

**North
Atlantic**

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The Northeast Utilities System

April 18, 1997
Docket No. 50-443
NYN-97041

United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Seabrook Station
Reply NRC Inspection Report 96-11

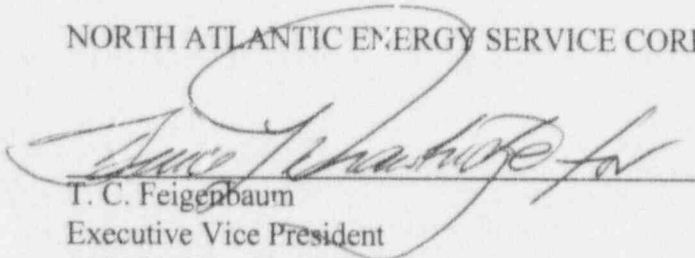
In a letter dated March 7, 1997¹, the NRC requested that North Atlantic Energy Service Corporation (North Atlantic) provide the reasons why the motor-operated valve (MOV) program document was not revised by January 31, 1997 as committed during the NRC Generic Letter 89-10 MOV close-out inspection. The inspection report also requested the updated projected completion date for the MOV program document revision. Accordingly, the enclosure to this letter provides the requested response.

North Atlantic is making certain commitments in response to this Inspection Report. The commitments are fully described in the enclosure to this letter.

Should you have any questions concerning this response, please contact Mr. Terry L. Harpster, Director of Licensing Services, at (603) 773-7765.

Very truly yours,

NORTH ATLANTIC ENERGY SERVICE CORP.


T. C. Feigenbaum
Executive Vice President
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cc: H. J. Miller, Regional Administrator
A. W. De Agazio, Sr. Project Manager
J. B. Macdonald, NRC Senior Resident Inspector



¹ NRC Inspection Report 96-11, dated March 7, 1997, J. F. Rogge to T. C. Feigenbaum.

ENCLOSURE 1 TO NYN-97041

REPLY TO NRC INSPECTION REPORT 96-11

In NRC Inspection Report 96-11, North Atlantic was requested to provide the reasons for why the motor-operated valve (MOV) program document was not revised by January 31, 1997 as committed during the NRC Generic Letter 89-10 MOV close-out inspection. The inspection report also requested the updated projected completion date for the MOV program document revision. The following provides North Atlantic's response to these requests.

I. Background

North Atlantic made two commitments to the NRC at the November 15, 1996 exit meeting for the MOV close-out inspection. The first commitment was to revise the MOV program document ES 1850.003, "Motor Operated Valve Performance Monitoring," by January 31, 1997, to strengthen certain administrative controls for engineering evaluations and dynamic test acceptance criteria. The second commitment was to test 15 MOVs, over the next two refueling outages, to obtain additional site-specific performance data. These commitments were originally made by North Atlantic during the conduct of the inspection to address the inspector's concerns. Both of these commitments were documented in North Atlantic's exit meeting minutes, however, they were not entered into the Action Information Tracking and Trending System (AITTS). Notwithstanding, North Atlantic management personnel agreed with these commitments and were aware that they had been made. At the time that NRC Inspection Report 96-11 was issued (March 7, 1997), the revision to the MOV program document had not been completed. However, actions to address testing of eight valves during the upcoming refueling outage to satisfy the second commitment were on schedule and had been substantially completed. Seven additional valves will be tested during the sixth refueling outage.

II. Causes

Three apparent causes have been identified for the failure to implement this commitment in a timely manner:

a) Resource Management

Recently, adequate personnel resources have not been available to perform all MOV related tasks in a timely manner. These tasks include routine program updates, development of MOV work packages for the outage, updates/revisions to MOV design basis calculations, planning for margin improvements, program improvements to address NRC concerns, valve testing, analysis of valve data, emergent work activities, etc. The majority of these MOV activities are the responsibility of the MOV system engineer, with the periodic support of other engineering resources. The MOV system engineer was aware of the commitment to update the MOV program

document. While revision of the program document was one of his top priorities, it became subordinate to supporting emergent work activities and the development of work packages for performing additional valve testing during the upcoming refueling outage, in part, to comply with the other NRC commitment to obtain additional data on stem friction coefficients.

The MOV system engineer kept Technical Support management aware of the aforementioned resource limitations. In response, management directed him to arrange for either in-house engineering support or outside contract resources. The MOV system engineer had limited success in obtaining assistance from in-house engineering resources due to other competing engineering priorities. Similarly, the MOV system engineer attempted to find qualified contract personnel with no success. Technical Support management was apprised of the MOV system engineer's lack of success in obtaining resources, however, they were also unsuccessful at obtaining additional resources. Additional resources would have allowed the MOV system engineer to complete the revision to the MOV program document by January 31, 1997.

b) Management Monitoring

Technical Support management typically relies on AITTS to track the progress of NRC and other commitments. Technical Support management lost track of the status of this specific commitment since it was not entered onto AITTS. The reason why the commitment was not entered into AITTS relates to the adequacy of applicable administrative procedures in specifying when verbal commitments are to be entered into AITTS. Specifically, the responsible Licensing engineer intended to enter all inspection related commitments into AITTS upon receipt of the inspection report. These commitments would be subsequently updated to reflect the information provided in North Atlantic's anticipated response to the inspection report. This would ensure that the commitments entered onto the tracking system were consistent with the way they were characterized in the inspection report and in the subsequent response. It would also ensure that the verbal commitments were described in docketed correspondence as is required by the Regulatory Compliance Manual. While the Regulatory Compliance Manual was clear that verbal commitments need to be subsequently described in docketed correspondence, it was not clear when such commitments needed to be captured on AITTS.

c) Communications

Prior to January 31, 1997, Technical Support management had been informed by the MOV system engineer that he was in jeopardy of missing some of his commitments. In response, management provided their expectations that commitments were to be completed on time. The MOV System engineer did

not subsequently apprise Technical Support management that the commitment to update the MOV program would not be completed as scheduled.

III. Corrective Actions

1. On March 17, 1997, North Atlantic completed the revision to the MOV program document ES1850.003. The revised program document strengthens certain administrative controls for engineering evaluations and dynamic test acceptance criteria and reflects how the MOV program is currently being implemented at Seabrook Station.
2. North Atlantic is currently in the process of obtaining additional personnel resources to support implementation of the MOV program. These additional resources will consist of either in-house personnel, contract personnel, or both, and will support actions necessary to obtain MOV program closure. Subsequently, North Atlantic will evaluate the resources necessary for long-term implementation and maintenance of the MOV program.
3. North Atlantic will revise the Regulatory Compliance Manual to clarify that verbal regulatory commitments are to be entered into AITTS as soon as possible after they are made and that they should be revised/updated, as necessary, to reflect the description of the commitment in subsequent docketed correspondence.
4. Technical Support management has adopted a more active role in monitoring and supporting the MOV system engineer in the implementation of the MOV program.

IV. Completion Date for Revision of the MOV Program Document

As described in the first corrective action above, North Atlantic has completed the revision to the MOV program document.