

JAN 14 1986

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 Report 50-423/85-71 (11/11-22/85)

This forwards the NRC report of follow-up inspection of surveillance procedure adequacy. The inspection effort was performed by an NRC contractor.

Considering the operating mode by operating mode approach to procedure implementation, the inspection concluded that surveillance procedure status was acceptable. That conclusion was based on the assessment that procedures were sufficient to support existing activities and the ongoing effort to finalize procedures was sufficient to provide acceptable final procedures when they would be needed.

This inspection identified conditions related to the performance of your staff in preparing surveillance and related procedures. Such conditions can be directly applicable to facilitating adherence to procedures and the associated requirements and commitments. In addition to follow-up on specific items, we will be using overall adherence to Technical Specifications and commitments to evaluate your ongoing performance in such matters.

We wish to call your attention, in particular, to the positioning of local stop (root) valves for instruments. As noted in open item 85-37-03 (Report Pages 6 and 7), for Millstone 3 instruments which are on-scale, the root valves are aligned and lock-wired in position by a single, identified technician. This fulfills your commitment and provides accountability and repositioning controls. We believe that there is substantial merit in also providing a separate check of valve positioning. That conclusion is based in part on mispositioned root valves having provided on-scale indication at an operating plant due to valve leak-by. Such leak-by, or partial valve opening/closing, can provide on-scale indication while preventing the instrument loop from meeting time response requirements. Please review your controls in this regard and let me know what was found.

No violations of NRC requirements were identified.

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Your cooperation with us is appreciated.

Sincerely,

Original Signed By:

Edward C. Wenzinger, Chief  
Projects Branch No. 3  
Division of Reactor Projects

Enclosure: NRC Region I Report 50-423/85-71

cc w/encl:

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bcc w/encl:

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