



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

JAN 14 1991

Docket No. 50-336

File Nos. RI-90-A-180, RI-90-A-198

[REDACTED]

Information in this record was deleted  
in accordance with the Freedom of Information  
Act, exemptions b(7)(C)

FOIA- 91-162

Dear [REDACTED]

Subject: Allegations Concerning (1) Wide Range Nuclear Instrumentation  
Operability, (2) Operator Attentiveness, and (3) Alignment of  
Reactor Coolant Flow Transmitters.

The Region I office has completed its followup in response to the concerns you brought to our attention on October 8, 1990 and October 26, 1990 alleging that (1) wide range nuclear instrumentation was not operable as required by technical specifications, (2) personnel were not attentive to duties or were sleeping, and (3) alignment of the reactor coolant flow transmitters was not accomplished properly.

We found your allegation concerning the operability of wide range nuclear instrumentation to be unsubstantiated and have documented our findings in NRC inspection report, 50-336/90-22, section 5.3.3. We concluded that at least two of the four instruments were operable during fuel movement, although one channel was spiking.

We also found your allegation concerning two licensee workers who were reportedly found asleep to be unsubstantiated and have documented our findings in section 3.7 of the above noted report. We were unable to confirm that the individuals were inattentive or that they compromised work control.

Finally, we found your allegation concerning the improper alignment of reactor coolant flow transmitters to be unsubstantiated and documented our findings in section 5.3.1 of the above noted report. We concluded that the alignments were completed adequately although a proposed revision to the alignment procedure provided more detailed instructions for use of an improved test rig.

Copies of the above noted reports are attached for your information. We appreciate your informing us of your concerns and feel that our actions in this matter have been responsive to those concerns. Should you have any additional questions, or if I can be of further assistance in this matter, please call me collect at (215) 399-2222.

Sincerely,

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

bcc/with encl:  
J. Stewart (2)  
M. Perkins ORC

9212220047 920608  
PDR FOIA  
GUILD91-162 PDR

W/102



bcc w/ encl:  
J. Stewart, DRP (2)  
M. Perkins, DRMA ORC

*J. Stewart*  
RI:DRP  
D.Johnson/vhd

1/11/91

*J. Stewart*  
RI:DRP  
Haverkamp

1/11/91  
OFFICIAL RECORD COPY

*J. Stewart*  
RI:DRP  
Wenzinger  
1/11/91

ALLEGATION COL RI-90-A-0192 - 0002.0.0  
01/09/91

# SAMPLE RECORD OF ALLEGATION PANEL DECISIONS

SITE: MS-2

PANEL ATTENDEES:

ALLEGATION NO.: R1-90-A-192

Chairman - Wiggins

DATE: 11/21 (Mtg. 1 2 3 4 5)

Branch Chief - ECW

PRIORITY: High Medium Low

Section Chief (AOC) - Stewart

SAFETY SIGNIFICANCE: Yes No Unknown

Others - Gray, Briggs - DRS

CONCURRENCE TO CLOSEOUT: DD BC SC

CONFIDENTIALITY GRANTED: Yes No  
(See Allegation Receipt Report)

IS THERE 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) Routine Document & closeout. IR 90-22 (MS-2 combined report)

2) \_\_\_\_\_

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

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

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

NOTES: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

11/115

# APPENDIX 4.0

## SAMPLE RECORD OF ALLEGATION PANEL DECISIONS

SITE: Mill-2

ALLEGATION NO.: R1-90-A-180

DATE: 10/11/90 (Mtg. 1 2 3 4 5)

PRIORITY: High Medium Low

SAFETY SIGNIFICANCE: Yes No Unknown

CONCURRENCE TO CLOSEOUT: DD BC SC

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 to licensee
- 2) Document inspection count (generally) in 90 IR
- 3) Review licensee response & closeout w/ allegor  
(be sure to mention inspection to allegor)
- 4) \_\_\_\_\_
- 5) \_\_\_\_\_

NOTES: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

### PANEL ATTENDEES:

Chairman - Brough

Branch Chief - \_\_\_\_\_

Section Chief (AOC) - Haverkamp

Others - STEWART

Durr ~~Stewart~~

(017 was interviewed by

Stewart 10/11/90

# ALLEGATION RECEIPT REPORT

Date/Time Received: 10/11/90 0900 - no stamp  
10/8/90 1600 - initials

Allegation No. R1-90-A-0180  
 (leave blank)

Name: [REDACTED]  
 Phone: \_\_\_\_\_

Address: \_\_\_\_\_  
 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 X  
 Yes \_\_\_\_\_ No \_\_\_\_\_  
 Yes \_\_\_\_\_ No \_\_\_\_\_  
 Yes \_\_\_\_\_ No \_\_\_\_\_  
 Yes \_\_\_\_\_ No \_\_\_\_\_  
 Yes \_\_\_\_\_ No \_\_\_\_\_

Allegor's Employer: NU

Position/Title: [REDACTED]

Facility: Millstone - 2

Docket No.: 50/236

(Allegation Summary (brief description of concern(s): (1) Problems with W-30 - Range Nuclear Instruments (WRNI) during refueling  
(2) Discrepancy change concern  
[REDACTED] re-contacted by Stewart 10/11/90 to get allegation details)

Number of Concerns: 2

Employee Receiving Allegation: W. Raymond → J. S. Stewart  
 (first two initials and last name)

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

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 10/89)

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

W1105



# ALLEGATION RECEIPT

Tue, Oct 9, 1990  
4:04 PM

ALLEGATION NO RI-A-90-0710  
Resident Office No A

Name: [REDACTED]  
Phone: [REDACTED]

Address: [REDACTED]  
City/ St: [REDACTED]

## Confidentiality

Was it requested? Yes \_\_\_ No Y  
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 the filer? Yes \_\_\_ No \_\_\_  
Has a confidentiality agreement been signed? Yes \_\_\_ No \_\_\_  
Memo documenting why it was granted is attached? Yes \_\_\_ No \_\_\_

Yes \_\_\_ No Y  
Yes \_\_\_ No \_\_\_  
Yes \_\_\_ No \_\_\_  
Yes \_\_\_ No \_\_\_  
Yes \_\_\_ No \_\_\_  
Yes \_\_\_ No \_\_\_

Employer: NNECO  
Facility: MILLSTONE 2

Position/Title: [REDACTED]  
DOCKET NO.: 50-336

SUMMARY: (1) Wide range nuclear instrumentation monitors are not operable as required to support refueling operations since (i) "A" channel spikes periodically, which is a longstanding problem that has not been resolved; (ii) "C" channel has low IR readings on its cable; and, (iii) a PDCR to change out the channels is still open and until closed out and signed-off, the channels cannot be operable. (2) [REDACTED] "owner" of WRNI procedures, was not asked to review a recent procedure change processed on the day shift (he is on the night shift) to support outage activities. When the PORC sent the procedure back with comments to change the associated data sheets, [REDACTED] was asked to review the latter changes (he was on the day shift at that time) and, (3) Workers are under pressure to bless off discrepant conditions (e.g. WRNIs) to make equipment operable to support critical path activities.

NUMBER OF CONCERNS 3 [REDACTED] is not directly involved in these activities. These concerns have not been discussed with his supervisor or licensee management. He wanted the NRC to be "aware" of the issues.

Cable on channel C  
connector was damaged -  
discrepant condition, confusion  
problems w/ operability  
- not completely operable -

WR op test done  
to get a operable, PDCR  
not closed out at same  
time (spiking -  
Pegs out)  
bang on

Discrepant w/ alleg  
10/11/90 0900  
2. What problem?  
24174  
3. Example where  
workers signed off  
a discrepant  
condition?  
(P. & Kane)  
WRNI  
a & c

→ interested in  
getting 2 channel  
operable w/  
no time to  
correct problem

704 27140 220157710 704 51:01 06 09 170

M106

Information in this record was deleted  
in accordance with the Freedom of Information  
Act, exemptions b7C, b7D  
FOIA- [REDACTED]

#### ADDITIONAL INFORMATION

TS 3.9.2 requires at least two source range monitor be operating, with continuous visual and audible indications. Since the alleged raised operability and compliance questions regarding TS 3.9.2, the SRI deemed immediate followup was appropriate.

10/8/90

Inspector review of refueling activities on 10/8/90 noted that Reactor Engineering and operations personnel were using 3 WRNI channels for core monitoring during fuel moves - Channels A, B, & D. Channel C was available for indication but was not used to meet TS 3.9.2 requirements. Although channel A "spiked" periodically, it was considered operable and providing an accurate indication of core conditions. It tracked fuel moves and correlated with other monitors. Operability was demonstrated by completion of the normal surveillances.

A review of a computer generated plot of the three channels for the day shift showed the stable indications for the period with the exception of two periods when "spikes" occurred. RE personnel response to the spikes was to treat them as valid until proven spurious by comparison to other channels.

In addition to monitoring count rate during alterations, data from the WRNI was used to complete 1/M plots for each core insertion. Inspector review of the WRNI tabulated data and the 1/M plots showed at least two channels (and most often three) were always available during alterations. The spiking problem on Channel A did not preclude using the data to track core conditions during fuel moves. The inspector noted that the high reactor boron concentrations (>1950 ppm) resulted in low counts from all WRNI channels (in the range from 1 to 6 cps). The resulting large scatter in the data made the 1/M plots acceptable but minimally effective.

Based on the above, the inspector concluded that the requirements for TS 3.9.2 were being met and core conditions were being adequately monitored during core alterations.

10/9/90

EMPLOYEE RECEIVING ALLEGATION: WILLIAM J. RAYMOND  
1:30 p.m. 10/8/90

ACTIVITY: ☒ REACTOR

FUNCTIONAL AREA: (a) ☒ Operations (f) ☐ Onsite H&S  
(c) ☐ Safeguards (g) ☐ Offsite H&S  
(h) ☐ Other

Time Required to Process Request: 3 Man-Hours