proposed and installed by Myrock were satisfactorily tested in the plant before the Barney electricians were even involved. The effort expended during design change did not result in unnecessary radiation exposure. Review of individual dosimetry records for specific RWP events substantiated this conclusion.

(3) Required design procedures were followed and adequate documentation was provided to install high radiation area doors and gates and associated alarm lights, bells, and cut out switches. Four Plant Design Change Requests were approved in order to define the work in the three units. Those documents are:

PDCR 1-105-86, High Radiation Area Gate Alarms & Warning Lights
PDCR 2-004-87, High Radiation Area Gate Alarms & Warning Lights
PDCR MF3-87-002, High Radiation Area Gate Alarms & Warning Lights
PDCR MF3-86-372, High Radiation Area Wire Mesh Gates

A copy of these PDCRs is included as Attachments 6, 7, 8, and 9. No QA Category I work was involved.

(4) The initial design process occurred during late 1986. Lights similar to those already installed were ordered so that 1986 O&M expense funds could be used. Subsequently, a more suitable and less expensive light was used for the design. Despite a \$6,244 restocking charge (see Attachment 10), a net savings of more than \$10,000 was realized. The originally proposed lights were never installed and therefore, did not contribute to rework and unnecessary radiation exposure.

(5) The work was initially assigned to Myrock personnel. Interviews of several personnel in the Station Services Engineering Department revealed that Myrock work progress was unacceptably slow. Unnecessary difficulty was experienced in setting up to do a job, including work order, tagout, and RWP preparation and coordination, and staging tools and materials. These difficulties are in addition to those described previously in (2) concerning the inexperienced technician. In addition, progress in the work area was slower than desired. This resulted in a projection that all doors and gates would not be completed by the commitment date, and that unnecessary radiation exposure could occur. [REDACTED] reassigned the work to the W. J. Barney Company.

(6) The guidance to personnel performing the work appears to have been adequate. This finding is based on the following:

- Station Services Engineering personnel walked down the job with Barney personnel.
- As much as possible, the materials were pre-fabricated and tested in the shop.

- Documentation in the custody of the current electrical foreman contained appropriate lists, sketches identical to those in the PDCRs, and plans identifying the locations of work areas.
- The current electrical foreman, [REDACTED] indicated that he had no difficulty with the work in the field. He indicated that problems with the wiring were experienced (as described in Finding (2) - inexperienced technician), but that these were identified in the shop and corrected before proceeding to the field installation phase.
- The retrofits to existing installations in Unit 1 encountered 115 volts d.c. in the condulets to the warning lights. Craft personnel were briefed that this voltage was present and in appropriate safety precautions. The d.c. voltage is in wiring to the annunciator panel in the Control Room which could not be deenergized for the work. There were no 24 volts d.c. components or wiring on this job.

(7) The radiation exposure for the job does not appear to have been excessive. Doses for the units are as follows:

<u>Unit</u>	<u>Man-Rem</u>	<u>Manhours</u>	<u>Dose Rate</u>
1	0.885	264	3.3 mr/hr
2	0.710	236.09	3.0 mr/hr
3	0.000	0	0.0 mr/hr

Attachment 11 is a tabulation of the Myrock and Barney personnel who worked on the job. The exposures listed in Attachment 11 are for all work during the period, not just for the high radiation area gate work. Individual exposure records for specific RWP entries during the first few installations did not contain excessive exposures. Furthermore, Health Physics reports that no person's administrative exposure limits had to be increased during this job. In addition, a walk down of several installations showed that a typical work area was confined to the vicinity of the gate and a nearby electrical panel, and was not well into the high radiation area. The power supply for each new installation was carefully selected to minimize the time spent in radiation areas. ALS cable was specified in order to avoid the longer installation time that electrical conduit would have required. It appears that all reasonable efforts to minimize radiation exposure were taken.

(8) Proper administrative controls generally were used. This judgment is based on the audit of Barney work performed by the Quality Services Department, and on my personal review of documentation, interviews of personnel, and walk down of representative high radiation area gate work sites. In many cases, personnel who signed off certain work functions were not clearly authorized to do so. In all but one person's case, this uncertainty is attributed to ambiguity in ACP-QA-2.02C, "Work Orders". Appropriate observations and conclusions are summarized as follows:

(a) The report of the audit of work performed by W. J. Barney Company is included as Attachment 12, memo QSD-ES-4243, dated February 4, 1988 from the Supervisor, Assessment Services, to myself. 119 of 269 work orders were reviewed in depth with no evidence of Category I work being determined.

- Concerning the 66 instances of no tagging of electrical work and the improper use of "Operator in Attendance" tagging, most of these were associated with the high radiation area gate work. Investigation determined that one tagout for one gate on one work order was used to effectively protect personnel working on other gates covered by other work orders, if they had a common power supply. In nearly all cases, this tagging was controlled by the engineering technician directing the work, who approved recommending no tags to Operations. The ACP-QA-2.06A requirement to list additional work for a tag clearance on SF-210B, "Tag Clearance Additional Work Order Authorization", was erroneously not used. Investigation revealed that personnel in Station Services Engineering Department did not understand the application of this feature of the ACP.

- Concerning the minor problems cited that the tagging requirements were sometimes changed or unknown, the concern appears to be a matter of interpretation of the use of the work order format. The instances cited are located in the planning section of the work order that describes the job and associated requirements, such as tagging. ACP-QA-2.06A assigns the responsibility for the determination of tagging requirements to the Operations Department. Interviews with Units 1 and 2 Operations personnel confirmed that the Shift Supervisor or Supervisory Control Operator discuss tagging requirements with the job supervisor. The results in terms of a tagging decision are documented in the work authorization section of the work order, and that entry represents the final decision concerning tagging requirements. The omission of a correction to earlier work order entries recommending tagging requirements is not a violation of either the ACP-QA-2.02C, "Work Order Procedure", or the ACP-QA-2.06A, "Tagging Procedure".

(b) The events noted chronologically in Attachment 5 described the general sequence of the work control process in the high radiation area gate work. I personally reviewed most of the work orders associated with this job, discussed the entire process with the following personnel:

Station Services Engineering Supervisor [REDACTED]
Engineering Technician, [REDACTED]
Senior Engineer, [REDACTED]
Barney Electrical Foreman, [REDACTED]
Barney Carpenter Foreman, [REDACTED]
Supervising Control Operator, [REDACTED] and
Health Physics Supervisor, [REDACTED]

and walked down several high radiation area gate work areas in order to evaluate all aspects of the work. In general, the design and

work control procedures were followed. The implementation of the tagging procedures could have been improved, as described earlier. Problems noted were:

- "Department approval" to perform work was frequently signed off by [REDACTED] the Barney engineering technician, although his name was not on the authorizing list promulgated by [REDACTED] ACP-QA-2.02C permits personnel who are not supervision to sign off, if authorized in writing. [REDACTED] reported that Mr. [REDACTED] had his authorization, and that the omission of his name from the list was an oversight.
- Other work order signatures were signed off by personnel whose authorization is considered ambiguous per ACP-QA-2.02C. For example, [REDACTED] the craft supervisor, signed off "tagging verified", a "job supervisor" responsibility for which another person was designated on the work order. For similar reasons, [REDACTED] signed off "work/ inspection" complete. [REDACTED] was satisfied with this occurrence, as he felt it met the requirements of ACP-QA-2.02C. Further consultation with [REDACTED] Supervisor Plant Quality Services, Millstone, confirmed that the procedure was ambiguous, and that there was no intent in drafting the procedure to exclude contractor personnel from signing off the aforementioned signatures.

Despite the errors and ambiguities, the work in all other respects appears to have been properly controlled. It was obvious that all required steps were taken by personnel who were competent and able to ensure that they were performed correctly.

Corrective Action: (1) Concerning the tagging problems the following action has been taken or is in progress:

- The Station Superintendent promulgated memo MP-11440 dated January 29, 1988 to emphasize the need to follow ACP-QA-2.06A as the only acceptable process for safety tagging. A copy is included as Attachment 4.
- Memo MP-S-QSS-88-6 dated February 8, 1988 was issued to [REDACTED] to require an improvement in tagout control (see Attachment 13). [REDACTED] memo MP-SSE-88-13 dated February 25, 1988 documents the corrective action with particular emphasis on training for "Operator in Attendance" tagging, and on work direction. (See Attachment 14).
- [REDACTED] conducted a followup meeting with his department personnel and W. J. Barney management to further clarify tagging requirements. That meeting partially addressed the situation encountered during the high radiation area gate work. MP-SSE-81-31 dated Mar 4, 1988 documents the meeting. (See Attachment 15).
- Additional training in Station Services Engineering to fully correct knowledge deficiencies in the use of SF-

210B and "Operator in Attendance" tagging will be completed by June 1, 1988.

(2) Concerning the designation of personnel to perform duties and sign off work:

- Memo MP-SSE-88-25 dated April 15, 1988 promulgated a revised list of personnel who are authorized to sign off work orders for Station Services Engineering.
- On May 11, 1988, the authorization within Station Services Engineering Department for signing off work orders was limited to NNECo personnel.
- The Quality Services Department has committed to revise ACP-QA-2.02C in order to correct the aforementioned ambiguities. The draft revision is targeted for distribution for review by June 1, 1988. It is expected to propose tagging and work completion signoff by the job supervisor or person directing the work, as authorized by the department head.
- The Station Services Engineering Supervisor will propose a revised list of personnel authorized to sign off work orders. The list will be consistent with the method used by other departments. The target completion date is June 1, 1988.
- A formal means will be established whereby Station Services Engineering Department supervision will be assured that contractor personnel will perform work at the station in accordance with applicable procedures. This means is expected to be an adaptation of the department's indoctrination program for permanent NNECo personnel. The target date for completion of this task is July 1, 1988.

Allegation 6 (Security Lighting): Inadequate work activity coordination resulted in two work groups working on the same security lighting problem at the same time.

Findings: This allegation is believed to address the removal of lights mounted on the side of Warehouse 4.

- The Security Department initially submitted a trouble report to Myrock Satellite, the organization that usually corrects security lighting failures.
- The Station Services Engineering Department subsequently issued a work order to W. J. Barney Company to remove the lights at the request of the Security Department, when the Myrock response was delayed.
- [REDACTED] was assigned the job. While preparing for the work, he noticed Myrock personnel performing the same job.

- The work order to Barney was cancelled, and the work was completed by Myrock.

Corrective Action: The Station Services Superintendent issued a memo, Attachment 16, to the Security Supervisor requesting prevention of future problems. The problem was believed to be related to a work request method in which two organizations were frequently requested to perform different tasks related to lighting at the same locations. NNECo Security personnel were cautioned at a staff meeting to use care in avoiding duplicate work assignments in the future. The Assistant Security Supervisor Operations further emphasized this point at shift turnover meetings.

Allegation 7 (Excessive Barney Superintendent Control): The W. J. Barney Company Superintendent, [REDACTED] controls the Station Services Engineering Supervisor, [REDACTED] who approves the actions of Barney management. [REDACTED] owns two buildings on-site and rents them to NNECo. [REDACTED] is a former Barney employee.

Findings

- [REDACTED] has been a NNECo employee for more than eleven years, having started in 1977.
- The W. J. Barney Company has been on-site and active in Station Services Engineering Department work since about 1982, about five years after Mr. [REDACTED] started at NNECo.

Barney is currently on-site under Blanket Purchase Order #062866, which was awarded on July 1, 1986 as a result of a competitive bid process. The purchase order expires July 1, 1988, and it is expected that a competitive bid process would be used, if contractor support for the Station Services Engineering Department is to be continued.

- During the five years that I have provided oversight supervision to [REDACTED] and the Station Services Engineering Department, there have been several situations in which a competitive bid process or comparison of quotes was used before a specific job was awarded. In some cases, the outcome was to award the work to Barney, as in the most recent bid to modify Warehouses 3 and 8 to include office space. In other cases, the job was awarded to another contractor, the more recent notable cases being the Refueling Outage Building modifications to provide Production Test shop space and the modification of Warehouse 1 to provide office space for the Security contractor and the Personnel Processing Center.
- At one time, two buildings on-site were owned by Fairfax Enterprises, a company in which [REDACTED] was reportedly president. These buildings were initially leased, as was the custom for most of the temporary buildings on-site. Both building leases were awarded to Fairfax Enterprises as a result of a competitive bid process that was administered by the Northeast Utilities Purchasing Department. Other companies on the bidders list were either unable to bid because the building requirements exceeded the scope of their capability, or the companies declined to work on a job site that used union labor. The Purchasing Department files were reviewed with

[redacted] the buyer who negotiated the purchase order. A brief summary of essential details is included in Attachment 17. The buildings were subsequently purchased by Northeast Utilities for financial reasons.

- [redacted] is accountable to Millstone Station management. He meets periodically with me, his immediate supervisor, in order to discuss jobs, priorities, and assignment of work. Over the past year, the workload has increased substantially in the Station Services Engineering Department. During the fourth quarter 1987, the prioritization of Station Services Engineering Department work was formalized into a weekly review process that integrated priorities of the Site Utilization Committee work with other work requested of [redacted] department. [redacted] regular interaction with me has permitted me to provide appropriate guidance and station management direction into his department's work. Those inputs have included direction concerning competitive bids and the control and scheduling of jobs. From this point-of-view, [redacted] is not under the control of [redacted] and Barney management.

Corrective Action: None. Adequate oversight controls are being used to manage the work performed by the Station Services Engineering Department and the W. J. Barney Company under Mr. [redacted] direction.

Allegation 8 (Procurement Management Practices): [redacted] does not properly manage the procurement process. He allows contractors to be involved in the purchase of materials and in the procurement record keeping function. Original purchase order documents are missing from [redacted] files and are in the custody of Mr. [redacted].

Findings

- Contractors were involved in procuring materials for work in the Station Services Engineering Department. The customary practice for jobs assigned by [redacted] to Barney, or C. N. Flagg, or other contractors was to first obtain a quote for the cost of a job. The quote included time and materials. Some materials are available from the KNECo warehouse, and some must be procured from commercial sources which may or may not be local. In many cases, the contractor was authorized to procure materials for jobs assigned. The cost of the materials was invoiced to [redacted] by the contractor, who authorized payment by Northeast Utilities, if appropriate. Since KNECo personnel provided job supervision for Barney work, and since quotes were approved before the contractor was authorized to procure material, the procurement process was under control.
- Personnel who work in the Millstone Financial Control Department and routinely are involved in financial reports for all KNECo departments have on several occasions in the past praised the financial control process in the Station Services Engineering Department. I have been told that [redacted] has control of the money that is being spent in his department. His records are easy to review.
- [redacted] worked for Barney at Millstone for more than two years. Personnel in the Station Services Engineering Department respected him and his work. [redacted] considered him to be "... very knowledgeable, resourceful and is cooperative". He was trusted by KNECo personnel. [redacted] reports

that [REDACTED] had offered to straighten out a file of purchasing documentation that consisted of sales slips from local merchants. [REDACTED] did not return the file when he was terminated by Barney.

Corrective Action

- W. J. Barney construction personnel and other contractors no longer have access to procurement records in the Station Services Engineering office, except for a contractor clerk. Files are in a locked office when not in use.
- Station Services Engineering Department personnel now order materials from local vendors. Sometimes contractors are used to pickup and deliver the materials to Millstone.

Summary of Outstanding Corrective Action

- Complete training Station Services Engineering Department personnel and contractors in requirements of ACP-QA-2.06A, "Tagging", by June 1, 1988.
- Station Services Engineering Supervisor propose revised list of personnel authorized to sign off work orders by June 1, 1988.
- Quality Services Department revise ACP-QA-2.02C, "Work Orders", to clarify authorization to sign off "tagging verified" and "work complete". Promulgate draft revision for review by June 1, 1988.
- Station Services Engineering Supervisor establish formal means to assure that contractors perform work at the station in accordance with applicable procedures by July 1, 1988.
- Close out the Controlled Routing, CR 6926, "Control of Tagging in Outlying Buildings", by July 15, 1988.

Conclusion

1. The involvement of the Station Services Engineering Department and the W. J. Barney Company in safety related work is minimal. W. J. Barney performed limited work in Containment for Units 2 and 3 under NNECo job supervision within the units. Most of Barney's work was for the Station Services Engineering Department (SSE). SSE performs some Fire Protection QA Appendix R work, primarily with fire doors in which contractor support is sometimes used. An extensive amount of non-safety related work with the Security System is performed by SSE with extensive contractor support. The most extensive work "in-plant" by SSE recently was the high radiation area gate/door job which did not involve Category I work. W. J. Barney does not have an approved Quality Assurance Program at Millstone. Despite the increasing workload at Millstone Station Services Engineering, there is no evidence to support that W. J. Barney is involved in Category I safety related work, other than that noted in the report under NNECo job supervision. In particular, extensive interviewing failed to substantiate that Barney personnel were involved in any Category I welding.
2. Work within Station Services Engineering Department, including that performed by W. J. Barney, is controlled. The work order system and the station tagging

system are used to control work. Adequate resources are available to use the work order system since a PMNS Planner is assigned to the department. Some procedural violations concerning the use of personnel to sign off certain work order functions were noted. However, these violations did not appear to result in a loss of effective control of work. In particular, the work in the Station Services Engineering Department was always authorized by [REDACTED] or a person who reported directly to him. The tagouts were always approved by a Unit Shift Supervisor or Supervising Control Operator in their process of authorizing work. The final work order review was performed by [REDACTED].

3. Some problems were identified in the implementation of the tag clearance system. "Operator in Attendance" tagging was not always implemented in outlying buildings in accordance with the procedure. The method in use was determined to be safe by industrial safety personnel. A procedure for this outlying building situation is under development. The procedure was not followed for using one tag clearance for several work orders due to personnel error.
4. Excessive radiation exposures do not appear to have occurred during the high radiation area gate job. Extensive efforts were implemented to plan the work so that exposures would be minimized. These included walk downs during design, walk downs of Station Services Engineering personnel with Myrock and Barney personnel before work, prefabrication of materials in the shop, and design using materials that would reduce the amount of time in radiation areas. Delays that occurred early in the job were attributed to prolonged preparatory work by Myrock personnel prior to entering the work area, to design changes that were proposed by the electricians, and to the engineering technician in Station Services Engineering learning how to administratively coordinate tagouts and RTAs so that work could start on schedule. Individual administrative responsibilities did not have to be increased. The job was reassigned to Barney when Myrock progress was determined to be too slow. The job is completed within the ALPA guidelines of 1 REM.
5. The control of W. J. Barney work is effective. Station personnel authorized work. Procedural problems noted in work order processing and tagouts did not result in ineffective control. Station Services Engineering work is prioritized. Work assigned to contractors is based on pre-job quotes. In some instances competitive bids are used to evaluate contractors. Management oversight of Station Services Engineering is extensive and occurs frequently and periodically. Financial records substantiate the control of work. Training in tagout processing is correcting past tagging deficiencies. Pending implementation of the designation of personnel to sign off work order functions will ensure stricter procedural compliance. A method to assure that contractors will work at the station in compliance with procedures is being developed.
6. Based on a review of documentation and interviews, it is my conclusion that Station Services Engineering Department personnel and supporting contractor personnel follow station procedures. Corrective action is in progress for those identified deficiencies that remain to be corrected. In my judgment, the contractor work force and management that supports Station Services Engineering Department is not out of control, nor does it have unusual powers on-site.

RJA:l

Attachments

RECORD OF TELEPHONE CALL

From: Bill Raymond

APRIL 26, 1988

3:37 PM

Information in this record was deleted
in accordance with the Freedom of Information
Act, exemptions b2, b7C

FOIA- 91-112

SUBJECT: ADDITIONAL INFORMATION FROM [REDACTED]

REFERENCE: ALLEGATION RI-87-A-0113

I received a telephone call from [REDACTED] on April 25, 1988, who called to check on the status of the allegation followup, and to request a meeting when the inspection was completed. I told him that I was expecting NNECO to finish their reviews of the issues and to report back to me by the end of this month, and that I would be agreeable to schedule a meeting with him to discuss the results as summarized in a routine inspection report.

I summarized for [REDACTED] the results of preliminary feedback from the utility on some of the issues - (i) nothing improper associated with the buildings onsite owned by [REDACTED] (ii) utility followup did confirm that administrative tagging controls were not strictly followed and what corrective actions were taken to better assure compliance with procedures.

[REDACTED] seems contented with the NPC's followup of the issues, but is upset that NNECO has not responded to his request for a meeting to address his dismissal from Barney and to retrieve the purchase order material he has in his possession. [REDACTED] wanted to know if the NPC could make the utility meet with him. I stated that while I agreed that it would be appropriate for NNECO to meet with him, I was not aware of a mechanism we had to force the issue.

[REDACTED] stated that he had contacts on site who stated that things are not any different than before - in general reference to the controls over the activities of [REDACTED] & Barney Co. [REDACTED] offered no specifics. [REDACTED] did state that he had information about two individuals who had worked at the site and were terminated with completing a body count. He at first declined to provide the specific information apparently because "he was in contact with area anti-nuclear groups who were interested in his story, wanted to support him" and the information was being saved for later. When I pressed him for the information, he provided the following:

Two CN Flagg contractor personnel who worked at a MP2 outage, one 1983

M/2

and one in 1964, never received termination whole body counts or termination exposure reports. Both individuals worked within the radiation control areas and had to wear respirators for the job. One of the workers is [REDACTED] who apparently has a known Cesium uptake. [REDACTED] said he would contact me after talking to the other individual to see if he would be willing to provide his name and possibly talk directly to the NRC.

I asked [REDACTED] to contact me if he had any further information.

UNITED STATES
NUCLEAR REGULATORY COMMISSION
MILLSTONE STATION RESIDENT OFFICE
WATERFORD, CONNECTICUT

24
In accordance with the Freedom of Information Act, this record was deleted.

MEMORANDUM

SUBJECT: [REDACTED] Investigation #1-87-A-011

Telephone: [REDACTED]

[REDACTED] contacted me by telephone on January 13, 1988, in response to a request for additional information during our January 13th meeting. [REDACTED] stated that he had contacted a contact, Barney [REDACTED], about the use of electricians to do welding. The foreman apparently reversed his first statement and said that Barney was not involved in work involving welding. The foreman is not willing to talk to the NRC directly about this issue.

[REDACTED] stated that he did not feel comfortable with the last conversation with the foreman. [REDACTED] had heard from other sources that the word was put out at the site for workers not to talk people about site matters, including the news media in particular. [REDACTED] thinks that the foreman may be scared and not willing to get more involved in the issue.

[REDACTED] thanked [REDACTED] for the information and said it would be considered in the NRC followup of the issues.

Follow-up Inspection for Welding Activities

During an inspection in the MP2 containment on January 23, 1988, I looked for Barney involvement in ongoing work activities and found none. I will continue to pursue this issue during routine inspection of MP2 and MP3 outage activities.

N/22

UNITED STATES
NUCLEAR REGULATORY COMMISSION
MILLSTONE STATION RESIDENT OFFICE
WATERFORD, CONNECTICUT

MEMORANDUM

January 15, 1988

FOR: A. Sheehy, Attorney General
Thru: E. McCabe, Chief
FROM: William J. Raymond, SRI, Millstone Station

SUBJECT: [REDACTED] Allegation RI-87-A-0113 Update

On January 13, 1988, I met with [REDACTED] for 2-1/2 hours starting at 7:00 p.m. at [REDACTED]. During the meeting, [REDACTED] presented me with [REDACTED] materials that document his concerns and provide examples of allegedly unsatisfactory work practices at the Millstone site performed by the Barney Company, and by the [REDACTED] of Barney [REDACTED] in particular.

The meeting mostly provided additional information on issues previously addressed by the NRC staff (see McCabe memo dated 12/11/87). New information was provided in two areas: (i) an allegation that Barney is using unqualified welder (an electrician) to do Category I work in the containment; and, an allegation of improprieties in the relationship between Barney Co. and the NNECO Supervisor having direct oversight on that company's work [REDACTED] as well as improprieties in certain actions by [REDACTED]. A summary of the issues discussed is provided below.

A. Examples of activities performed or directed by [REDACTED] and/or Barney that were discrepant or not done per procedures:

A.1. In July 1987, Barney installed 16 pole lights in the Simulator building parking lot. [REDACTED] was in charge of the work and noted that a template was not provided by the manufacturer to assure proper alignment of the mounting bolts in the concrete pads for the lights. There

are 4 mounting bolts for each light. [redacted] contacted the manufacturer and obtained a template. [redacted] wanted to do the job without a template. An argument ensued that was resolved in a meeting between [redacted] and a Barney Vice President, who directed [redacted] to "do what [redacted] says no matter if he is right or wrong." The light mounting pads and bolts were constructed without the template.

A.2 In March to August 1987, Barney had the job to install alarms and warning lights on the roof. [redacted] providing access to the roof. Alarms were installed on the roof. [redacted] that the [redacted] [redacted]

[redacted] His efforts were [redacted] installing the alarms on 11/2 doors. [redacted] written criteria or direction on how to install [redacted] to function. The engineering technician designed the system with problems with: use of strobe lights that were not needed; selection of bells that ran on 24 VDC and required [redacted] of using 110 VAC alarms in the first place.

[redacted] stated he was assigned to do the work [redacted] completed in the March - August time period. [redacted] point on this issue was that: Barney assigned an inexperienced person to work in a radiation area without adequate direction and guidance; the installation of a system important to the protection of radiation was based on "blackboard designs" and resulted in needless exposure to personnel for the first 2 weeks of the job after it was not done right; and, there was a \$6000 restock charge (Exhibit J) for equipment not used based on the design for the job that was aborted.

A.3 In July 1987, the air conditioning in the new building for the MP2 maintenance shop was not working and a request to investigate/repair the unit was processed. [redacted] acting without an authorized work order (AWO) or tags, went to a 480 volt breaker panel in the building and turned on 6 or 7 breakers in an attempt to start the units. The new units were later tied into the panel and made operable. [redacted] stated that Mr. [redacted] acted carelessly by exercising the 480 volt breakers without knowing what was on the other end of the circuits, and acted without regard for established safety & tagging controls. Following this incident, a procedure was developed to establish the control and flow of work assignments within Barney - see Exhibit B of Attachment 1.

In late Summer 1987 while modifying the MP2 offices, carpenters requested an electrical wire be moved from a wall to allow installation of [redacted]

a window. [redacted] began processing an AWD and tag order to do the job - see Exhibits G, H & I. [redacted] then learned that the job had been done by Millstone electricians and that the work had been moved without the use of an AWD or tags. [redacted] was apparently discharged in the ensuing argument over this event. [redacted] stated [redacted] for following the the administrative controls [redacted] It was during the discussions following this incident [redacted] stated in the presence of [redacted] that he does not come under [redacted] jurisdiction. [redacted] reportedly stated that [redacted] to process the [redacted] for [redacted] window.

A.4 In another job performed by Barney involving the installation of temporary security lights in the [redacted] problem occurred in the coordination of the work. [redacted] two work parties were trying to do the same [redacted] essentially negating the efforts of the other.

This issue was previously reviewed by NRC R-1 and determined not [redacted] regulatory concern (see exhibit D). There was [redacted] provided by [redacted]

A.5 [redacted] stated he had a recent discussion with a Barney foreman [redacted] at the site who stated that Barney was getting involved in more work inside the facility and more specifically that Barney was involved in "Category I" work in the containment. [redacted] stated that Barney has in its employ an electrician who has welding experience but is not a certified welder. [redacted] stated Barney is using this person to do welding on Category I work. [redacted] could not be more specific about what was meant by category I work, or which containment was involved, or whether it was MP2 outage related work. [redacted] stated that licensee engineering was aware of the qualifications of the individual and that the cognizant engineering group for the work had accepted the situation. [redacted] stated his contact at the site was [redacted]

I asked [redacted] to either have [redacted] contact me directly or to call him to get any additional information that might help us follow up the potential use of unqualified welders for safety related work.

B. Alleged improprieties by a NNECO Supervisor and in the relationship between Barney management and a NNECO Supervisor.

The following allegations were made either directly or by implication by [redacted] without substantiating evidence, except for item 5 below for which documentation was provided.

B1. [redacted] has unusual power at the site as a supervisor having oversight in the [redacted]

[redacted] them out to NNECO [redacted] for the last 5 years but he used to [redacted] into NNECO to [redacted] station [redacted]

B2. [redacted] [redacted] afford such an expensive [redacted] annually [redacted]

B3. [redacted] was hired by [redacted] to complete the [redacted] in his [redacted] worked after hours [redacted] in his spare time to do the work. Fluorescent electrical [redacted] \$800 were ordered for the [redacted] dwelling but were not installed. [redacted] wrote a purchase order [redacted] to avoid a \$160 restock charge. The lights were placed into NNECO [redacted]

B4. [redacted] allowed contractors active involvement in the procurement process for materials needed for jobs the contractors worked on, even though that practice was contrary to NNECO policy and procedures. Mr. [redacted] stated he was involved in purchase orders worth about \$100,000. [redacted] is not aware of any irregularities in the procurement of materials, other than authority was delegated to levels it should not have been given to.

B5. [redacted] stated that [redacted] loose control of the procurement process was exemplified by the fact that purchase orders representing about \$20,000 worth of material were missing from the station files and in his possession. [redacted] presented for my review at the meeting a 1 inch thick stack of original purchase orders for materials ordered for various jobs at the site. [redacted] retained possession of the documents.

Summary

[redacted] basic concern can be summarized as follows: the above

incidents are examples of work poorly performed or done without regard to established administrative controls; the Barney Project Manager is unrestrained in the conduct of activities; the PI has inappropriate relationships in the relationship with the NNECO supervisor; the PI has the attitude that he can work without administrative controls; not answer to anyone; and, his actions are not checked by the NNECO supervisor. If this attitude is unchecked, there exists for an adverse impact on the safety of the jobs.

meeting was held.

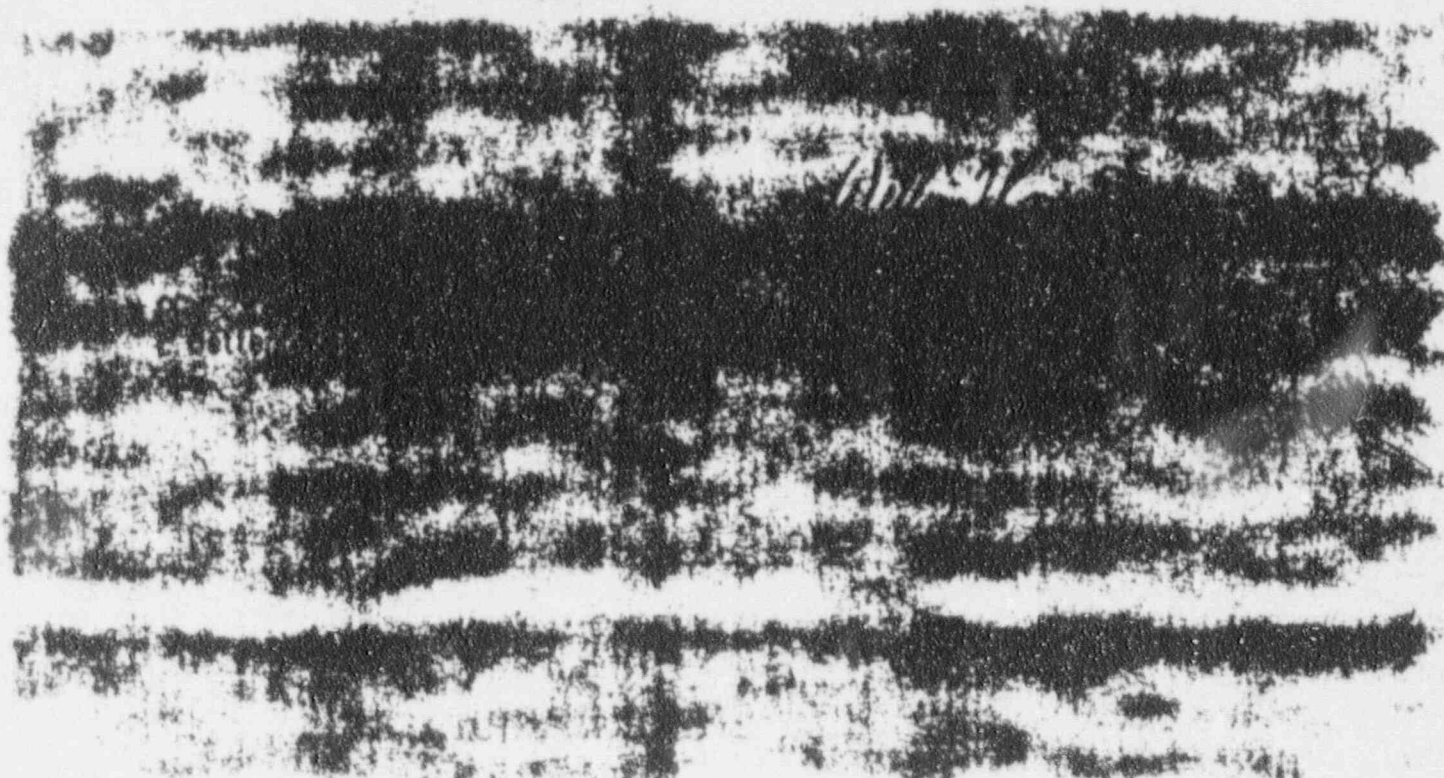
I found [redacted] to be sincere and concerned about the control in accordance with administrative controls in a [redacted] manner. [redacted] the information he provided, principally the issues involving the [redacted] to procedures, conducting work, radiological [redacted] with adequate controls, guidance to keep exposures as low as reasonably achievable, and [redacted] for safety related work. I also stated that some of the [redacted] related to nuclear safety and thus outside of NRC jurisdiction.

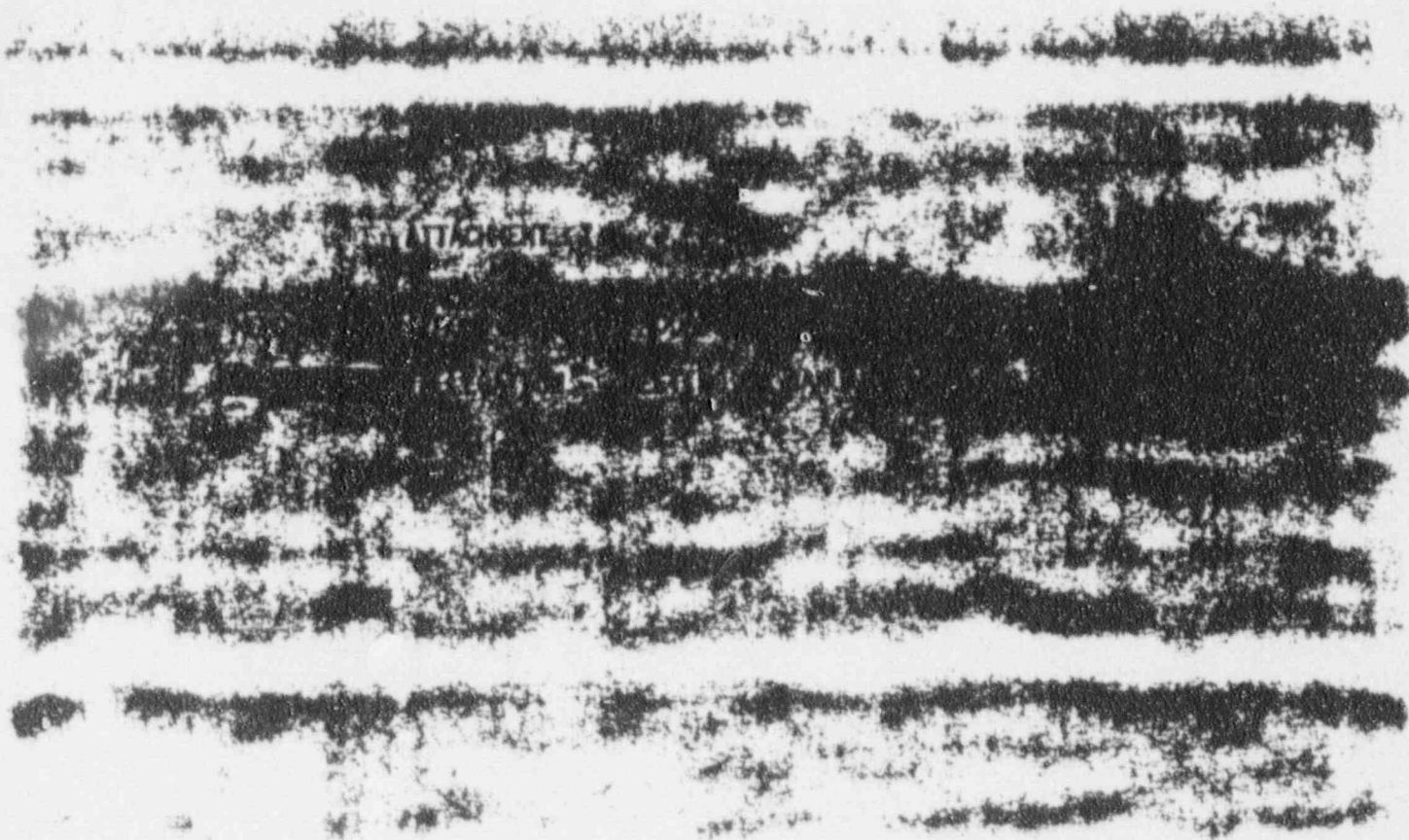
Recommendations

I recommend the issues below be considered for further NRC review and followup. I discussed the results of the meeting with [redacted] by telecon with Mr. McCabe on January 14, 1988. Based on our review of the issues from [redacted] we concluded that no specific safety concerns were identified in the information provided, but that I should proceed on the welding issue to see if the concerns could be substantiated.

- a. Assure safety related welding is being done by qualified personnel - concentrate on MP2 and MP3 outage work.
- b. Verify contractor work activities are conducted per AWO and tagging procedures.
- c. For the job involving the installation of alarms on the high rad area gates, determine whether work associated with the aborted design resulted in excessive exposures which could have been avoided had better guidance been provided.

d. Verify the control of contractors is appropriate and station procedures
and policies are followed.





ATTACHMENT 1 INDEX

- Exhibit A: First [redacted] Letter to [redacted] Security [redacted]
- Exhibit B: Second [redacted] Letter to [redacted]
- Exhibit C: NNECO Response to First [redacted] Letter
- Exhibit D: Poster Request for Letters [redacted]
- Exhibit E: Work Request to Tag for #2 Maintenance Shop [redacted]
- Exhibit F: NPC [redacted] Letter [redacted]
- Exhibit G: Millstone ACP 2.06A - Station Tagging [redacted]
- Exhibit H: Vendor's Letter [redacted] [redacted] [redacted]
- Exhibit I: [redacted]

Exhibit A

New Haven Register, Wednesday, December 16, 1987 Page 13

NU is fined \$25,000 for security violations at Millstone plant

Associated Press

WATERFORD — The Nuclear Regulatory Commission Tuesday fined Northeast Utilities \$25,000 for security violations at Millstone Nuclear Power Station.

"The violations represent a significant lapse in attention to and control of the physical security program at Millstone," said William T. Russell, head of the NRC regional office in King of Prussia, Pa.

Russell said among other things, inspectors discovered two visitors wandering around without any escort in an area of the power plant where no one should have been without proper clearance.

Russell also said the lack of adequate security appeared to have been a problem for some time.

Northeast Utilities said it would pay the fine. Russell said the utility had the option of appealing the fine if it felt violations of NRC rules cited by inspectors were not true.

Anthony Castagno, a spokesman for the utility that operates the three reactors in Millstone, said he couldn't comment on details of the NRC's findings because plant security was involved. As a result, information about the violations is exempt from public release, Castagno and the NRC said.

"If I could give you details of these things, it would put them in

a different perspective," Castagno said.

He said that in the case of the two, unescorted visitors cited by Russell, the visitors and their escort had become temporarily separated.

"It was a matter of a minute or two," Castagno said.

Russell said Northeast must file within 30 days a plan explaining why security had been allowed to lapse, "corrective steps that it has taken or plans to take and the date when it expects to be in full compliance with NRC requirements."

He added that the state has been informed of the situation.

Russell, in a letter to the utility, said inspectors visited Millstone twice between Aug. 11 and Nov. 2. Russell also said the utility itself reported some security violations.

Russell did discuss the prob-

lems in general terms in his letter to the utility, which said, "The violations included multiple examples of inadequate protected and vital area barriers, two examples of visitors being in the protected area without an escort, improper implementation of compensatory measures, as well as other degradations of the physical security program."

The administrator said he was concerned about the situation because security shortcomings, "the majority of which were identified by the NRC, had existed for an extended period and should have been obvious" to all those connected with the plant.

Yet, Russell told the utility, "these conditions were not detected by your staff even though security personnel made frequent pa-

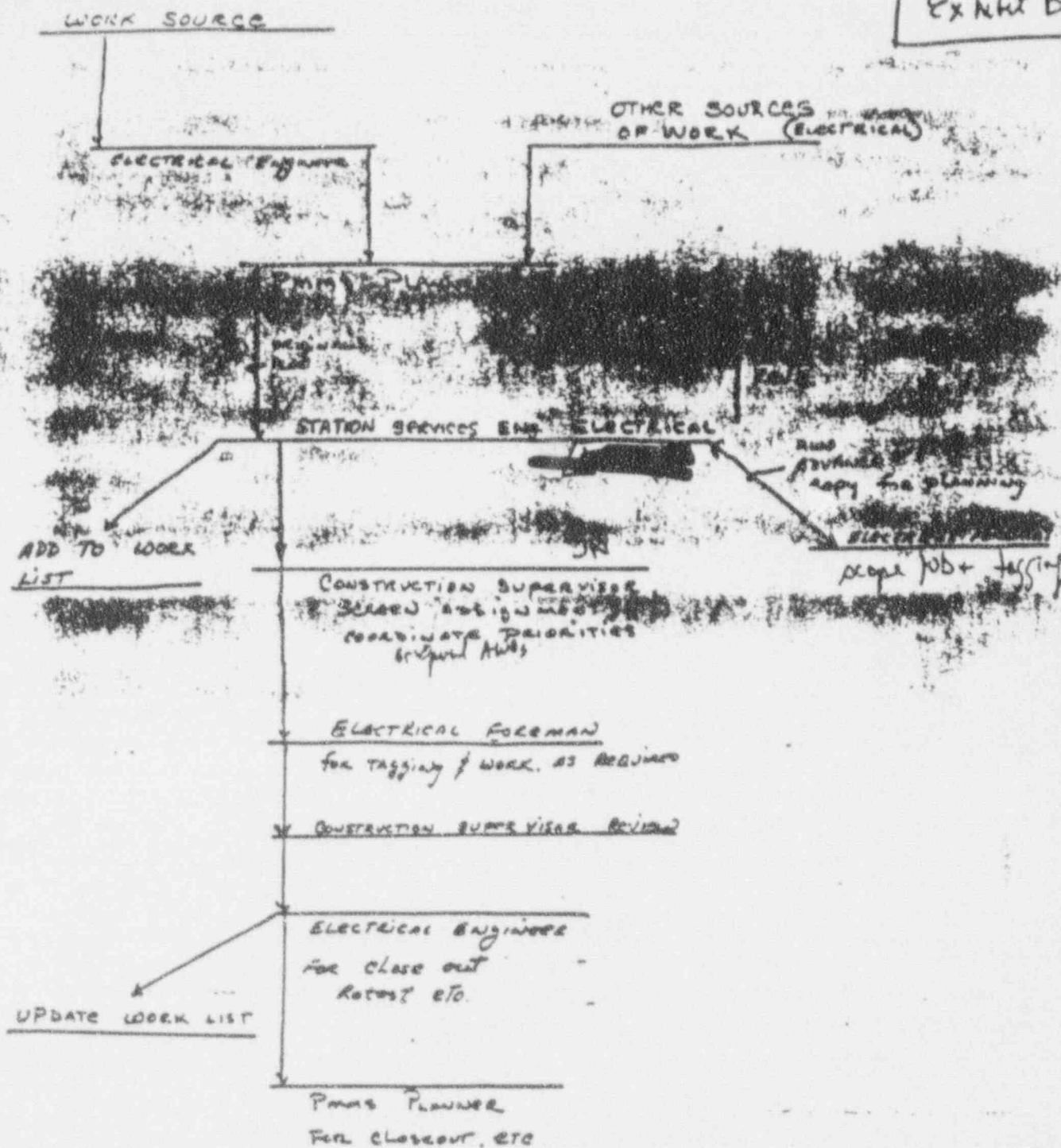
trols of the entire facility."

Castagno said Northeast has

taken steps to correct the problems cited by the NRC, but the compa-

ny is confident that the plant always has been secure.

Exhibit B



October 15, 1987

Station Services Superintendent
Millstone Station
P.O. Box 177
Waterford, N.J.
Dear Mr. [redacted]:

I, [redacted], was, until [redacted] for W. J. Barney, Corp., at [redacted] Two and Three in Waterford. Some events have [redacted] that if continued, result in serious injury to employees at the [redacted] site.

On or about August 17, 1987, [redacted] for W. J. Barney, a contractor at the site, caused 480 volt circuits to be [redacted] off and on at Unit #2 maintainance without following proper tagging procedure. [redacted] went to [redacted] and requested that he formulate a procedure to prevent recurrence of these events in violation of Administrative Control Procedures QA-2.06A Rev. 12 paragraph 6.1.3.3, a copy of which is attached hereto. Various meetings were held between August 17, 1987, and approximately August 21, 1987. I, [redacted], electrical engineer,

and [redacted] were present at some or all of these meetings. A final revision of procedure control for electrical work dated August 20, 1987, was eventually agreed upon. A copy of this procedure is enclosed. On or about September 4, 1987, [redacted] carpenter foreman for W. J. Barney, notified me of carpentry work, including cutting in windows, in Unit #2 maintainance which also would require electrical work to be done. On or about September 8, 1987, I went to [redacted] for Unit #2 Maintainance, to get verification of the money to do the work on Unit #2 related to the carpentry work per Rel. #015150 dated September 8, 1987, a copy of which I have enclosed. That same day, I, [redacted], received an authorization work order per ACP-QA-2.061 Rev. 12 Paragraph 4.13 page three and five, copies of which are enclosed. On or about September 9, 1987, [redacted] went to the job site for verification of which

Harry Haynes

Page Two

October 16, 1987

circuit breakers had to be tagged and locked generally. On or about September 1, 1987, I went to [redacted] control room. I am the #2 Shift Supervisor. I see copy of the log dated 1987, which is attached. On or about September [redacted] was notified by [redacted].

The log was [redacted] tall [redacted] without [redacted] done [redacted] given [redacted] 1987 and September [redacted] or about September [redacted] at which [redacted] and I were [redacted] that meeting, I was told by [redacted] that [redacted] long on this job. I replied that I was simply [redacted] authorized Northeast Utilities Tagging Procedures [redacted] work. I rejected this. A copy of this notice is enclosed.

I might wish to have [redacted] if you would contact [redacted] so that we can schedule a [redacted] would like to review the violations that have occurred on site as I have described them in this letter. If these [redacted] indicate normal operation procedures, I fear that continued violations will eventually result in serious injury or loss of life. I look forward to hearing from you at your earliest convenience.

Sincerely yours,

JJD

76. Follow up letters

Exhibit D

[REDACTED]
November 19, 1987

[REDACTED]
Station Services Superintendant
P.O. Box 128
Waterford, CT 06385

Dear [REDACTED]

I am writing to you again in reference to my letter dated October 16, 1987, which was received at your address on October 19, 1987, certified mail, return receipt requested, a copy of the receipt is enclosed.

I feel in view of the safety involved in this matter, a response by you is long overdue. NU policies, in my 2 1/2 years as [REDACTED] on site, was always safety first. I think your company at least owes me an explanation of the allegations that I have made about electrical safety in the plant. If I do not receive a reply from you by November 27, 1987, I will carry this matter further, to the media, whom I have already contacted. The public should be made aware of just how safe our nuclear site is at Millstone Station, and how certain individuals in charge conduct themselves. A copy of my original letter is also enclosed.

Sincerely,

[REDACTED]
JJD

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

Exhibit E

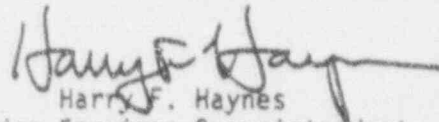
Dear [REDACTED]

Thank you for your letter of [REDACTED] which brings your concern relative to safety of workers at our site to the company's attention. Please be assured that we will investigate your allegations and take appropriate action, if any is required.

Thank you again for expressing your concern for the safety of workers at our site.

Sincerely,

NORTHEAST NUCLEAR ENERGY COMPANY



Harry F. Haynes
Station Services Superintendent
Millstone Nuclear Power Station

HFH:cjh

cc: J. F. Follett, Sr
Safety Representative

Exhibit F

1ST Letter

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.
Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☐ Show to whom delivered date, and addressee's address. 2. ☐ Restricted Delivery
†(Extra charge)†

3. Article Addressed to: Harry F Haynes Millsstone Station P.O. Box 128 Waterford CT 06385	4. Article Number PW14 148405 Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail Always obtain signature of addressee or agent and DATE DELIVERED .
5. Signature - Addressee X	8. Addressee's Address (ONLY if requested and fee paid)
6. Signature - Agent X <i>Scott J. Egan</i>	
7. Date of Delivery 10/19/87	

PS Form 3811, Mar. 1987

• U.S.G.P.O. 1987-178-266

DOMESTIC RETURN RECEIPT

2ND Letter

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.
Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☐ Show to whom delivered, date, and addressee's address. 2. ☐ Restricted Delivery
†(Extra charge)†

Article Addressed to: Harry F. Haynes Station Services Superintendent P.O. Box 128 Waterford, CT 06385	4. Article Number p 031 875 313 Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail Always obtain signature of addressee or agent and DATE DELIVERED .
5. Signature - Addressee X	8. Addressee's Address (ONLY if requested and fee paid)
6. Signature - Agent X <i>157265 B/S</i>	
7. Date of Delivery 11/20/87	

PS Form 3811, Mar. 1987

• U.S.G.P.O. 1987-178-266

DOMESTIC RETURN RECEIPT

LOCAL ID: 12-STA-TASKS
STA
KLDG:
ROOM: VARIOUS
ELEV: 0000 FT 00 IN

Exhibit 9/

ORDER 12 37 10030
NO TYPE... OT
PRIORITY... 4
LEAD DEPT... STA
UNIT STATUS REQ: U
SCHD STRT DATE: 09 / 10 / 87
DES COMP DATE: 09 / 18 / 87

TROUBLE REPORT NO.:

EQUIPMENT DESCRIPTION:

STATION SERVICES ENGINEERING NON-QA TASKS FOR UNIT TWO

PROBLEM DESCRIPTION: REMOVE ELECTRICAL CONDUIT IN THE OLD WAREHOUSE WHICH IS NOW THE UNIT TWO MAINTENANCE SHOP/OFFICE

SUSPECTED DUE TO NEW WINDOW INSTALLATION
CAUSE:

ORIGINATOR :
SUPV APPROVAL :

DATE: 09 / 09 / 87

DATE: 00 / 00 / 00

QC REQD : N
TAG REQD : YES
RWP REQD : N
ALARA REV: N

CAT I: N
EEQ : N
FPQA : N
RWQA : N

CONVEX CLR: N
GUARD REQD: N
LLRT REQD : N
IST REQD : N

PART SHEET: N
TANK ENTRY: N
TOOL LIST: N
FIRE WAT: N

PROCEDURES CAUTIONS

EVAL: N/A
W28275300030

CAUTION NOTES

INVOLVES PDCR: N
PDCR NO.:
RESP ENGR:
APPL CODE:
P.O. NO.:

REMOVE
DISCONNECT

TASK
DESCRIPTION

DEPT	ACT MEN	ACT HRS
WJB	---	---
WJB	---	---
	---	---
	---	---
	---	---
	---	---

JOB DESCRIPTION DISCONNECT THE ELECTRICAL WIRING AND REMOVE IT, ALSO REMOVE THE ASSOCIATED CONDUIT SO AS TO ALLOW THE INSTALLATION OF A NEW WINDOW IN THE UNIT 2 MAINTENANCE OFFICES.

*** ACC#W2827530000 LINE ITEM 30 *** RELEASE #015151 ***
AU CCC ACC SU C CHS W.O. ACT RE ACZ

ACCOUNTS: W2 827 530 00

- 100 Z
- Z
- Z

ASST DEPT NOTIFIED: _____

WORK DIRECTED BY: _____
JOB SUPERVISOR: R AYALA

DEPARTMENT APPROVAL: _____

DATE: 9-19-87

TAG CLEARANCE NO: 1569-87

COPY OF TAGGING ATTACHED: UP

LCO ENTERED: __ APPL TECH SPEC NO: _____

TIME PERMITTED: _____

AUTHORIZED BY OPS: *RFB*

TIME: 0700 DATE: 9-19-87

1044E 9/11/87

1128710030

EL 9/9/87

REL # 015150

NORTHEAST UTILITIES



WORK REQUEST FORM

This form:

- (1) Confirms prior discussion and agreement between Betterment Construction and the utility.
- (2) Documents the account assignment of charges.

Work Description, including approximate time period, location of work.

Remove electrical conduit - due to new window installation (wall work) Unit II main

(Tagging Required)
later

Cost to date

Gen Foreman 3hrs - \$93.00

ELEC Foreman 2 hrs - \$58.00

(3) ELECTRICIANS - 3 hrs - \$162.00
\$313.00

☒ Original

☐ Change

\$450.00

Cost estimate or Not-to-exceed: \$

Work requested by:

Date:

9/8/87

Approved by: (CCC approval authority per MAP 3.02)

Account Distribution:

ACC	DEPT	ACT	BLD	EL	WATER	SEWER	WIND	TELE	OTHER
112	827	530	00	0					30

Original: Betterment Constr. Repr.

Copy: Financial Control

W. D. Romberg
Form Approved by Station Superintendent

6-28-85
Effective Date

Exhibit I

ADMINISTRATIVE CONTROL PROCEDURE COVER SHEET

A. IDENTIFICATION

TITLE STATION TAGGING

NUMBER ACP-QA-2.06A

REV. 12

B. QA REVIEW: QA/QC SUPERVISOR: [Signature] (QA RELATED ONLY)

C. UNREVIEWED SAFETY QUESTION EVALUATION DOCUMENTATION REQUIRED:

(Significant change in procedure method or scope
as described in FSAR)

(If yes, document in SORC meeting minutes)

YES [] NO [☒]

D. ENVIRONMENTAL IMPACT

(Adverse environmental impact)

(If yes, document in SORC meeting minutes)

YES [] NO [☒]

E. INTEGRATED SAFETY REVIEW REQUIRED

(Affects response of Safety Systems, performance of safety-
related control systems or performance of control systems
which may indirectly affect safety system response.)

(If yes, document in SORC meeting minutes.)

YES [] NO [☒]

F. SORC APPROVAL SORC MEETING NO. 86-25

J. APPROVAL AND IMPLEMENTATION

THIS PROCEDURE IS HEREBY APPROVED AND EFFECTIVE ON THE DATE BELOW.

[Signature]
STATION/UNIT/STATION SERVICES SUPERINTENDENT

1 July 86
EFFECTIVE DATE

H. REQUIRED ROUTING

The following personnel are required to initial that they are aware of the provisions of the above listed document:

	Admin.	Unit 1	Unit 2	Unit 3	Station Services	Other Groups
Superintendents						
All Plant Personnel						
Exempt Personnel						
Department Heads		✓	✓	✓	✓	
Supt. Staff Engineers						
SS./SCO,		✓	✓	✓		

I. DOCUMENT SUMMARY

Summary:

Minor Housekeeping - title changes, typographical errors, reference changes, etc.

Change resulting from NRC regulations, bulletins, etc. (indicated in body of procedure per MAP 1.02). See action/description below.

Change resulting from a Station CR (audit finding, program improvement, program expansion, etc.). See action/description below.

Other

See action/description below.

Action:

Personnel indicated on SF 330 read procedure as revised.

Personnel indicated on SF 330 read description below at a minimum. (Procedure may be reviewed as time permits.)

Description:

5.1 ADD'D TO SS RESPONSIBILITIES

5.2 NEW JOB SUPERVISOR RESPONSIBILITIES

6.1.2.5 GUIDELINES FOR TAGGING PERMITTEE
OPERATED VALVES

~~6.2.2.2 ASSET REQUIREMENTS RP.~~

6.2.2.3 ASSET REQUIREMENTS

1. ~~PROCEDURE~~
This procedure establishes the controls to be used at Millstone Station for the proper use of safety tags in order to provide safety to persons, service and equipment during work being performed in plant.
2. ~~APPLICABILITY~~
This procedure applies to all personnel who perform any maintenance work, request tag placement or removal on Millstone controlled equipment. Equipment under the jurisdiction of CONVEX shall be tagged in accordance with CONVEX switching and tagging procedure #6401.
3. REFERENCES
 - 3.1 Northeast Utilities Quality Assurance Program Topical Report (NUQAT), Section 14, Inspection, Test and Operating Status.
 - 3.2 Production Plant Instructions for Clearance Tagging Electrical and Mechanical.
 - 3.3 Northeast Utilities Protective Clearance Tagging Procedure for Nuclear Generating Stations.
 - 3.4 ACP-QA-2.12, System Valve Alignment Control
 - 3.5 ACP-QA-10.04, Nuclear Power Plant Records.
 - 3.6 ACP-QA-9.01, QA Audit Program.
4. DEFINITIONS
 - 4.1 Clearance
Specific authority given to a qualified person to perform work following all necessary operations to remove equipment from service and place the proper safety tags to restrict the operation of the equipment.
 - 4.2 Red Tag
A tag placed on equipment (mechanical or electrical) which, if operated, would endanger personnel and/or equipment. Red tagged equipment is not to be operated under any circumstances.

4.3 Blue Tag

A tag placed on equipment to indicate that the equipment is to be energized only by order of the individual to whom the tag is issued.

4.4 Green Striped Hold Tag

A tag placed on equipment to prevent reenergizing if it trips. Reclosing controls (automatic or master supervisory) shall be made inoperative with the placement of this tag.

4.5 Yellow Caution Tag

A tag placed on a device or piece of equipment as a caution against improper operation if a red tag or blue tag does not specifically apply. The tag contains certain precautions or information which should be understood before operating the equipment.

4.6 Supplemental Tag

Tags used to supplement red tags to eliminate the need for writing out an unreasonable number of red tags.

4.7 Mini-Tag

A small tag of the appropriate color or identification which may be used on control panels for information purposes only.

4.8 Lifted Tags

Tags removed from equipment which are not cleared from the tag log to allow temporary operation such as a retest.

4.9 NPRF - Nuclear Plant Records Facility

The area designated for the handling, processing, and referencing of Nuclear Power Plant Records.

4.10 Operator In Attendance

Designated operator that will position valves and breakers as listed on the Tag Log Sheet SF 210. This operator will remain in the general area of the valves and/or breakers to assure their positions are not changed.

4.11 Restoration

The required repositioning and/or verification of valve/switch/breaker position(s) to attain the required/desired position alignment and, if required, the assurance of proper alignment (i.e., independent verification) for the present plant conditions.

4.12 Panel Tags

Tags to be used on control panels in place of the normal red, blue and yellow tags.

4.13 WO

Automated or Manual Work Order.

5. RESPONSIBILITIES

5.1 Shift Supervisor

Responsible to administer the safety tag program in accordance with this procedure. Included within this is the responsibility to place the proper tags for personnel safety. For the purposes of reference 3.2 (Production Plant Instructions for Clearance tagging), the "Person in Authority" shall be either the on-shift SS, SCO or SRO designated by the SS (SS/SCO/SRO).

The SS, SCO and SRO must communicate to insure each is aware of work authorized to be performed. The SS, SCO or SRO shall also evaluate how the intended tag-out will affect the plant. Attention shall be given to the tag-outs impact on technical specifications, fire protection equipment, equipment environmental qualifications, etc.

5.2 Job Supervisor

The Job Supervisor, (anyone authorized to request tag placement or clearance) is responsible to verify that the equipment isolation and tagging at the work site represents safe working conditions. The Job Supervisor shall take what ever actions are necessary to assure such verification, these actions may include appropriate tests, checking of tags, valves, meters, gauges, vents, drains, markers

or discussions with Operations personnel. If unsatisfactory the Job Supervisor, may request additional isolating, switching and tagging. The Job Supervisor (anyone authorized to request tag placement or clearance) is the qualified person for whom the tags are placed.

5.3 Operations Supervisor

Responsible for the periodic audits of the Safety Tag Log and for maintaining current the list of personnel authorized to request tag placement or clearance.

5.4 Department Head

Responsible for the indoctrination of new personnel and periodic retraining in the requirements of this procedure, and for notifying the Operations Supervisor of any changes in this Department's list of personnel authorized to request safety tag placement or clearance. The authorization to request safety tag placement or clearance can be revoked if the individual violates this procedure.

5.5 Operator In Attendance

Responsible to position valves and/or breakers as listed on the Tag Log Sheet SF 210. If the "Operator in Attendance" must leave for a duration not to exceed one (1) hour, the job shall be stopped and the Work Order shall be in the custody of the Operator. If the "Operator in Attendance" must leave for more than one (1) hour the valves and breakers shall be tagged as listed on the Tag Log Sheet SF 210. The "Operator in Attendance" is responsible to assure the positions of the valves and breakers remain as listed on the Tag Log Sheet SF 210 until permission to cancel the clearance is obtained.

6. INSTRUCTIONS

6.1 Safety Tagging

6.1.1 Request for Tagging

- 6.1.1.1 Request for red or blue tags shall normally be made through a properly filled out WO or as a specific step in a Station Procedure. Green stripe hold tags and yellow caution tags may be issued in the same manner as red or blue tags upon the request/recommendation of any person authorized to request safety tag placement or removal.
- 6.1.1.2 Personnel authorized to request safety tag placement or removal are listed on SF 209-1, 209-2 and 209-3, Personnel Authorized to Request Safety Tag Placement or Removal. Tags shall be issued only to listed qualified individuals. Safety tags may be requested by the SS/SCO on duty if they are required to support plant operations and there is no applicable work order. In this case "SS/SCO on Duty" will be entered in the "Supervisor in Charge of Job" block on SF 210, Tag Log Sheet.
- 6.1.1.3 The approval of the Duty Officer, Department Head or Outage Management Representative, in writing will be required for persons not on the authorization list.
- 6.1.1.4 If it becomes necessary to change the name of the qualified individual requesting tags after a clearance is in effect, the original requestor or his supervisor shall inform the SS/SCO of the transfer, and the name of the successor shall be entered in the tag log. Thereafter, the successor shall be responsible for the proceedings under that clearance.

6.1.2 Safety Tag Log

- 6.1.2.1 All tags issued shall be recorded in the safety tag log located in the Control Room. The log shall be maintained with one clearance to a tag log sheet, SF 210.
- 6.1.2.2 All tags shall be issued with a sequential clearance number by year. Multiple tags with the same clearance number will reflect the number on the tag 66-82-1, 66-82-2, 66-82-3, etc. Clearance numbers will be assigned from SF 211 tag log clearance number index.
- 6.1.2.3 Tag Log Sheet (SF 210) will be filled out with the following information before the tag out is issued:
1. Clearance Number
 2. Date
 3. WO Number (if no work authorization is involved, eg. SS tagging or procedural step then NA will be written in the WO Number block.)
 4. Equipment (individual equipment or system to be tagged.)
 5. Reason (brief description)
 6. Supervisor in charge of job (either the Job Supervisor or the SS/SCO/SRO's name or title for SS/SCO tagging.)
 7. Operator preparing the tagout.

4.11 Restoration

The required repositioning and/or verification of valve/switch/breaker position(s) to attain the required/desired position alignment and, if required, the assurance of proper alignment (i.e., independent verification) for the present plant conditions.

4.12 Panel Tags

Tags to be used on control panels in place of the normal red, blue and yellow tags.

4.13 WO

Automated or Manual Work Order.

5. RESPONSIBILITIES

5.1 Shift Supervisor

Responsible to administer the safety tag program in accordance with this procedure. Included within this is the responsibility to place the proper tags for personnel safety. For the purposes of reference 3.2 (Production Plant Instructions for Clearance tagging), the "Person in Authority" shall be either the on-shift SS, SCO or SRO designated by the SS (SS/SCO/SRO).

The SS, SCO and SRO must communicate to insure each is aware of work authorized to be performed. The SS, SCO or SRO shall also evaluate how the intended tag-out will affect the plant. Attention shall be given to the tag-outs impact on technical specifications, fire protection equipment, equipment environmental qualifications, etc.

5.2 Job Supervisor

The Job Supervisor, (anyone authorized to request tag placement or clearance) is responsible to verify that the equipment isolation and tagging at the work site represents safe working conditions. The Job Supervisor shall take what ever actions are necessary to assure such verification, these actions may include appropriate tests, checking of tags, valves, meters, gauges, vents, drains, markers

6.1.3.3 Tagging for Outside Contractors:

6.1.3.3.1 In all cases, Mini-stone tags will be hung on the mechanical boiler.

6.1.3.3.2 Outside contractors having their own tagging procedures may require special conditions, either in the form of a plant approved procedure or by revision to this procedure to allow the use of their system.

6.1.3.4 Mini-tags may be used on control panels for information purposes only. Mini-tags will not be used in place of full size tags. When a breaker is tagged out a mini tag of the appropriate color and clearance number may be hung on the control panel to inform personnel that the equipment is out of service. If mini-tags are used it should be indicated on the tag log sheet by placing an "M" in parentheses next to the corresponding tag number. Mini-tags should be cleared, when the tags are cleared. They may be destroyed, they do not have to be retained with the tag log sheet tags.

6.1.3.5 Minimum tagging requirements for work on the flue gas side of boilers and within enclosures, tanks and condensers are specified in reference 3.2 (Production Plant Instructions for Clearance Tagging).

6.1.3.6 Supplemental tags (mechanical only) may be used as specified in reference 3.2 (Production Plant Instructions for Clearance Tagging) to eliminate the need for writing out an unreasonable number of

TELEPHONE CALL RECORD

12/11/87

SUBJECT: ADDITIONAL INPUT FROM MR. [REDACTED]

Ref: Allegation RI-87-A-0113

About 1:10 pm, 12/11/87, I took a collect telephone call from Mr. [REDACTED] who had previously made an allegation to us about work he had been associated with at Millstone 2 when he was a general foreman for the W. J. Barney Co. The matters previously addressed were security lighting and work involving the Unit 2 maintenance shop. During today's discussion, [REDACTED] said he was satisfied with the response he got from the NRC, and with our letter to him. He would now like to talk in person with someone from the NRC because he feels that W. J. Barney is a substandard contractor who [REDACTED] for following Northeast Utilities (NU) procedures. [REDACTED] stated that he is putting his information together and plans to go to the media with his concerns.

A primary concern expressed by [REDACTED] is [REDACTED], a Project Manager for W. J. Barney. [REDACTED] reportedly stated, in front of [REDACTED] the cognizant NU supervisor, that he [REDACTED] doesn't come under NU or NRC jurisdiction. [REDACTED] stated that he had sent a letter about this to [REDACTED] (the NU Millstone Station Services Superintendent) who had sent him back a "cute" reply saying he would look into it. What [REDACTED] said he wants, however, is an explanation from [REDACTED] on why [REDACTED] for following NU procedures. Also, there are other, radiation procedure aspects (unspecified) that [REDACTED] wants to talk to the NRC about in person.

In response to my question about there being any immediate safety hazard to anyone, [REDACTED] stated that [REDACTED] is a project manager and is endangering people on the site. But no specific safety hazard, nuclear or non-nuclear, was stated. In response to my asking for specifics, [REDACTED] said that there was an effort to alarm all the high radiation gates at the site by an August 1 deadline. Mr. [REDACTED] said he was given a call to do the job, but they gave it to an inexperienced person who overbought, costing the utility \$6000 in charges to send the materials back. They reportedly then gave the job to [REDACTED] and he got it done.

[REDACTED] said his concern is about how W. J. Barney performs their work. He was onsite for 2.5 years as a foreman and general foreman, and doesn't see why he should be penalized for questioning safety items. He feels that, in his position, it was his job to do that.

Though I was unable to elicit any safety specifics from [REDACTED], I did note that he seemed calm and sincere during our discussion.

I informed [REDACTED] that I could not identify a safety concern that came under NRC jurisdiction from the information he had now provided, and that this may be an OSHA or labor relations matter. [REDACTED] re-emphasized that he wanted to talk to the NRC in person. He gave me

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his phone number [REDACTED] but stated that he was on the road and the number is an answering machine. I told [REDACTED] that I would like him to arrange to talk with [REDACTED] the Senior Resident Inspector, and gave him the resident office number. [REDACTED] said he would keep trying to contact Mr. Raymond to set up a meeting. I pointed out that Bill and the other residents would be in a regional office meeting for most of next week. [REDACTED] said he would keep trying and that a meeting after the first of the year is OK with him because he doesn't plan to go to the media before then. I stated that we did not in any way want to affect his going to the media or anyone else, but that the NRC did want to hear from concerned persons and assess their concerns.

(A quick review of the allegation files brought out that [REDACTED]

[REDACTED] He had then expressed concern to us that tag-out practices which did not meet nuclear safety controls might carry-over into nuclear areas, but identified no specifics. His concern about security lighting adequacy was already being addressed incident to security specialist inspection. The file also indicates that [REDACTED] had planned to bring his concerns to the licensee's attention through IBEW Local #90. No unaddressed safety or security matters were identified by our previous addressal of [REDACTED] previous input.)

Ebe McCabe

Ebe McCabe
Chief, RPS-1B

copy:

W. Raymond
E. Conner
L. Bettenhausen
K. Abraham

ALLEGATION PANEL DECISIONS

Priority: Medium

Safety Significance: Unknown

An allegation panel met on 9/24/87 regarding RI-87-A-0113 at Millstone 2, where a failure to follow (or have) electrical tagging procedures (non-safety related systems) and discrimination was alleged.

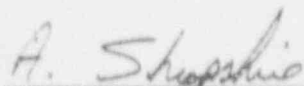
Attendees:

W. Kane	Panel Chairman
L. Bettenhausen	Branch Chief
R. Matakas	Investigator, OI:RI
A. Shropshire	Office Allegation Coordinator

FOLLOW-UP ACTIONS:

- 1) The AOC will send an acknowledgement letter to the alleged (ECD 9/30/87), enclosing DOL information. The letter will also explain the NRC's role in nuclear safety and that more information is required to determine what actions the NRC should take or if it is within our purview.
- 2) If no response is received within 30 days, the Region will assume that no more information will be provided and the AOC will send a closeout memo to the OAC (ECD 10/31/87).

Section Chief concurrence required for closeout.



A. Shropshire, OAC



E. McCabe, AOC



W. Kane
Panel Chairman

cc:

J. Allan
J. Gutierrez
C. White, OI:RI
W. Johnston
L. Bettenhausen
E. McCabe
Allegation File

W/24

ALLEGATION DESCRIPTION

Millstone 2
(Site or Licensee)

50-336
(Docket No.)

Allegation RI-87-A-0113 was received on 9/15/87 at 1415 by T. Rebelowski.

Characterization of the 1 concern(s):

Failure to follow (or have) electrical tagging procedures (non-safety related systems)

Confidentiality: No (OAC has alleged's name & address)
Employer: W. J. Barney
Position: General Foreman (Electrical)

Type of Regulated Activity: Other - Nonregulating
Functional Area(s): Building Construction

DETAILS: (Timeframe of Allegation: Current)

The alleged called and stated "he was fired on [REDACTED]"

The alleged has been employed by W. J. Barney for the last [REDACTED]
[REDACTED] When asked why Barney used the word [REDACTED] the
alleged stated that he was told that he [REDACTED]
[REDACTED]

The alleged was working on electrical cables supplying the new Unit 2 Maintenance Building.

He was informed by the inspector that his concerns should be addressed to DOL within 30 days. He was told that we will supply him with information.

NOTE: Problems with immediate supervisor, [REDACTED] Project Manager, said that he did not need to follow electrical tagging procedures. The alleged stated that he felt this type of statement could permeate into nuclear construction areas.

The alleged is bringing this matter to NUSCO through his business agents, Local 90 IBEW.

Onsite supervisor involved [REDACTED] Station Services Engineering.

Information in this record was deleted
in accordance with the Freedom of Information
Act, exemptions b7C
FOIA- 91-162

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