

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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November 7, 1985

Docket No. 50-245
A05307

Mr. Stewart D. Ebnetter, Director
Division of Reactor Safety
Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

Gentlemen:

Millstone Nuclear Power Station, Unit No. 1
Inspection No. 50-245/85-15

In October, 1985⁽¹⁾ Northeast Nuclear Energy Company was informed of a Notice of Violation which resulted from conditions identified during a special safety inspection conducted June 17 - June 28, 1985. The purpose of this letter is to provide responses to Violation A and Violation B as contained in the notice.

Violation A

Technical Specification 6.8.1 states in part: "Written procedures shall be established, implemented and maintained covering activities...recommended in Appendix 'A' of Regulatory Guide 1.33, February, 1978...." This appendix requires that maintenance that can affect the performance of safety-related equipment should be properly performed in accordance with written procedures appropriate to the circumstances.

Contrary to the above requirements, two examples of a violation were identified as follows:

1. As of June 28, 1985, written calibration procedures were not established for the calibration of safety-related pressure switches PS-2-16, PS-2-20, PS-2-54, and PS-2-56 which provide low suction pressure, start prohibit, interlocks for the safety-related Feedwater Coolant Injection (FWCI) pumps A and B.
2. On June 18, 1985, it was identified that the self-aligning rod-end bushing on a mechanical snubber, pipe support ICHR-8, of the safety-related isolation condenser had slipped partially out of the rod-end bushing housing, resulting in an inoperable isolation condenser system until repairs were made. A subsequent review of procedure MP 739.6, "Mechanical Snubber Visual Inspection" revealed that the procedure was incapable of identifying the misaligned rod-end bushing.

(1) Stewart D. Ebnetter letter to J. F. Opeka, "Inspection Report 50-245/85-15," dated October 11, 1985.

Response A.1

Corrective Steps Which Have Been Taken and the Results Achieved Are:

Written procedures specifying calibration requirements, including setpoints, tolerances and restoration have been developed, reviewed and approved for instrumentation associated with the FWCI system and related equipment.

Corrective Steps Which Will be Taken to Avoid Further Violations Are:

Newly developed and approved procedures are being utilized for the FWCI system during the present refueling outage. Reviews are presently being performed to ensure that Technical Specification requirements are met by existing surveillance procedures. These reviews will serve to identify the need for any additional procedures.

Date When Full Compliance Will be Achieved:

Review of Technical Specification requirements to determine the need for additional procedures will be completed by December 31, 1985. Any required procedures will be implemented by March 31, 1986.

Response A.2

Corrective Steps Which Have Been Taken and the Results Achieved Are:

MP 739.6, Mechanical Snubber Visual Inspection, has been reviewed and revised to specifically address the visual inspection of rod-end bushings. Additionally, MP 739.5, Inspection of Hydraulic Snubbers, has been revised to include inspection of these bushings. Both procedures have been reviewed by the PORC and have been approved.

Corrective Steps Which Will be Taken to Avoid Further Violations Are:

In accordance with the revised approved procedures for inspection of mechanical and hydraulic snubbers, visual inspections of rod-end bushings are being performed during the present refueling outage.

Date When Full Compliance Will be Achieved:

All required actions to ensure full compliance regarding this item have been completed.

Violation B

Technical Specification 6.12.2 states that locked doors shall be provided to prevent unauthorized entry into each high radiation area in which the intensity of radiation is greater than 1,000 mrem/hr. The licensee's administrative procedure (SHP) 4906, "Posting Radiological Controlled Areas," Section 8.4 requires that all high radiation areas with general area dose rates greater than 1,000 mrem/hr shall have all entrances locked or shall be continuously guarded to prevent unauthorized entry into those areas.

Contrary to the above requirement, on June 27, 1985, at approximately 1:00 PM, the door to the Scram Discharge Volume (SDV) high radiation area had been left unlocked and unattended. This area was posted with signs on the door "High Radiation Area, RWP Required for Entry" and "Door Must be Locked at All Times." A survey of the area disclosed "hot spots" of 2,000 mrem/hr. Further, if a reactor scram occurred the general area radiation would be greater than 1,000 mrem/hr.

Response B

Corrective Steps Which Have Been Taken and the Results Achieved Are:

Upon discovery of the violation, the door of the SDV high radiation area was locked. Personnel who routinely enter this area have been instructed to pay particular attention to locking this door, since it does not have the locked-when-closed feature used in other high radiation area doors throughout the plant.

Corrective Steps Which Will be Taken to Avoid Further Violations Are:

A plant work request is being prepared for changing the latch on the SDV high radiation area door to a latch that provides automatic locking when the door is closed. This latch design, used in other areas of the plant, requires use of a key for entering the area, but does not affect exit from the area.

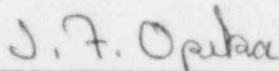
Date When Full Compliance Will be Achieved:

Installation of a locked-when-closed latch on the SDV high radiation area door is scheduled to be completed by April 1, 1986.

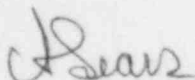
We believe that the actions and commitments identified above are sufficient to ensure resolution of the violations identified during the June inspection.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



J. F. Opeka
Senior Vice President



By: C. F. Sears
Vice President