



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
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KING OF PRUSSIA, PENNSYLVANIA 19406-1415

November 15, 2001

Docket No. 05000245

License No. DPR-21

Raymond P. Necci
Vice President - Operations
Dominion Nuclear Connecticut, Inc.
Millstone Nuclear Power Station, Unit 1
c/o Mr. David A. Smith, Process Owner - Regulatory Affairs
Rope Ferry Road
Waterford, CT 06385

SUBJECT: INSPECTION 05000245/2001010, DOMINION NUCLEAR CONNECTICUT, INC., MILLSTONE NUCLEAR POWER STATION, UNIT 1, WATERFORD, CONNECTICUT

Dear Mr. Necci:

On September 25, 2001, the NRC completed an inspection at your Millstone Unit 1 facility and the findings were discussed with your staff on September 25, 2001. The enclosed report presents the results of this inspection.

During the four month period covered by this inspection, you conducted limited decommissioning activities at Millstone Unit 1 in a safe manner and maintained appropriate focus on the safe storage of fuel in the spent fuel pool. The Fuel Rod Accountability Project continued throughout the period.

In accordance with 10 CFR 2.790, a copy of this letter will be placed in the NRC Public Document Room and will be accessible from the NRC Web site at <http://www.nrc.gov/NRC/ADAMS/index.html>. No reply to this letter is required.

Your cooperation with us is appreciated.

Sincerely,

/RA/

Ronald R. Bellamy, Chief
Decommissioning and Laboratory Branch
Division of Nuclear Materials Safety

Enclosure:
Inspection Report No. 05000245/2001010

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EXECUTIVE SUMMARY

Dominion Nuclear Connecticut, Inc.
NRC Inspection Report No. 05000245/2001010

This integrated inspection included aspects of licensee operations and plant support during decommissioning activities. The report covers a four-month period of announced inspections by two regional inspectors.

Operations

The licensee's organization was appropriate for the overall decommissioning condition of the facility. Staff with Unit 1 institutional knowledge had been assigned to other Millstone Station organizations and provided valuable human resources to support the modified safe storage (SAFSTOR) condition at Unit 1. (O1.1)

The inspector determined the licensee's self-assessment and corrective action program for Millstone Station Unit 1 was adequate. (O1.2)

Housekeeping was improved during the inspection period, and the licensee's fire protection program appeared well developed and established to meet the existing hazards at Millstone Unit 1. (O1.3) In the area of radiological safety, the inspectors noted good job planning, work practices and attention to personnel radiation protection. (O2.1) The radiation survey program was found to be adequate, and personnel were observed to be following appropriate survey procedures. The radiological safety and As Low As Reasonably Achievable (ALARA) program appeared to be effective in implementing the ALARA goals. Periodic surveillance inspections were carried out in accordance with the technical specifications. No safety concerns were identified. (O2.2, O2.3)

The radioactive waste storage and transportation program was well organized and effective. Shipping documentation was very good and showed that shipments had been made in compliance with the Nuclear Regulatory Commission (NRC) and Department of Transportation (DOT) regulations. No safety concerns were identified. (O2.4)

Plant Support

The inspectors found the licensee's process and review for abandonment of the liquid radwaste systems thorough and complete. The new evaporator is operable, and the Defueled Safety Analysis Report (DSAR) has been revised by the licensee to accurately reflect installed plant equipment for processing liquid radwaste in the Unit 1 reactor building. The actions taken by the licensee have eliminated the remaining deficiencies previously identified in the liquid radwaste processing facilities and equipment, and violation 01172/EEI 50-245/96-003-01 is therefore closed. (R2.1)

Sample skid flowrate instrument specifications are no longer contained within the Radiological Effluent Monitoring Offsite Dose Calculation Manual, and the instrument functional test procedure is therefore no longer in conflict with the Permanently Defueled Technical Specifications. Instrument settings are consistent with the instrument manufacturer's recommendations. This licensee event report (LER) is closed. (LER 50-245/1997-030) (R2.2)

The Fuel Rod Accountability Project (FRAP) investigation continued throughout the inspection period. The inspectors found the investigation progressed in a thorough and systematic manner. The licensee's FRAP report identifying the results of the investigation are under NRC review and will be followed up during a special NRC inspection. (R2.3)

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REPORT DETAILS

I. Operations

O1 Conduct of Operations

O1.1 General Comments (71801)

The Millstone Unit 1 staffing had been reduced since the decommissioning contractor achieved cold and dark on March 30, 2001, in the last inspection period. The central monitoring station staff was focused on equipment associated with the Spent Fuel Pool Island (SFPI). Unit 1 staff performed routine rounds and surveillance walk-downs of systems. Engineering continued with completing modifications to the ventilation system for the reactor building.

During this inspection period, Unit 1 personnel completed ongoing decommissioning activities, including removal from service of the former Unit 1 liquid radwaste processing facility and startup of the new reactor building radwaste evaporator. Spent fuel pool island ventilation was isolated from the rest of Unit 1, operable in the manual mode with some work remaining to enable automatic operation. Most scaffolding and temporary equipment that had accumulated in Unit 1 was removed during this period.

O1.2 Organization, Facility Management and Control

a. Inspection Scope (36801)

The inspector reviewed the licensee's systems for overall management and control of the decommissioning process. The licensee's organizational structure and staffing were reviewed and evaluated to verify that licensing commitments were being met.

b. Observations and Findings

The organizational structure of Millstone Station Unit 1 is headed by the Millstone Station Vice President of Nuclear Operations who has the overall responsibility of Unit 1, supported by the Unit 1 General Manager.

The licensee significantly reduced staff dedicated to Unit 1 activities during this inspection period. The inspector evaluated the organization to determine if reductions in program areas since shutdown and reaching a modified SAFSTOR condition were appropriate to protect public health and safety. The only radioactivity associated with the facility was contamination that resulted from previous normal operation of the reactor. Because the majority of the contamination is sealed in the reactor vessel and spent fuel located in the spent fuel pool (SFP), the radiological issues in Unit 1 have been significantly reduced. Based on discussions with the various radiation protection staff members, the inspector observed the staff was knowledgeable in their areas of responsibility and the staff had extensive historical work experience with the Millstone Unit 1 facility.

c. Conclusions

The licensee's organization was appropriate for the overall decommissioning condition of the facility. Staff with Unit 1 institutional knowledge had been assigned to other Millstone Station organizations and provided valuable human resources to support the modified SAFSTOR condition at Unit 1. No safety concerns were noted.

O1.3 Self-Assessment, Auditing and Corrective Actions

a. Inspection Scope (40801)

The inspector reviewed the licensee's controls for identifying, resolving and preventing issues that may degrade safety or quality, including self-assessments, auditing, and corrective actions. The inspector reviewed licensee procedures and the documentation of self-assessments, audits and surveillances.

b. Observations and Findings

The inspector reviewed and discussed the licensee's self-assessment and corrective action program covering activities occurring in the Unit 1 facility. The Corrective Action program for Millstone is designed to provide the method to identify, evaluate and correct adverse conditions in a timely manner. For audits of station activities, the audit team typically focuses on activities being conducted in Units 2 & 3, but an audit may also review work being done in Unit 1. The audits are typically broad in scope and have addressed the major non-radiological aspects of the facility as well as any radiological concerns.

The inspector reviewed the licensee's Condition Report (CR) 01-06670 covering the Annual Occupational Exposure Report that the licensee failed to submit to the NRC by March 1, 2001, as required by Technical Specification 5.7.1. The Technical Specification requires that a tabulation be reported annually by March 1 of the number of station, utility, and other personnel receiving exposures greater than 100 mrem/yr. This issue was identified by the NRC project manager. Immediate action was taken by the licensee and the information was provided to NRC on July 16, 2001. The licensee determined that the report for Unit 1 was missed as a result of the organizational transition from the contractor managing Unit 1 operations prior to April 1, 2001 to Dominion Nuclear Connecticut (DNC) as the new owner and Millstone licensee after April 1, 2001. Similar reports for Units 2 and 3 were submitted as required. The licensee concluded that the causes of missing the Unit 1 report should not recur, and that the existing DNC system for assuring timely submittal of this report is adequate to assure future reports are made as required.

c. Conclusions

The inspector determined the licensee's self-assessment and corrective action program for Millstone Station Unit 1 was adequate. Although this issue was corrected, it constitutes a violation of minor significance that is not subject to enforcement action in accordance with Section IV of the Enforcement Policy. No safety concerns were identified.

O1.4 Decommissioning Performance and Status Review at Permanently Shut Down Reactors

a. Inspection Scope (71801)

The inspectors toured the plant to assess the general material condition of the structures, systems and components (SSCs) associated with the safe storage of spent fuel, radiological effluent controls, and radiation protection.

b. Observations and Findings

All areas were generally clean and had been emptied of most tools and equipment from the floor areas. The areas were adequately posted and controlled. The Unit 1 fire protection program had been incorporated into the site program including monthly fire extinguisher inspections and hydrant testing, which are conducted by the site fire brigade.

External hydrants which are part of the Millstone Site general service water system are capable of providing water for fighting fires at Unit 1. DNC has a Millstone site-wide fire brigade made up of fire protection professionals who are assigned a fire protection advisor on a daily basis, typically from the operations department. Backup fire protection is available from the local offsite Waterford Fire Department.

c. Conclusions

Housekeeping was improved during the inspection period. The licensee's fire protection program appeared well developed and established to meet the existing hazards at Millstone Unit 1. No safety concerns were identified.

2.0 Radiological Safety

2.1 Personnel Radiation Protection

a. Inspection Scope (83750)

The inspector reviewed surveillance and survey procedures, and discussed ALARA goals with the licensee. Surveys of radiological control areas and the radiation protection manual were reviewed.

b. Observations and Findings

All radiation work permits (RWPs) are reviewed by the site ALARA Council and are controlled through the Millstone Units 2 & 3 Radiation Protection Manager's office.

The Health Physics (HP) organization was in the process of reviewing all the Unit 1 radiation protection procedures to merge them into the site-wide procedures. This will reverse the work performed to separate Unit 1 procedures from the rest of the site during the period before the decision to sell the entire site to DNC. The HP program manager for Unit 1 had identified 67 station procedures that needed specific evaluation to update the procedures to reflect the current status of Unit 1.

Workers are issued dosimetry that includes both thermoluminescent dosimeters (TLDs) and direct-reading electronic dosimeters (DRDs). TLDs are issued quarterly and the program is certified by the National Voluntary Laboratory Accreditation Program (NVLAP). The dosimetry program for Unit 1 is not differentiated from dosimetry for Units 2 & 3 and is a Millstone Station program.

c. Conclusions

The inspector noted good job planning, work practices and attention to personnel radiation protection. No safety concerns were identified.

2.2 Surveys and Contamination Control

a. Inspection Scope (83750)

The inspector reviewed the licensee's Unit 1 routine radiological survey program, and also reviewed selected surveys.

b. Observations and Findings

Radiological surveys are used to identify and evaluate radiation sources in areas throughout the plant. The survey data is used to provide the basis for radiological controls, maintaining worker exposure ALARA and planning maintenance activities. Health Physics personnel perform the routine surveys at regular, scheduled intervals according to plant conditions and historical data. The operational matrix specifies the survey requirements reflecting the radiological conditions associated with the plant. The survey matrix had been revised to reflect the fact that Unit 1 is shutdown and defueled. Surveys are typically divided into weekly, monthly and quarterly frequencies. A review of select survey records indicated that area dose rates in the spent fuel pool area were typically less than 5 millirem per hour.

The inspector performed tours of the reactor building and radwaste storage areas. The inspector observed personnel doing work in the radiation control area (RCA), moving hazardous materials for transport to other storage locations onsite. All personnel leaving potentially contaminated areas surveyed themselves at the exit points using survey instruments brought into the area for this purpose.

c. Conclusions

The inspector found the radiation survey program to be adequate, and observed personnel to be following appropriate survey procedures. No problems or safety concerns were noted.

2.3 As Low As Is Reasonably Achievable Program (ALARA)

a. Inspection Scope (83750)

The inspector reviewed the licensee's program for keeping radiation exposures ALARA.

b. Observations and Findings

The ALARA program has also been reinstated as a Millstone Station program rather than a Unit 1 only program. The ALARA program is directly managed by the Station ALARA Council, which reviews and approves dose goals and action plans. It also monitors dose goal progress and assigns corrective actions, as needed. The Station ALARA Council also reviews and approves the allocation of resources and capital expenditures to ensure success of the site ALARA program. Licensee staff were controlling personnel exposures to minimal levels, and the cumulative Unit 1 exposure received by the end of the inspection period was 13.1 person rem for the current year. Nine RWPs had been established to cover ongoing work in Unit 1. These included routine tours, surveillance, escorting, inspections, and minor equipment repairs.

c. Conclusions

The radiological safety and ALARA program were effective in implementing the ALARA goals. Periodic surveillance inspections are being carried out in accordance with the technical specifications. There were no safety concerns identified.

2.4 Solid Radwaste Management and Transportation

a. Inspection Scope (86750)

The inspector reviewed the licensee's program for collection, processing and shipment of Unit 1 radioactive waste. The inspector toured the restricted areas to determine if the licensee had characterized, classified, stored and shipped radioactive waste in accordance with the regulations. Areas of inspection focus included verification of compliance with regulatory requirements found in 10 CFR 20.2006, 10CFR 61.55 and 61.56, 10 CFR 71 and 49 CFR 172 Subparts C, D, E, F, G, and I.

b. Observations and Findings

The inspector observed a radwaste shipment from the plant on August 15, 2001, reviewed selected procedures, shipping documents and records, and interviewed cognizant plant personnel. The inspector toured the radwaste storage and processing areas, including the radwaste building, the Millstone Radioactive Waste Reduction Facility (MRRF), the staging area in the reactor building, and the staging area outside the fence near the east entrance. During the facility tour the inspector observed very little radioactive waste; the amount of ongoing work had declined dramatically since the Unit was declared "Cold and Dark" on March 30, 2001. The inspector observed several containers of Class C waste from Unit 3 stored in the Unit 1 radwaste building waiting to be moved to the Unit 3 radwaste storage facility.

The Unit 1 radwaste program had been incorporated into the site wide radioactive waste disposal program. From January 1, 2001 to August 9, 2001 the licensee made 38

shipments totaling approximately 596,000 pounds of waste. The waste was comprised mainly of dry active waste, dewatered resin, a pump impeller, contaminated water and a number of sources and standards. The licensee had shipped the waste in seavans, B-25 boxes, drums and poly high integrity containers.

c. Conclusions

The radioactive waste storage and transportation program was well organized and effective. Shipping documentation was very good and showed that the shipments had been made in compliance with NRC and Department of Transportation (DOT) regulations. No safety concerns were identified.

II. Plant Support

R1 Radiation Protection & Chemistry (RP&C) Facilities and Equipment

R2.1 (Update) Violation 01172/EEI 50-245/96-003-01: Liquid Radwaste Management System

a. Inspection Scope (37801)

The inspector reviewed the status of the new reactor building liquid radwaste evaporator and the licensee's plans to formally remove the old liquid radwaste systems from service.

b. Observations and Findings

The inspector discussed operation of the liquid radwaste evaporator installed in the reactor building. Input of liquid into the evaporator batch holding tank from the reactor building sumps had been limited, with little accumulation. Operation of the evaporator had caused unanticipated condensation in the Heating, Ventilation, and Air-Conditioning (HVAC) ductwork due to limited airflow in the system. The licensee had responded by installing additional heat tracing on the evaporator exhaust ducts, and plans to monitor operation of the system to confirm this corrective action prevents the condensation.

Licensee plans for removal from service of the old Unit 1 liquid radwaste systems were described in detail in NRC Inspection Report 05000245/2000018. The System Evaluation and Reclassification Team (SERT) presented to the Station Operations Review Committee (SORC) the document package to accomplish abandonment of the systems comprising Unit 1 liquid radwaste treatment systems. The only remaining functional liquid treatment system for Unit 1 is the newly installed reactor building evaporator. SORC approved the SERT package for abandonment in August 2001. Revised text for the Defueled Safety Analysis Report (DSAR) was approved as part of the SERT package and incorporated into the DSAR in August 2001. The revised DSAR reflects the availability of the new liquid radwaste processing capability.

The changes to the Unit 1 liquid radwaste processing systems eliminate the need to implement other aspects of the licensee's improvement plan, developed in response to significant deficiencies in the liquid radwaste processing systems documented by the NRC in Inspection Reports 50-245/95-35 and 50-245/96-03, and identified as violation 01172/EEI 50-245/96-003-01.

c. Conclusions

The inspectors found the licensee's process and review for abandonment of the liquid radwaste systems thorough and complete. The new evaporator is operable, and the DSAR has been revised by the licensee to accurately reflect installed plant equipment for processing liquid radwaste in the Unit 1 reactor building.

The actions taken by the licensee have eliminated the remaining deficiencies previously identified in the liquid radwaste processing facilities and equipment and violation 01172/EEI 50-245/96-003-01, which is therefore closed. **(EEI 50-245/96-003-001)**

R2.2. (Update) LER 1997-030: Stack Sampler Flowrate Setpoints

a. Inspection Scope (37801)

The inspector reviewed the licensee's actions taken subsequent to the subject LER.

b. Observations and Findings

Modifications at Unit 1 to prepare for placing facilities in the cold and dark condition had included removing Unit 1 HVAC inputs to the station stack. The spent fuel pool island ventilation replaced the stack as the pathway for Unit 1 airborne releases. The inspector reviewed currently installed and operational Unit 1 equipment for the implementation of the actions described in the subject LER.

Section 5.6.4.a of the Millstone 1 Permanently Defueled Technical Specifications states that the gaseous monitoring instrumentation setpoint determination will be done in accordance with the methodology in the Radiological Environmental Monitoring and Offsite Dose Calculation Manual (REMODOCM). The licensee stated that the sampler flowrate instrument setpoints had been removed from the REMODOCM and were instead incorporated into the procedure for setting up and testing the spent fuel pool island (SFPI) ventilation exhaust air monitor. This vent monitor replaced the equivalent monitor on Unit 1 effluents previously released through the Unit 1 stack.

Unit 1 Procedure SP 407SS, "SFPI Ventilation Exhaust Air Monitor Functional Test", Rev. 000-03, section 4.3.10, includes specifications for the installed ventilation exhaust flowrate monitoring instrumentation to be set at 2.0 CFM. This procedure implements the monitor vendor's recommendations for setpoints, including sampler flowrate. The inspector reviewed the vendor's Operation and Maintenance Manual for the CAM-100G(V17) Continuous Air Monitor and noted that section 3.3.3.9 stated, "It is recommended that the sample flow rate be set to 2.0 SCFM to obtain the optimal efficiency of the shrouded probe's virtual design."

c. Conclusions

Sample skid flowrate instrument specifications are no longer contained within the REMODCM, and the procedure is therefore no longer in conflict with the Permanently Defueled Technical Specifications. Instrument settings are consistent with the instrument manufacturer's recommendations. This LER is closed. **(LER 50-245/1997-030)**

R2.3 Fuel Rod Accountability Project (FRAP)

a. Inspection Scope (60801)

The inspector reviewed the activities of the FRAP staff and progress in the investigation to account for two spent fuel rods missing from the SFP.

b. Observations and Findings

The licensee's investigation to determine the whereabouts of two unaccounted for spent fuel rods continued throughout this inspection period. The inspector discussed status of the investigation with involved management and staff, reviewed pertinent records and SFP inspection results, and the status of licensee reviews of records related to shipments between Millstone and General Electric/Vallecitos and the low level waste burial sites at Hanford, WA and Barnwell, SC.

The inspector discussed with the licensee the methods being applied to the FRAP investigation. A total of 72 scenarios were identified as possible explanations for disposition of the two spent fuel rods. Each scenario was being evaluated through review of records, interviews, and physical inspections. In addition to the physical inspections, hardcopy and electronic records had been reviewed and 138 interviews conducted. Approximately 40,000 person hours had been expended by Northeast Utilities staff and contractors on the investigation team from its inception in January 2001 through the end of July 2001.

The inspector reviewed the results of recent inspections performed in the Millstone 1 SFP, including video recordings of visual inspections using a remotely operated crawler on the floor of the SFP. The crawler was used to examine otherwise inaccessible areas of the SFP, such as beneath the storage racks, and did not show any evidence of the two unaccounted for spent fuel rods. The licensee had completed approximately 100 specific inspections directly related to the search for the spent fuel and was considering what inspections remained to be performed. Inspections were conducted in accordance with a search plan, describing the objective and procedure to be used for each inspection. The search plans were derived from the action plans developed to define actions to be taken to investigate each of the individual scenarios. Prior to implementing the searches, each plan was reviewed by the Independent Review Team, an oversight group established by Northeast Utilities to provide concurrent quality assurance and review for investigation team activities.

c. Conclusions

The Fuel Rod Accountability Project investigation continued throughout the inspection period. The inspectors found the investigation and spent fuel pool inspections progressed in a thorough and systematic manner. The licensee's FRAP report identifying the results of the investigation are under NRC review and will be followed up during a special NRC inspection.

III. Management Meetings

X1 Exit Meeting Summary

The inspectors met with licensee management representatives following each site visit during the inspection period and discussed the results of the inspection. The licensee acknowledged the findings presented. Additional information was discussed on September 25, 2001.

PARTIAL LIST OF PERSONS CONTACTED

Licensee

Raymond Necci - Vice President Nuclear Technical Services, Dominion
Dan Meekhoff - Unit 1 General Manager, Dominion
Don Cleary - Operations Manager, Dominion
Dave Dodson - Team Leader, Regulatory Affairs
Paul Willoughby - Regulatory Affairs
Mari Jaworsky - Senior Engineer, Regulatory Affairs
Frank T. Perry - Health Physics Supervisor
Bob Leach - Radiation Protection
Mark Biron - Director, MPO support services
Guy Lombardo - Chemistry
Dave Wilkins - Chemistry
Peter Quinlan - Engineering
Axel Hayes - Shift Supervisor, Operations
Rich Kennedy - Operations
Dennis Reagan - ALARA Council / HP
Ken Hajnal - TL Radiation Protection
Paul Tulba - Waste Services

INSPECTION PROCEDURES USED

36801	Organization, Management, and Cost Controls at Permanently Shutdown Reactors
60801	Spent Fuel Pool safety at Permanently Shutdown Reactors
70801	Decommissioning Performance and Status at Permanently Shutdown Reactors
83750	Occupational Radiation Exposure
86750	Solid Radioactive Waste Management and Transportation of Radioactive Materials

ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

None

Closed

VIO 01172/EEI Liquid Waste Management System Changes
96-003-01

LER 1997-030-00 Stack Sampler Flowrate Setpoints

Discussed

VIO 01172/EEI Liquid Waste Management System Changes
96-003-01

LER 1997-030-00 Stack Sampler Flowrate Setpoints

LIST OF ACRONYMS USED

ALARA	As Low As is Reasonably Achievable
CFR	Code of Federal Regulations
CR	Condition Report
DNC	Dominion Nuclear Connecticut, Incorporated
DOT	Department of Transportation
DRD	Direct Reading Dosimeter
DSAR	Defueled Safety Analysis Report
EEI	Escalated Enforcement Item
FRAP	Fuel Rod Accountability Project
HP	Health Physics
HVAC	Heating, Ventilation, and Air-Conditioning
LER	Licensee Event Report
MRRF	Millstone Radioactive Waste Reduction Facility
NRC	Nuclear Regulatory Commission
NVLAP	National Voluntary Laboratory Accreditation Program
RCA	Radiation Control Area
REMODCM	Radiological Environmental Monitoring and Offsite Dose Calculation Manual
RP	Radiation Protection
RWP	Radiation Work Permit
SAFSTOR	Safe Storage
SERT	System Evaluation and Reclassification Team
SFP	Spent Fuel Pool
SFPI	Spent Fuel Pool Island
SNM	Special Nuclear Material
SORC	Station Operations Review Committee
SSC	Structures, Systems and Components
TLDs	Thermoluminescent Dosimeters
URI	Unresolved Item