

May 31, 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, CORRECTION TO
SAFETY EVALUATION RE: CHANGE TO REVISION 21 OF THE NUQAP
TOPICAL REPORT (TAC NOS. MA8551B AND MA8552B)

Dear Mr. Scace:

Our letter of May 8, 2000, granted your March 16, 2000, request to change Revision 21 of the Northeast Utilities Quality Assurance Program Topical Report for Millstone Nuclear Power Station, Units 2 and 3. You identified two typographical errors in our Safety Evaluation enclosed with that letter. We corrected those errors and are enclosing revised Safety Evaluation page 3. I apologize for any inconvenience this has caused.

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: As stated

cc w/encl: See next page

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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 3 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 4 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.

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Date: May 8, 2000

Millstone Nuclear Power Station
Unit 2

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