

NOV 13 1985

Docket No. 50-423

Northeast Nuclear Energy Company
ATTN: Mr. J. F. Opeka
Senior Vice President - Nuclear
Engineering and Operations Group
P. O. Box 270
Hartford, Connecticut 06101

Gentlemen:

Subject: NRC Region I Inspection No. 50-423/84-23

This refers to your letter dated April 19, 1985, in response to our letter dated March 20, 1985 and to the telephone conference call between Mr. S. Orefice of your staff and Mr. J. P. Durr of my staff on October 25, 1985.

With respect to the violation regarding cables from vertical tray 3TC0010 which were unsupported for a distance of 10 feet, you state that the intent of the specification No. E-350 is to secure the cables and not to support them. This intent will be reflected in a revision to the specification. You stated that controls on unsupported cable lengths were being separately analyzed on a case by case basis and that the 4.5 foot requirement had no bearing on this engineering feature.

For the violation dealing with cables being run outside of raceways and conduits, you stated in our telephone conversation that these cables are in the cable spreading room, a non-hazard area, and should not require protection from hazards provided by trays, ducts, or conduits. You further stated that this area will be analyzed for hazards in an ongoing plant study to assure hazards are not present.

Your response to the marking of cables appears to be adequate.

Thank you for informing us of the corrective and preventive actions documented in your letter and our subsequent telephone conference. These actions will be examined during a future inspection of your licensed program.

Your cooperation with us is appreciated.

Sincerely,

Original Signed By:
Jacques P. Durr



Stewart D. Ebnetter, Director
Division of Reactor Safety

8511190186 851113
PDR ADOCK 05000423
G PDR

OFFICIAL RECORD COPY

RL MILLSTONE 3 84-23 - 0001.0.0
11/08/85

IE01 1/1

cc:

V. Papadopoli, Construction Quality Assurance Supervisor
E. R. Foster, Director of Generation Construction
E. J. Mroczka, Vice President, Nuclear Operations
D. O. Nordquist, Manager of Quality Assurance
R. T. Laudenat, Manager, Generation Facilities Licensing
W. D. Romberg, Station Superintendent
Public Document Room (PDR)
Local Public Document Room (LPDR)
Nuclear Safety Information Center (NSIC)
NRC Senior Resident Inspector
State of Connecticut

bcc:

Region I Docket Room (with concurrences)
Senior Operations Officer (w/o encl)
DRP Section Chief

RI:DRS
Paolino/kg1
11-8-85

RI:DRS
Anderson
11/8/85

RI:DRS
Durr
11/8/85

OFFICIAL RECORD COPY

RL MILLSTONE 3 84-23 - 0001.1.0
11/08/85

NORTHEAST UTILITIES

THE CONNECTICUT LIGHT AND POWER COMPANY
WESTERN MASSACHUSETTS ELECTRIC COMPANY
HOLYOKE WATER POWER COMPANY
NORTHEAST UTILITIES SERVICE COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY

General Offices • Selden Street, Berlin, Connecticut

P.O. BOX 270
HARTFORD, CONNECTICUT 06141-0270
(203) 666-6911

April 19, 1985

Docket No. 50-423
A04760

Mr. Stewart D. Ebnetter, Director
Division of Reactor Safety
Region I
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

Reference: (1) S. D. Ebnetter letter to W. G. Counsil, "Inspection Report No. 50-423/84-23," dated March 20, 1985.

Dear Mr. Ebnetter:

Millstone Nuclear Power Station, Unit No. 3
IE Inspection Report No. 50-423/84-23
Response to Violation

As a result of an inspection conducted by your office from October 22-26, 1984 at the Millstone Nuclear Power Station, Unit No. 3, the following violation was identified and transmitted to us in Reference (1):

VIOLATION

10 CFR 50, Appendix B, Criterion V, states, in part, "Activities affecting quality shall be prescribed by documented instructions — shall be accomplished in accordance with these instructions."

- o Licensee Electrical Installation Procedure No. E-350, Revision 6 dated April 20, 1984, page 3-29, Section 3.2.4.9, line 28.51 states, in part, that: "Unsupported lengths of cable shall not exceed 4.5 feet;"
- o Line 25.14 of Section 3.2.31, page 3.34 of Procedure E-350 states, in part, that: "Cables shall be installed in cable trays, conduits, in accordance with drawings, cable schedules;"
- o Section 3.2.2.9 of Procedure E-350 states, in part, that: "safety-related cables are to be marked using color tape at the entrance of enclosures and at intervals of 15 feet."

Contrary to the above,

- a. Cables from vertical tray 3TC0010 to horizontal trays 3TC0020 and 3TC0080 were unsupported for a distance of 10 feet.

8504290414 3pp.

- b. Cable vertical runs in the cable spreading room, of 20 feet or more, were attached to the support structure by plastic (non-seismic) tie wraps.
- c. Black cables entering electrical penetration No. F3V, located inside the containment, were not identified as required to indicate division/channel orientation.

The above examples of failures to follow procedures are in violation of 10 CFR 50, Appendix B, Criterion V. This was determined to be a Severity Level V violation.

In accordance with Reference (1), Northeast Nuclear Energy Company (NNECO) hereby provides the following response to this notice of violation:

RESPONSE

Condition

- a. Cables from vertical tray 3TC0010 to horizontal trays 3TC0020 and 3TC0080 were unsupported for a distance of 10 feet.
- b. Cable vertical runs in the cable spreading room, of 20 feet or more, were attached to the support structure by plastic (non-seismic) tie wraps.

Response

Electrical installation Specification Procedure No. E-350, Section 3.2.4.7, specifies Kellems grips which can be used for supporting of cables on any vertical slope and also describes the requirements for the sizing and spacing of supports. This is in strict compliance with the National Electric Code Article 300-19. The use of the wraps with a 4.5 foot spacing requirement is for the securing of cables, which is in compliance with Article 336-5 of the National Electric Code.

Corrective and Preventive Actions

No field changes have to be made because vertical cables have been installed in accordance with procedures. Electrical Installation Specification Procedure No. E-350, Section 3.2.4.9 will be revised to clarify the 4.5 foot spacing requirement in respect to the securing of cables, not the supporting of cables, which is in compliance with the National Electric Code Article 336-5.

Condition

- c. Black cables entering electrical penetration No. F3V, located inside the containment, were not identified as required to indicate division/channel orientation.

Response

Electrical Specification E-350, Section 3.2.2.9 allows the use of black jacketed cable, when approved by the engineer, as a substitute for cables that are supplied by the manufacturer with color coded jackets. The black jacketed cable shall be color coded with the appropriate colored tape to identify this cable as a Category I redundant cable installation. This tape shall be applied at a point of entry to and exiting from enclosed areas.

The cables that were observed by the inspector at penetration No. F3V did not have the tape at the entry point as required by the specification.

Corrective and Preventive Actions

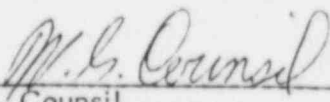
These cables had the tape applied on the same day this violation was noted by the inspector. An inspection of other penetrations for a similar situation was performed and no further problems were noted.

This is considered to be an isolated case and no further corrective action is necessary.

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



W. G. Council
Senior Vice President