

Northeast
Utilities System

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SEP 16 1996

Docket No. 50-423
B15884

Re:10CFR2.201

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Millstone Nuclear Power Station, Unit No. 3
Reply to a Notice of Violation
Inspection 50-245/96-05; 50-336/96-05; 50-423/96-05

In a letter dated August 15, 1996,¹ the NRC transmitted the results of a safety inspection conducted at Millstone Station on May 7, 1996 through June 26, 1996. The inspection concluded that certain of our activities appeared to be in violation of NRC requirements. Specifically, Millstone Unit No 3 was cited for one violation for failure to audit Technical Specification (TS) Section 6.8.4.e, "Accident Monitoring Instrumentation", within a five year period. This should have been performed during Audit A223063, dated October 1994.

On behalf of Millstone Unit No. 3, Attachment 1 of this submittal provides Northeast Nuclear Energy Company's (NNECO's) reply to the violation, pursuant to the provisions of 10CFR2.201.

The following summarizes NNECO's commitments made within this letter:

B15884-01: Technical Specification section 6.8.4 ([a] through [e]) has been added to the scope of the next scheduled Technical Specification Audit (A21073) to ensure that this item is properly evaluated. The audit is scheduled to start on September 30, 1996 and will be completed on October 31, 1996.

B15884-02: An evaluation of the audits of the Millstone Unit No. 3 Technical Specifications since 1991 will be conducted to determine if all required sections have been adequately audited. Audits will be performed of TS sections as required. This review and follow-up corrective actions will be completed by October 31 for Millstone Unit No. 3. A similar review of the audit program will be completed for Millstone Unit Nos. 1 and 2, and Connecticut Yankee. The reviews for Unit Nos. 1 and 2 will be

¹ NRC letter dated August 15, 1996, "NRC Combined Inspection 50-245/96-05; 50-336/96-05; 50-423/96-05 and Notice of Violation," W. D. Lanning to T. C. Feigenbaum,.

completed prior to December 31, 1996. The Connecticut Yankee review will be completed prior to re-start from their current outage.

B15884-03: The process for the independent review of "The TS Audit Matrix" will be revised to require a review of what "has been done" versus "what has been scheduled". In the future, personnel will enter information into the tracking database after the audit has been completed and after the independent reviewer has checked "what has been done". Procedure QAS 2.13 will be revised by October 31, 1996.

B15884-04: A root cause evaluation will be performed to address this violation, and related deficiencies identified in the audit program. This root cause evaluation will be completed by October 31, 1996.

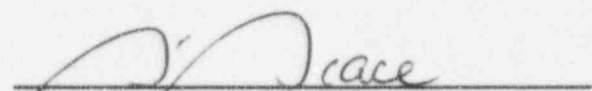
Should you have any questions regarding this, please contact Mr. William J. Temple at (860) 437-5904.

Very truly yours

NORTHEAST NUCLEAR ENERGY COMPANY

FOR: T. C. Feigenbaum
Executive Vice President and
Chief Nuclear Officer

BY:


S. E. Scafe
Vice President - Nuclear

cc: H. J. Miller, Region 1 Administrator
V.L. Rooney, NRC Project Manager, Millstone Unit No. 3
W. D. Lanning, Director Millstone Assessment Team
T. A. Easlick, Senior Resident Inspector, Millstone Unit No. 1
P. D. Swetland, Senior Resident Inspector, Millstone Unit No. 2
A. C. Cerne, Senior Resident Inspector, Millstone Unit No. 3
W. J. Raymond, Senior Resident Inspector, Connecticut Yankee

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B15884

Attachment 1

Millstone Nuclear Power Station, Unit No. 3

Reply to a Notice of Violation

Inspection 50-245/96-05; 50-336/96-05; 50-423/96-05

September 1996

Restatement of Violation

Unit No. 3 Technical Specification (TS) 6.5.3.7, requires, in part, that Nuclear Safety Assessment Board audits shall be performed at least once per 24 months in accordance with Nuclear Group Procedures (NGP) and shall encompass the conformance of unit operation to provisions contained within the technical specifications and applicable license conditions. Procedure NGP 2.02, "Nuclear Safety Assessment Board", requires that over a five year period, all items contained within TS sections will be audited. Contrary to the above, TS section 6.8.4.e, "Accident Monitoring Instrumentation," was not audited within a five year period.

This is a Severity Level IV Violation (Supplement I)

Reason for the Violation

NNECO agrees with this violation which was identified by the NRC in that section 6.8.4.e of the Millstone Unit No. 3 TS was not audited during the past five years. In addition, our investigation of the violation identified that none of the sections of 6.8.4. ([a] through [e]) were audited during the past five years.

The investigation determined that the following causes contributed to this violation:

1. Ineffective Communication

The Audit Team Leader (ATL) did not clearly communicate that the Technical Specialist was responsible for evaluating all sections of TS 6.8.4. The investigation determined that the ATL was properly trained and understood the requirements of the audit process (QAS procedure 2.13, "Planning, Scheduling, Performance, Reporting, and Follow-up of Assessment Services Audits"), but failed to advise the Technical Specialist of his responsibility.

2. Inadequate Review of the Audit Package/Inattention to Detail

The Audit Team Leader did not ensure completion of the audit checklist performed by the Technical Specialist. The ATL is responsible for ensuring that all portions of the checklist are completed and that justification is provided for those portions of the checklist which were not evaluated. The checklist item for TS 6.8.4 was not completed and no justification was provided for the lack of objective evidence as required by the audit procedure. The investigation verified that the ATL was knowledgeable of his responsibilities.

3. Ineffective Audit Tracking Process

The TS Audit Tracking process is used to schedule required areas for TS audits. TS sections required to be audited are entered in a tracking program with the audit number and audit schedule start date prior to the actual start of the audit. This information is not updated with actual audit information. The output from

the program, "The TS Audit Matrix," does not provide the actual start date of the audit or what was actually audited.

4. Inadequate Corrective Action From Unresolved Item (URI 423/94-01-05, Adequacy of Technical Specification Audits - Unit No. 3)

To prevent recurrence of missing TS sections required to be audited, NU committed to having a technical reviewer independently review "The TS Audit Matrix" to ensure TS sections are audited on the required frequency. This review verifies that all TS sections are being appropriately scheduled for audit. However, as discussed above this process does not provide assurance that the TS sections are actually audited. The investigation determined this corrective action to be ineffective in preventing recurrence of the problem since it did not properly address the causal factors associated with the violation (i.e., problems with implementation of the TS Audit Matrix and personnel error)

Corrective Steps Taken and Results Achieved:

- Technical Specification section 6.8.4 has been added to the schedule of the next Technical Specification Audit (A21073) to ensure that this item is properly evaluated. The audit is scheduled to start on September 30, 1996 and will be completed by October 31, 1996.
- The Audit Team Leader was counseled on the importance of effective communication of audit assignments to the Technical Specialist during the performance of an audit. In addition, the lessons learned from this event were shared with the audit group regarding the audit procedure, management expectations, their responsibilities and authority, and the importance of adhering to procedural and regulatory commitments.

Corrective Steps That Will Be Taken to Avoid Further Violations:

- An evaluation of the audits of the Millstone Unit No. 3 Technical Specifications since 1991 will be conducted to determine if all required sections have been adequately audited. Audits will be performed of TS sections as required. This review and audit will be completed prior to the re-start of Millstone Unit No. 3. A similar review of the audit program will be completed for Millstone Unit Nos. 1 and 2 and Connecticut Yankee. The reviews for Units 1 and 2 will be completed prior to December 31, 1996. The Connecticut Yankee review will be completed prior to re-start from their current outage.
- The process for the independent review of "The TS Audit Matrix" will be revised to require a review of what "has been done" versus "what has been scheduled." In the future, personnel will enter information into the tracking database after the audit has

been completed and after the independent reviewer has checked "what has been done". Procedure QAS 2.13 will be revised by October 31, 1996.

- Initiatives are underway to improve Millstone's corrective action program which will result in improved root cause determinations and corrective actions to prevent recurrence of the issue. Of specific note, root cause evaluations are being performed for notices of violation. A root cause evaluation was added to the requirements for follow-up of this violation. The evaluation will address the violation and related deficiencies identified in the audit program. This will be completed by October 31, 1996.
- Northeast Utilities is performing an evaluation of the current method of performing Technical Specification audits to determine the value of a performance based auditing approach versus the current line item compliance based approach. It is expected that this evaluation will be completed by December 31, 1996.

Date When Full Compliance Will Be Achieved:

Millstone Unit No. 3 will be in full compliance by October 31, 1996 after TS section 6.8.4 is audited during the next Technical Specification Audit.