

May 8, 2000

Mr. S. E. Scace - Director  
Nuclear Oversight and Regulatory Affairs  
Northeast Nuclear Energy Company  
P. O. Box 128  
Waterford, CT 06385-0128

SUBJECT: MILLSTONE NUCLEAR POWER STATION, UNITS 2 AND 3, RE: CHANGE TO  
REVISION 21 OF THE NUQAP TOPICAL REPORT (TAC NOS. MA8551B AND  
MA8552B)

Dear Mr. Scace:

Your letter of March 16, 2000, submitted a request to change Revision 21 of the Northeast Utilities Quality Assurance Program Topical Report for Millstone Nuclear Power Station, Unit Nos. 2 and 3. The change would be a reduction in commitment under the provisions of 10 CFR 50.54(a)(3). This change requested a program exception to ANSI N18.7-1976, paragraph 5.2.15, "Review, Approval, and Control of Procedures." Paragraph 5.2.15 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." You proposed deleting the biennial plant procedures review requirement and instead would biennially audit a sample of routine plant procedures, maintain the same 2-year review frequency for non-routine procedures, and immediately review procedures following an unusual incident or plant modification.

The staff has reviewed your reduction in commitment, as documented in the enclosed Safety Evaluation. The revised quality assurance program incorporating these changes will continue to satisfy the criteria of Appendix B to 10 CFR Part 50 and is, therefore, acceptable. If you have any questions, please contact me at 301-415-1484.

Sincerely,

*/RA/*

Victor Nerses, Sr. Project Manager, Section 2  
Project Directorate I  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket Nos. 50-336 and 50-423

Enclosure: Safety Evaluation

cc w/encl: See next page

May 8, 2000

Mr. S. E. Scace - Director  
Nuclear Oversight and Regulatory Affairs  
Northeast Nuclear Energy Company  
P. O. Box 128  
Waterford, CT 06385-0128

SUBJECT: MILLSTONE NUCLEAR POWER STATION, UNITS 2 AND 3, RE: CHANGE TO REVISION 21 OF THE NUQAP TOPICAL REPORT (TAC NOS. MA8551B AND MA8552B)

Dear Mr. Scace:

Your letter of March 16, 2000, submitted a request to change Revision 21 of the Northeast Utilities Quality Assurance Program Topical Report for Millstone Nuclear Power Station, Unit Nos. 2 and 3. The change would be a reduction in commitment under the provisions of 10 CFR 50.54(a)(3). This change requested a program exception to ANSI N18.7-1976, paragraph 5.2.15, "Review, Approval, and Control of Procedures." Paragraph 5.2.15 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." You proposed deleting the biennial plant procedures review requirement and instead would biennially audit a sample of routine plant procedures, maintain the same 2-year review frequency for non-routine procedures, and immediately review procedures following an unusual incident or plant modification.

The staff has reviewed your reduction in commitment, as documented in the enclosed Safety Evaluation. The revised quality assurance program incorporating these changes will continue to satisfy the criteria of Appendix B to 10 CFR Part 50 and is, therefore, acceptable. If you have any questions, please contact me at 301-415-1484.

Sincerely,  
**/RA/**

Victor Nerses, Sr. Project Manager, Section 2  
Project Directorate I  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket Nos. 50-336 and 50-423

Enclosure: Safety Evaluation

cc w/encl: See next page

**DISTRIBUTION:**

File Center PDI-2 Reading  
PUBLIC (PUBLIC)  
ACRS (RidsAcrcAcnwMailCenter)  
OGC (RidsOgcRp) T. Clark  
J. Clifford (RidsNrrDlpmLpdi1)

V. Nerses (RidsNrrPmVNerses)  
E. Adensam (RidsNrrDlpmLpd1)  
J. Linville RI (RidsRgn1MailCenter)  
R. Urban, RI (RidsRgn1MailCenter)  
M. Padovan (RidsNrrPmMPadovan)  
T. Clark

To receive a copy of this document, indicate "C" in the box									
OFFICE	PDI-1/PM	C	PDI-2/LA		PDI-2/PM		IQMB	PDI-2/SC	
NAME	MPadovan:lcc		TClark		VNerses		TQuay*	JClifford	
DATE	4/28/00		4/28/00		4/28/00		4/12/00	5/5/00	

DOCUMENT NAME: Accession #ML003712372  
OFFICIAL RECORD COPY

\*SE dated 4/12/00 with  
no major changes

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

PROPOSED CHANGES TO QUALITY ASSURANCE PROGRAM

NORTHEAST NUCLEAR ENERGY COMPANY

MILLSTONE NUCLEAR POWER STATION, UNIT NOS. 2 AND 3

DOCKET NOS. 50-336 AND 50-423

1.0 INTRODUCTION

Northeast Nuclear Energy Company's (NNECO's) letter of March 16, 2000, requests changes to Revision 21 of the Northeast Utilities' Quality Assurance Program Topical Report for Millstone Nuclear Power Station, Unit Nos. 2 and 3. NNECO identified one change to be a reduction in commitment under the provisions of 10 CFR 50.54(a)(3). This change requests a program exception to ANSI N18.7-1976, paragraph 5.2.15, "Review, Approval, and Control of Procedures." Paragraph 5.2.15 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." NNECO is proposing to review a sample of the routine procedures, maintain the same 2-year frequency for non-routine procedures, and immediately review procedures following an unusual incident or plant modification. This evaluation reviews the reduction in commitment for compliance to 10 CFR Part 50, Appendix B requirements.

2.0 BACKGROUND

NNECO follows the guidance of ANS-3.2/ANSI N18.7-1976, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants." Regarding reviews of plant procedures, section 5.2 of that standard states:

Plant procedures shall be reviewed by an individual knowledgeable in the area affected by the procedure no less frequently than every two years in order to determine if changes are necessary or desirable.

3.0 EVALUATION

The scope of this evaluation is limited to the reduction in commitment that eliminates the 2-year review frequency for all plant procedures.

Enclosure

### 3.1 Review of Plant Procedures

Staff guidance for changing biennial procedure reviews in quality assurance programs is contained in the C. E. Rossi to M. W. Hodges memorandum of December 21, 1992. The staff evaluated conformance of NNECO's requested exceptions to the intent of ANS 3.2/ANSI N18.7-1976 in accordance with this guidance.

#### 3.1.1 Staff Guidance (Element 1)

Element 1 — Programmatic controls should specify that all applicable plant procedures will be reviewed following an unusual incident, such as an accident, an unexpected transient, significant operator error, or equipment malfunction and following any modification to a system, as specified by Section 5.2 of ANSI N18.7/ANS 3.2 which is endorsed by RG [Regulatory Guide] 1.33.

Appendix E, "Program Exceptions," Item 14, Paragraph 4 of NNECO's submittal states:

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.

Evaluation: 10 CFR Part 50, Appendix B, Criterion XVI, Corrective Action, states "Measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected." According to Attachment 1 of NNECO's submittal, their corrective action program requires a review of the applicable plant procedures following an unusual incident (accident, unexpected transient, significant operator error, or equipment malfunction). Therefore, the corrective action program and the proposed exception meets the intent of Element 1 guidance.

#### 3.1.2 Staff Guidance (Element 2)

Element 2 — Non-routine procedures (procedures such as emergency operating procedures, off-normal procedures, procedures which implement the emergency plan, and other procedures whose usage may be dictated by an event) should be reviewed at least every two years and revised as appropriate.

Appendix E, "Program Exceptions," Item 14, Paragraph 3 in NNECO's submittal states:

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

Evaluation: The proposed exception meets the intent of Element 2 guidance.

### 3.1.3 Staff Guidance (Element 3)

Element 3 — 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.

Appendix E, “Program Exceptions,” Item 14, Paragraph 6 in NNECO’s submittal states:

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.

Evaluation: The proposed exception meets the intent of Element 4 guidance.

### 3.1.4 Staff Guidance (Element 4)

Element 4 — Routine plant procedures that have not been used for two years should be reviewed before use to determine if changes are necessary or desirable.

Appendix E, “Program Exceptions,” Item 14, Paragraph 5 in NNECO’s submittal states:

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.

Evaluation: According to Attachment 1 of NNECO’s submittal, NNECO will modify the Millstone Point procedures program to implement a Limited Use administrative requirement. This will ensure routine procedures are reviewed prior to use if they are not used between refueling outages. Therefore, the procedures program and the proposed exception meets the intent of Element 1 guidance.

## 4.0 CONCLUSION

NNECO’s exception to the frequency-based review requirement of ANS 3.2/ANSI N18.7-1976 meets the intent of staff guidance for such changes and is therefore, acceptable.

Principal Contributor: M. Bugg

Date: May 8, 2000

Millstone Nuclear Power Station  
Units 2 and 3

cc:

Ms. L. M. Cuoco  
Senior Nuclear Counsel  
Northeast Utilities Service Company  
P. O. Box 270  
Hartford, CT 06141-0270

Edward L. Wilds, Jr., Ph.D.  
Director, Division of Radiation  
Department of Environmental  
Protection  
79 Elm Street  
Hartford, CT 06106-5127

Mr. Allan Johanson, Assistant Director  
Office of Policy and Management  
Policy Development and Planning  
Division  
450 Capitol Avenue - MS 52ERN  
P. O. Box 341441  
Hartford, CT 06134-1441

Regional Administrator, Region I  
U.S. Nuclear Regulatory Commission  
475 Allendale Road  
King of Prussia, PA 19406

First Selectmen  
Town of Waterford  
15 Rope Ferry Road  
Waterford, CT 06385

Mr. F. C. Rothen  
Vice President - Nuclear Operations  
Northeast Nuclear Energy Company  
P.O. Box 128  
Waterford, CT 06385

Mr. Charles Brinkman, Manager  
Washington Nuclear Operations  
ABB Combustion Engineering  
12300 Twinbrook Pkwy, Suite 330  
Rockville, MD 20852

Mr. R. P. Necci  
Vice President - Nuclear Technical Services  
c/o Mr. David A. Smith  
Northeast Nuclear Energy Company  
P. O. Box 128  
Waterford, CT 06385

Senior Resident Inspector  
Millstone Nuclear Power Station  
c/o U.S. Nuclear Regulatory Commission  
P. O. Box 513  
Niantic, CT 06357

Mr. J. T. Carlin  
Vice President - Human Services - Nuclear  
Northeast Nuclear Energy Company  
P. O. Box 128  
Waterford, CT 06385

Mr. M. H. Brothers  
Vice President - Nuclear Operations  
Northeast Nuclear Energy Company  
P. O. Box 128  
Waterford, CT 06385

Mr. M. R. Scully, Executive Director  
Connecticut Municipal Electric  
Energy Cooperative  
30 Stott Avenue  
Norwich, CT 06360

Mr. William D. Meinert  
Nuclear Engineer  
Massachusetts Municipal Wholesale  
Electric Company  
P. O. Box 426  
Ludlow, MA 01056

Ernest C. Hadley, Esq.  
1040 B Main Street  
P. O. Box 549  
West Wareham, MA 02576

Mr. B. D. Kenyon  
President and CEO - NNECO  
Northeast Nuclear Energy Company  
P.O. Box 128  
Waterford, CT 06385

Millstone Nuclear Power Station  
Units 2 and 3

cc:

Citizens Regulatory Commission  
ATTN: Ms. Geri Winslow  
P. O. Box 199  
Waterford, CT 06385

Ms. Terry Concannon  
Co-Chair  
Nuclear Energy Advisory Council  
41 South Buckboard Lane  
Marlborough, CT 06447

Mr. C. J. Schwarz  
Station Director  
Northeast Nuclear Energy Company  
P. O. Box 128  
Waterford, CT 06385

John W. Beck, President  
Little Harbor Consultants, Inc.  
Millstone - ITPOP Project Office  
P. O. Box 0630  
Niantic, CT 06357-0630

Mr. Evan W. Woollacott  
Co-Chair  
Nuclear Energy Advisory Council  
128 Terry's Plain Road  
Simsbury, CT 06070

Mr. D. A. Smith  
Manager - Regulatory Affairs  
Northeast Nuclear Energy Company  
P. O. Box 128  
Waterford, CT 06385

Ms. Nancy Burton  
147 Cross Highway  
Redding Ridge, CT 00870

Mr. L. J. Olivier  
Senior Vice President and  
Chief Nuclear Officer - Millstone  
Northeast Nuclear Energy Company  
P.O. Box 128  
Waterford, CT 06385

Deborah Katz, President  
Citizens Awareness Network  
P.O. Box 83  
Shelburne Falls, MA 03170

Attorney Nicholas J. Scobbo, Jr.  
Ferriter, Scobbo, Caruso, Rodophele, PC  
75 State Street, 7th Floor  
Boston, MA 02108-1807

Mr. G. D. Hicks  
Director - Nuclear Training Services  
Northeast Nuclear Energy Company  
P.O. Box 128  
Waterford, CT 06385