



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

SEP 4 1990

Docket No. 50-336
File No. RI-90-A-0117

Information in this record was derived
in accordance with the Freedom of Information
Act, exemptions b6, b7C
FOIA- 91-162

[REDACTED]
Dear [REDACTED]

Subject: Allegation concerning the Millstone Nuclear Power Station

The NRC Region I office has completed its follow-up in response to the additional information that you brought to our attention on July 25, 1990, concerning violations of tagging procedures at the Millstone Nuclear Power Station in 1987.

In 1988 the NRC resident inspectors responded to your initial concerns about inadequate tagging procedures at Millstone. The results of the inspectors' investigation of your concerns were documented in Inspection Report 50-336/88-13, Section 8.5 and Appendix B, Item 3.6, Part B, which is enclosed for your review.

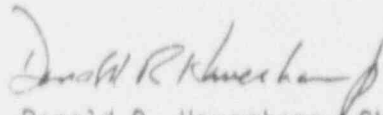
We acknowledge receipt of the additional information concerning this issue that you provided to us on July 25, 1990, specifically the memo from Wayne D. Romberg dated October 3, 1986. This memo addresses the Millstone Nuclear Power Stations policy on safety tags. Thank you for bringing this item to our attention. Although the Romberg memo is not specifically addressed in Inspection Report 50-336/88-13, the inspector was aware of the station policy on safety tags when he reviewed your concerns in 1988. That policy was restated in the memorandum by S. Scace dated January 29, 1988. At the time of inspection 88-13, the licensee gave consideration to establishing a separate station tagging authority for non-nuclear safety work. That option was not selected and the single tagging authority approach remains today as station policy. Our present review has concluded that no new information about the previous tagging issue at Millstone has been identified in the information you provided on July 25, 1990. We will reconsider this issue if you provide us additional or new information. Therefore, unless we hear from you, we intend no further action in regard to your concerns about tagging discrepancies at the Millstone Nuclear Power Station in 1987.

In addition to Inspection Report 50-336/88-13 the NRC has inspected the adequacy of Millstone Nuclear Power Station safety tag procedures on numerous occasions. Enclosed are excerpts from inspection reports 50-336/89-13, dated October 11, 1989; 89-17, dated October 20, 1989; 89-23, dated January 19, 1990; 89-24, dated March 9, 1990; and 90-09, dated June 28, 1990.

W/64

We appreciate your informing us of your concern and feel that our actions in this matter have been responsive.

Sincerely,



Donald R. Haverkamp, Chief
Reactor Projects, Section 4A
Division of Reactor Projects

Enclosures: As stated

bcc w/enclosures:
A. Vogel, DRP
M. Perkins, DRMA
W. Raymond, SRI
Allegation File RI-90-A-0117

APPENDIX 4.0

SAMPLE RECORD OF ALLEGATION PANEL DECISIONS

SITE: MILLSTONE UNIT 2

PANEL ATTENDEES:

ALLEGATION NO.: 21-90-A-0117
~~87-A-0117~~Chairman - Bill HehlDATE: 8/22/90 (Mtg. ① 2 3 4 5)Branch Chief - Ed WengingerPRIORITY: High Medium LowSection Chief (AOC) - D. HaverskampSAFETY SIGNIFICANCE: Yes No UnknownOthers - AVigelCONCURRENCE TO CLOSEOUT: DD BC SCCONFIDENTIALITY GRANTED: Yes No
(See Allegation Receipt Report)IS THEIR A DOL FINDING: Yes NoIS CHILLING EFFECT LETTER WARRANTED: Yes NoHAS CHILLING EFFECT LETTER BEEN SENT: Yes NoHAS LICENSEE RESPONDED TO CHILLING EFFECT LETTER: Yes No

ACTION:

- 1) AOC Send C/O /ack. letter to allegor, include other inspections that have covered the tagging
- 2) problems at Millstone since 1988 and our review evaluation of the procedure.
- 3) _____
- 4) _____
- 5) _____

NOTES: _____

W. R. R. R. R.

σ_{Fe}	σ_{Cu}	σ_{Zn}	σ_{Mg}	σ_{Al}
0.76	0.89	0.92	0.95	0.97

ALLEGATION NO. ~~_____~~ RZ-90-A-0117
Resident Office No. _____

*name: [REDACTED]
*phone: [REDACTED]

4-2578 00 00 [REDACTED]
City: [REDACTED]

Was it requested?

Yes _____ No 2

Yes it initially granted:

Yes _____ No _____

Was it finally granted by the allegation panel?

Yes _____ No _____

Does a confidentiality agreement need to be sent to the alleged?

Yes _____ No _____

Has a confidentiality agreement been signed?

Yes _____ No _____

* Item documenting why it was granted is attached.

Yes _____ No _____

Employer: None

POSITION: [REDACTED]

Facility: MILLESTONE-22

SECRET NO. 50-37-423716

[illegible][illegible]

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[illegible]

FUNCTIONAL AREA ☐ Operations ☐ Inside H&D
 ☐ Safeguards ☐ Offsite H&D
 ☐ Other

Information in this record was deleted
in accordance with the Freedom of Information
Act, exemptions b1, b7C
FOIA- 91-162

Time Required to Process Request: 1 Man-Hours

Ex 5, 6, 7c

N/66

ALLEGATION REFORMATION

[redacted] contacted the resident office by phone on July 19, 1990 and informed Mr. Habighorst that he was presenting a new allegation about activities at Millstone. He stated he is sending in the mail a copy of a 10/3/86 memo from Wayne Romberg covering the need to use safety tags in outlying areas. Mr. Habighorst acknowledged the alleged intentions and stated NRC will contact him upon receipt of the memo.

The memo was never mailed to the NRC, but [redacted] presented it to me personally at the public meeting in East Lyme on July 25. [redacted] stated the letter demonstrated that management rules were in effect and therefore were not met when he raised the tagging issue in the Millstone 2 warehouse in 1987.

[redacted] acknowledged receipt of the information and stated I would get back to him after review of the matter.

My review of this matter has identified no new information about the previous tagging issue at Millstone. The issue was covered under Allegation No. 50-336/88-13, and is addressed in Inspection Report 50-336/88-13, Section B E and Appendix B, Item 7.6, Part B1. I conducted the allegation follow up and inspection for all issues raised in 1987.

Page 14 of Appendix B states that the tagging activity in the warehouse was not conducted as required by station procedures. There was a management expectation that, since there was only one tagging procedure for the station - ACP 2.06, all tagging be performed in accordance with its controls. The NRC position was an established policy, as evidenced by the Romberg memo of 10/3/86 - although not referenced in the inspection report) and re-enforced by the Escobedo memo of 1/19/88.

At the time of the inspection, the licensee gave consideration to establishing a separate station tagging authority for work done in the areas outside of the plant process buildings. That option was not selected and the single tagging authority approach remains today as station policy.

RECOMMENDATION

EY →
5

11/25/90
NORTHEAST UTILITIES



THE CONNECTICUT LIGHT AND POWER COMPANY
THE STONY HARBOR LIGHT AND POWER COMPANY
THE STONY HARBOR ELECTRIC COMPANY
THE STONY HARBOR WATER POWER COMPANY
THE STONY HARBOR UTILITY SERVICE COMPANY
THE STONY HARBOR NUCLEAR ENERGY COMPANY

M
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October 3, 1986
MP-9575

TO: Distribution

FROM: Wayne D. Romberg
Station Superintendent - Millstone
(Millstone Exp. #300)

SUBJECT: Safety Tags

It has come to my attention that safety tags are not always used by for areas and systems not directly related to the unit. A recent example involved the Paint Shop. Control Room personnel expressed surprise and reluctance to a request to tag electrical supplies in support of work scheduled in that building. The modifications to the office buildings on Unit 3 apparently were also done without any tagging.

This is contrary to ACP-QA-2.06A (Station Tagging), which applies to all Millstone controlled equipment. MAP 2.13 (Maintenance and Control of Miscellaneous Site Facilities) delineates areas of responsibility for general outside areas. Operations personnel are required to place tags when requested in support of approved work.

Personnel safety is not to be compromised for the sake of convenience. The tagging system is an effective tool and is to be used everywhere on the station.

Please ensure your personnel are aware of this policy.

WDR/JAS:cjh


Distribution: List DH
F. C. Rothen
D. L. Hoisington
J. A. Sloan
R. A. Ayala

12⁰⁰ P.M.
7/19/90

TELECON [REDACTED]
RE: MILLSTONE

- INQ. AS TO STATUS OF HIS COMPLAINTS TO THE NRC.
- I ADVISED HIM THAT OI DID NOT HAVE ANY INVESTIGATION SPECIFICALLY ADDRESSING ISSUES GENERATED BY HIS COMPLAINTS
- HE SAID THAT HE HAS BROUGHT COMPLAINTS TO THE RESIDENT INSPECTOR AT MILLSTONE
- HE IS AWARE OF [REDACTED] [REDACTED] ISSUES AND THINKS HE IS BEING "SLIGHTED"
- I INFORMED HIM THAT SOMEONE FROM THE NRC WOULD GET BACK TO HIM
- I TOLD HIM THAT HIS DOL ISSUES HAD BEEN FORWARDED TO THE NRC AND WERE EITHER UNDER REVIEW BY NRC STAFF OR ~~WOULD~~ BE REVIEWED AFTER DOL RULES ONE WAY OR THE OTHER.

CW

 came to [redacted] on 7/19/90, with as
a letter & new ^{hand} allocation.

He is looking for [redacted] memo from W. Romero on
the need to be [redacted] in the outline areas.

I told him, I'm [redacted] with [redacted] of memo. Told him
I'll [redacted] [redacted] of memo, for consideration.

