

July 12, 2001

Mr. R. P. Necci
Vice President - Nuclear Technical Services
c/o Mr. David A. Smith
Dominion Nuclear Connecticut, Inc.
Rope Ferry Road
Waterford, CT 06385

SUBJECT: MILLSTONE NUCLEAR POWER STATION, UNIT NOS. 1, 2, AND 3, CHANGE
TO REVISION 22 OF THE DNC QAP TOPICAL REPORT (TAC NOS. MB1922
AND MB1926)

Dear Mr. Necci:

Your letter of May 10, 2001, submitted a request to change Revision 22 of the Dominion Nuclear Connecticut, Inc. (DNC) Quality Assurance Program (QAP) Topical Report for Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3. The change would be a reduction in commitment under the provisions of 10 CFR 50.54(a). This change would modify your Independent Safety Engineering Group (ISEG) commitment for Units 2 and 3 described in Section 1.0, "Organization" and in Appendix F, "Administrative Controls" of the DNC QAP by revising the reporting relationships and clarifying the description of the ISEG. 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 QAP 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) 415-3199.

Sincerely,

/RA/

John Harrison, Project Manager, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-245, 50-336, and 50-423

Enclosure: Safety Evaluation

cc w/encl: See next page

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ACCESSION NO. ML011840367

*SE dated 5/30/01 with no major changes.

OFFICE	PDI-2/PM	PDI-2/PM	PDI-2/LA	IQMB/BC*	PDI-2/SC
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DATE	7/11/01	7/11/01	7/11/01	5/30/01	7/11/01

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Millstone Nuclear Power Station
Units 1, 2, and 3

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Millstone Nuclear Power Station
Units 1, 2, and 3

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

PROPOSED CHANGES TO QUALITY ASSURANCE PROGRAM

DOMINION NUCLEAR CONNECTICUT, INC.

MILLSTONE NUCLEAR POWER STATION, UNIT NOS. 1, 2, AND 3

DOCKET NOS. 50-245, 50-336, AND 50-423

1.0 INTRODUCTION

By letter dated May 10, 2001 (Ref. 1), Dominion Nuclear Connecticut, Inc. (DNC/the licensee) submitted a proposed change to the Quality Assurance Program (QAP) described in Revision 22 of the DNC Quality Assurance Program Topical Report (QA Topical) for Millstone Units 1, 2, and 3. The proposed change, submitted as a reduction in commitment in the QA program description previously accepted by the Nuclear Regulatory Commission (NRC), would revise the reporting relationship for the Independent Safety Engineering Group (ISEG). The ISEG is directly involved in meeting the requirements of NUREG-0737, Item I.B.1.2, for Millstone Units 2 and 3.

2.0 BACKGROUND

The ISEG performs independent reviews of plant operations in accordance with the guidelines of item I.B.1.2 of NUREG-0737. Item I.B.1.2 provides the following clarification, which is applicable to the proposed change:

The new ISEG shall not replace the plant operations review committee and the utility's independent review and audit group as specified by current staff guidelines (Standard Review Plan, Regulatory Guide 1.33, Standard Technical Specifications). Rather, it is an additional independent group of a minimum of five dedicated, full-time engineers, located onsite, but reporting offsite to a corporate official who holds a high-level, technically oriented position that is not in the management chain for power production.

The ISEG organization at Millstone is described in Appendix F of the QA Topical (as revised and accepted by NRC letter dated September 14, 2000, Ref. 2). To reflect the proposed change in reporting relationship, the following new sentence is added under "Function":

The ISEG shall function to advise the Vice President Senior Nuclear Executive - Millstone on matters related to nuclear safety.

Enclosure

The second paragraph under "Function" describes the current ISEG reporting relationship,

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.

This paragraph would be replaced, as follows, to describe the proposed reporting relationship.

The ISEG reports to management who is not in the direct chain of command for power production. This relationship provides for access to a high-level, technically oriented, management position such that the required authority and organizational freedom to perform assessment is not influenced by cost and schedule when opposed to nuclear safety considerations. 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 the SORC and the NSAB. ISEG independence is similar to that of the Oversight function.¹

3.0 EVALUATION

The licensee proposes to reassign the ISEG reporting relationship from the Process Owner - Oversight to the Process Owner - Performance Improvement.

The functional relationships of Millstone organizations having quality functions are described in Section 1 of the licensee's QA Topical. The senior manager responsible for all activities related to the operation of Millstone Power Station is the Vice President and Senior Nuclear Executive - Millstone. The three management chains reporting to the senior manager are responsible for (1) Operations, (2) Nuclear Technical Services, and (3) Oversight.

The ISEG function would be reassigned to the management chain responsible for nuclear technical services. This reassignment is consistent with the NUREG guidance that the ISEG function report to a high level, technically oriented position that is not in the management chain for power production. In addition, the reassignment remains independent of the plant operations review committee and the independent review and audit group.

The ISEG function would be assigned to the Performance Improvement organization, which reports through the Assessment organization to the Vice President - Nuclear Technical Services. The revised ISEG description makes clear that the function of the ISEG is to advise senior management on the overall quality and safety of operations. Reports of ISEG activities will continue to be provided to the Vice President and Senior Nuclear Executive - Millstone. The ISEG function will continue to have the independence and organizational freedom as it had under the Oversight reporting relationship. Since the revised ISEG function remains consistent with the guidelines of NUREG-0737, the proposed change is acceptable.

¹ Reviewer Note: The SORC and the NSAB are the review bodies implementing the review and audit functions described by ANSI N18.7-1976/ANS-3.2, Section 4, "Reviews and Audits."

4.0 CONCLUSION

The proposed reassignment of the ISEG function is consistent with the guidelines of NUREG-0737, item I.B.1.2 for the independent review function and is, therefore, acceptable.

5.0 REFERENCES

1. Letter, Dominion Nuclear Connecticut, Inc., to U.S. NRC, "Proposed Change to Revision 22 of the DNC Quality Assurance Topical Report, Independent Safety Engineering Group Reporting Relationship," May 10, 2001.
2. Letter, U.S. NRC to Northeast Nuclear Energy Company, "Millstone Nuclear Power Station, Units 2 and 3, Change to Revision 22 of the NUQAP Topical Report (TAC Nos. MA9995 and MA9996)" September 14, 2000.

Principal Contributor: Kenneth Heck

Date: July 12, 2001