

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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August 7, 1985

Docket No. 50-423
A05049

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

- References: (1) E. C. Wenzinger letter to J. F. Opeka, "Region-Based Inspection 50-423/85-23," dated July 8, 1985.
- (2) J. F. Opeka letter to R. W. Starostecki, "Response to I&E Inspection No. 50-423/85-12," dated June 26, 1985.

Dear Mr. Starostecki:

Millstone Nuclear Power Station, Unit No. 3
Response to I&E Inspection No. 50-423/85-23

Pursuant to the provisions of 10CFR2.201, 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 an item of noncompliance noted during an inspection conducted from May 20 through June 14, 1985 by your office at the Millstone Unit No. 3 site.

VIOLATION

10CFR50, Appendix B, Criterion V and the NNECO Startup Test Manual require that activities affecting quality be accomplished in accordance with procedures.

Contrary to the above, on May 30, 1985, an activity affecting quality was not accomplished in accordance with procedures, in that Fire Protection Water (FPW) valve, FPW-V555, was not red-tagged shut for system flushing as required by Phase I Test Procedure T3341A1F02, resulting in partial flooding of the Service and Control Buildings.

This was determined to be a Severity Level IV Violation.

RESPONSE

This incident was caused by personnel error. As previously discussed in Reference (2), this incident and other recent water releases resulted in a

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thorough review of the NNECO Startup Program to identify a common factor contributing to the occurrence of these personnel errors. Based on that review, steps have been taken to strengthen the Startup Administrative Program. Additional specific detail and direction have been provided to clarify test procedure release, performance, hold, and re-release controls.

It should be noted that the statement in Reference (1) that "...water did drain underneath a closed door into the Control Room..." is incorrect. Due to the routine traffic through the Service Building to the Control Room door during the incident, the water was tracked into the Control Room.

Cause

The root cause of the event was personnel error. However, we believe that additional controls during the re-release of test procedures will prevent or reduce future chances for occurrence of events of this nature.

Corrective and Preventive Actions

A revision to the NNECO Startup Manual is being processed and will be implemented by September, 1985 to strengthen the Startup Program in the area of test procedure release. As reported in Reference (2), the Startup Manager has issued written direction to implement this new policy. The NRC Millstone Unit 3 Senior Resident Inspector was given a copy of these implementing directions.

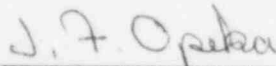
ADDITIONAL DISCUSSION

In Reference (1), you requested that we address the consideration of time between establishment of conditions for an activity and the actual performance of that activity. The above described corrective actions adequately address this concern.

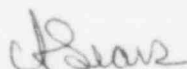
We consider this to be our final report for this violation. We trust that the above information satisfactorily responds to your concerns.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



J. F. Opeka
Senior Vice President



By: C. F. Sears
Vice President