From: PAUL M. BLANCH <PMBLANCH@ix.netcom.com>
To: JZ <JAZWOL@aol.com>
Date: 9/13/96 5:49pm
Subject: ALLEGATIONS

John:
I would appreciate it if you would keep me informed as to the status of these allegations.

September 11, 1996

Nuclear Regulatory Commission
Attention: Mr. David Vito - Sr. Allegations Coordinator
Region 1
475 Allendale Road
King of Prussia, Pennsylvania 19406-1415

RE: Safety Concerns At Millstone Power Station

Mr. Vito,

This letter is in response to your letter of August 29, 1996 regarding possible safety concerns with various systems at Millstone Power Station in Waterford, Connecticut. While these concerns are my own, they may provide the Nuclear Regulatory Commission with a another example of Northeast Utilities' method of resolving concerns.

In April 1993 I joined Northeast Nuclear Energy Corporation as an electrical engineer in the electrical design department of Unit 2 at the Millstone Power Station in Waterford, CT. My immediate supervisor was Mr. Jeffrey Regan who was the individual directly responsible for employing me. Our Manager at that time was a Mr. Jeffrey Bibby. Mr. Bibby was responsible for both Mechanical and Electrical Design groups, and support departments which included drawing preparation/revision group.

During the 2 year 9 month period of my employment the following changes in management occurred in the design engineering department of Unit 2

Mr. Bibby was replaced by Mr. Michael Ahern as manager

Mr. Ahern was replaced by Mr. Steven Sudigala as Manager

Mr. Jeff Regan was discharged from NNECO

These personnel changes merely reflect the ever shifting management style at Northeast Utilities. Perhaps it is reflective of the ever shifting criteria used for evaluation. In addition, the Nuclear Group Policies went through at least 3 revisions in my tenure at NU. While this in itself may not be significant, it again reflects NU's inability to devise a plan, and thoroughly implement it.

I must reiterate one more time the attitude of NU's management in short

circuiting established procedures. With regards to the layoffs performed in January 1996, under the guise of cost reduction, they serve merely again as an example of Northeast Utilities circumventing their own established procedures.

Let us assume for the moment that all 100 people laid off in January 1996 were indeed employees who for one reason or another should have been terminated permanently. The are sufficient procedures in place at Northeast Utilities that would allow for this. They did however require formal procedural steps to be performed in accordance with the MERCK Manual of discipline. These procedures include verbal warning, written warning, time off, and discharge.

Northeast Utilities apparently chose NOT to pursue this option due to the time involved and instead came up with the elaborate device known as the "workforce reduction matrix" which theoretically solved their "problem" in a relatively short period of time, by "laying off" versus "terminating" undesirable employees. If the NRC allows this device to stand, then it merely paves the way for NU to devise ANY scheme to circumvent established procedures.

With regards to the specific concerns raised in my letter of June 26th of this year. they will be discussed individually in the following paragraphs.

A). FAST TRANSFER SCHEME

An EDSFI (93-81-01/02) from the NRC in March 1993 indicated a need to provide proof that the Fast Transfer Scheme, as currently designed, would complete its sequence of events in a time frame of 6 cycles as defined by FSAR The specific paragraph of the FSAR is unknown at this time due to a majority of notes being unavailable to me due to the method by which we were ushered out in January, 1996..

This EDSFI required the preparation of a test procedure which is the charter of Technical Support. An EWR was prepared by Technical Support which asked Design engineering to provide assistance in preparing a procedure that would verify the response time of the Fast Transfer Scheme. The procedure was fashioned after one that is utilized on Unit 1.

For background purposes this was the FIRST time since beginning operation of UNIT 2 that a formal procedure was being developed to test the fast transfer scheme, which is considered an integral safety system.

To summarize details, a timeline was prepared and is attached. Over the next 18 months, numerous versions of station test procedure T-94-061 were prepared, and reviewed by ALL concerned departments.

It was determined by myself and my direct supervisor that this procedure should be performed during UNIT 2 shutdown prior to start-up to minimize any possible adverse events. During the review process, which included Generation Test, Operations, Technical Support, System Engineer, and others, two facts determined the sequence of events that the LPSI pump would trip during the test had to be known.

(a) That the LPSI pump was being used for shutdown cooling

(b) That the LPSI pump was affected by the Fast Transfer Scheme

A list of personnel involved and whether they knew of both conditions is available.

The test was performed at midnight on 6/22/95 with the resultant loss of the LPSI pump. This event was thoroughly documented by ACR 002470 (attached copy). At that time, it was determined that this event was NON-reportable.

The fast transfer scheme was proven to be questionable in fulfilling the criteria of FSAR to be able to transfer from Normal Station Service to Reserve Station service in a consistent time frame of less than 6 cycles, basically due to the following logic.

Both the NSST and RSST breakers receive simultaneous signals during the initiation of a Fast Transfer. The NSST to "open" and the RSST to "close" There is a synch check relay involved which would assures the RSST from closing in on a phase angle of greater than 30 degrees. However the flaw in the fast transfer scheme is while all criteria may be met, and the NSST and RSST both receive appropriate signals, there is the possibility of for any number of reasons, mechanical OR electrical, (see attached logic diagram) the RSST could possibly be prevented from closing and thus create a loss of Normal Power (LNP). Given the past performance of the back up safety system (ESAS) (a documented failure of 2 out of 3 tests during startup of Unit 2 in 1995) this could result in a Station Blackout, thus leaving the Reactor coolant Pumps without suitable power.

B). REFUEL/SKIMMER POOL TANK/PUMP - Unit 2

The refuel/skimmer pool tank and pump are inappropriately sized for each other. The pump is of such a high velocity that it creates a vortexing effect when draining down the tank. with this vortexing effect, the pump "chatters" considerably and based on known pump data, is prone to damage. This condition was merely attempted to be correct by Northeast Utilities by raising the lower level setpoint, rather than resize the pump.

C). RCP MOTOR LEVEL SWITCHES - UNIT 2

During my employment with Northeast Utilities, the Reactor Cooling Pumps utilized a Foxboro pressure transmitter to determine the upper and lower oil level indication which was directly read in the control room.

Based on the experience of numerous "nuisance alarms" in the control room, I was initially given the task to revise this configuration. The Foxboro transmitters required frequent calibration which in turn created large amount of radiation exposure.

Utilizing prior submarine experience, I implemented a GEMS/DELEVAL sensor which provided a far more accurate reading and lowered the amount of

radiation exposure level due to the fact that in the event of a level failure, the only solution was complete replacement.

This situation requires NO investigation by the NRC. It is merely used as a point of illustration and question as to why after this condition existing for approximately 12 years prior, and my resolution of the this severe problem, I was label as "Needs Improvement" in initiative and innovation and summarily discharged under the guise of a cost reduction.

By copy of this letter Mr. Vito, I am requesting a formal investigation by the NRC into the Fast Transfer Scheme utilized at Unit 2. This investigation at a minimum should include a review of ACR 2470, the parties involved in the review, and the personnel preparing the root cause investigation of the event. Also a investigation is requested by copy of this letter concerning the operation of the Refuel Pool, and Skimmer Pool tank/pump combination. I believe the pump designations are P21, and P96

In addition, I am requesting from the NRC again, the specific name of the individual responsible for the investigation of the layoff of 100 personnel at the Millstone Power Station under the guise of a cost reduction using the now infamous "workforce reduction matrix".

Sincerely,

cc: S. Jackson

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