

November 13, 2000

Mr. R. G. Lizotte
Master Process Owner - Assessment
Northeast Nuclear Energy Company
P. O. Box 128
Waterford, CT 06385-0128

SUBJECT: MILLSTONE NUCLEAR POWER STATION, UNIT NOS. 2 AND 3, CHANGE TO
REVISION 22 OF THE NUQAP TOPICAL REPORT (TAC NOS. MA9995 AND
MA9996)

Dear Mr. Lizotte:

Your letter of September 14, 2000, submitted a request to change Revision 22 of the Northeast Utilities Quality Assurance Program (NUQAP) 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). This change modifies your Independent Safety Engineering Group (ISEG) commitment for Millstone Unit 3 described in Appendix F, "Administrative Controls," to the NUQAP by implementing a site-wide ISEG function applicable to both Millstone Units 2 and 3. ISEG is a commitment associated with NUREG-0737, "Clarification of TMI Action Plan Requirements," (November 1980).

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 301-415-2426

Sincerely,

/RA/

Jacob I. Zimmerman, 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

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ACCESSION NO. ML003767687

*SE dated 10/26/00 with no major changes.

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Millstone Nuclear Power Station
Units 2 and 3

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Millstone Nuclear Power Station
Units 2 and 3

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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

By letter dated September 14, 2000 (Reference 1) Northeast Nuclear Energy Company (NNECO) transmitted a proposed change to Revision 22 of the Northeast Utilities Quality Assurance Program (NUQAP) Topical Report for Millstone Unit Nos. 2 and 3. This proposed change was submitted in accordance with the requirements of 10 CFR 50.54(a) as reflecting changes that reduced commitments in the NUQAP description previously approved by the Nuclear Regulatory Commission.

NNECO proposed to modify its Independent Safety Engineering Group (ISEG) commitment for Millstone Unit 3 described in Appendix F, "Administrative Controls," to the NUQAP by implementing a site-wide ISEG function applicable to both Millstone Unit 2 and Unit 3. ISEG is a commitment associated with NUREG-0737, "Clarification of TMI Action Plan Requirements," (Reference 2).

Also, NNECO has added the following paragraph to the ISEG description in draft Appendix F to the NUQAP:

The ISEG shall report organizationally to a director (or higher) who is not in the direct chain of command of power production. The ISEG is directly involved in meeting the requirements of NUREG-0737 for item I.B.1.2 for Millstone Units 2 and 3. The ISEG is independent of PORC and NSAB.

NNECO stated that this paragraph had been inadvertently eliminated from the ISEG description in NUQAP, Revision 21, during the relocation of quality assurance-related technical specification administrative controls in accordance with Administrative Letter 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance," dated December 12, 1995.

2.0 EVALUATION

NUREG-0737, Item I.B.1.2, "Independent Safety Engineering Group," prescribed that applicants for an operating license establish an ISEG to perform independent reviews of plant

Enclosure

operations. The ISEG function is typically discharged by a dedicated, full-time group of engineers, located onsite, but reporting to a corporate official who holds a high-level, technically oriented position that is not in the management chain for power production.

Currently, the ISEG commitment is only applicable to Millstone Unit 3 and the NUQAP stipulates that four individuals be assigned to this function. However, NNECO has elected to expand the ISEG function to include Millstone Unit 2 under its purview while increasing the ISEG complement to five, full-time members to address safety issues on both units in accordance with NUQAP requirements.

Section 13.4, "Operational Review," of NUREG-0800, "Standard Review Plan," (SRP) (Reference 3) provides the acceptance criteria used by the staff when evaluating the ISEG function. Although the proposed change constitutes a reduction in commitment with respect to Millstone Unit 3, the ISEG structure proposed by NNECO in draft Appendix F to the NUQAP will, in effect, increase the available technical expertise located onsite, and provide continuing, systematic, and independent assessment of activities at both Millstone units in a manner consistent with the provisions in Section 13.4 of the SRP.

3.0 CONCLUSION

The ISEG structure proposed by NNECO, as described above, continues to satisfy the provisions of Section 13.4 of the SRP. Therefore, the proposed revision to the NUQAP incorporating the reduction in commitments described in draft Appendix F to the NUQAP will continue to comply with the quality assurance criteria of Appendix B to 10 CFR Part 50 and is, therefore, acceptable.

4.0 REFERENCES

1. Northeast Nuclear Energy Company (S. E. Scace) letter to USNRC, "Millstone Nuclear Power Station, Unit Nos. 2 and 3, Proposed Changes to Revision 22 of the Northeast Utilities Quality Assurance Program Topical Report — Millstone Nuclear Power Station," dated September 14, 2000.
2. NUREG-0737, "Clarification of TMI Action Plan Requirements," dated November 1980.
3. NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants," dated June 1987.

Principal Contributor: J. Peralta

Date: November 13, 2000