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UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PENNSYLVANIA 19406
DEC 06 1990

Docket No. 50-336

Northeast Nuclear Energy Company
ATTN: Mr. E. J. Mrocza
Senior Vice President - Nuclear
Engineering and Operations Group
P.O. Box 270 Hartford, Connecticut 06141-0270

Dear Mr. Mrocza:

The U.S. Nuclear Regulatory Commission recently received an allegation concerning activities at Millstone Nuclear Power Station Unit 2 (RI-90-A-0205). 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 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.

Contains 10 mm range information

9212220055 92C508
PDR FOIA
GUILD91-162 PDR

11/128

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

Sincerely,

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

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

cc: w/enclosure
W. Raymond, SRI
Allegation File (2)

cc: w/o enclosure
PDR
State of Connecticut

Contains 10 CFR 2.790 information

SAMPLE RECORD OF ALLEGATION PANEL DECISIONS

SITE: MS-2

PANEL ATTENDEES:

ALLEGATION NO.: R1-90-A-0205Chairman - WigginsDATE: 11/21/90 (Mtg. 1 2 3 4 5)Branch Chief - ECWPRIORITY: High Medium LowSection Chief (AOC) - StewartSAFETY SIGNIFICANCE: Yes No UnknownOthers - Gray, Briggs - DRSCONCURRENCE TO CLOSEOUT: DO 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) Turnover to licensee2) closeout

3) _____

4) _____

5) _____

NOTES: _____

ALLEGATION RECEIPT REPORT

Date/Time Received: 11/6/90

Allegation No. R1-90-A-0205
(leave blank)

Name: [REDACTED]

Address: _____

Phone: _____

City/State/Zip: _____

Confidentiality:

Was it requested?	Yes _____	No <u>X</u>
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 alleeer?	Yes _____	No _____
Has a confidentiality agreement been signed?	Yes _____	No _____
Memo documenting why it was granted is attached?	Yes _____	No _____

Alleeer's Employer: NU

Position/Title: _____

Facility: MS-2

Docket No.: 50-336

(Allegation Summary (brief description of concern(s)): (1) Procedural Compliance

Number of Concerns: 1

Employee Receiving Allegation: P. Habighurst - mailed to JSS Sturmer
(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 10/89)

Information in this record was deleted
in accordance with the Freedom of Information
Act, exemptions b7C
FOIA- 91-165

11/130

203 443 5893

DEC 03 '90 18:34 NRC MILLSTONE OFFICE P02

Mike Perkins,

RI-90-A-0206

DEC 03 '90 15:06

F01

Pete Habighurst

Enclosure 2

RI-90-A-0206

page 2 of 3

SP-2401J

Issue 2: On or about November 9, 1990 during recovery from the Refueling outages, surveillance procedure ~~SP-2401J~~ (High power Functional Test) was partially completed in operational mode 3 and the remainder completed in mode 2. The mode 2 portion verified the operability of the control element assembly withdraw prohibit. The segmentation was due to problems with wide range nuclear instrument. *Thermal Margin Low Pressure Functions Test*

~~Are the above statements valid? If so, do technical specifications and procedures allow this surveillance to be segmented in the two operational modes.~~

Technical Specification Table 4.3-1 requires TMLP functional to be surveilled in operational modes 1 and 2.

Issue 3: During a technical ^{by the alleged} specification review of alarm functions (i.e. LER 90-01) it was identified that the alarm verification of control element assemb. withdraw prohibit was ~~not~~ included in the wide range functional surveillance (SP 2401B, 2401F, and the TMLP functional). During recent procedure upgrades, this change was not included in any procedures ~~SP-2401B~~ but it should have been.

Please discuss the validity of the assertion.

but not in TMLP, HI-POWER, and LPO Functional Sur.

Pete, Please review your Nov 9, 1990 memo and reword these issues accordingly,

Scott S

Dec 3 1400 hrs.

215-337-5232

W/134

SAMPLE RECORD OF ALLEGATION PANEL DECISIONS

SITE: MS-2

PANEL ATTENDEES:

ALLEGATION NO.: R1-90-A-206Chairman - WigginsDATE: 11/21/90 (Mtg. 1 2 3 4 5)Branch Chief - EC WenzingerPRIORITY: High Medium LowSection Chief (AOC) - J S StewartSAFETY SIGNIFICANCE: Yes No UnknownOthers - Gray, Briggs - DRSCONCURRENCE TO CLOSEOUT: DD BC SCCONFIDENTIALITY GRANTED: Yes No
(See Allegation Receipt Report)IS THEIR A DOL FINDING: Yes No N/A

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) Precedential Reference issue(1) - T/O to licensee2) Issue(2) Issue(3) - T/O to licensee

3) _____

4) _____

5) _____

NOTES: _____

ALLEGATION RECEIPT REPORT

Date/Time Received: 11/19/90 11:30am

Allegation No. R1-90-4-0206
(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 alieger? _____
- 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 _____

Alleger's Employer: NU

Position/Title: [REDACTED]

Facility: 45-2

Docket No.: 50-236

(Allegation Summary (brief description of concern(s): 1) Procedure Compliance
2) - 5 Compliance 3) Information for 40-10000
4) 20000

Number of Concerns: 3

Employee Receiving Allegation: P. H. Adams
(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 10/89)

Information in this record was deleted
in accordance with the Freedom of Information
Act, exemptions (b)(7)(C)
FOIA 91-162

11/18/90

ALLEGATION TOPIC: ~~NOT REFORMING RPS SURVEILLANCE IN~~
REQUIRED MODE OF OPERATION

DATE: NOVEMBER 4, 1990

TIME: 12:00 (NOON)

ALLEGOR: [REDACTED]

Issue 2.

INSPECTOR: PETER J. HABIGHORST

CONCERN: (1) The alleged stated that surveillance procedure SP-2401F (Monthly Hi-Power Functional Test) was partially completed in operational mode 3 and the remainder of the surveillance was completed in operational mode 2. The portion of the surveillance completed in mode 2 was verification of operability of the control element assembly withdraw prohibit. The alleged believes the procedural implementation was segmented based on wide range nuclear instrumentation problems.

(2) During a past technical specification review of alarm functions (i.e. LER 90-01), the alleged identified that alarm verification of control element assembly withdraw prohibit was not included in the wide range functional surveillance (SP2401B, 2401F, and TMLP functional). Procedure change for SP2401B occurred, however the changes to 2401F and TMLP functional were not included. The alleged previously informed the licensee about this aspect. He believes the changes to the procedure were not incorporated, and does not know the justification for not changing the procedures.

INSPECTOR ASSESSMENT AND ACTIONS

Technical Specification TABLE 4.3-1 requires high power RPS trip signal to be surveilled in modes 1, 2, 3*. * indicates that the reactor trip circuit breakers are closed. Additionally, above 15% of rated thermal power, recalibrate the ex-core detectors which monitor the -C1 by using the in-core detectors or restrict thermal power during subsequent operations to less than or equal to 90% level with the existing reactor coolant pump combination.

Inspector review of requirements conclude that the monthly functional test for high power should be completed in total in mode 3 with the reactor trip circuit breakers closed. The next surveillance should be within 30 days thereafter. During power ascension testing the daily channel checks may be suspended to allow for ascension testing sequence.

Facts Concerning performance of SP-2401F:

1. Shift Supervisor Authorization of Surveillance on 10/31/90.

2. Work completed on 11/1/90 with instrument conformance report (ICR) 90-109 written for channel 'B' RPS concerning floor setpoint out of specification low. The floor setpoint is a reference power setpoint compared to actual NI power or delta T power values. AWD M2-90-13167 written to perform corrective maintenance on floor setpoint value. In review of AWD M2-90-13167 channel 'B' was corrected and returned to service on 11/02/90. Channels 'A', 'C', and 'D' completed satisfactorily on 11/1/90.

3. Resident inspector inquired with IC supervisor when the control rod withdrawal prohibit annunciator verification in SP2401F was completed. According to the completed surveillance procedure it was completed on 11/1/90.

4. At 5:20 p.m. on 11/1 the facility was in Mode 4.

5. At 11:15 a.m. on 11/2 the facility was in Mode 5.

6. At 8:00 p.m. on 11/2 the facility was at an RCS temperature of 532 F. (At this point the reactor trip circuit breakers can be closed.)

7. At 6:40 p.m. on 11/4 the facility was in Mode 2.

8. SP-2401F requires annunciator verification of CWP in step 6.15.5 and 6.15.7.1 for reset and alarm. The inspector questioned the IC supervisor is verification that control element assembly movement is also part of this verification. The supervisor has an open question for this issue. The supervisor did mention that two other surveillances verify CWP alarms. The department is planning to develop an independent procedure for CWP alarm and function verification in the future to remove this aspect from the RPS surveillances, since CWP is a control function and has no relationship to RPS safety functions.

Followup Discussions with [REDACTED] at 2:30 p.m.

The allegor was in error on the surveillance procedure designator in that he believes it now was SP-2401J (Thermal Margin Low Pressure Functional Test).

TS Table 4.3-1 requires TMLP to be surveilled in operational modes 1,2.

The allegor also pointed out that no verification of CWP to the rod control system occurs except during the performance of SP-2401B wide range NI functional test. He believes it should be incorporated in TMLP, HI-POWER, LPD functional test, then annunciator verification.

INSPECTOR ASSESSMENT AND RECOMMENDATIONS

The followup discussions present a potential technical specification violation of preformance of functional testing in relationship to required operational modes. Additional inspection is needed to resolve this issue, thus this inspector recommends this item be followed up during routine inspection. Immediate operability concerns are not presented since verification of the functional test was completed, it becomes more an issue of the timeliness in conducting the surveillance.

ALLEGATION TOPIC: CONTROLS FOR THE MAIN TURBINE STATOR COOLING SYSTEM AND REOCCURRING PROBLEMS WITH THE STEAM JET AIR EJECTOR

DATE: NOVEMBER 13, 1990

TIME: 11:30 A.M.

INSPECTOR: PETER J. HABIGHORST

CONCERN: (1) The alleged believes that the switch alignment procedure for the main turbine generator stator cooling system was not completed properly, and the licensee was unresponsive to questions surrounding the control of the activity (2) Reoccurring problems with the steam jet air ejector performance

TOPIC 1 *Procedural Compliance*

On November 6, 1990 the I/C department completed procedure IC2435F. Procedure IC2435F starts the stator cooling system without the main turbine on line. The procedure sets flow control valves, and records data on pressures and flows within the system.

On November 11, the alleged was assigned a corrective maintenance work order to troubleshoot and identify the cause of low flow condition for the stator cooling pumps. At the time two pumps were operating to maintain the required flow of 32 gpm. Two pump operation is abnormal since one pump is in stand-by with a lower pressure setpoint to start.

[REDACTED] troubleshooting on November 11, indicated that the low control valve setpoint was not set as required by IC2435F. [REDACTED] notified his immediate supervisor of the troubleshooting results.

Currently, both stator cooling pumps are in operation.

The alleged believes (1) IC2435F implementation was not per procedure, and (2) operations department in the valve line-up of the stator cooling system on November 11, did not understand the basis for the setpoint for the flow control valve. A plant equipment operator questioned the correct position for the flow control valve, and no action was taken based on the question.

INSPECTOR ASSESSMENT and RECOMMENDATIONS

The stator cooling system for the main turbine is not safety related. Improper operation of the system could ultimately result in a main turbine trip/reactor trip. The inspector

is aware of the licensee formulation after discussion with the alleged of a troubleshooting plan to address this issue.

The aspect of procedural adherence to IC2435F is necessary. Recommend this issue be turned over to the licensee to address the aspects of procedural adherence, and actions to restore the stator cooling system to normal operation.

ISSUE 2

Prior to the refueling shutdown (September 15) the alleged noted flowrate problems with the steam jet air ejector. He recommended based on his troubleshooting efforts that the licensee upgrade the cooler. At the start-up of this outage the air ejector exhibited flow control problems due to flooding. IC supervision is aware of the problem.

The alleged's concern is that the licensee was aware of the problems of the air ejector and did no work during the refueling outage to address the problems.

INSPECTOR ASSESSMENT AND CONCLUSIONS

After the initial meeting with the alleged, he noted that Millstone 2 maintenance did order additional coolers, and have yet to receive them as of this write-up. This item has been documented in past resident inspection reports. At this time the inspector deems no allegation is presented, and there is assurance once the coolers are received the steam jet air ejector monitor can be upgraded. The licensee has planned a complete upgrade of the entire system in the near future.

RI-90-A-144