

Docket Room



CONNECTICUT YANKEE ATOMIC POWER COMPANY

BERLIN, CONNECTICUT

P.O. BOX 270 HARTFORD, CONNECTICUT 06141-0270

TELEPHONE
203-665-5000

August 16, 1985

Docket No. 50-213

A05085

Mr. Edward C. Wenzinger, Chief
Projects Branch No. 3
Division of Reactor Projects
Region I
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

Reference: (1) E. C. Wenzinger letter to J. F. Opeka dated
July 19, 1985

Gentlemen:

Haddam Neck Plant
Response to I&E Inspection No. 50-213/85-15

Pursuant to the provisions of Section 2.201 of the NRC's "Rules of Practice", Part 2, Title 10, Code of Federal Regulations, this letter is being submitted in response to Reference (1), which informed the Connecticut Yankee Atomic Power Company (CYAPCO) of two violations noted during a special inspection conducted on June 14-26, 1985.

Item 1

Technical Specification (TS) 6.8 requires written procedures to be established, implemented and maintained. Section 6.5 of Procedure ACP 1.0-3.1, "Preparation, Review and Disposition of Plant Design Change Requests (PDCRs), and Section 6.2.4 of Procedure NEO 3.12, "Safety Evaluations", require a determination of the effect of a proposed modification on plant TSs.

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TS 3.22.E-1, "Fire Detection Systems" requires 8 out of 10 control room smoke detectors to remain operable.

Contrary to the above, during the review of PDCR 713, "Process Computer Replacement", in April - May 1985, neither the corporate or site engineering design review nor the safety evaluation completed in accordance with Procedures ACP 1.0-3.1 and NEO 3.12, respectively, determined that the removal of the 3 control room smoke detectors detailed in the PDCR 713 work scope would violate Technical Specification 3.22.E.1, a condition that requires an NRC approved Technical Specification change prior to implementation.

Response

The failure of the review of PDCR 713 to identify the Technical Specification change, was due in large part to the wording within the Technical Specifications that require 8 out of 10 control room smoke detectors to remain operable. The 3 smoke detectors to be removed under the PDCR were located in an adjacent room physically separated from the control room proper. The Technical Specifications did not provide a location for the smoke detectors other than specifying the control room. In error, at the Engineering/Design level, it was not recognized that a Technical Specification Change Request would be required for this modification. The lack of clarity in the Technical Specification requirement allowed the error to remain throughout the Design Review Process including the Final Safety Review.

Corrective action has been taken to preclude this situation from recurring. Fire Protection Engineering has:

- 1) Initiated a Technical Specification Change Request to address the smoke detector removals,
- 2) Initiated a revision to NEO 5.12, "Performance of Fire Protection Reviews" requiring a detailed Technical Specification evaluation as part of the review process. This revision is scheduled to be implemented by September 30, 1985.

In addition, we will re-emphasize to our Project Engineers that it is their responsibility to ensure that the unit's Technical Specifications are reviewed to ensure that required changes are identified throughout all phases of project implementation. Supporting disciplines will be reminded to review their efforts in support of projects to ensure that changes in Technical Specifications are also identified and reported to the Project Engineer.

Based on these actions and our ongoing review of the Engineering/Design process, CYAPCO believes that these actions will be effective and that there will be no further recurrence of this problem.

Item 2

TS 6.5.1 requires that the Plant Operations Review Committee (PORC) function to advise the Station Superintendent on all proposed changes or modifications to plant systems or equipment that affect nuclear safety.

Contrary to the above, on May 9, 1985, the PORC did not function to advise the Station Superintendent of the nuclear safety affect of PDCR 713, "Process Computer Replacement", in that the PORC failed to identify that the removal of 3 control room smoke detectors detailed in the PDCR 713 work scope would violate TS 3.22.E.1 which requires 8 out of 10 control room detectors to remain operable.

Response

Work affecting any aspect of fire protection has been stopped on this PDCR. This stoppage will continue until the PDCR has been appropriately revised and approved by PORC. This is expected to occur by September 2, 1985. Several corrective measures have been taken to improve PORC's review of PDCRs. The plant procedure outlining the responsibilities of the PORC has been revised to require that PDCRs be reviewed only during specially designated PORC meetings. It requires, except in emergency, PDCR distribution seven days prior to PORC review, and emphasizes that the appropriate discipline members be present. Annual PORC membership training will detail the requirements of PDCR reviews and the PORC members' responsibilities in that review process. PDCRs which will be implemented during a scheduled outage are now required to be submitted for approval by PORC at least 1 month prior to the start of the outage.

All the above measures are currently in place and, we believe, will be effective in eliminating problems of this type.

Reference (1) also delineated two unresolved items:

UNR 213/85-15-03

NEO 2.18 provides one of several means by which corrective actions are identified and followed. None of the corrective action procedures cited in NEO 2.18 were initiated for the PDCR design review problems. Although action to prevent removal of the detectors was taken, as was some action that increased detector system sensitivity, no formal recognition, documentation or initiation of action to prevent recurrence of these design review errors was identified until the June 18, 1985 initiation of action by the Senior Vice President.

Response

As noted in your report, initial action consisted of that which would prevent removal of the detectors, initiation of the Technical Specification Change Request, and the PDCR revision. Appropriate corrective action consisted of Generation Fire Protection Engineering revising NEO 5.12 and their PDCR review checkoff list. These changes, in addition to the re-emphasis of project engineer's and discipline engineer's responsibilities with respect to design modifications and their impact on Technical Specifications were considered adequate to correct the problem.

A Plant Information Report (PIR #85-81) was initiated on May 29, 1985, and therefore, NEO 2.18 was not considered applicable since appropriate resolution was being made.

UNR 213/85-15-04

The licensee's corrective actions in this case were not timely because a delay in reporting the identified degradation in control room fire protection to plant personnel resulted in extending the period of apparent violation of a TS limiting condition for operation for several hours. Neither were the corrective actions effective because the identified discrepancy (detectors not within 12 inches of the ceiling) was not corrected, in that the detectors were only raised to within about 18-30 inches of the ceiling. This failure resulted in a further apparent violation of TS 3.22 from May 29, when the compensatory fire watch was terminated without verification of the actual location of the detectors until June 13, 1985 when the NRC inspector identified the discrepancy in detector location. Since NRC review of the subsequent reevaluation of the smoke detector operability criterion has confirmed that the detectors remained operable throughout this period, no actual Technical Specification violation occurred. Nevertheless, the implementation of the licensee's corrective action program based on the apparent violation was flawed.

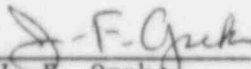
Response

CYAPCO fully believes that the available corrective action programs are adequate. However, due to the fact that the procedures were not effectively utilized in this instance, CYAPCO will implement training sessions for the plant department engineers. This training will encompass the engineer's responsibilities on the effective use of plant procedures and the automated work order process. The initial session will be held by September 30, 1985. The balance will be conducted on a continual retraining basis. This training will provide effective corrective action for this problem.

We trust that you will find these actions responsive to your concerns. My staff is available to answer any questions you may have regarding this matter.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY



J. F. Opeka
Senior Vice President