

NORTHEAST UTILITIES



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

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July 17, 1985

Docket No. 50-423
A05005

Mr. R. W. Starostecki, Director
Division of Reactor Projects
Region I
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, Pennsylvania 19406

Reference: (1) E. C. Wenzinger letter to J. F. Opeka, "Resident Inspection
50-423/85-16," dated June 19, 1985.

Dear Mr. Starostecki:

Millstone Nuclear Power Station, Unit No. 3
Response to I&E Inspection No. 50-423/85-16

Pursuant to the provisions of 10 CFR 2.201, this report is submitted in reply to Reference (1) which informed Northeast Nuclear Energy Company (NNECO) of an apparent Severity Level IV Violation. This was the result of items of noncompliance noted during an inspection conducted April 23 through May 27, 1985 by your office at the Millstone Unit No. 3 site.

VIOLATION

10 CFR 50, Appendix B, Criterion V and the Northeast Utilities Quality Assurance Topical Report, Revision 6, require that activities affecting quality be prescribed by appropriate procedures.

Contrary to the above, on April 3, 1985, an activity affecting quality was not prescribed by appropriate procedures in that maintenance activities, conducted as authorized, resulted in flooding in a part of the Control Building.

This was determined to be a Severity Level IV Violation.

RESPONSE

Extent of Condition

NNECO performed an investigation of the Control Building flooding event and made the following determinations:

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- o The tagging for the Automated Work Order (AWO) controlling corrective maintenance activity on Service Water System valve 3-SWP-V744 provided adequate isolation.
- o A reverification of tag positions as per the tag-out clearance number indicated that the tag-out valves were in the as-tagged configuration.
- o Residual water remained within the tagged and isolated Service Water System piping. The operator who performed the tag-out clearance did not vent or drain the isolated piping.

Cause

The root cause of the Control Building flooding event was personnel error. The operator failed to vent and drain the piping within the tagged and isolated portion of the Service Water System prior to release of the AWO by the Supervising Control Operator to the Job Supervisor. Subsequently, the Job Supervisor failed to verify that the tagged and isolated piping had been drained. The Administrative Control Procedures (ACP) for Station Tagging and Work Orders have adequate controls to ensure that proper and safe work conditions are established prior to commencing work. Had either the Supervising Control Operator or the Job Supervisor followed the procedural controls, this event would not have occurred.

Corrective and Preventive Actions

All Shift Supervisors, Supervising Control Operators and Maintenance Department supervisory personnel have been briefed on the Control Building flooding event; the consequences of this event; and the requirement to follow administrative procedural controls. Additionally, the Unit Superintendent has issued a memorandum emphasizing Operations Department responsibility for establishing proper work conditions during tagging clearance and the Job Supervisor's responsibility to verify the work conditions established prior to starting work.

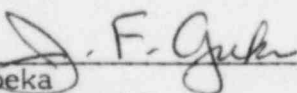
ADDITIONAL DISCUSSION

In Reference (1), you also requested that we also address the potential need to revise generic maintenance procedures to limit the time interval between verification of maintenance prerequisites and the commencement of work. Based on the above determinations, no procedural revisions are deemed necessary. The event resulted from work conditions not being properly established and not verified prior to work commencing.

We consider this to be our final report for this violation. We trust that the above information satisfactorily responds to your concerns.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



J. F. Opeka
Senior Vice President