

October 11, 1996

Mr. Ted C. Feigenbaum
Executive Vice President - Nuclear
Northeast Nuclear Energy Company
c/o Mr. Terry L. Harpster
P. O. Box 128
Waterford, Connecticut 06385

SUBJECT: UPDATE LETTER TO YOUR NOTICE OF VIOLATION REPLY DATED
FEBRUARY 15, 1996

Dear Mr. Feigenbaum:

This refers to your letter dated June 28, 1996, which updates your February 15, 1996 response letter to a Notice of Violation in NRC Inspection Report 95-38.

Thank you for informing us of your action plan for standardization of the surveillance program for Millstone Units 1, 2, and 3. This plan will be examined during a future inspection of your licensed program.

Your cooperation with us is appreciated.

Sincerely,

Original Signed By:

Jacque Durr, Chief
Reactor Projects Branch No. 6
Division of Reactor Projects

Docket Nos. 50-245; 50-336; 50-423

cc w/o cy of Licensee's Response Letter:

P. Richardson, Nuclear Unit 2 Director
M. Brothers, Nuclear Unit 3 Director
L. Cuoco, Esquire
Senior Vice President, Nuclear Safety and Oversight
W. Riffer, Nuclear Unit 1 Director
Vice President, Reengineering
Vice President, Nuclear Technical Services
F. Rothen, Vice President, Maintenance Services

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11/01

Mr. Ted C. Feigenbaum

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cc w/cy of Licensee's Response Letter:

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Utilities System

Millstone Offices • Rope Ferry Rd., Waterford, CT

P.O. Box 128
Waterford, CT 06385-0128
(203) 447-1791

June 28, 1996
Docket Nos. 50-245
50-336
50-423
B15770

Re: 10CFR2.201

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

Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3
Standardized Station Surveillance Program Plan

In a letter dated February 15, 1996,⁽¹⁾ Northeast Nuclear Energy Company (NNECO), on behalf of Millstone Unit Nos. 1, 2, and 3, submitted a reply to a Notice of Violation,⁽²⁾ pursuant to the provisions of 10CFR2.201. Specifically, corrective actions were identified to prevent recurrent instances of missed technical specification surveillances at Millstone Unit Nos. 1, 2, and 3.

In our reply to Notice of Violation 95-38, we committed to providing the Staff with an action plan for standardization of the station surveillance program by June 30, 1996. The commitment is stated as follows:

B15529-01 Provide the Staff with an action plan for
standardization of the station surveillance
program by 6/30/96.

⁽¹⁾ F. R. Dacimo letter to U.S. Nuclear Regulatory Commission, "Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3, Reply to a Notice of Violation, Inspection 50-245/95-38; 50-336/95-38; 50-423/95-38," dated February 15, 1996.

⁽²⁾ R. W. Cooper letter to R. E. Busch, "NRC Combined Inspection 50-245/95-38; 50-336/95-38; 50-423/95-38, and Notice of Violation dated December 18, 1995.

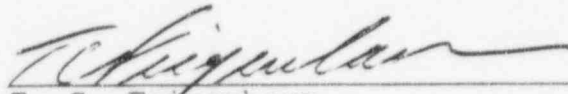
On behalf of Millstone Unit Nos. 1, 2, and 3, Attachment 1 of this submittal provides the Standardized Station Surveillance Program Plan in reply to commitment number B15529-01.

In response to your request in Inspection Report 96-04, dated June 6, 1996,⁽³⁾ NNECO will send the staff a follow-up response to Notice of Violation 95-38 by August 1, 1996. The response will include an update of our corrective actions taken and any changes to our commitments.

Should you have any questions regarding this submittal, please contact Mr. R. T. Laudenat at (860) 444-5248.

Very truly yours

NORTHEAST NUCLEAR ENERGY COMPANY



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

cc: T. T. Martin, Regional I Administrator
J. W. Andersen, NRC Project Manager, Millstone Unit No. 1
D. G. McDonald Jr., NRC Project Manager, Millstone Unit
No. 2
V. L. Rooney, NRC Project Manager, Millstone Unit No. 3
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. D. Lanning, Director, Millstone Oversight Team

⁽³⁾ W. D. Lanning letter to T. C. Feigenbaum, "NRC Combined Inspection Report 50-245/96-04; 50-336/96-04; 50-423/96-04 and Notice of Violation," dated June 6, 1996.

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Attachment 1

Millstone Nuclear Power Station, Unit Nos. 1, 2 and 3
Standardized Station Surveillance Program Plan

June 1996

MILLSTONE UNIT NOS. 1, 2, AND 3
STANDARDIZED STATION SURVEILLANCE PROGRAM PLAN

Background

As a result of the Notice of Violation (NOV) 95-38, a root cause evaluation was conducted in the area of ineffective corrective actions and missed Technical Specification Surveillances. This evaluation determined the cause of the problem, noted certain corrective actions, and made recommendations on how Millstone Station could more effectively manage the scheduling and tracking of technical specification surveillances, and implement more effective corrective actions. Upon completion of the root cause evaluation on February 15, 1996, a reply to the NOV was submitted which made certain commitments. Specifically, commitment B15529-01 addresses the plan for standardization of the Millstone Station surveillance program and is being addressed by this submittal. The commitment is stated as follows:

B15529-01 Provide the Staff with an action plan for standardization of the station surveillance program by 6/30/96.

To develop the plan, a review of LERs at the 5 Northeast Utilities (NU) Units since 1993 involving missed or inadequate surveillance tests was conducted. The review was completed by members of the Nuclear Operational Standards staff in lieu of a "re-engineering problem solving team" as stated in the original response to the NOV. The results of that review as well as recommendations from the ISEG report dated October 27, 1995 and the root cause analysis for this violation were considered in developing this plan.

Additionally, procedure WC-9, "Station Surveillance Program," was effective at Millstone Unit 3 on March 31, 1996 and at Millstone Units 1 & 2 on April 30, 1996. This procedure establishes the requirements of the program that will be followed at Millstone Station to fulfill the NU Quality Assurance Program Topical Report, Section 11 requirements for periodic surveillance tests. This procedure applies to surveillance tests required by Technical Specifications which have a required performance frequency of greater than 24 hours. Conditional surveillance tests and those with a frequency of less than 24 hours are controlled by procedures and other mechanisms (e.g., round sheets, timers, logbooks, etc.).

Standardized Station Surveillance Program Plan Details

The following is a summary of the plan which has been developed for the standardization of the station surveillance program at Millstone Unit Nos. 1, 2, and 3:

The Work Planning and Outage Management (WP & OM) Departments at Millstone Unit Nos. 1, 2, and 3, will be using the Production Maintenance Management System (PMMS) as the primary scheduling tool and the responsible performing departments will be using Microsoft ACCESS as the independent scheduling tool. The WP & OM Managers will be responsible for implementation of the plan for their respective units.

Millstone Unit 3 WP & OM Department currently uses PMMS as their primary scheduling tool. The performing departments use Microsoft Access as the independent backup scheduling tool. Millstone Units 1 and 2, will shortly be using PMMS and ACCESS. The transition is underway at Units 1 and 2, and will be fully implemented by September 1, 1996.

The PMMS is a computerized work order management database that is already in use at Millstone Station. PMMS is capable of meeting the requirements for scheduling and tracking surveillance test completion. The major benefit of using this in-house program is that, once all data including frequency of performance is entered, the program will prompt the user to generate new work orders for the next performance of a given test each time a current work order is closed.

Microsoft ACCESS is an independent backup database which is currently in use at Millstone Station and is available on the corporate network. A process using this database has been developed at Millstone Station to independently verify surveillance scheduling and tracking. This process can be used in concert with PMMS. The ACCESS database has the capability of flagging surveillances which are past their originally scheduled date for performance. During the logon process, the database automatically brings up a screen which lists tests that are past their originally scheduled date for performance. It also has the capability of producing various reports including listings of mode dependent tests.

Conclusions

The transition to the PMMS and Microsoft ACCESS scheduling tools is underway. The process of accomplishing the transition from existing systems to those noted above is labor intensive. Due to this and the current level of effort at the site, full implementation is scheduled by September 1, 1996. At that time, all three Millstone Units will be using the same primary and independent backup tools for scheduling surveillance tests. In the interim, WC-9, "Station Surveillance Program," will provide continuity until the new plan is fully implemented.