



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION I  
476 ALLENDALE ROAD  
KING OF PRUSSIA, PENNSYLVANIA 19406  
APR 10 1991

[REDACTED]

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

Dear [REDACTED]

The Region I office has completed its followup to the concerns that you brought to our attention on the dates described. Relevant documentation such as letters from the licensee are attached to this letter. A synopsis of these concerns and our subsequent actions and regulatory conclusions are detailed below.

On October 8, and October 11, 1990, you provided to us a number of concerns associated with Wide Range Nuclear Instrument operability. You further discussed this issue with me in January, 1991. Additionally you provided to us on the same dates, a concern that you were not consulted during a recent procedure change associated with surveillance procedure SP-2417H, and that this omission was contrary to station procedures. We provided these issues to your employer in a letter dated October 26, 1990 and they responded in a letter dated December 21, 1990 (attached). Additionally, we inspected the issue of wide range nuclear instrument operability and provided you the results of our investigation in a letter dated January 14, 1991.

Your assertions that spiking had occurred on the channel "A" of the instrument were true, but inoperability and violations of technical specifications have not been substantiated. With regard to SP-2417H, the licensee admitted that you were not consulted for the procedure change, but no violation of procedures occurred and your allegation appears to be unsubstantiated. Furthermore, the procedure change was determined to be adequate. The NRC is satisfied that the licensee addressed your concerns, and we plan no further action in these matters.

On August 8, 1990, you provided us with concerns asserting that (1) work associated with the overhaul of the containment radiation monitor was improperly controlled and (2) a bypass-jumper tag was improperly controlled during the maintenance of work order M2-90-08033. We provided these concerns in a letter to the licensee dated October 2, 1990 and the licensee responded in a letter dated December 3, 1990 (attached).

We note from the licensee response that some problems were identified in the control of work associated with the radiation monitor, but it appears from the licensee's assessment that at least one monitor was operable during the times in question in your assertion.

We note that the licensee identified the problems described in your concern and took proper corrective actions. Further the licensee is implementing additional controls to establish better

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coordination of activities between operations and maintenance. Your allegation that there were problems associated with the control of maintenance is substantiated; however, the NRC considers the problems minor with respect to nuclear safety and notes that appropriate corrective actions have been taken. With regard to issue (2), the pin connector in question was not connected to anything, therefore a bypass tag or a work order would not be appropriate. Your allegation may be true, but is of no consequence. In any case, we are satisfied with the licensee's response and plan no further actions in these matters.

On November 9, and November 11, 1990, you provided to us (1) a description of events associated with the main turbine stator cooling troubleshooting, (2) a question as to the propriety of completing the thermal margin low pressure surveillance in Modes 3 and 2, and, (3) a question regarding the testing of the control element withdrawal prohibit alarm. We provided these issues to your employer in a letter dated December 6, 1990, and received their response in a letter dated January 4, 1991 (attached).

Your assertions regarding issue (1) were determined to be true, but appear to be of no consequence to nuclear safety. The problems had previously been identified by the licensee and appropriate corrective actions appear to have been taken. With regard to issue (2), it appears no violation of technical specifications occurred, and your allegation appears to be unsubstantiated. With regard to issue (3), the alarm testing was determined to be adequate and your allegation appears to be unsubstantiated. We are satisfied that the licensee answered your concerns and we plan no further action in these matters.

On September 28, 1990, and in several discussions with NRC personnel during the recent refueling outage, you asserted that there were violations of the overtime policy at Millstone Unit 2. We investigated your assertion and discussed the issue with unit management, but could not substantiate your claim. To enable further evaluation, more specific details are needed. We note that you have recently provided us a similar concern that overtime restrictions may not have been complied with, and we are inspecting this concern. We will inform you of the results of our inspections when complete.

On September 28, 1990, and in a November 5, 1990, memorandum to our resident inspector, you provided the NRC with seven concerns involving: (1) the procedural adequacy and implementation of IC 2419C section 5.5.6 which involve the heated junction thermocouple inspection; (2) the instrument calibration review that you initiated; (3) the instrument calibration review that had been initiated associated with test voltages being out-of-specification; (4) a red tag that was improperly hung on the Weidmuller Block TCD; (5) an assertion that an annunciator window change had been improperly handled by the licensee; (6) an assertion that surveillance procedure SP-2401J had not been implemented when an instrument and controls technician turned in the paperwork without restoring the bypass key; and, (7) an assertion that you had received harassing mail from a co-worker.

We referred issues 1 thru 6 to the licensee in a letter dated November 11, 1990 and received their response in a letter dated December 21, 1990 (attached). We note that the licensee was aware of the discrepancies that you identified in your assertions and had taken actions to correct the deficient conditions when originally identified.

In regard to issue (1), the procedure was written for a skilled instrument and controls technician with experience in this type of maintenance; however, you made no assertion that maintenance was improperly or incompletely performed to the extent that operability of essential equipment was affected. In any case, your allegations appear to be substantiated but of minor significance with respect to nuclear or personnel safety. With regard to issue (2), the licensee provided us a copy of the instrument calibration review (ICR) and we are providing this copy for your review. Please inform us if you have further questions regarding this matter. With regard to issue (3), the licensee had taken action to address the problem that you described and we have not been informed of any inoperabilities that resulted from the corrective actions. With regard to the drawing concern of issue (3), more information is needed to adequately address your concerns. Please inform us of any additional details or further questions that you may have in this matter. With regard to issue (4), a minor tagging discrepancy had been previously identified and was promptly corrected. Further, guidance on the tagging of Weidmuller blocks was to have been provided to operations personnel. Your allegation in this case appears to be substantiated, but is of little concern with respect to nuclear safety. With regard to issue (5), no problems were identified, and no corrective actions were warranted. With regard to issue (6), we note that operations personnel identified the condition that you asserted and took prompt actions to restore the channel. The technician in this case appears not to have exceeded Unit 2 Technical Specification limitations. However, your allegation regarding implementation of the surveillance procedure was substantiated by the licensee. We are satisfied with the licensee responses to these six issues and plan no further action in these matters.

Finally, with regard to issue (7), the NRC cannot take action based on co-worker harassment, especially if the alleged harassment is anonymous. If you feel that you are being harassed by your employer, we again remind you to take these issues to the Department of Labor.

On September 14, 1990, you provided us a three concerns detailing: (1) failure of operators to note that the steam jet air ejector may not be working properly; (2) the failure of your supervisor to respond to one of your questions; and, (3) the failure of another instrument and controls technician to follow an unspecified department instruction requiring that a trouble report sticker be attached to an instrument after a problem was identified. We provided your concerns to the licensee in a letter dated October 4, 1990, and they responded in a letter dated December 7, 1990 (attached).

With regard to issue (1), the licensee identified no inoperability associated with the radiation monitor, but has identified that upgrade of the system is warranted. The licensee plans to replace the monitor in 1991. Your concerns therefore have some validity. With regard to

issue (2), communication between you and your supervisor appears to have been either misunderstood or incomplete. We could not determine the validity of your complaint. With regard to issue (3), the licensee determined that the orange sticker was properly placed for operator information and that work was properly controlled by the applicable work documents. Your concerns in this case appear to be unsubstantiated. We are satisfied with the licensee response to the concerns as presented, and the NRC plans no further action with regard to these matters.

We appreciate you informing us of your concerns and feel we have been responsive to those concerns. Should you have any additional questions or if I can be of further assistance, please call me collect at (215) 337-5225.

Sincerely;

*Edward C. Wenzinger*  
Edward C. Wenzinger, Chief  
Reactor Projects Branch 4

Attachments: As stated

bcc:w/o enclosures  
M. Moore DRMA (6)  
J. Stewart (8) 1  
W. Raymond

{ R1-90-A-144 closeout  
R1-90-A-204 closeout  
R1-90-A-206 closeout  
R1-90-A-136 closeout  
R1-90-A-180 closeout  
R1-90-A-174 closeout

Rick Walsh - CI

RI-TC-A-0204

V. - 22 - 4 - 0040

I talked with [REDACTED] today about claims that he was being harassed by NU mgmt because

(1) [REDACTED] at MS training is called by co-workers the [REDACTED] at training and

(2) He was sent a copy of a recent newspaper account of an NRC inspection with the word's "Sorry" on the article

- I tele him of his DCL rights

He wanted us to do something and I tele him we need more information, specifics of how NU mgmt is involved

He stated DC's access card will not pass

This is the your information

Scott Stewart

Information in this record was deleted  
in accordance with the Freedom of Information  
Act, exemptions (b)(7)  
FOIA- 91-142

N/122

## SAMPLE RECORD OF ALLEGATION PANEL DECISIONS

SITE: Millstone 2ALLEGATION NO.: R1-90-A-0174DATE: 9/28/90 (Mtg. 1 2 3 4 5)PRIORITY: High Medium LowSAFETY SIGNIFICANCE: Yes No UnknownCONCURRENCE TO CLOSEOUT: DD BC SCCONFIDENTIALITY 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) Inform Licensee by telecon2) Followup with letter, request licensee response3) ~~Closeout~~ / Review4) Closeout

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

NOTES: Attempted to complete (1) Fri. 4/28 1545hrs (could notcontact: Kremer, Scott, Kimberg, Smith, Residents. + Stewart.(2) [REDACTED] discussion w/ D. Habigast 10/2/90 1200hrs (attached).Information in this record was deleted  
A4-11 accordance with the Freedom of Information  
Act, exemptions b5, b7C  
FOIA- 91-162

M92



# ALLEGATION RECEIPT REPORT

Date/Time Received: 9/28/90 1200hrs

Allegation No. P1-90-A-0174  
(leave blank)

Name: [REDACTED]

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

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

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

## Confidentiality:

- Was it requested? \_\_\_\_\_
- Was it initially granted? \_\_\_\_\_
- Was it finally granted by the allegation panel? \_\_\_\_\_
- Does a confidentiality agreement need to be sent to allegor? \_\_\_\_\_
- Has a confidentiality agreement been signed? \_\_\_\_\_
- Memo documenting why it was granted is attached? \_\_\_\_\_

Yes	_____	No	_____
Yes	_____	No	_____
Yes	_____	No	_____
Yes	_____	No	_____
Yes	_____	No	_____
Yes	_____	No	_____

Allegor's Employer: NU

Position/Title: [REDACTED]

Facility: MILLSTONE 2

Docket No.: 50-336

(Allegation Summary (brief description of concern(s): (1) I+C department hours of work may exceed guidelines

Number of Concerns: 1

Employee Receiving Allegation: T. Martin → W. Hehl → J. Stewart (Documenter)  
(first two initials and last name)

Type of Regulated Activity (a) ☒ Reactor (d) \_\_\_\_\_ Safeguards  
(b) \_\_\_\_\_ Vendor (e) \_\_\_\_\_ Other: \_\_\_\_\_  
(c) \_\_\_\_\_ Materials (Specify)

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

Functional Area(s): ☒ (a) Operations (e) Emergency Preparedness  
\_\_\_\_\_ (b) Construction (f) Onsite Health and Safety  
\_\_\_\_\_ (c) Safeguards (g) Offsite Health and Safety  
\_\_\_\_\_ (d) Transportation (h) Other: \_\_\_\_\_

(NRC Region I Form 207  
Revised 10/99)

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Act, exemptions b7C

FOIA: 91-162

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Act, exemptions 1, 5, 7C

Meeting between [redacted] and P. H. [redacted] on October 2,  
1987 between 11:00 a.m. and 1:00 p.m.

#### OVERTIME CONTROLS

Current I/C department work hours are listed below on a  
2-week schedule 10 hrs + 1/2 hr lunch  
- MIDS 5 days (1800 - 0430) with one day off,  
subsequently followed by 7 days on (1800 - 0430) with  
one day off. At this time the mid shift individual goes  
to dayshift.

[redacted] believes this is difficult for the body to  
adjust to, even though it may meet the limitations in the  
NRC generic letter guidance on overtime.

On September 14, [redacted] proposed to his supervisor that  
the rotating shift should be twelve consecutive days (12)  
and 2 days off prior to rotating to day shift.

I/C department head responded to [redacted] on September 27  
and concluded his proposal would not be implemented based on  
(1) [redacted] proposal is too late within the outage to  
change, and, (2) Department reviewed other departments  
implementation of shift work and found similar hours with  
the exception of the health physics organization.

[redacted] concern is that in late 1987 the licensee  
committed (verbally) to have as a policy individuals work 6  
days on and 2 days off. NRC inspection report 80-776/22-17  
indicated this verbal comment was not a commitment due to  
the fact it was not formally on the docket; therefore, the  
licensee has not been fulfilling these verbal commitment  
presently, and the NRC appears to have been problem with  
tracking.

[redacted] review of NRC generic letter appears is that  
enough manpower is available to cover the attention of the  
work guidelines. He does not believe manpower is sufficient  
with the I&E I/C department.

[redacted] will not use the existing grievance process  
(NUP-08-1.09) because of past experience, he will not deal  
with the unit director, and generally he feels it will be a  
waste of time.

[redacted] also presented the difference between revision 2 and 3  
to ACR-04-1.19 section 6.8. Specifically the examples of  
not to do are omitted within revision 3. And currently  
appear to be implemented.

[redacted] will provide applicable documentation on demand.

W/74



5/11/90

I discussed overtime concern with the alleged. He does not like his shift assignment and feels that individuals deserve more time off after a mid-shift. He felt that his supervisors have not given full consideration to his recommended shift schedule but they did respond to his request for review. He noted that although no-one was exceeding CT guidelines, the internal principles of having people rotate on mid-shift was not being complied with.

J. Stewart  
10/11/90

- I discussed this with Bill Hehl - T/O Div. he concurred that no followup letter to licensee was required if alleged not alleging that CT was being exceeded.

J. Stewart  
12/3/90 (discussed week of 10/19/90)

- Do not T/O to licensee with letter, SRI will review.

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