



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

OCT 02 1990

Docket No. 50-336

Mr. Edward C. Mroczka  
Senior Vice President  
Nuclear Engineering and Operations  
Northeast Nuclear Energy Company  
P.O. Box 270  
Hartford, CT 06141-0270

Dear Mr. Mroczka:

The U.S. Nuclear Regulatory Commission recently received an allegation concerning activities at Millstone Unit 2 (RI-90-A-136). Details of this allegation are enclosed for your review and followup.

We request that the results of your review and disposition of this matter be submitted to Region I within 30 days of the date of receipt of this letter. We request that your response contain no personal privacy, proprietary, or safeguards information so it can be released to the public and placed in the NRC Public Document Room. If necessary, such information shall be contained in a separate attachment which will be withheld from public disclosure. The affidavit required by 10 CFR 2.790(b) must accompany your response if proprietary information is included.

The enclosure to this letter should be controlled and distribution limited to personnel with a "need to know" until your investigation of the allegation has been completed and reviewed by NRC Region I. The enclosure to this letter is considered Exempt from Public Disclosure in accordance with Title 10, Code of Federal Regulations, Part 2.790(a). However, a copy of this letter excluding the enclosure will be placed in the NRC Public Document Room.

The response requested by this letter and the accompanying enclosure are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Your cooperation with us is appreciated. We will gladly discuss any questions you may have concerning this information.

Sincerely,

Edward C. Wenzinger, Chief  
Projects Branch 4  
Division of Reactor Projects

Enclosure: Allegation Details  
(10 CFR 2.790(a) INFORMATION)

9212210399 920608  
PDR FOIA  
GUILD91-162 PDR

M/73

cc w/encl:

W. Raymond, SRI

cc w/o encl:

W.D. Romberg, Vice President, Nuclear Operations

S.E. Scace, Nuclear Station Director, Millstone Station

J.S. Keenan, Nuclear Unit Director, Millstone Unit 2

Gerald Garfield, Esquire

Public Document Room (PDR)

Local Public Document Room (LPDR)

State of Connecticut

bcc w/encl:

M. Perkins, DRMA

J. Stewart, DRP

ATTACHMENT

RI-90-A-136

Numerous work orders and design changes have been performed on radiation monitors RM-8262 and RM-8123 during the period June - August 1990. The following items have been identified.

1.
  - a. Work on the flow control valve, including replacement, commercial grade dedication, and retesting was conducted under AWO M2-9004311 while the AWO only authorized work on the system bypass valves.
  - b. The flow control valve failed an initial 60 psi leak check, but this failure was not dispositioned.
  - c. There was not adequate communication between maintenance and operations to ensure that proper actions were conducted when the monitors were inoperable.
    - (1) From July 23 to August 4 neither monitor was operable, and compensatory actions were not taken. (The inoperability was due to in-progress system design change work.)
    - (2) On July 26 RM-8262 was out-of-service to change filters and RM-8123 was out-of-service due to a failed low flow alarm, but no Technical Specification Action Statement was logged and no compensatory measures were taken. (Please address separately from (1).)
  - d. Drawings have not been updated as a result of the above design change work.
2. AWO M2-9008033 installed a bypass jumper (Jumper Card #3) without required documentation. (No Bypass-Jumper log entry and no PDCE.) The tag was cleared on August 31, 1990.

# APPENDIX 4.0

## SAMPLE RECORD OF ALLEGATION PANEL DECISIONS

SITE: Millsboro - 2

PANEL ATTENDEES:

ALLEGATION NO.: RI-90-A-136

Chairman - Wiggins

DATE: 9/12/90 (Mtg. (1 2 3 4 5))

Branch Chief - ECW

PRIORITY: High Medium Low

Section Chief (AOC) - Havenkamp

SAFETY SIGNIFICANCE: Yes ☒ No ☐ Unknown ☐

Others - J. Durr

CONCURRENCE TO CLOSEOUT: DD BC SC

W. Raymond, P. Hoberst } (site)  
J. Stewart } by phone

CONFIDENTIALITY GRANTED: Yes No  
(See Allegation Receipt Report)

IS THEIR A DOL FINDING: Yes No

IS CHILLING EFFECT LETTER WARRANTED: Yes No

HAS CHILLING EFFECT LETTER BEEN SENT: Yes No

HAS LICENSEE RESPONDED TO CHILLING EFFECT LETTER: Yes No

### ACTION:

1) Turnover for license review / 302 response. Signed by ECW.

2) Review response. Circulate as appropriate.

3) \_\_\_\_\_

4) \_\_\_\_\_

5) \_\_\_\_\_

NOTES: LTR drafted (to typist) 9/18/90 0900 JSS.

# ALLEGATION RECEIPT REPORT

Date/Time Received: 8/30/90 1300

Allegation No. RZ-90-A-0136  
(leave blank)

Name: [REDACTED]

Address: \_\_\_\_\_

Phone: \_\_\_\_\_

City/State/Zip: \_\_\_\_\_

Confidentiality Requested:

Was it requested?

Yes ☐ No ☒

Was it initially granted?

Yes ☐ No ☒

Was it finally granted by the allegation panel?

Yes ☐ No ☒

Does a confidentiality agreement need to be sent to allegor?

Yes ☐ No ☒

Has a confidentiality agreement been signed?

Yes ☐ No ☒

Memc documenting why it was granted is attached?

Yes ☐ No ☒

Allegor's Employer: Northeast Utilities

Position/Title: [REDACTED]

Facility: Millstone - 2

Docket No.: 50/336

(Allegation Summary (brief description of concern(s): (1) Improper control of work (maint. ops) during overhaul of containment radiation monitors. (2) Improper control of bypass/Jumper tag

Number of Concerns: 2

Employee Receiving Allegation: P.J. Habighorst / J.S. Stewart  
(first two initials and last name)

Type of Regulated Activity (a) ☒ Reactor  
(b) ☐ Vendor  
(c) ☐ Materials

(d) ☐ Safeguards  
(e) ☐ Other: \_\_\_\_\_  
(Specify)

Materials License No. (if applicable): \_\_\_\_\_

Functional Area(s): ☒ (a) Operations  
☐ (b) Construction  
☐ (c) Safeguards  
☐ (d) Transportation

☐ (e) Emergency Preparedness  
☐ (f) Onsite Health and Safety  
☐ (g) Offsite Health and Safety  
☐ (h) Other: \_\_\_\_\_

(NRC Region I Form 207  
Revised 10/89)

Information in this record was deleted  
in accordance with the Freedom of Information  
Act, exemptions b7C, b7D  
FOIA 91-162

N/76

Detailed Description of Allegation: (1) There were numerous problems with work done on containment radiation monitors 8262 + 8123.

- a. Work on the flow control valve, replacement, commercial dedication, retesting was conducted under AWO M2-90 04311 while the AWO only authorized work on the system bypass valve.
- b. Commercial grade dedication of the flow control valve was improper,
  - a Snoop test was used with the valve in place which obviously won't work
  - the valve failed an initial 60psi leak check but this was not properly dispositioned
- c. There was not good communications between maint and ops to ensure ops took proper actions when systems were inoperable:
  - from 7/23 to 7/4 Neither RMI was operable and no approved compensatory measures were in place
  - on 7/26 ~~8262~~<sup>8262</sup> OOS to change filters + 8/23 OOS due to no low flow alarm but no TSAS was logged and no Chemistry sample (TS Comp Actions) was taken
- d. Drawings have not been updated as result of PDCE work.

(2) AWO M2-90 08083 ~~is~~ installed a bypass jumper (Jumper Card #3) without required documentation - No Bd log entry and no PDCE. The tag was cleared on 8/31/90.