NORTHEAST UTILITIES
THE CONNECTICUT LIGHT AND POWER COMPANY
WESTERN MASSACHUSETTS ELECTRIC COMPANY
HOLYOKE WATER POWER COMPANY
NORTHEAST UTILITIES SERVICE COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY

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August 15, 1990

Docket No. 50-245
A08905

Re: 10CFR2.201

Director, Office of Enforcement
U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Gentlemen:

Millstone Nuclear Power Station, Unit No. 1
Reply to a Notice of Violation (EA 90-084)

By letter dated July 16, 1990,(1) the NRC transmitted its Notice of Violation (NOV) and proposed imposition of civil penalty relating to Inspection Report No. 50-245/90-05. The inspection was conducted at the Millstone Station between February 21 and April 2, 1990 to review the circumstances associated with failure to meet a technical specification limiting condition for operation for the main steam line (MSL) high flow setpoint and the failure to perform the monthly gas turbine generator (GTG) surveillance test in accordance with technical specification requirements.

Pursuant to 10CFR2.201, Northeast Nuclear Energy Company (NNECO) is providing its response to the subject NOV and proposed imposition of civil penalty. The response to the NOV is included in Attachment 1. We also provide below our perspectives on certain matters concerning the Staff's July 16, 1990 letter.

In the letter, the Staff stated that our corrective actions, "although acceptable, were not considered prompt and comprehensive in that they did not adequately address improvements in [our] programs for assuring timely identification and resolution of potential safety concerns." We are concerned that we were not successful in communicating our thorough response to these deficiencies.

As discussed at the May 24, 1990 Enforcement Conference held in King of Prussia, Pennsylvania, NNECO has voluntarily initiated several programs to update and verify the design configuration of Millstone Unit No. 1. They include a Setpoint Verification Program, a Design Basis Reconstruction (DBR) Program, and an Updated Final Safety Analysis Report (UFSAR) Verification effort. These programs represent significant undertakings and commitment by

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(1) T. T. Martin letter to E. J. Mroczka, "Notice of Violation and Proposed Imposition of Civil Penalty-$25,000 (NRC Inspection Report No. 50-245/90-05)," dated July 16, 1990.

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NNECO to improve design basis documentation at Millstone Unit No. 1. The details of these programs are reiterated in Attachment 2 for your convenience.

While the programs were not initiated as a result of the deficiencies in question, and were in fact ongoing at the time of discovery of the deficiencies, we believe they address a contributing cause, namely conflicting design basis information. We also believe that these programs are very broad in scope and are therefore responsive to the current violation. Moreover, corrective actions specifically in response to these deficiencies, including the following, were initiated:

- An Engineering Work Request Tracking System, which is described in detail in Attachment 2, has been implemented to track and prioritize activities that are forwarded to Northeast Utilities Service Company (NUSCO).

- Lessons learned from the GTG surveillance testing deficiency are being incorporated into reviewer training and audit program development/implementation.

- Other technical specification surveillance requirements that may not provide specific acceptance values (numerical) have been compared to surveillance procedures to assure consistency and confirm that requirements are met. Follow-up actions to clarify technical specification requirements are planned, where appropriate.

The above actions demonstrate NNECO's prompt and comprehensive response to the issues relating to the MSL high flow setpoint and GTG surveillance testing deficiencies.

The Staff's July 16, 1990 letter stated that the NOV and proposed civil penalty were authorized for a perceived licensee weaknesses "for prompt identification and resolution of safety significant deficiencies." While NNECO concedes that the deficiencies were not identified and resolved as promptly as they could have been, we want to emphasize our prompt response upon confirmation of the deficiencies. They were reported to the NRC per 10CFR50.72 and corrective actions were immediately taken to resolve the deficiencies. NNECO does not believe, however, that the deficiencies were safety significant.

Corporate procedure NEO 5.05, Revision 0, "Design Input, Design Verification, and Design Interface Reviews," was implemented on July 1, 1980. This procedure defines the requirements for providing input to the design process and for design verification, using independent design reviews and design interface reviews. We believe that had this procedure been in place at the time the MSL high flow setpoint was originally calculated (1976), this deficiency could have been prevented through independent verification of assumptions. In addition, a corporate procedure, NEO 2.25, "Identification and Implementation of NRC Reporting Requirements," which provides guidance on reporting of

potential concerns, has been implemented since the genesis of these deficiencies. NNECO believes that had this procedure been formally in place at the time the MSL high flow setpoint was recalculated,[2] the issue would have been promptly prioritized and evaluated. To supplement the procedural guidance, as discussed at the Enforcement Conference, NNECO has also developed a training program for unit personnel which specifically addresses timeliness, conservatism, and consistency in the reportability process. NNECO considers a heightened awareness to the safety significance of issues to be very important. Accordingly, the training program reinforces the corporate position of being increasingly more sensitive to any issue that could have potential safety implications.

It should be noted that the concern by the I&C Engineer in raising the priority for completion of the setpoint verification, was not based on a nuclear safety concern, but so as to increase the allowable tolerance to provide for ease of calibration of the MSL high flow switches.

We believe that the ongoing programs and improved procedural guidance, along with the corrective actions initiated to specifically address the deficiencies, provide a high degree of confidence that NNECO will promptly identify, track, and resolve potential safety concerns in the future.

In summary, NNECO believes that the information presented to the Staff, both at the May 24, 1990 Enforcement Conference and herein, demonstrates complete and comprehensive corrective measures in regard to these issues. Additionally, the self-initiated programs to enhance documentation related to plant design bases, will ensure timely resolution of similar occurrences, as well as provide a firm foundation with which to assess future activities. NNECO also believes it to be very important that the Staff recognize and understand our commitment to excellence in these matters. We are quite concerned that we were unable to successfully demonstrate our corrective actions to you, so that you would have a greater appreciation for the comprehensiveness of these actions. Therefore, we would welcome the opportunity to meet with you at a mutually agreeable time to discuss our programs and provide you with a more comprehensive understanding of our activities and goals.

Notwithstanding our concerns about the Staff's apparent misunderstandings of our comprehensive corrective actions, we have enclosed a check for $25,000 in full payment of the civil penalty. Since the MSL high flow setpoints and GTG surveillance testing issues were not resolved as promptly as they could have been, NNECO believes it would not be prudent to expend additional resources to contest the civil penalty.

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(2) A Millstone Unit No. 1 engineer calculated a setpoint different from the existing setpoint in April 1987, but was uncertain as to which calculation was correct, because of different assumptions for the value of reactor pressure.

In addition to our formal response to the NOV and proposed imposition of civil penalty, Attachment 3 provides information addressing operability determinations as requested by Mr. J. T. Wiggins at the May 24, 1990 Enforcement Conference.

If there are any questions about the information provided above or in Attachments 1, 2, or 3, please contact us.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

FOR: E. J. Mroczka
Senior Vice President

BY: _____
C. F. Sears
Vice President

cc: T. T. Martin, Region I Administrator
J. T. Wiggins, Deputy Director, Division of Reactor Projects
M. L. Boyle, NRC Project Manager, Millstone Unit No. 1
W. J. Raymond, Senior Resident Inspector, Millstone Unit Nos. 1, 2, and 3

STATE OF CONNECTICUT)
) ss. Berlin
COUNTY OF HARTFORD)

Then personally appeared before me, C. F. Sears, who being duly sworn, did state that he is Vice President of Northeast Nuclear Energy Company, a Licensee herein, that he is authorized to execute and file the foregoing information in the name and on behalf of the Licensee herein, and that the statements contained in said information are true and correct to the best of his knowledge and belief.

_____
Notary Public

Docket No. 50-245
A08905

Attachment 1

Millstone Nuclear Power Station, Unit No. 1

Reply to a Notice of Violation (EA 90-084)

August 1990

1. Description of Violations

10 CFR Part 50, Appendix B, Criterion XVI (Corrective Actions), requires, in part, that measures shall be established to assure that conditions adverse to quality, such as failures, deficiencies and deviations are promptly identified and corrected.

Contrary to the above, on two occasions prior to March 1990, conditions adverse to quality existed at Millstone Unit 1; however, one condition was not promptly identified, and the other condition, although identified, was not promptly corrected, as evidenced by the following two examples:

A. In April 1987, a Unit 1 engineer performed a calculation of the main steam line high flow trip setpoint partly in response to a General Electric Service Information Letter (SIL) and found that the existing setpoint was in excess of the setpoint limit of 120% of rated steam flow described in technical specification (TS) limiting condition for operation 3.2.A and Table 3.2.1. Although this determination (which constituted a condition adverse to quality) was sent to the corporate engineering department in April 1987 to verify the validity of the calculation and the assumptions used, final verification that the setpoint was nonconservative was not made until March 1990, even though the Unit 1 instrument and control (I&C) engineer repeatedly had sought disposition of this matter during this period; and

B. Since 1978, the monthly surveillance test of the gas turbine generator was performed at a load greater than 6 megawatts as specified by procedure SP-668.2, Gas Turbine Emergency Fast Start Test, Revision 12, dated February 21, 1990 (and prior revisions). The [gas turbine generator] was not tested at the full load output (of 9.876 megawatts as specified in Table 8.3-7 of the Updated Final Safety Analysis Report that existed at the time of identification) as required by technical specification surveillance requirement 4.9.A.2.a. Although these TS surveillance tests were performed monthly, and periodic audits of technical specifications and biennial reviews of these tests were performed, this condition was not identified and corrected until March 2, 1990.

2. Admission or Denial of the Alleged Violations

Northeast Nuclear Energy Company (NNECO) acknowledges that the main steam line (MSL) high flow setpoint was in excess of the technical specification setpoint limit of 120% of rated steam flow and that the gas turbine generator (GTG) was not tested at full load output as required by technical specifications. NNECO also acknowledges that these deficiencies were not identified and resolved as promptly as they should have been.

3. Reasons for the Violations

A. Main Steam Line High Flow Setpoint

The root cause of this deficiency was initial incorrect calculations in 1976. The calculations were erroneously based on initial General Electric assumptions that were t valid for plant operating conditions.

A contributing factor was the existence of several setpoint references for different purposes that were not clearly defined and therefore susceptible to incorrect use. In this case, an incorrect reactor pressure value was used to perform the MSL setpoint calculation.

Other contributing factors were: (1) the lack of an adequate calculation verification process in 1976 (programs implemented since that time have corrected this deficiency) and (2) the failure to elevate this setpoint concern to a level that would have resulted in more prompt resolution of the question regarding validity of the assumptions. While item (2) is considered a contributing factor to the overall deficiency, its significance in the promptness aspect of the deficiency is not diminished.

B. Gas Turbine Generator Testing

NNECO has determined that the root cause of the GTG-related events was a lack of verification of the load requirement of the GTG as it applied to technical specifications. A contributing cause was the inattention to detail by (1) personnel that revised and/or cancelled related surveillance procedures and (2) personnel reviewing surveillance procedures without questioning test levels when appropriate.

4. Corrective Steps Taken and the Results Achieved

A. Main Steam Line High Flow Setpoint

The following short-term/prompt corrective actions were taken as a result of this issue:

- The MSL setpoint was promptly recalculated and corrected.
- An independent third-party root cause analysis was promptly performed to ensure that NNECO had broadly evaluated the origin of the deficiency and that appropriate broad corrective actions to be taken would address root cause concerns.
- A review of ongoing programs , promptly conducted to ensure that (1) a deficiency of this type would not occur utilizing

current setpoint procedures and (2) current procedural setpoint verifications would discover similar setpoint deficiencies.

B. Gas Turbine Generator Testing

The following prompt corrective actions were taken to address this issue:

- The GTG operability surveillance procedure was modified to require a monthly load test at greater than 10 MWe. Subsequently, the GTG was successfully tested to the revised procedure.

- The Millstone Unit No. 1 Director expedited an ongoing GTG load study. As a result, NNECO promptly discovered a concern regarding GTG maximum load requirements.

- The Millstone Unit No. 1 Director reinforced to personnel responsible for performing technical specification audits and biennial procedure reviews the need for a comprehensive verification of technical specification and procedural requirements.

- An independent third-party root cause analysis was promptly performed to ensure that NNECO had evaluated the origin of the deficiency and that broad corrective actions would be taken.

5. Corrective Steps to Prevent Future Violations

A. Main Steam Line High Flow Setpoint

As stated in the cover letter, NNECO believes that had corporate procedure NEO 5.05, "Design Input, Design Verification, and Design Interface Reviews," been in place when the setpoint was originally calculated (1976) this deficiency could have been avoided. In addition, had NEO 2.25, "Identification and Implementation of NRC Reporting Requirements," been formally in place when the setpoint was recalculated (April 1987), the issue would have been promptly evaluated. Attachment 3 provides information addressing operability determinations as requested by Mr. J. T. Wiggins at the May 24, 1990 Enforcement Conference.

NNECO has also implemented an Engineering Work Request Tracking System which (a) tracks activities that are forwarded to Northeast Utilities Service Company (NUSCO) from the plant site, (b) assigns priorities to site concerns that are forwarded to NUSCO and (c) alerts both plant and NUSCO staff to issues requiring prompt attention (e.g., Priority 1 issue addressed within 3 days of being forwarded to NUSCO). This effort, which will be monitored by

management, should prevent extensive delays in resolving potentially safety significant issues.

In addition to the Engineering Work Request Tracking System in use at Millstone Unit No. 1, a level of effort (LOE) work tracking system was instituted in March 1989. The LOE is a formal commitment between NNECO and NUSCO corporate engineering to provide engineering deliverables that do not warrant the complexities of the Project Assignment System.

An LOE is assigned a tracking number and is reviewed monthly at meetings between the plant and corporate engineering management. This process gives task's the appropriate visibility with status review monthly.

As the Staff is aware, NNECO has also initiated several programs to update and verify the design configuration of Millstone Unit No. 1. These programs are summarized below and discussed in more detail in Attachment 2.

o Setpoint Verification Program

A comprehensive program to continuously verify that all Reactor Protection and Emergency Core Cooling System trip setpoints are correct and meet the requirements established in the Millstone Unit No. 1 Technical Specifications is in progress.

In addition to the above, programmatic changes have been implemented to ensure that an independent review of instrument uncertainties and setpoint changes is performed. Current procedures ensure that all setpoint changes receive proper review prior to implementation. This effort is currently expected to be completed during 1992.

o Design Basis Reconstruction Program

NUSCO has a Design Basis Reconstruction (DBR) Program in place for Millstone Unit No. 1. The objective of this program is to capture and consolidate functional requirements, i.e., the "why's" of selected systems. Twenty Design Basis Documentation Packages covering approximately thirty systems, are currently scheduled for development by the end of 1991.

o Updated Final Safety Analysis Report Verification

NUSCO has a Millstone Unit No. 1 Updated Final Safety Analysis Report (UFSAR) Verification effort in progress. This effort is being performed concurrently with the Design Basis Reconstruction Program mentioned above and will cover all systems within

the scope of the DBR program. Areas and systems which will not be verified by the DBR team will be reviewed to determine if FSAR verification is needed. Completion is scheduled for mid-1992.

B. Gas Turbine Generator Testing

The following long-term corrective actions have been initiated:

- o A technical specification change to clarify the GTG test requirements/acceptance criteria of Section 4.9.A.2.a is currently undergoing in-house technical review and will be submitted to the Staff by October 31, 1990.

- o Other technical specification surveillance requirements that may not provide specific acceptance values (numerical) have been compared to surveillance procedures to assure consistency and confirm that requirements are met. Follow-up actions to clarify technical specification requirements are planned, where appropriate.

- o Lessons learned from this event will be incorporated into reviewer training and audit program development/implementation by December 31, 1990.

- o As previously discussed, NUSCO has implemented a UFSAR Verification effort that will review the UFSAR for various plant systems. This effort is being performed concurrently with our voluntary Millstone Unit No. 1 Design Basis Reconstruction Program, which will consolidate our design basis information.

NNECO believes that the DBR Program and UFSAR Verification effort may uncover deficiencies similar to those involved with the MSL high flow setpoint and GTG surveillance testing issues, and will also provide a valuable source of information for resolving design basis questions in a timely manner.

6. Date When Full Compliance Will Be Achieved

We consider our existing procedures and programs to be in full compliance and acceptable. Notwithstanding this conclusion, NNECO currently plans to complete the enhancements discussed in Item 5 above, to further strengthen these programs and procedures to minimize the likelihood of the occurrence of similar deficiencies not being promptly identified and resolved.

Docket No. 50-245
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Attachment 2

Millstone Nuclear Power Station, Unit No. 1

Self-Initiated Programs

August 1990

Design Basis Reconstruction Program

A. General Description

The main goal of the Design Basis Reconstruction (DBR) program at Northeast Utilities (NU) is to capture the original design basis, the "whys" behind the physical plant. The program has been in place for approximately five years and will continue for another five. It encompasses all four nuclear units. Several NSSS and BOP Design Basis Documentation Packages (DBDPs) have and will be developed. These DBDPs will be maintained and updated to reflect the current plant configuration.

Northeast Utilities Service Company (NUSCO), on behalf of Northeast Nuclear Energy Company (NNECO), currently has a purchase order with General Electric (GE) to provide the design basis requirements for Millstone Unit No. 1 up to the date of turnover and additional changes which involved GE. This information is updated and expanded into a DBDP. A single DBDP may include more than one system. In addition to GE efforts, all remaining Millstone Unit No. 1 information retained by Ebasco, the original architect/engineer (A/E), was obtained. This has provided some of the original information for the BOP DBDPs and since this was a turnkey plant, it may also provide some input to the NSSS DBDPs. At present, DBDPs are maintained on a yearly basis.

B. Module Content

The individual sections of the subject module are briefly described below.

1. Section 1.0--General

This section provides general information about the project along with an overview of the DBDP. This section also contains a set of scoping piping and instrumentation diagrams (P&IDs) to define the extent and boundaries of the DBDP.

2. Section 2.0--System Descriptions

This section provides references to currently available system descriptions for the respective DBDP system.

3. Section 3.0--Functional Requirements

The intent of this section is to provide the functional requirements in a readily usable fashion. It will generally contain information on the following five subjects:

a. 3.1--System Level Functional Requirements
b. 3.2--Component Level Functional Requirements
c. 3.3--System Interface Requirements
d. 3.4--Plant Design Changes
e. 3.5--Correspondence

Sections 3.1 and 3.2 define the key functional requirements which were based on selected attributes, similar to ANSI 45.2.11. Vendor, A/E and NU design documents are reviewed for functional requirements. Pertinent design basis information from these documents are included within this section. The impact of the Systematic Evaluation Program (SEP), the Integrated Safety Assessment Program (ISAP), and Three Mile Island (TMI) upgrades are also discussed in this subsection. Licensing documents, such as the Updated Final Safety Analysis Report (UFSAR) and Technical Specifications, are also referenced for a functional requirement if it is the only source for that functional requirement.

System Interface Requirements Information, Subsection 3.3, defines the functional requirements and references pertaining to the interfaces between the subject DBDP system and all other plant systems.

Plant Design Change Data, Subsection 3.4, provides information that pertains to the design changes for that system since turnover. This subsection includes a list and summary of all the approved Plant Design Change Records, Plant Design Change Evaluations, and Project Assignments for that system and identifies the component identification numbers and purpose. This subsection may also include a list of Work Order information if it impacts a functional requirement. If a design change document modified, added or deleted a functional requirement, that information is brought forward into the system and/or component subsections.

Correspondence, Subsection, 3.5, includes a list and summary of pertinent letters, memos, and general correspondence that pertains to the subject DBDP system.

4. Section 4.0--Calculations

The intent of this section is to provide a listing of those pertinent calculations that were reviewed for a given system and the functional requirements found as a result of that review. Pertinent functional information from the calculations will be incorporated into Section 3.0.

5. Section 5.0--Specifications

The purpose of this section is to provide a consolidated listing of vendor, A/E, and NU specifications that pertain to a given system and/or component. Information will be incorporated into Section 3.0 as applicable.

6. Section 6.0--Design Discrepancies

This section contains a listing of design basis discrepancies which have been identified during the DBDP development. Discrepancies resulting from conflicts in support documentation

are included here for either the original design or for changes made to the system since plant turnover. These discrepancies are also referenced within Section 3, to notify the user of the potential conflict.

7. Section 7.0--Licensing

This section will list the existing licensing documents applicable to the subject DBDP. This section will include, at a minimum, applicable UFSAR, FSAR, and Technical Specification sections, as well as ISAP and SEP/TMI topic designations.

8. Section 8.0- Procedures

This section is being reserved for a consolidation of functional requirements and design basis information that is contained within, invoked by, or referenced by the various plant procedures. This section is not currently being developed.

C. Schedule

The present schedule is for completion of Millstone Unit No. 1 development activities by the end of 1991. After initial issue, the documents are put into a maintenance mode of annual updates. The maintenance program is currently being evaluated to optimize the approach.

D. Discrepancies

For the documents currently under development, the following is a breakdown of the number of discrepancies identified to date:

Standby Liquid Control--0
Feedwater Control/Feedwater Coolant Injection--8
Low-Pressure Coolant Injection--9
Control Rod Drive--13
Reactor Protection Systems--12
Service Water--19

The process for reviewing and dispositioning discrepancies has been under development and currently we are formalizing the procedure which will be implemented in the near future. Overall, we believe that our program is compatible with that being developed by the NUMARC Design Basis Documentation Working Group, which has been interacting with the NRC on this issue.

UFSAR Verification Effort

Recently a plan was developed to verify the Millstone Unit No. 1 UFSAR to satisfy the generic concern identified in the self-initiated SSFI of the Condensate and Feedwater Injection Systems. In order to best utilize resources, it was decided to use the DBR team to verify those systems for which we are developing DBDPs.

The DBR team will verify those items within the scope of the DBR program for those systems for which we are developing DBDPs. Areas and systems which will not be verified by the DBR team will be reviewed to determine if FSAR verification is needed. Each group will process UFSAR change packages, as needed.

The present schedule for this verification effort is for completion by mid-1992. This schedule provides adequate time for discipline input and reviews. This has the added advantage of increasing the use of and familiarity with the final document by the personnel who routinely use it. This approach is also responsive to the NRC concern stated in Inspection Report 50-245/90-05, which we share, regarding the degree of confidence in the accuracy of the UFSAR.

Setpoint Verification Program

Management has recognized the need to revise the Reactor Protection System and Engineered Safety Features uncertainty calculations. These uncertainty calculations are the basis for the establishment of proper instrument setpoints.

The review of Millstone Unit No. 1 uncertainty calculations will be in accordance with current NRC approved guidance and standards. The governing standard is ISA 67.04-1987, "Setpoints for Nuclear Safety-Related Instrumentation." This standard is endorsed by Regulatory Guide 1.105, "Setpoints for Nuclear Safety-Related Systems."

To further our involvement and commitment to the area of uncertainties/setpoints, NUSCO has a voting member on the present ISA 67.04 Committee.

The elements of Millstone Unit No. 1 Setpoint Verification Program are:

- o Program Definition

  Defining the scope and control mechanism. This activity also involves prioritizing the Instrument Loops and their associated Uncertainty/Setpoint Calculations.

- o Development of Tools

  A standard Uncertainty/Setpoint Methodology was developed from current NRC guidance. This in-house methodology is necessary to ensure a consistent, conservative product.

- o Production of Uncertainty/Setpoint Calculations

  This activity is presently ongoing, utilizing in-house engineering personnel. The progress of this effort is tracked in our monthly plant specific Project Review Meetings.

- o Resolution of Setpoint Change Requests

  In parallel with the above step, resolution of any calculated setpoint deemed suitable for revision will occur. Setpoints that

require revision will utilize the current setpoint change request procedure, and reportability procedure, if appropriate.

Additionally, the above issues are being reviewed with respect to their significance to Millstone Unit Nos. 2 and 3, and the Haddam Neck Plant.

Engineering Work Request Tracking System

On April 9, 1990, NNECO implemented and formalized an "instruction" at Millstone Unit No. 1, that provided guidance and a formal tracking system for documents that are transmitted to NUSCO for engineering support, evaluation, or review. Further, this "instruction" provides a method for initial issue evaluation so that a priority for completion is promptly assigned. This "instruction" will result in feedback to plant management with regard to the NUSCO priority assigned to items that may result in potentially reportable conditions or conditions that may affect plant operations.

The tracking system has the following key characteristics:

- Provides a method for initial evaluation and prioritization.
- Assigns a unique tracking number for each engineering request.
- The tracking log is reviewed each week by the Engineering Manager.

Priorities are assigned as follows:

- Priority 1--The issue involves a potentially reportable condition. A reportability evaluation in accordance with NEO 2.25 will be initiated, as appropriate.

- Priority 2--The issue involves a potential impact on plant equipment operability.

- Priority 3--The issue involves an "external commitment."

- Priority 4--Outage issue.

- Priority 5--"Routine" issue.

The tracking system was initiated as a short-term measure at Millstone Unit No. 1. An integrated tracking system will be implemented for all three units at the Millstone Station by December 31, 1990.

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Attachment 3

Millstone Nuclear Power Station, Unit No. 1

Operability Determinations

August 1990

One issue that arose during our discussion at the May 24, 1990 Enforcement Conference concerns our procedures governing operability determinations, and the time limits imposed on that process. First, we believe there is no one fixed time table that is appropriate for all circumstances. Rather, each case must be evaluated on its own merits, and the timeliness of the review is governed by the safety significance of the case at hand. At Northeast Utilities, this process is governed by corporate procedure NEO 2.25, "Identification and Implementation of NRC Reporting Requirements". From initiation to completion, the procedure identifies limiting time frames for an operability determination to be completed. For example, the technical evaluation portion of an operability determination is limited to a maximum of 20 days, and in many cases this is done much more quickly. A licensing review and a Unit Director review are also part of the procedure, and they are administratively time-limited, principally for control purposes. Although the maximum contemplated time frame from beginning to end could be up to 35 days, the procedure does not suggest that this period is appropriate or acceptable for all circumstances. Rather, it outlines a reasonable framework within which we work, recognizing that there may be cases requiring a decision within a matter of hours, days, or weeks.

This procedure has been in place for approximately a year. Since NEO 2.25 is relatively new, we have monitored its use closely and have made improvements as necessary, most recently in April of this year, when it was expanded to cover "Operability Determinations."

As with many procedures, they must be implemented with a nuclear safety ethic, and good judgment. Each unique case must be evaluated on its own merits, and we recognize the NRC's authority to question and critique our actions, both while the issue is evolving and after the fact. As we gain additional experience with these procedures, as well as monitor additional regulatory guidance, if and when it becomes available, we may implement further changes to this procedure. As of this writing, we believe that the existing NEO 2.25 provides an appropriate and acceptable framework.

In a letter dated April 9, 1990 and during the mid-SALP discussions, NNECO stated that development of additional training on reporting was contemplated. NNECO has developed a program for unit personnel which addresses timeliness, conservatism, and consistency. NNECO considers a heightened awareness to the safety significance of issues to be very important. Accordingly, the training program reinforces the corporate position of being increasingly more sensitive to any issue that could have potential safety implications.