

**NORTHEAST UTILITIES**

THE CONNECTICUT LIGHT AND POWER COMPANY  
WESTERN MASSACHUSETTS ELECTRIC COMPANY  
NEW YORK WATER POWER COMPANY  
NORTHEAST UTILITIES SERVICE COMPANY  
NORTHEAST NUCLEAR ENERGY COMPANY

General Offices • Seiden Street, Berlin, Connecticut

P.O. BOX 270  
HARTFORD, CONNECTICUT 06141-0270  
(203) 665-5000

March 7, 1991

Docket No. 90-336  
RI-90-A-0225

Mr. Charles W. Hehl, Director  
Division of Reactor Projects  
U. S. Nuclear Regulatory Commission  
Region I  
475 Allendale Road  
King of Prussia, Pennsylvania 19406

Dear Mr. Hehl:

Millstone Nuclear Power Station, Unit No. 2  
RI-90-A-0225

We have completed our review of an allegation concerning activities at Millstone Unit No. 2 (RI-90-A-0225). As requested in your transmittal letter dated January 30, 1991, our response does not contain any personal privacy, proprietary, or safeguards information. The material contained in this response may be released to the public and placed in the NRC Public Document Room at your discretion. The NRC letter and our response have received controlled and limited distribution on a "need to know" basis during the preparation of this response.

Background

The NRC Senior Resident Inspector notified Northeast Nuclear Energy Company (NNECO) on December 17, 1990 that an allegation had been received regarding the disposition of NCR 290-063. NNECO was asked if there was any record of this allegation in the Nuclear Safety Concerns Program (NSCP). At that time there was none. On December 21, 1990, a copy of the allegation package was received by the NSCP via a drop box located at Millstone Station. The package contained information regarding a nuclear concern. No name or other identifying information was provided with the package which would allow NNECO to respond to the person with the concern. At that time, the NRC was contacted and the details of the allegation discussed. The NRC noted that they would be evaluating this allegation using their internal system.

Our response to this allegation is based on our review of the issues identified by the NRC and the information contained in the anonymous NSCP drop box package. As such, we believe our response fully addresses all the issues presented by these two sources.

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We also feel it is important to recognize that the material in question was purchased in 1978. At that time as well as now, the material fully meets the requirements of the original plant piping system design requirements. Industry standards and regulatory requirements continue to evolve with time. Our current procurement procedures are substantially different than they were in 1978 and reflect our responsiveness and commitment to current industry requirements.

#### NRC Concern

"Several concerns have been identified related to resolution of NCR 290-063.

1. Material purchased via Purchase Order Nos. 508480 and 508481 was not adequate for the intended use.
2. The purchase orders did not list a year or addenda of the ASME code.
3. The certified material test reports did not list a year or addenda of the ASME code.
4. QA audits could possibly have discovered the above noted discrepancies.
5. The justification for PDCR 2-125-79 (PA 79-155) was not adequately established.
6. 10CFR50, Appendix B, Criteria VIII, were not met related to the above purchase orders."

The NRC requested that NNECO review the named nonconformance report, determine the validity of the assertions, and discuss any actions that we have taken or will take to resolve any identified deficiencies. Provided below is our response to these issues.

#### Response

##### Item 1

Material purchased via Purchase Order Nos. 508480 and 508481 was not adequate for the intended use.

Response - The materials on the referenced purchase orders were supplied with Chemical, Physical, and Non-Destructive Test Reports. NNECO considers the material adequate for the Millstone Unit No. 2 systems it is installed in. The materials meet the requirements of the original design specifications for Millstone Unit No. 2. The design requirements for Millstone Unit No. 2 systems that this particular material is installed in do not invoke NCA 3800. The ANSI B31.7-1969 and ASME Section III-1971 codes do not contain the provisions for NCA 3800.

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Items 2 and 3

The purchase orders did not list a year or addenda of the ASME code. The certified material test reports did not list a year or addenda of the ASME code.

Response - Both of these statements are answered by the following response. Plant Engineering reviewed the certifications supplied by the materials' manufacturer. The CMTRs meet the requirements for the applicable Millstone Unit No. 2 piping systems. While the purchase order and CMTRs do not list any specific code year nor class of material, the actual chemical and physical test results supplied meet the requirements of the original design. This material was purchased for stock in 1978. At the time of the order, procurement practices followed ANSI material requirements and did not require referencing a year or addenda of the ASME code. This material was receipt-inspected against the requirement of the original piping system design and found to be in full conformance.

Item 4

QA audits could possibly have discovered the above noted discrepancies.

Response - This is a true statement. In fact, audits performed by the Assessment Services section have identified concerns in the purchasing process.

The QA audit program at Northeast Utilities is based upon a two-year cycle of the activities described in Appendix B to 10CFR50, which lists those activities that affect the safe operation of a nuclear plant. Those activities include all aspects of operating and maintaining the plant, including purchasing. Based upon a selective sampling process, documents are chosen for review in order to give a comprehensive assessment of the activity. In the case of purchasing, literally thousands of items exist in the overall sample, and only a select few are used in the audit sample base. Problems noted during this review are then relayed to station management for their resolution and corrective action.

The QA audit program is not intended to correct every deficiency that exists but rather to identify problems and trends, in order to prevent them from continuing. Our assessments continue to show that an adequate material traceability program is in place at Northeast Utilities.

Item 5

The justification for PDCR 2-125-79 (PA 79-155) was not adequately established.

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Response - PDCR 2-125-79 contained a nonconformance report (NCR 290-063) with statements made by an engineer assigned to disposition the NCR. These statements have apparently been misinterpreted. One statement says, "it is not possible to determine exactly which line the flanges could be installed in." The intent of this statement is: without an exhaustive review of records, it is not possible to determine all the piping lines the flanges were installed in. A review of the material issue forms contained in Nuclear Records indicated 30 flanges were issued to the Charging Pump Replacement Project (PDCR 2-125-79). Six of these flanges were returned to the warehouse at a later date. The charging pump has 15 different piping line designations that could have a flange installed in them from one of these purchase orders. Rather than attempt to determine which line had a specific flange installed, all piping lines were reviewed and evaluated as if a flange had been installed. This evaluation determined that a flange from these purchase orders met the original design requirements for the system.

The NCR was generated as a result of a review conducted to satisfy an NRC inspection open item. To satisfy the concern of this item, Northeast Utilities presented the NRC with its position on NCA 3800. The NRC has reviewed and accepted this position. The basis of the position is contained in Nuclear Engineering & Operations Procedure 7.05.

#### Item 6

10CFR50, Appendix B, Criteria VIII, were not met related to the above purchase orders.

Response - Criteria VIII addresses the identification and control of material. The details of this requirement stress the need to be able to identify material by heat number, part number, serial number, or other appropriate means.

A review of Material Receipt Inspection Reports 2-173-77 and 1-175-77 indicate that each of the flanges received had specific heat numbers associated with them. These were recorded by the receipt inspector in the "Remarks" column of the report. Additionally, supporting documentation in the report, i.e., Test Reports and Certifications, all contain the corresponding heat number. All items were green-tagged as indicated by the receiving report.

Per our review, it appears that material traceability was maintained through the heat number, both from the part to the records and vice-versa.

#### Summary

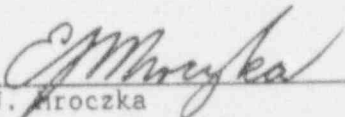
All of the above assertions are invalid. The material supplied with these purchase orders is acceptable for the systems it is installed in at Millstone Unit No. 2. No further action is planned on this subject.

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After our review and evaluation, we find that these issues do not present any indication of a compromise of nuclear safety. We appreciate the opportunity to respond and explain the basis for our actions. Please contact members of my staff if there are any further questions on this matter.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

  
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E. J. Mroczka  
Senior Vice President

cc: W. J. Raymond, Senior Resident Inspector, Millstone Unit Nos. 1, 2,  
and 3  
E. C. Wenzinger, Chief, Projects Branch No. 4, Division of Reactor  
Projects