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July 11, 1985

Docket No. 50-423
B11604

J. M. Taylor, Director
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Reference: (1) James M. Taylor to J. F. Opeka, Construction Appraisal
Team Inspection No. 50-423/85-04, May 21, 1985.

Gentlemen:

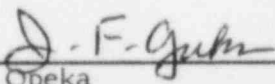
Millstone Nuclear Power Station Unit No. 3
Response to Construction Appraisal Team Inspection

Northeast Nuclear Energy Company (NNECO) has completed its preliminary review of the Construction Appraisal Team (CAT) Inspection Report provided in Reference 1.

Although no specific response was required by Reference (1) we are providing the NRC our planned course of action for each of the items identified in the overall conclusions of Appendix A to the CAT Inspection Report. These planned actions are summarized in Attachment I.

Other more specific actions will be presented to the Millstone Unit No. 3 Resident Inspector as they are developed. NNECO is working to resolve all identified CAT concerns as soon as possible.

Very truly yours,



J. F. Opeka
Senior Vice President

Attachment

cc: Dr. Thomas E. Murley
Regional Administrator
Region I
U. S. Nuclear Regulatory Commission
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ATTACHMENT I

CAT Identified Weakness

1. Control of work on systems and components subsequent to turnover from Construction to the testing organization requires improvement. This is indicated by the deficiencies found in the control of wiring changes, and preventive maintenance deficiencies found in the mechanical and electrical areas subsequent to turnover to the startup organization. Additional attention is needed to ensure that missed maintenance activities are evaluated as to the potential damaging effects on the components. These findings indicate the need to re-evaluate the controls applied to activities subsequent to system turnover from Construction to Operations.

NNECO Action

1. The CAT was concerned with "Control of Work on Systems and Components Subsequent to Turnover". Two specific areas were addressed, control of wiring changes and preventive maintenance (PM) deficiencies.

A complete review of the wiring change control process is being accomplished. Specifically, methods are being examined to assure termination tickets are generated for all required wiring changes or for post turnover wiring changes, document control techniques address CAT concerns. Corrective actions will be initiated as deemed necessary.

The PM deficiencies identified by the CAT relate to a lack of formal procedural evaluation of the storage PM program for carry-over of storage type PM's for equipment which would not be start up tested within a short period of time after turnover. It has been NNECO's program to rely on initial component testing to demonstrate full functionality and acceptability of equipment. This testing would ensure a sound basis to begin the operational PM of each piece of equipment. Because of the large number of system turnovers and delays in the commencement of testing, the original program objectives have not been met in a few cases, some affecting Category II equipment.

During the course of the audit, NNECO proposed and implemented several changes to the PM program. The changes were discussed with the NRC and were accepted as adequate to resolve their concerns. Reference I summarized the proposed changes as follows:

"In response to our concerns, NNECO proposed changes to Maintenance Procedure 3704A, 'Preventive Maintenance', which would include formalized review and implementation guidelines regarding storage preventive maintenance activities, and an evaluation of the effects of missed maintenance activities over two or more periods. Maintenance Procedure 3719MB, 'Mechanical Equipment General Inspections' was to be written also, to document inspection criteria for mechanical equipment. In addition, equipment which has already been turned over to NNECO will be reviewed for inclusion into the Preventive Maintenance Program in accordance with the revised procedures. These proposed changes, when implemented, will adequately resolve the concerns of the NRC CAT".

CAT Identified Weakness

2. A number of hardware deficiencies were identified which appear to have been caused by a lack of effective communications between the design, construction, and inspection groups. Design parameters were in some cases not properly translated into inspection criteria. For example, pipe supports had been installed and accepted by QC with dimensional tolerances not in accordance with the design calculations. In addition, a lack of thoroughness on the part of the design organization was identified. Examples identified include: omission of the Residual Heat Removal System from the pipe support "lugs-in-contact" review; wiring termination changes made to drawings without the issuance of the necessary documents to control the actual construction work; inadequate technical justification for the acceptance of unmarked fasteners in certain motor control centers; and conflicting details for a structural steel end connection.

NNECO Action

2. NNECO has retained an independent consultant to perform a review to determine the extent of the communication concerns expressed by the CAT. Activities were initiated in early April and a final report should be available in the August time frame. Results of this review will be made available to the NRC with corrective actions, as necessary, being initiated immediately.

CAT Identified Weakness

3. A significant number of document control errors were found at both the Quality Control and Construction drawing stations. This is of particular concern in that the deficiencies in document control had been identified previously. In fact, a 100% audit of all drawing stations had been performed just prior to the start of the NRC CAT inspection. The corrective actions taken had not been effective, however.

NNECO Action

3. NNECO has initiated short and long term corrective actions to address the document control errors found by the CAT. Drawing Record Cards and the accuracy of information at the drawing stations were the predominant deficiencies identified.

NNECO has assigned drawing station managers on a full-time basis. Their responsibility is to ensure information at the station is current and consistent. Additionally, NNECO has procured an interactive, on line computer data base to provide immediate status of drawing station documents. The computer data base is currently scheduled to be installed and operational in August 1985.

CAT Identified Weakness

4. A number of findings indicate that the effectiveness of Quality Control inspection activities needs to be improved. These findings include the area of piping as-built drawings, mechanical equipment foundation anchorage, structural steel connections (welded and bolted), piping support miscellaneous hardware (lock nut tightness, cotter pin installations, etc.). Also, vendor deficiencies were identified in the areas of tank and heat exchanger fillet welds (pressure boundary and supports), performance of load indicating washers, and marking of fasteners.

NNECO Action

4. The CAT expressed a concern that a number of findings indicate that the effectiveness of the Quality Control inspection activities could be improved. The Millstone 3 Project will be evaluating each of the CAT concerns identified in the report. Measures will be taken to correct deficiencies identified in this evaluation.

It should be noted that the vendor deficiencies identified in the area of tank and heat exchanger fillet welds are currently the subject of I&E Information Notice 25-33. Additionally, other examples of findings given have been cited in other CAT Reports (e.g., pipe support miscellaneous hardware, marking of fasteners, performance of load indicating washers). It is difficult to relate these generic industry issues to a weakness specific to Millstone 3.

Although it is recognized that the effectiveness of Quality Control inspection activities can always be improved it is the Millstone 3 Project's position that the examples cited are not indicative of a program weakness.

The Millstone 3 Project has strived to take an aggressive attitude towards quality. This can be demonstrated by the high construction completion versus QC accepted ratios which continue to be achieved. Additionally, the Millstone 3 Project has developed and used a comprehensive commodity monitoring management tool (MEPPS) to plan, control, administer and monitor Construction and QC activities. The status of QC activities is also evaluated in the Project's weekly meeting. This has allowed the Project to maintain a stable, levelized inspector work force. This provides many advantages in the areas of inspector training and inspector qualification.