



**Northeast
Nuclear Energy**

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The Northeast Utilities System

MAR 16 2000

Docket Nos. 50-336
50-423
B17940

Re: 10 CFR 50.54(a)

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

**Millstone Nuclear Power Station, Unit Nos. 2 and 3
Proposed Change to Revision 21 of the
Northeast Utilities Quality Assurance Program Topical Report**

The purpose of this letter is to request a change, in accordance with 10 CFR 50.54(a), to Revision 21 of the NUQAP Topical Report, as approved by the Nuclear Regulatory Commission on August 23, 1999.

The change requests a program exception to ANSI N18.7-1976, paragraph 5.2.15, "Review, Approval, and Control of Procedures," which states in part: "Plant procedures shall be reviewed by an individual knowledgeable in the area affected by the procedure no less frequently than every two years to determine if changes are necessary or desirable." Northeast Nuclear Energy Company (NNECO) currently commits to performing biennial review of procedures as specified in ANSI N18.7-1976. Under the proposed change, NNECO would revise its commitment to paragraph 5.2.15, to meet the criteria provided in a memorandum from the Director, Division of Reactor Inspection and Licensee Performance, NRC Office of Nuclear Reactor Regulation, to Directors of the Division of Reactor Safety for Regions I, II, III, IV and V; dated December 21, 1992, Subject: Biennial Procedure Reviews. NNECO has modeled their Quality Assurance Program change after the Seabrook Quality Assurance Program's deletion of biennial review requirement, which was approved by the NRC in November, 1994.⁽¹⁾ NNECO has existing administrative and programmatic controls in place at Millstone Station that ensure procedures are maintained current in accordance with 10 CFR 50, Appendix B, thus meeting the intent of the biennial review.

⁽¹⁾ NRC Correspondence dated November 10, 1994, from Michael C. Modes, Chief, Materials Section, Division of Reactor Safety to Mr. Ted C. Feigenbaum, Senior Vice President and Chief Nuclear Officer, North Atlantic Energy Service Corporation.

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NNECO believes the proposed biennial review process is equal to or more effective than that provided by ANSI N18.7-1976. In accordance with Millstone Point Station procedures, the Site Operations Review Committee has reviewed and approved the proposed change. However, as the proposed change results in a reduction of commitment to ANSI N18.7-1976, paragraph 5.2.15, NNECO requests NRC review and approval of the proposed change in accordance with 10 CFR 50.54(a).

Attachment 1 to this letter provides a detailed description of the proposed NUQAP changes and includes NNECO's methods of complying with the described changes. Attachment 2 provides a copy of the proposed NUQAP change (Appendix E). In accordance with 10 CFR 50.54(a), NNECO will implement the proposed change upon approval by the NRC Staff or 60 days from the date of this letter.

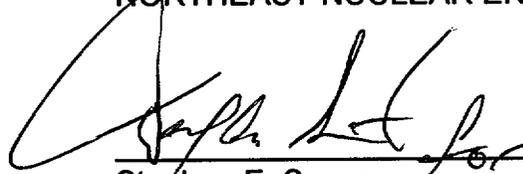
There are no regulatory commitments contained in this letter.

NNECO looks forward to the completion of the NRC review and approval of the change to Revision 21 of the NUQAP Topical Report.

If you have any further questions regarding this submittal, please contact Mr. Paul Willoughby at (860) 447-1791, extension 3655.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



Stephen E. Scace
Director - Nuclear Oversight and
Regulatory Affairs

Attachments (2)

cc: H.J. Miller, Region I Administrator
J. I. Zimmerman, NRC Project Manager, Millstone Unit No. 2
D. P. Beaulieu, Senior Resident Inspector, Millstone Unit No. 2
V. Nerses, NRC Senior Project Manager, Millstone Unit No. 3
A. C. Cerne, Senior Resident Inspector, Millstone Unit No. 3

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Attachment 1

Millstone Nuclear Power Station, Unit Nos. 2 and 3

**Proposed Change to the Northeast Utilities Quality Assurance Program
Deletion of the Requirement to Perform a Biennial Review of Plant Procedures**

March 2000

Description of Change:

This change revises the Northeast Utilities Quality Assurance Program (NUQAP) by taking exception to ANSI N18.7-1976, Section 5.2.15, Review, Approval and Control of Procedures with regard to the biennial review of procedures.

NNECO meets the December 21, 1992, internal guidance provided by the Director of Reactor Inspection and Licensee Performance to the Regional Directors of Reactor Safety. The NNECO implementation methodology for each of the four considerations in the NRC guidance is discussed below, and a copy of the proposed NUQAP change follows.

Consideration: Programmatic controls should specify that all applicable plant procedures will be reviewed following an unusual incident (accident, unexpected transient, significant operator error, or equipment malfunction) and any modification of a system as specified by Section 5.2 of ANSI 18.7-1976 which is endorsed by RG 1.33.

NNECO Method of Meeting Requirement: The corrective action program requires a review of the applicable plant procedures following an unusual incident.

Consideration: Non-Routine Procedures (Such as EOP, Emergency Plan, and other procedures dictated by an event) should be reviewed at least every two years and revised as appropriate.

NNECO Method of Meeting Requirement: The biennial review will not be eliminated for EOPs/AOPs, E-Plan, Security Plan, and procedures that are used during an event.

Consideration: At least every two years, the Quality Assurance (or other "independent") organization should audit a representative sample of the routine plant procedures that are used more frequently than every two years. The audit is to ensure the acceptability of the procedures and verify that the procedure review and revision program is being implemented effectively. The root cause of significant deficiencies is to be determined and corrected.

NNECO Method of Meeting Requirement:

NNECO Quality Assurance organization reviews plant procedures that are used more frequently than a normal plant fuel cycle on a sampling basis, as part of routine audits and surveillances.

Consideration: Routine plant procedures that have not been used for two years should be reviewed before use to determine if changes are necessary or desirable.

NNECO Method of Meeting Requirement:

Upon NRC approval of the proposed change, the Millstone Point procedures program will be modified to implement a Limited Use administrative requirement to ensure routine procedures are reviewed prior to use if they are not used between refueling outages.

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Attachment 2

Millstone Nuclear Power Station, Unit Nos. 2 and 3

**Proposed Change to the Northeast Utilities Quality Assurance Program
Appendix E - DRAFT Modification for Deletion of Biennial Review Requirement**

March 2000

APPENDIX E

NORTHEAST UTILITIES QUALITY ASSURANCE PROGRAM (NUQAP)
TOPICAL REPORT - MILLSTONE POWER STATION

PROGRAM EXCEPTIONS

1. ANSI N45.2.9, states in part, "structure, doors, frames, and hardware should be Class A fire-related with a recommended four-hour minimum rating." The three record storage vaults at NNECO have a two-hour rating.

NNECO's vaults are used for storage of documentation that is unsuitable for filming or awaiting filming.

A records organization exists along with written procedures addressing the control of quality assurance records.

2. ANSI N18.7-1976, paragraph 4.3.2.3 "Quorum" states in part: "A quorum for formal meetings of the (Independent Review) Committee held under the provisions of 4.3.2.2 shall consist of not less than a majority of the principals, or duly appointed alternates..."

A quorum of the Nuclear Safety Assessment Board shall consist of the Chairman or Vice Chairman and at least enough members to constitute a majority of the assigned members. No more than a minority of the quorum shall have line responsibility for operation of one of Northeast Utilities' nuclear units. No more than two alternates shall be appointed voting status at any meeting in fulfillment of the quorum requirements.

3. ANSI N45.2.9-1974, paragraph 1.4, definition of "Quality Assurance Records" states in part: "For the purposes of this standard, a document is considered a quality assurance record when the document has been completed."

Northeast Utilities has developed the following alternative definition to provide guidance during the interim period from the time a document is completed until it is transmitted to the Nuclear Document Services Facility:

"A record is considered a working document until it is transmitted to the Nuclear Document Services Facility (NDSF) at which time it is designated as a Quality Assurance Record. The following maximum time limits are established for the transmittal of working documents to the NDSF:

Operations Documents - Documentation generated during plant operations may be maintained, as needed, by operating plant departments, for up to one year.

New Construction or Betterment Documents - Documents which evolve during new construction or betterment projects shall be transmitted to NDSF within 90 days of completion of a new construction project or turnover of a betterment project or plant operations.

Procurement Documents - Inspection/Surveillance/Audit Reports generated during vendor oversight activities which are used to maintain vendor status for current and future procurements may be maintained, as needed, by Nuclear Materials and Document Management for up to three years.

All Other Working Documents - All other working documents shall be transmitted to NDSF within 6 months of their receipt or completion."

The requirements of ANSI N45.2.9-1974 do not apply to these "working documents" based on paragraph 1.1 of the ANSI standard which states:

"It (ANSI N45.2.9) is not intended to cover the preparation of the records nor to include working documents not yet designated as Quality Assurance Records."

4. Regulatory Guide 1.64 - 6/76, the Regulatory position states, in part, "It should not be construed that such verification constitutes the required independent design verification." Northeast Utilities has developed the following alternative to allow for adequate independent design verification:

This review may be performed by the originator's Supervisor, only if the Supervisor:

Did not specify a singular design approach;

Did not establish the design inputs or did not rule out certain Design considerations;

Is the only individual in the organization competent to perform the review.

Where the Supervisor performs the design review, the next level of management shall fulfill the Supervisor's responsibilities.

5. ANSI N45.2.13 - 1976, paragraph 10.3.4, states in part, "Post-Installation Test requirements and acceptance documentation (should) shall be mutually established by the purchaser and supplier." Involvement by the supplier in establishing Post-Installation Test requirements and acceptance documentation is requested only when it is deemed necessary and proper by the responsible engineering organization.

Northeast Utilities no longer has any nuclear plants under construction. As a result, most procurements are made for spare parts from suppliers who are not the original equipment manufacturer. In these cases, the supplier may have little or no understanding or knowledge of either the operation of the system the component is to be installed in, or applicable Post-Installation Test requirements and acceptance documentation. As such, Northeast Utilities assumes responsibility for establishing Post Installation Test requirements and acceptance documentation.

6. ANSI N45.2.2-1972, paragraph 1.2, states in part that, "The requirements of this standard apply to the work of any individual or organization that participates in the

packaging, shipping, receiving, storage, and handling of items to be incorporated into nuclear power plants."

Since a portion of Northeast Utilities procurement activities involve commercial suppliers which do not fully comply with the requirements of ANSI N45.2.2, the Northeast Nuclear Energy Company Nuclear Materials and Document Management organization verifies through source inspections, receipt inspection, and/or survey activities that the quality of the materials, items, components or equipment is preserved by those suppliers to the extent that packaging, shipping, storage and handling methods are employed which are commensurate with the nature of the product.

7. ANSI N18.1-1971, paragraph 4.2.2, states in part "The Operations Manager shall hold a Senior Reactor Operator's license". NU has developed an alternative to this requirement which has been accepted by the NRC via amendment 132 for the Millstone Power Station Unit No. 3 license which allows that:

If the Operations Manager does not hold a Senior Reactor Operator license for Millstone Unit No. 3, then the Operations Manager shall have held a Senior Reactor Operator license at a pressurized water reactor, and the Assistant Operations Manager shall hold a Senior Reactor Operator license for Millstone Unit No. 3.

8. ANSI N18.1-1971, paragraph 4.2.2, states in part "The Operations Manager shall hold a Senior Reactor Operator's license". NU has developed an alternative to this requirement which has been accepted by the NRC via amendment 190 for the Millstone Power Station Unit No. 2 license which allows that:

If the Operations Manager does not hold a Senior Reactor Operator license for Millstone Unit No. 2, then the Operations Manager shall have held a Senior Reactor Operator license at a pressurized water reactor, and an individual serving in the capacity of the Assistant Operations Manager shall hold a Senior Reactor Operator license for Millstone Unit No. 2.

9. Regulatory Guide 1.33 - 2/78, regarding audits, states in part:

(a) "The results of actions taken to correct deficiencies...at least once per 6 months."

(b) "...technical specifications and applicable license conditions - at least once per 12 months."

(c) "The performance, training, and qualifications of the facility staff - at least once per 12 months."

NU has developed an alternative which modifies these Audit frequencies to at least once per 24 months. This alternative has previously been accepted by the NRC via license amendments 79, 184, and 104 for MP1, MP2, and MP3, respectively.

10. Deleted

11. ANSI N45.2.13-1976, paragraph 10.3.5., states in part, "in certain cases involving procurement of services only, such as third party inspection; engineering and consulting services, and installation, repair, overhaul or maintenance work; the Purchaser may accept the service by any or all of the following methods:
- (a) Technical verification of the data produced
 - (b) Surveillance and/or audit of the activity
 - (c) Review of the objective evidence for conformance to the procurement document requirements such as certifications, stress reports, etc."

In order to maintain the independence requirement of the NRC's August 14, 1996 Order, NNECO will not perform an acceptance review of the work produced by the vendors contracted to conduct the Independent Corrective Action Verification Program. This work will be performed in accordance with the vendor's own approved, 10 CFR 50 Appendix B Quality Assurance Program.

12. Deleted.

13. Regulatory Guide 1.70 Revision 3, November 1978 Section 17.1.2.4 states in part: "The PSAR should include a listing of QA program procedures or instructions that will be used to implement the QA program for each major activity such as design, procurement, construction, etc. The procedure list should identify which criteria of Appendix B to 10 CFR 50 are implemented by each procedure".

NU has developed an alternative to this requirement where procedure indices are maintained which identify the procedures that implement the Quality Assurance Program for Millstone Power Station and which, by title and originating organization, indicate the Appendix B to 10 CFR 50 criterion being implemented.

14. ANSI N18.7-1976, Paragraph 5.2.15, "Review, Approval, and Control of Procedures," states in part: "Plant procedures shall be reviewed by an individual knowledgeable in the area affected by the procedure no less frequently than every two years to determine if changes are necessary or desirable."

NU implements administrative and programmatic controls that ensure procedures are maintained current in accordance with 10CFR50, Appendix B, thus meeting the intent of the biennial review.

NU implements administrative controls to perform biennial reviews of non-routine procedures such as EOP's, AOP's, E-Plan, Security and other procedures that may be dictated by an event.

Programmatic controls specify conditions when the mandatory review of plant procedures apply, and include a requirement to review applicable procedures following an accident or transient and following any modification to a system.

NU utilizes a pre-job briefing practice to ensure that personnel are aware of what is to be accomplished and what procedures will be used prior to beginning a job. In addition, the Procedure Compliance Policy requires that the job be stopped

and the procedure be revised or the situation resolved prior to work continuing if procedures cannot be implemented as written.

Additionally, NU Quality Assurance Program requires the review of a representative sample of plant procedures as part of routine audits and surveillances to ensure that existing administrative controls for procedure verification, review and revision are effective in maintaining the quality of plant procedures. Significant procedural deficiencies are identified and corrected through the Station Corrective Action Program. The Station Self-Assessment Program also periodically reviews selected procedures and identifies deficiencies and improvements through the Corrective Action Program.