



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

Docket
File

June 13, 1991

Docket Nos. 50-213, 50-245
50-336 and 50-423

LICENSEE: Northeast Utilities
FACILITIES: Haddam Neck and Millstone Units 1, 2 and 3
SUBJECT: DISCUSSION OF LICENSING ISSUES OF GENERAL INTEREST

On Thursday, May 23, 1991, representatives of the NRC staff and Northeast Utilities (NU) met at NU's Corporate Headquarters at 107 Seldon Street, Berlin, Connecticut. A list of attendees is contained in Enclosure 1. The meeting was the fourth in a series of meetings being held for the purpose of discussing topics of interest associated with NU's licensed facilities. An outline of the topics discussed at the meeting is contained in Enclosure 2.

The NRC staff presented its comments on the new 10 CFR Part 20. The NRC staff indicated that the new Rule had been adopted by the NRC to be implemented by licensees, on a voluntary basis, between now and January 1, 1993. The NRC staff indicated that NRC Regional meetings would be held during Fall 1991.

The Control Room Habitability issue was addressed for Millstone Unit 1 and Haddam Neck. The NRC staff indicated that NU should recalculate control room doses using all reasonable assumptions including iodine deposition models in the main steam lines and condenser developed by GE/BWR Owners Group and submitted to the NRC as a reference to the Hope Creek license amendment request dated April 3, 1991. While the NRC staff is involved in an initiative to change the accident source term, this initiative is not likely to be completed in the near future. NU agreed to recalculate control room doses by the end of 1991 and the NRC staff agreed to consider such mitigating factors as (1) respirators, (2) use of updated dose-factors contained in Publication No. 30 of the International Commission and Radiation Protection, "Limits for Intakes of Radionuclides by Workers," and (3) the limiting of control room operator occupancy time.

The NRC staff addressed the coordination of site visits and inspections. The Region I Section Leader and the NRR Project Manager should be aware of all site visits and inspections. Should the licensee receive a call to request a site visit, other than from the Section Leader or the Project Manager, these calls should be referred to one of the above. Although unannounced inspections will continue, all visits and inspections will be scheduled recognizing the licensee's burden and the need to efficiently utilize resources.

*Committed dose equivalent per unit intake (unweighted values)

101
11

At the conclusion of the meeting, it was decided that the next meeting in the series would be held in November 1991. No items were identified, during the meeting, for presentation at the next meeting.

/s/

David H. Jaffe, Project Manager
Project Directorate I-4
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosures:

1. List of Attendees
2. Outline

cc w/enclosures:

See next page

DISTRIBUTION

Docket file
NRC & L PDRs
PDI-4 Plant
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ACRS (10)
KBrockman, RI
AAsars
EKelly
JLee
WRaymond
JShedlosky
JStolz
EWenzinger, RI

| | | | | | |
|------|----------------|--------------|------------|------------|-----------|
| OFC | : PDI-4:LA | : PDI-4:PM | : PDI-4:PM | : PDI-4:PM | : PDI-4:D |
| NAME | : SNorris | : DJaffe/Bah | : GVissing | : AWang | : JStolz |
| DATE | : 6/5/91 | : 6/5/91 | : 6/5/91 | : 6/5/91 | : 6/18/91 |
| OFC | : PRPB:NRR | : Region I | | | |
| NAME | : L Cunningham | : U Kelly | : B. phone | | |
| DATE | : 6/12/91 | : 6/13/91 | | | |

Document Name: DISCUSSION OF LICENSING

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Northeast Nuclear Energy Company

Haddam Neck & Millstone Nuclear Power
Station Unit Nos. 1, 2 & 3

cc:

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List of Attendees

NRC

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E. Kelly

D. Jaffe
J. Lee

W. Raymond
J. Shedlosky
J. Stolz
G. Vissing
A. Wang
E. Wenzinger

NU

| | |
|-------------|-------------------|
| E. Annino | R. McGuinness |
| M. Bonaca | P. Miner |
| J. Bibby | J. Molton |
| C. Clement | E. Mroczka |
| F. Dacimo | E. Perkins |
| L. Davison | G. Van Noordennen |
| E. DeBarba | D. Ray |
| R. Factora | H. Risley |
| R. Harris | W. Romberg |
| W. Hutchins | S. Scace |
| R. Kacich | E. Schmidt |
| J. Keenan | J. Steel |
| | K. Zita |

ENCLOSURE 2

NRC/NU COUNTERPARTS MEETING

MAY 23, 1991

Location: Conference Dining Room (C152)
Time: 9 a.m. to 4 p.m.

Agenda

I. INTRODUCTION

II. SELECTED NU INITIATIVES

- A. NU Safety Ethic Presentation
- B. Nuclear Engineering and Operations Reorganization
- C. NU Performance Issues

III. REGULATORY INTERFACE ISSUES

- A. NRC/NU Communications Discussion
 - 1. Routine, Point of Contact
 - 2. Emerging Topics
 - 3. Management of Long-Term Projects
 - 4. NRC Inspections Scheduling
 - 5. Coordinating Site Activities
- B. Technical Specification Bases Control
- C. Emergency Amendments and Temporary Waivers
- D. Reportability/REFs
- E. Allegation Management

IV. ITEMS IDENTIFIED IN PREVIOUS MEETINGS

V. GENERAL LICENSING TOPICS

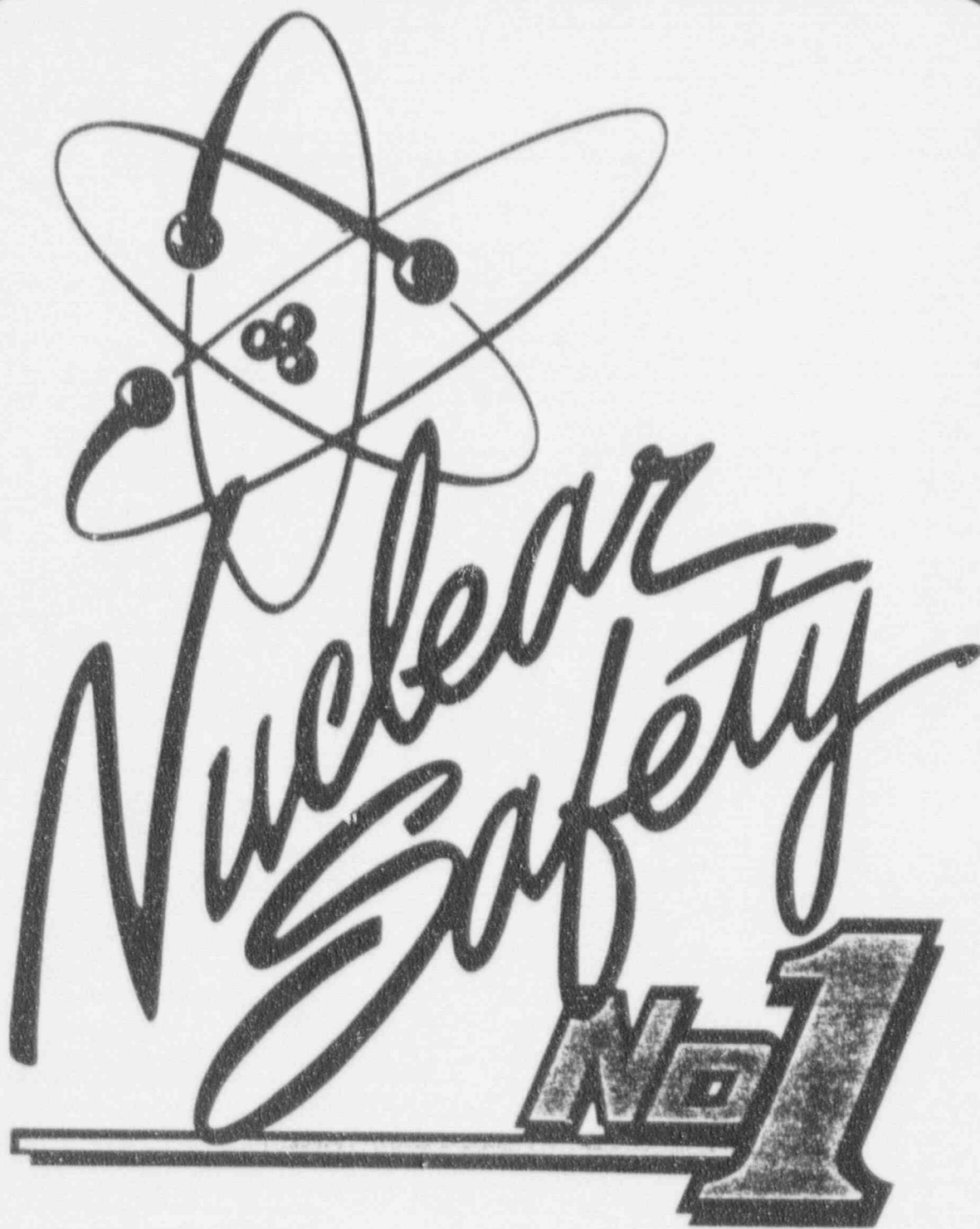
- A. Plant-Specific Regulatory Issues
- B. Status of USI, TMI Items, SEP Items, GSI
- C. Status of NRC Inspection Open Items

VI. SUMMARY AND CONCLUSIONS

I. INTRODUCTION

II. SELECTED NU INITIATIVES

II.A NU SAFETY ETHIC PRESENTATION



Corporate Mission Statement

Northeast Utilities is dedicated to providing safe, dependable, and reasonably priced energy and related services as an ethical, environmentally responsible, and financially sound private enterprise committed to the efficient use of resources, responsive to the needs of customers and their communities, sensitive to the well-being of employees, and yielding a fair return to shareholders.



B.M. Fox, President

"The nuclear safety ethic of our company relies on each employee asking hard safety questions in every aspect of their work"

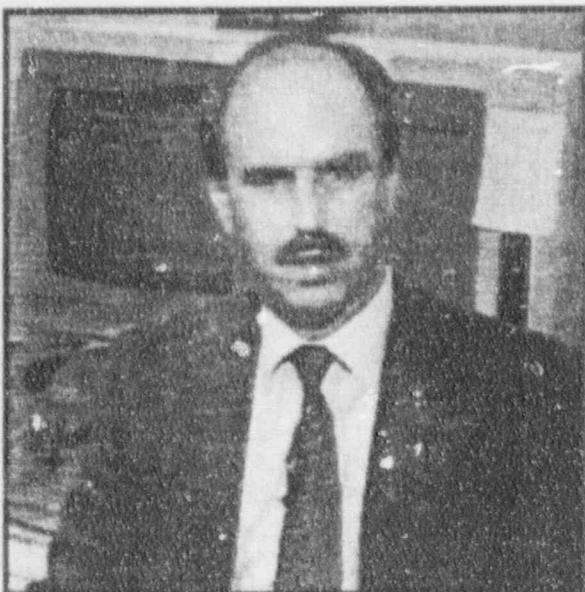
"Profitability and reasonable cost to the consumer is a natural result of maintaining the highest standards of safety"



E.J. Mroczka, Senior V.P. NE&O

"If proper emphasis is placed on safety and quality, a good capacity factor, productivity, is a natural consequence"

"I am personally committed to work with you to make this a successful organization"



E.A. DeBarba, V.P. GE&C

"Understanding the root cause of failures takes time, however, it is the only way in which we can prevent recurrence"

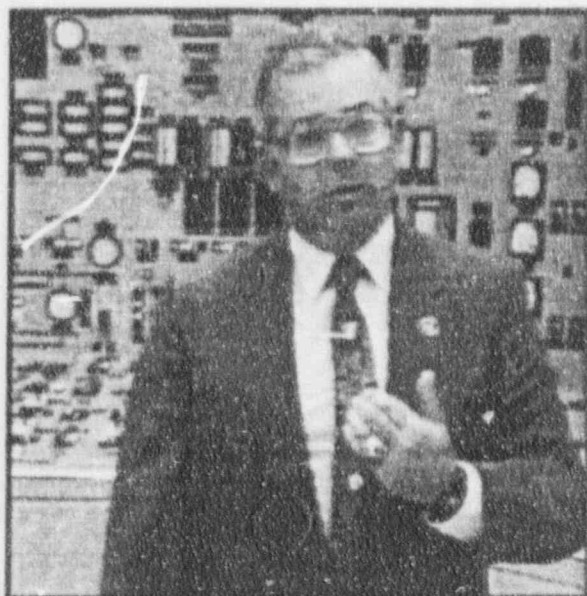
"Conservative decision making and prudent actions, maximize both individual professionalism and organizational effectiveness"



W.D. Romberg, V.P. Nuc. Ops.

"Procedures reflect the collective judgement of regulators, management, designers, engineers, mechanics and operators, on how best to perform work in a safe and consistent manner"

"Adherence to requirements and conscious, responsible compliance with our procedures means rejecting the impulse to work in haste"



C.F. Sears, V.P. N&EE

"Self improvement is a line responsibility"

"Our drive toward self improvement means we must constantly evaluate our work to determine its impact on safety"



W.B. Ellis, C.E.O.

"Our ethics consist of honesty, integrity, a sense of fair play, the courage to speak the truth without fear"

NE&O'S SAFETY ETHIC PRINCIPLES

The mission of Nuclear Engineering & Operations (NE&O) is safe, environmentally sound, dependable, and economic generation of electrical energy utilizing nuclear power. The foundation of this mission is the commitment of each individual in NE&O to a Safety Ethic which creates a pro-active and positive Safety Culture. The Safety Ethic is embodied in the following principles:

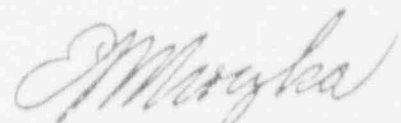
* The key resource of NE&O is its people and their professionalism.

* NE&O Personnel must:

- Create a state of mind which emphasizes safety and reliability through conservative decision making and recognizes that a high capacity factor is a natural consequence;
- Recognize that the potential risks inherent in nuclear technology necessitate that safety considerations pervade all activities;
- Accept personal and moral responsibility to ensure the safety of the public, utility and contractor personnel in our nuclear activities;
- Maintain a state of mind which promotes the use of: (1) effective root-cause assessment of events and deficiencies, (2) timely and effective corrective actions, (3) "what if" questions, (4) attention to detail, and (5) rigorous and constructive self-criticism;
- Perform work in accordance with applicable procedures and requirements.

* NE&O Management must:

- Establish and implement policies and procedures which ensure correct safety practices;
- Create an organizational structure with clearly communicated lines of responsibility and high accountability;
- Select, train and fill positions with the best-qualified and effective individuals who embody the NE&O Safety Ethic;
- Practice open communication characterized by active listening and welcome the identification of potential safety issues;
- Establish oversight review processes for nuclear activities.



E. J. Mroczka
Senior Vice President

11-28-90

NU'S COMMITMENT TO EXCELLENCE (CONT)

0 KEY ADEQUACY MEASUREMENT TOOL--PEER REVIEW OF "BEST SISTER UNITS"

0 MACRO RESULTS

-- DATA FROM 1984 THROUGH 1986

| <u>NU/SISTER PLANT</u> | <u>O&M EXPENSE (\$M)</u> | | <u>CAPITAL COSTS (\$M)</u> | |
|------------------------|------------------------------|---------------|----------------------------|---------------|
| | <u>NU UNIT</u> | <u>SISTER</u> | <u>NU UNIT</u> | <u>SISTER</u> |
| CONNECTICUT YANKEE | 62.4 | 24.6 | 26.3 | 8.4 |
| MILLSTONE 1 | 52.0 | 41.7 | 17.1 | 30.7 |
| MILLSTONE 2 | 58.8 | 38.7 | 25.0 | 15.3 |
| MILLSTONE 3 | NA | NA | NA | NA |
| AVERAGE | 57.7 | 35.0 | 22.8 | 18.1 |
| INDUSTRY AVERAGE | 61.6 (1) | | (2) | |

(1) FIVE-YEAR AVERAGE, 1985-1989

(2) DATA NOT AVAILABLE

NU'S COMMITMENT TO EXCELLENCE (CONT)

-- DATA FROM 1986 THROUGH 1988

| <u>NU/SISTER PLANT</u> | <u>O&M EXPENSE (\$M)</u> | | <u>CAPITAL COSTS (\$M)</u> | |
|------------------------|------------------------------|---------------|----------------------------|---------------|
| | <u>NU UNIT</u> | <u>SISTER</u> | <u>NU UNIT</u> | <u>SISTER</u> |
| CONNECTICUT YANKEE | 78.3 | 31.0 | 34.1 | 7.6 |
| MILLSTONE 1 | 57.0 | 43.9 | 20.9 | 16.5 |
| MILLSTONE 2 | 67.8 | 45.4 | 25.9 | 12.5 |
| MILLSTONE 3 | 59.9 | 69.8 | 15.4 | 31.2 |
| AVERAGE | 65.8 | 47.5 | 24.1 | 17.0 |
| INDUSTRY AVERAGE | 61.6 (1) | | (2) | |

(1) FIVE-YEAR AVERAGE, 1985-1989

(2) DATA NOT AVAILABLE

NU'S COMMITMENT TO EXCELLENCE⁽¹⁾ (CONT)

| | <u>ACTUAL STAFFING</u> | <u>O&M (LESS FUEL) \$M</u> | <u>CAPITAL \$M</u> |
|---------------------|------------------------|--------------------------------|----------------------|
| 1986 ⁽²⁾ | 2150 | 206.0 | 82.2 |
| 1987 | 2238 | 283.6 | 123.0 |
| 1988 | 2139 | 227.2 | 83.6 |
| 1989 | 2104 | 288.6 | 73.9 |
| 1990 | 2094 | 265.6 | 61.6 |
| 1991 | 2078 ⁽³⁾ | 295.7 ⁽⁴⁾ | 87.2 ⁽⁴⁾ |
| 1992 | 2125 ⁽⁴⁾ | 301.3 ⁽⁴⁾ | 157.0 ⁽⁴⁾ |

(1) COLLECTIVE DATA FOR ALL FOUR NU UNITS

(2) REFLECTS MP3 DATA FOLLOWING COMMERCIAL OPERATION IN APRIL.

(3) AS OF MARCH 31, 1991

(4) BUDGET

II.B NUCLEAR ENGINEERING AND OPERATIONS REORGANIZATION

**Major Gains to be Realized from
Restructuring**

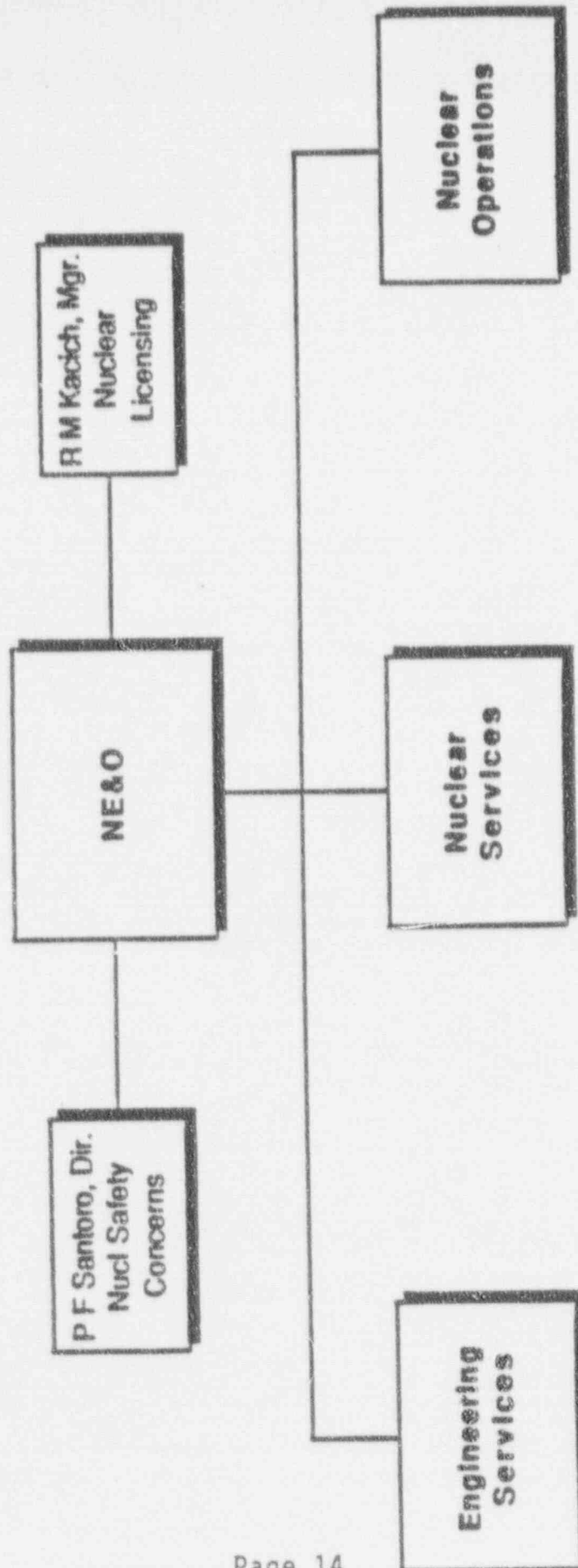
- Revitalize NE&O for the 1990's
- Improve Communication and Teamwork within NE&O
- Complete the Transition from Construction to Operational Focus
- Improve Decision Making Processes
- Capture Cost Effectiveness Opportunities
- Address Organizational Conflicts which Have Developed Over Time
- Clarify Responsibilities and Focus Accountability

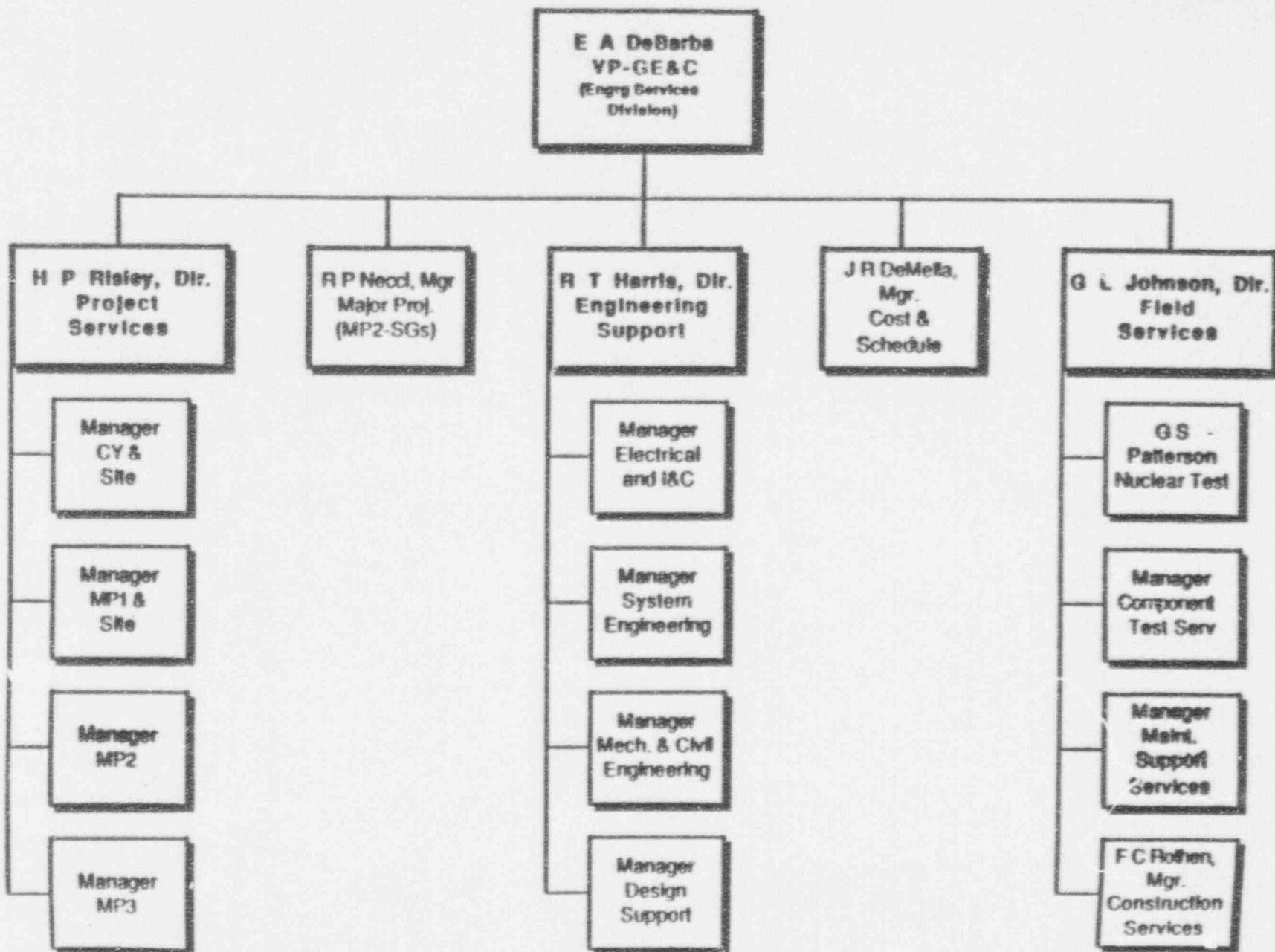
In Summary

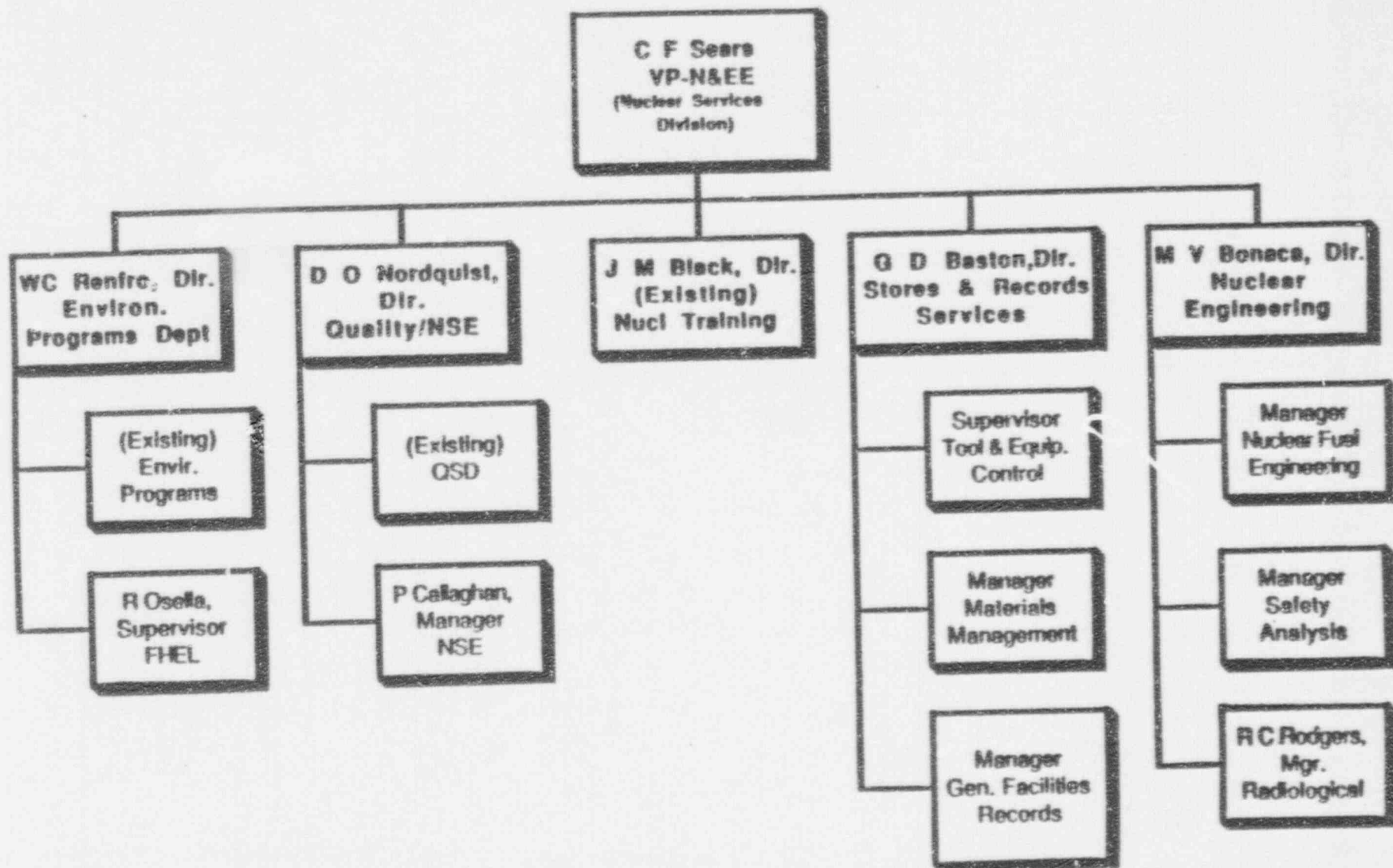
Improve Overall Performance of NE&O

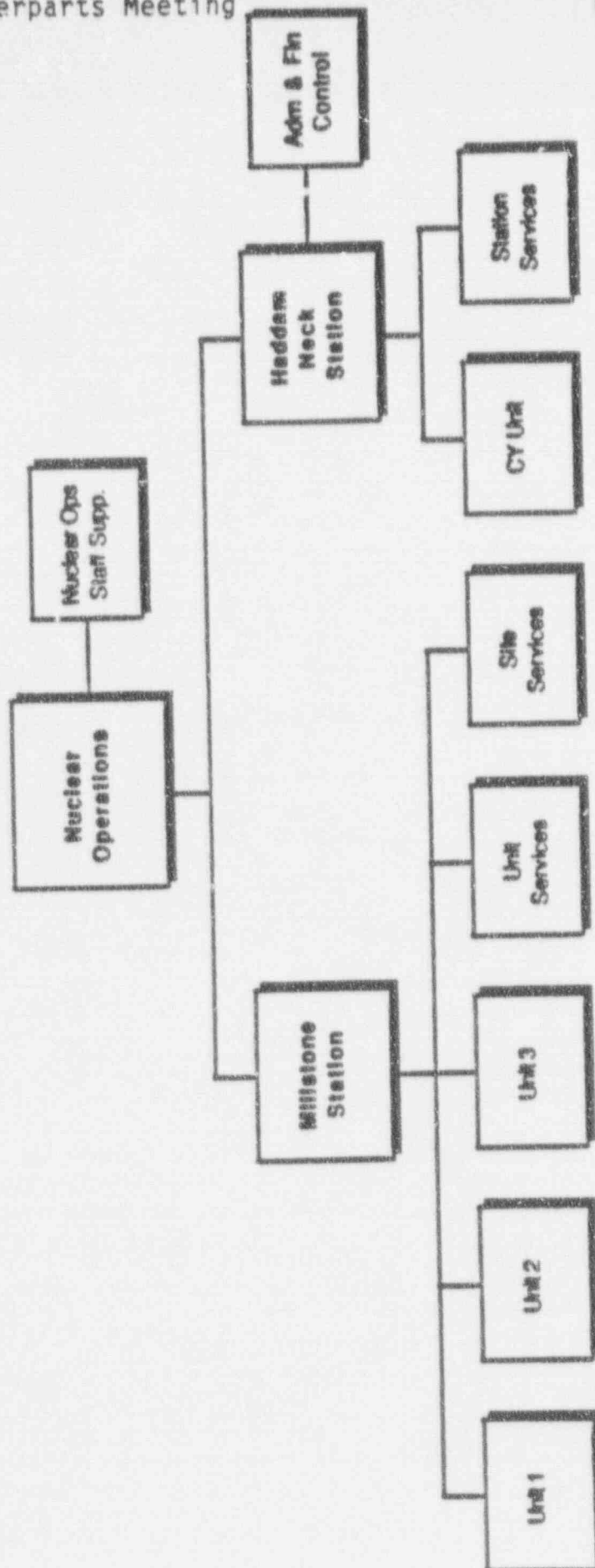
NE&O Restructuring

NE&O will be restructured for the 1990s, completing the transition from construction to operational focus. Engineering support of projects has been unitized, and selected functions, namely, records, stores and field services have been consolidated. Several directors will be rotated, and candidates will be selected for the newly structured management positions.









II.C NU PERFORMANCE ISSUES

PERFORMANCE IMPROVEMENTS

- o FORMATION OF THREE TASK GROUPS
 - NE&O PERFORMANCE TASK GROUP
 - ALLEGATIONS ROOT-CAUSE TASK GROUP
 - OPEPABILITY, REPORTABILITY, AND COMMUNICATIONS TASK GROUP
- o EACH TASK FORCE STAFFED WITH HIGHLY EXPERIENCED AND HIGHLY MOTIVATED PERSONNEL

NE&O PERFORMANCE TASK GROUP

- o CHARTER TO CRITIQUE NE&O PERFORMANCE SINCE JANUARY 1, 1990
- o DETERMINE UNDERLYING ROOT CAUSES OF ANY PERFORMANCE INADEQUACIES
- o PROPOSE MANAGEMENT MEASURES TO ENHANCE PERFORMANCE

NE&O PERFORMANCE TASK GROUP (CONT)

- o EVALUATE BROAD RANGE OF ISSUES TO ADDRESS THE FOLLOWING AREAS:
 - PERSONNEL-RELATED ERRORS
 - PROCEDURAL COMPLIANCE
 - FREQUENCY OF ESCALATED ENFORCEMENT ACTIONS
 - FREQUENCY OF SEEKING EMERGENCY AMENDMENTS OR TEMPORARY WAIVERS OF COMPLIANCE
 - DESIGN BASIS-RELATED ISSUES
 - PROGRAMMATIC ISSUES
- o MAJOR FINDINGS AND RECOMMENDATIONS FOR IMPROVEMENT TO BE PROVIDED TO SENIOR VICE PRESIDENT BY SEPTEMBER 1991

ALLEGATIONS ROOT-CAUSE TASK GROUP

- o CHARTER IS TO EVALUATE EXISTING INFORMATION AND DOCUMENTATION WITH THE OBJECTIVE OF AGGRESSIVELY IDENTIFYING AND ADDRESSING THE ROOT CAUSE FOR EMPLOYEE SAFETY CONCERNS
- o KEY ACTIVITIES:
 - ANALYZE SUBSTANCE OF SAFETY CONCERNS EXPRESSED VIA ALLEGATIONS OR OTHER NONCONFIDENTIAL SOURCES AND PROPOSE CORRECTIVE MEASURES TO MANAGEMENT
 - ASSESS THE WORKABILITY (USER FRIENDLINESS) OF THE THREE INTERNAL OPTIONS IN CONSTRUCTIVELY DEALING WITH ROOT CAUSES AND PROPOSE TO MANAGEMENT MEASURES FOR IMPROVEMENT
- o DESIGNED TO BE RESPONSIVE TO SALP BOARD RECOMMENDATION
- o MAJOR FINDINGS AND RECOMMENDATIONS FOR IMPROVEMENT TO BE PROVIDED TO SENIOR VICE PRESIDENT BY AUGUST 1991

OPERABILITY, REPORTABILITY, AND COMMUNICATIONS

- o CHAPTER IS TO DEVELOP AND IMPLEMENT IMPROVEMENTS TO NU OPERABILITY AND REPORTABILITY PROCEDURES AND GUIDANCE DOCUMENTS
- o TO BE ADDRESSED:
 - ENSURE COMPANY PHILOSOPHY ON OPERABILITY IS CLEAR
 - TECHNICAL MANAGER'S PRIMARY ROLE IS TECHNICAL ASSESSMENT ON SAFETY SIGNIFICANCE AND OPERABILITY
 - NUCLEAR LICENSING PROVIDES REPORTABILITY RECOMMENDATION TO UNIT DIRECTOR
 - ENSURE CONSERVATIVE DECISION MAKING
 - UNIT DIRECTOR MAKES THE DETERMINATION ON REPORTABILITY

OPERABILITY, REPORTABILITY, AND COMMUNICATIONS (CONT)

- FORMALIZE THE FEEDBACK LOOP ON REPORTABILITY DECISION
- IMPROVE HANDLING OF DIFFERING PROFESSIONAL OPINIONS
- IMPROVE COMMUNICATIONS WITH NRC IN THIS AREA
- o SUMMARIZE RESULTS OF EFFORTS AND PROVIDE RECOMMENDATIONS BY
AUGUST 1991

MILLSTONE STATION PERFORMANCE ENHANCEMENT PROGRAM

- Stephen E. Scace - May 23, 1991

OBJECTIVES

- Improve Overall Station Performance
 - Establish Management and Worker Expectations
 - Hold Supervision and Workers Accountable
 - Positive Incentives to Excel (W.G.)
 - Reanalyze and Improve How We Do Business (W.G.)

OBJECTIVES

- Improve Overall Station Performance (Continued)
 - Administrative Control Procedure Rewrite (W.G.)
 - Operability and Reportability Timeliness Improvements (NEO Task Group)
 - First Line Supervisor Responsibility Review (W.G.)
 - Identify Key Programmatic Issues (W.G.)

ALLEGATIONS ISSUES (NEO Task Group)

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RESTORE REGULATOR CONFIDENCE

- Performance Improvement
- Communications (NEO Task Group)
- Station Marketing (W.G.)
- Allegations Issues



PERIODIC SELF-ASSESSMENTS TO MONITOR PROGRESS

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ESTABLISHING MANAGEMENT AND WORKER EXPECTATIONS

- Millstone Principles of Excellence
 - Developed by Task Force of Supervisors and Workers
 - Directors to meet with Employee Groups of 8 -10
 - Reestablishing Constructive and Progressive Disciplinary Program



ESTABLISHING MANAGEMENT AND WORKER EXPECTATIONS

- Expectations Reinforcement
 - Attention To Detail (Tape)
 - Procedural Adherence (Tape)
 - ALARA (Tape)
 - Safety Ethic (Tape & VP Presentation)
 - NEO Vision (VP Presentation)



ESTABLISHING MANAGEMENT AND WORKER EXPECTATIONS

- First Line Supervisory Training Program
 - Assessment Center
 - Teamwork /Observation / Coaching Training
 - Full Program Implementation



FIRST LINE SUPERVISOR TRAINING PROGRAM CHRONOLOGY

- Millstone and Connecticut Yankee Requested Training Assistance 9/7/89
- Training Program Control Committee (TPCC) Formed 2/13/90
- TPCC Outlines Program
 - Supervisory Skills Training (8 weeks)
 - Administrative Training (2 weeks)

FIRST LINE SUPERVISOR TRAINING PROGRAM CHRONOLOGY

- Program Compared To INPO Guidelines
- Program Elements
 - Incumbent Supervisor Assessment
 - Application Exercises In Each Course
 - Follow Up Exercises In Continuing Training



FIRST LINE SUPERVISOR TRAINING PROGRAM CHRONOLOGY

- Initial Program - June 1991
 - Teamwork Training
 - Observation Training

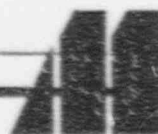


FIRST LINE SUPERVISOR TRAINING PROGRAM COURSES

Supervisory Courses

Duration

- | | |
|--|--------|
| 1. Teamwork/Observation | 4 days |
| 2. Problem Solving & Decision Making | 3 days |
| 3. Management Expectations & Professionalism | 2 days |
| 4. Innovation In The Work Place | 1 day |
| 5. Labor Relations | 4 days |



FIRST LINE SUPERVISOR TRAINING PROGRAM COURSES

| <u>Supervisory Courses</u> | <u>Duration</u> |
|----------------------------|-----------------|
| 6. Presentation Skills | 4 days |
| 7. Stress management | 1 day |
| 8. Leadership & Learning | 5 days |
| 9. Time Management | 3 days |
| 10. Intervention | 2 days |

FIRST LINE SUPERVISOR TRAINING PROGRAM COURSES

Supervisory Courses

Duration

11. Writing Skills "Put It In Writing"

2 days

12. Root Cause Analysis

1 day

13. Internships/ Resource Awareness

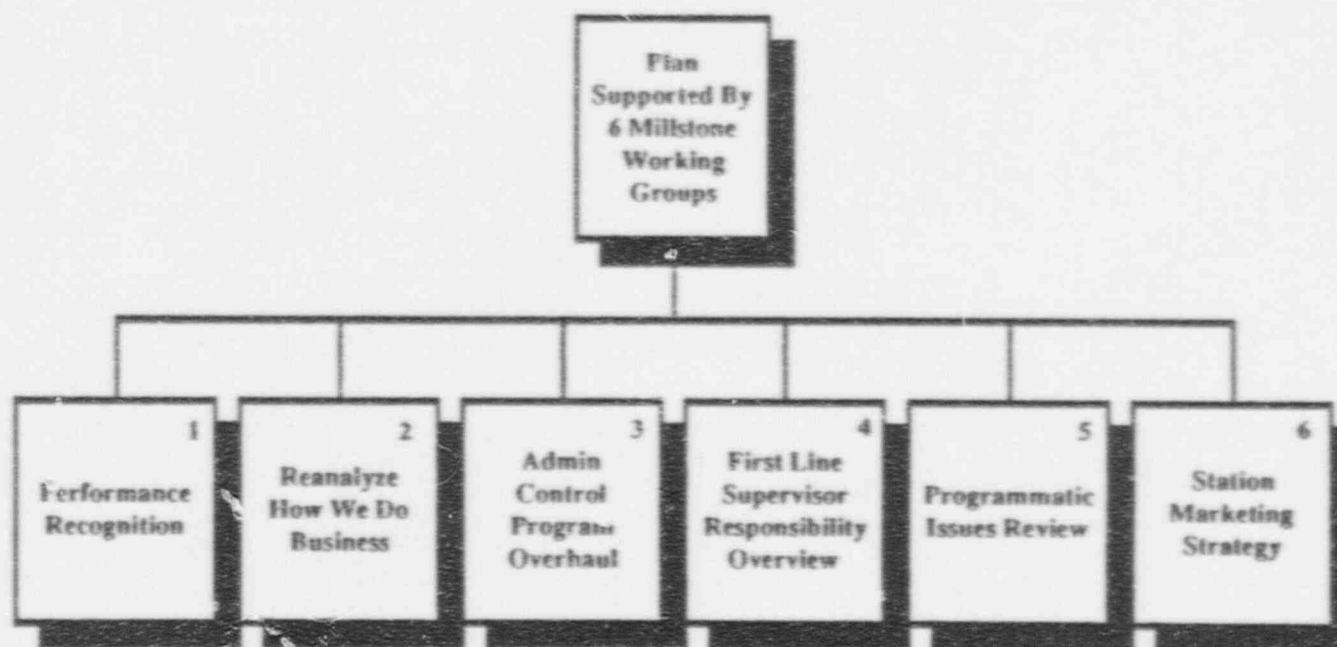
3 days

14. Interviewing Skills

1 day



NNEC₀ WORKING GROUPS



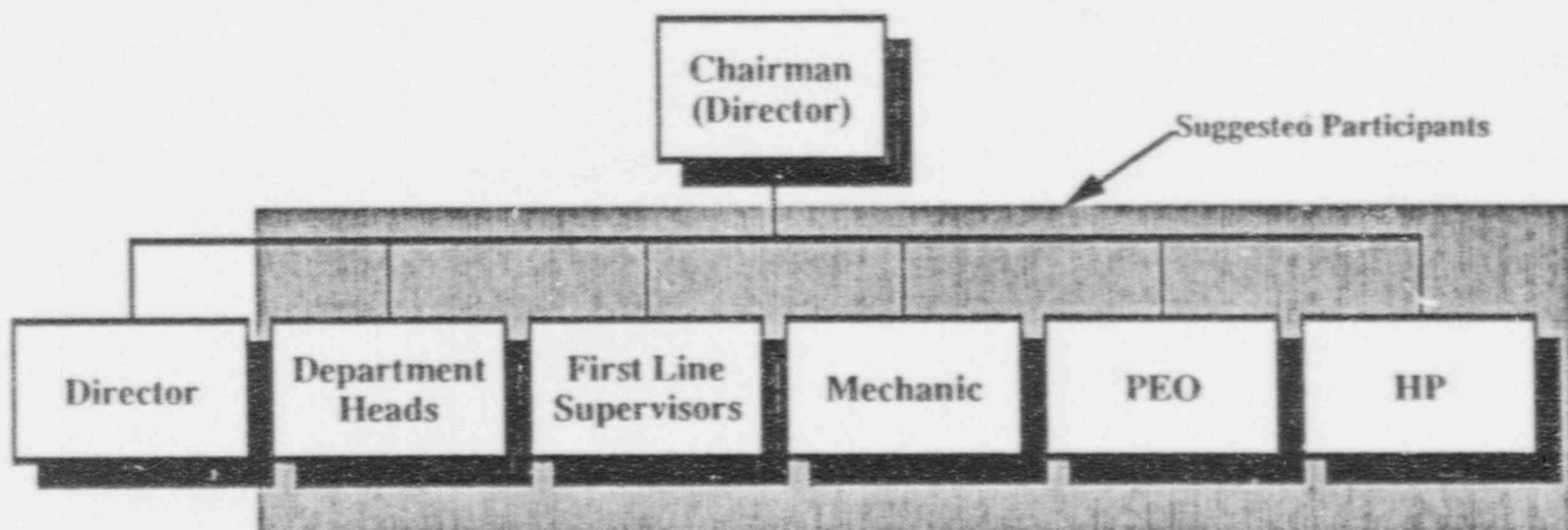
NEO TASK GROUPS

Operability
Reportability
Communications
Task Group

Allegation Issues
Task Group

NEO
Performance
Task Group

Performance Recognition



Potential Suggestions to Evaluate/Implement
(Performance Recognition Working Group)

EXCEL Program

Employee of the Month Program

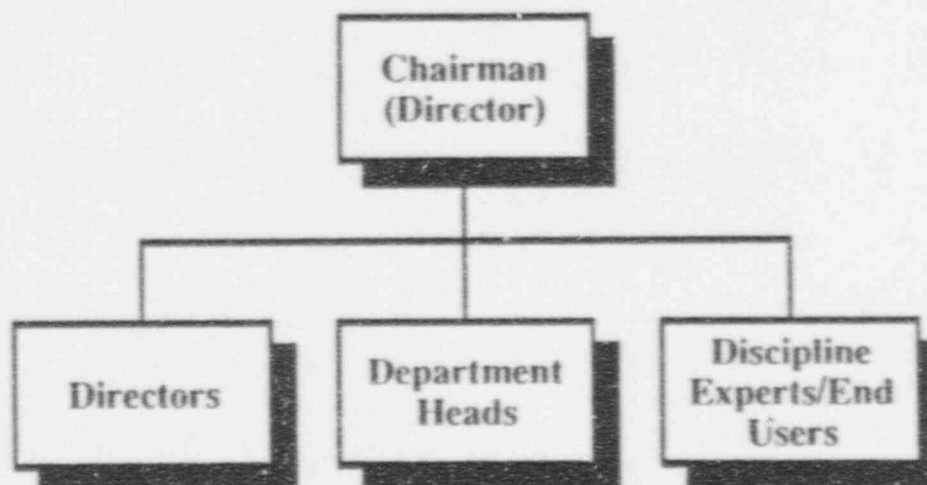
Photo/Parking Programs

Savings Bond Award Programs

Beneficial Solution Program



Re-Analysis of How We Do Business

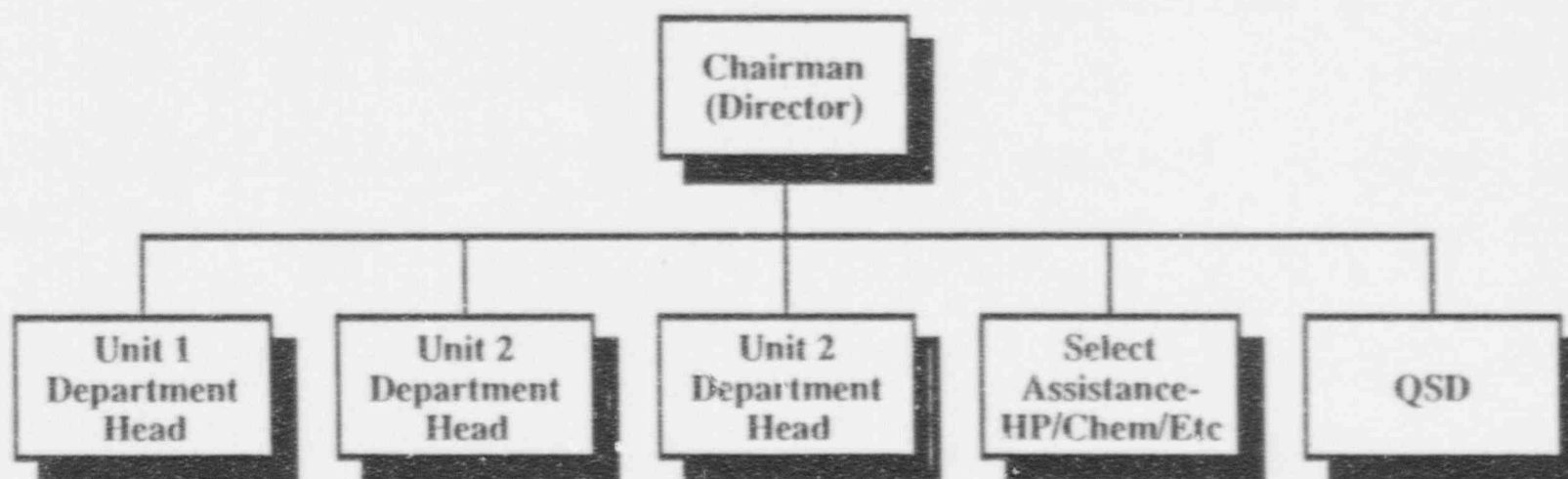


Potential Suggestions to Evaluate/Implement (How We Do Business Work Group)

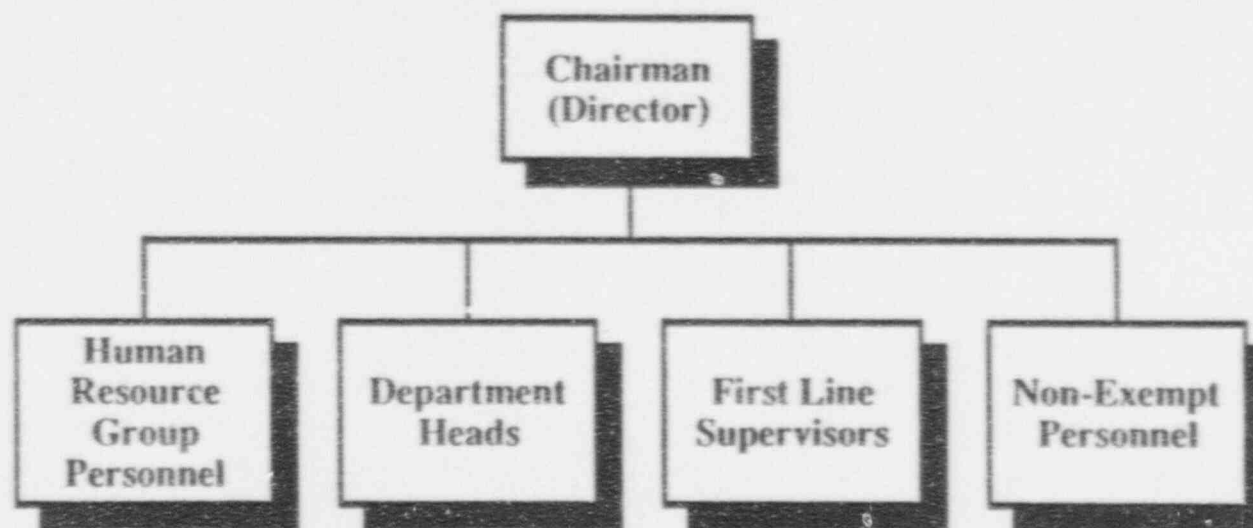
- Refocus Station Daily Morning Meeting
- Millstone Organization
- NEO Division Responsibility Changes
- Work Process
- Automated Tagging
- Utilization of INPO Assist Visits



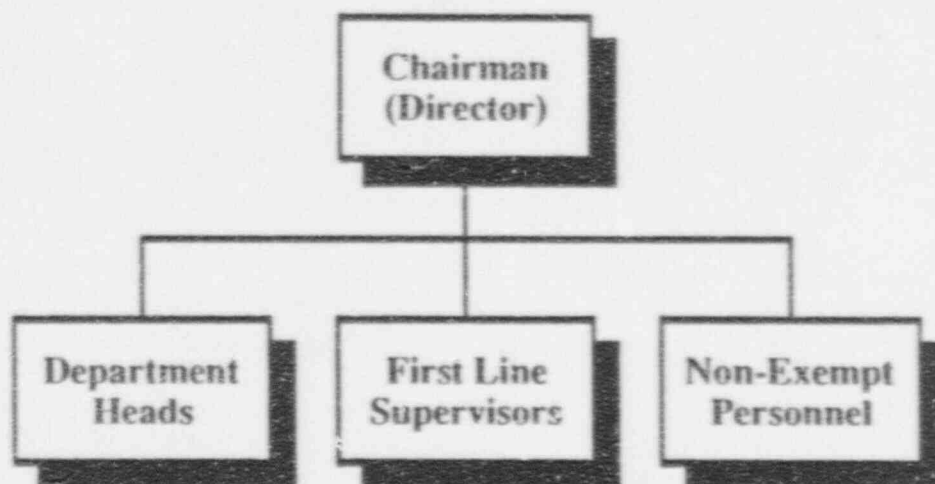
Administrative Control Program



First Line Supervisor Responsibility Review



Programmatic Issues

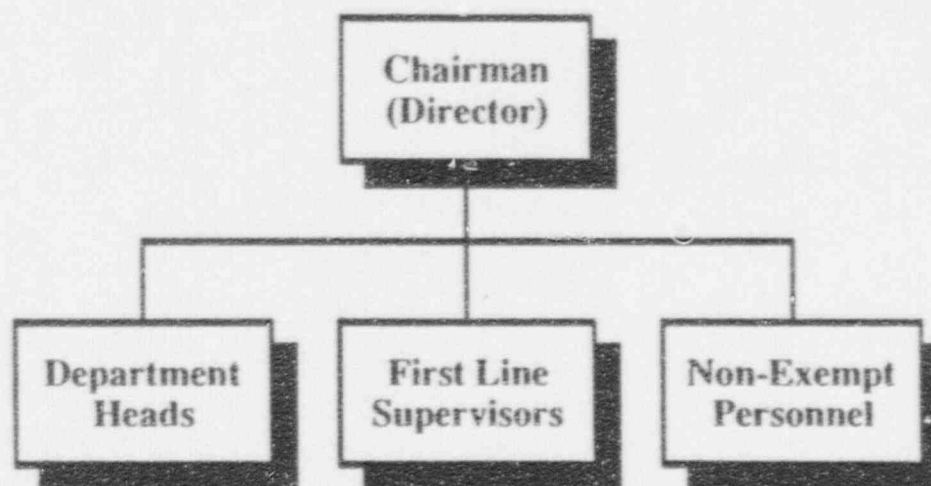


Potential Suggestions to Evaluate / Implement (Programmatic Issues)

- Material, Equipment, and Parts List (MEPL)
- Bill of Materials (BOM)
- Setpoint Program
- Site Data Processing Network



Station Marketing Strategy



Potential Suggestions to Evaluate/Implement (Marketing Working Group)

- Monthly Reports
- Magazine Exposure
- Regular (Weekly) Millstone Messengers
- Effective Interface with Auditors
- Access Point Displays
- Publicity for the Performance Enhancement Program



SUMMARY

- Program is focused to build on strong foundation and improve overall station performance
- A broad cross section of station personnel at all levels will be actively involved
- Development of First Line Supervisor's supervisory skills is a critical element to our program

SUMMARY

- Initiatives have been established to renew management expectations and to affect the necessary culture change
- Initiatives will be undertaken to improve our programs and practices to remove unnecessary burdens from our workers
- Our Goal is to establish and maintain rising expectation and performance levels

III. REGULATORY INTERFACE ISSUES

III.A NRC/NU COMMUNICATIONS DISCUSSION

III.A.1 ROUTINE, POINT OF CONTACT

III.A.2 EMERGING TOPICS

COMMUNICATION PROTOCOL (CONT)

NRC (CONT)

o OUR UNDERSTANDING IS:

- MOST ACCESSIBLE NRC CONTACT ON EMERGING ISSUES IS RESIDENT INSPECTOR TEAM
- FREQUENT REGION I AND NRR CONTACT IS APPROPRIATE AND CONSTRUCTIVE

III.A.2 EMERGING TOPICSRegion IMeetings Recently Held

| | |
|------------------|---|
| January 22, 1991 | Connecticut Yankee Mid-SALP Cycle Meeting |
| March 28, 1991 | Millstone SALP Meeting |
| May 14, 1991 | Management Meeting on NU Performance |

Today's Meeting

| | |
|--------------|----------------------|
| May 23, 1991 | Counterparts Meeting |
|--------------|----------------------|

Other Meetings Tentatively Planned

| | |
|----------------|--|
| June 1991 | Radiation Monitors/Calibration |
| July 11, 1991 | Millstone 2 S/G Replacement |
| August 1991 | Millstone Site Intake Structure Improvements/Service Water Systems |
| September 1991 | Millstone Mid-SALP Cycle Meeting |
| September 1991 | Connecticut Yankee Outage Plans |
| October 1991 | Results of Task Groups Recommendations (including SALP Board recommendation regarding Millstone 2 Operations). |
| November 1991 | Connecticut Yankee SALP Meeting |
| November 1991 | Counterparts Meeting |
| January 1992 | Millstone 2 Extended Outage Plans |

III.A.3 MANAGEMENT OF LONG-TERM PROJECTS

III.A.3 MANAGEMENT OF LONG-TERM PROJECTS

Haddam Neck Plant Zircaloy Cladding Conversion

| | |
|----------------|--|
| Early 1988 | Began Zircaloy Conversion Discussions With NRC |
| December 1988 | Submitted Small-Break Analysis |
| January 1989 | Submitted Large-Break System Evaluation Model |
| February 1989 | Submitted Large-Break Fuel Rod and Core Oxidation Evaluation Models |
| August 1989 | Revised Large-Break LOCA Approach |
| December 1989 | Submitted Fuel Mechanical Design Report |
| September 1990 | Submitted Appendix K Exemption Request |
| November 1990 | Submitted WCOBRA/TRAC Large-Break Analysis Results |
| January 1991 | Submitted Response to Request for Additional Information--Small-Break LOCA Analysis (4 Questions) |
| March 1991 | Submitted Proposed Technical Specification Change to Allow Zircaloy Clad Fuel in the Spent Fuel Pool and New Fuel Storage Area |
| April 1991 | Submitted Response to Request for Additional Information--Small-Break LOCA Analysis (3 Questions) |
| June 1991 | Submit the Technical Report Supporting Cycle Operation (TRSCO) With Updated non-LOCA Transient Analysis and Proposed Technical Specification Changes |
| December 1991 | Expected Cycle 17 Start-Up |

III.A.3 MANAGEMENT OF LONG-TERM PROJECTS (cont)

S/G Replacement Project--Interface With NRC

| | |
|-------------------|---|
| November 8, 1990 | Counterparts Meeting--Provided Discussion on General Replacement Strategy |
| December 17, 1990 | Meeting With NRC Vendor Inspection Branch--Preparation for NRC Audit of B&W Canada |
| January 23, 1991 | Meeting With NRC Staff--Provided Project History and Status to Date and S/G SA Procurement Discussion |
| March 20, 1991 | Meeting with NRC Staff--Provided Project Discussion of Installation Activities and Code Provisions |
| May 23, 1991 | Counterparts Meeting--Show Project Video and Answer Questions |
| July 11, 1991 | Meeting With NRC Staff--Discussion on ALARA and QA |

Proposed Future Topics

S/G Disposal

Design Reviews

S/U Testing

III.A.4 NRC INSPECTIONS SCHEDULING

May 16, 1991

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1991 NE&O CALENDAR OF EVENTSPAST EVENTS

| | |
|----------------------------------|--|
| January 3-7 | AIT at Millstone 3 |
| January 7-11 | Haddam Neck Environmental Effluent and Radiation Protection |
| January 7-11 | Haddam Neck Radiological Effluents Inspection |
| January 8-9 | NRC Human Factors Questions/Request for Feedback on Impact of Operator Regualification Program |
| January 9 | Seabrook SALP Meeting with the NRC |
| January 14-18 | NRC Vendor Inspection Branch Audit of B&W in Canada (S/G Replacement) |
| January 15 | Millstone 2 Enforcement Conference - Containment Integrity Issues, King of Prussia, PA |
| January 17 | Haddam Neck Zircaloy Conversion Meeting with NRC Staff - Washington, DC |
| January 22 - February 11 | Haddam Neck Electrical Distribution System Functional Inspection (EDSFI) Pre-Inspection Visit at Haddam Neck |
| January 22 | Haddam Neck Mid-Cycle SALP Meeting, King of Prussia, PA |
| January 22-25 | Haddam Neck ATWS Inspection |
| January 23 | Presentation to the NRC Staff on MP-2 Steam Generator Replacement, Washington, DC |
| January 28 - February 8 | NRC Maintenance Team Inspection at Seabrook |
| January 28 - February 1 | Haddam Neck Safeguards Inspection |
| February 4-8 | GOSPROMATOMNADZOR USSR (Soviet NRC) Visit on Resident Inspector Program at Haddam Neck |
| February 4-8 & February 18-22 | Haddam Neck EDSFI |

May 16, 1991

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PAST EVENTS (Cont'd.)

| | |
|--------------------------|---|
| February 4-8 | Millstone 3 GL 88-17 Region I Audit |
| February 7 | Millstone 2 Enforcement Conference - Service Water Cross Connect Valve, King of Prussia, PA |
| February 11-15 | Region I LER Follow-up at Millstone 1 |
| February 20-21 | Region I Utility Symposium on Engineering's Role in Plant Support - King of Prussia, PA |
| February 21 | Dosimetry Laboratory By-product Materials License Inspection by Region I |
| February 25 - March 1 | NRC Radwaste & Personnel Dosimetry Audit at CY |
| February 26-27 | NRR (Warren Lyon) Visit to Millstone 3 - Risk During Shutdown |
| February 28 - March 6 | NRC NDE Trailer at Millstone |
| March 4-8 | Millstone Station Security Inspection |
| March 4-8 | Appendix R Visit at Haddam Neck |
| March 6 | NUMARC Board of Directors Meeting - Washington, DC |
| March 7 | ACRS Meeting on Millstone 3 Pipe Rupture |
| March 11-12 | INPO E&A and Simulator Evaluation |
| March 20 | Millstone 2 Steam Generator Meeting, Washington, DC |
| March 21 | Pre-SALP Meeting |
| March 27 | Millstone 1 Enforcement Conference - Service Water System, King of Prussia, PA |
| March 28 | NRC/NU SALP Meeting - Millstone 1, 2, and 3 |
| April 1-5 | Millstone 3 NRC Audit - IE Bulletin 88-04 |
| April 2 | Haddam Neck Rehearsal Drill |
| April 6 | Millstone 1 Refuel Outage Start |

PAST EVENTS (Cont'd.)

| | |
|-------------|--|
| April 8-12 | NRC Emergency Plan Inspection at Haddam Neck |
| April 8-12 | NRC Region I Health Physics Inspection at Millstone) unannounced |
| April 8-12 | NRC Radiological Protection Inspection at Millstone |
| April 9 | INPO Exit Meeting - Berlin |
| April 9-10 | NUMARC Procurement Initiative Implementation Workshop, Baltimore, MD |
| April 15-19 | NRC Safeguards Regulatory Effectiveness Review at CY |
| April/May | Reportability Training at NU |
| May 6-10 | Millstone Station - Region I Chemistry Split Sample Inspection |
| May 6-10 | Millstone Station - NRC Closure of Unresolved Items in Maintenance Area |
| May 7-8 | NRC Regulatory Issues Conference, Washington, DC |
| May 9 | NUS TRENDS Region I Utility Meeting, Berlin |
| May 11 | Haddam Neck Partial Participation Exercise |
| May 13 | Practice Drill with State of Connecticut on the Ingestion Pathway Response |
| May 14 | NU Executives Meeting with Regional Management - King of Prussia, PA |

UPCOMING EVENTS

| | |
|-----------|--|
| May 20-22 | NRC/NRR Staff Visit to Millstone Site to Collect Information on Safety Risk During Shutdown |
| May 20-24 | NRC/NRR Visit to Haddam Neck to Review Information Associated with the Structural/Seismic Aspects of the New Switchgear Building |

May 16, 1991
Page 4UPCOMING EVENTS (Cont'd.)

| | |
|----------------------------------|---|
| May 21 | NU 1991 Annual Shareholders Meeting, South Windsor, CT |
| May 22 | Seabrook Station Annual Onsite Emergency Plan Exercise |
| May 22 | NU Executives Meeting with Commissioners and Senior Staff - Rockville, MD |
| May 23 | Fourth Counterparts Meeting |
| June 3-7 | NRC Review of Procurement at Millstone |
| June 3-7 | Millstone NRC Regualification Program Evaluation |
| June 10-14 | Haddam Neck NRC Regualification Program Evaluation |
| June 20 | Millstone 2 Steam Generator Operability - Washington, DC |
| June 27 | NUMARC Board of Directors Meeting - Washington, DC |
| June | Combined Utility Assessment (tentative) |
| June | Millstone 2 NRC Inspection on Reg. Guide 1.97 (tentative) |
| July 11 | Millstone 2 Steam Generator Project Presentation - King of Prussia, PA |
| August | CY GL 89-10 Inspection |
| August 26-30 & September 9-13 | Millstone 1 Electrical Distribution System Functional Inspection (EDSFI) |
| September 9-20 | INPO Evaluation of CY |
| September 30- October 4 | INPO Corporate Evaluation |
| September | Emergency Preparedness Inspection at Millstone |
| September | Millstone 1 EOP Inspection (tentative) |
| October 5 | Connecticut Yankee Refuel Outage Start |

UPCOMING EVENTS (Cont'd.)

| | |
|-------------|--|
| October | Millstone Full Participation Exercise (tentative) |
| November 20 | NUMARC Board of Directors Meeting - Washington, DC |

III.A.5 COORDINATING SITE ACTIVITIES

III.B TECHNICAL SPECIFICATION BASES CONTROL

III.B TECHNICAL SPECIFICATION BASES CONTROL

Background

1. 10CFR50.36 includes the following statement:

"A summary statement of the bases or reasons for such specifications, other than those covering administrative controls, shall be included in the application, but shall not become part of the Technical Specifications."

2. Therefore, plant Technical Specifications contain the following note:

"The Bases contained in succeeding pages summarize the reasons for the specifications in Section 2.0 and 3.0, but in accordance with 10CFR50.36 are not part of these Technical Specifications."

3. Bases sections are not legal part of Technical Specifications. They are written and controlled by the licensee/NRC, and a change to the bases shall not constitute a change to the license.

NU's Approach to Revise/Modify Bases

1. Changes to Bases Sections can be made and implemented without prior NRC approval when the changes involve a clarification or amplification of the applicable limiting conditions of operation and/or bases section.
2. Changes to Bases sections shall be reviewed and approved per NEO 4.02.
3. Changes to a Bases section will be provided to the NRC with the next amendment request.

Examples of the changes to Bases sections implemented by NU include:

- a. Millstone 1--Jet Pump
- b. Millstone 2--Core Alteration
- c. Millstone 3--Service Water System

III.C EMERGENCY AMENDMENTS AND TEMPORARY WAIVERS

COMMUNICATION PROTOCOL (CONT)

NRC (CONT)

o OUR UNDERSTANDING IS:

- SELF-IDENTIFICATION IS TO BE APPLAUDED/ENCOURAGED EVEN IF IT
CREATES REGULATORY "SURPRISES" AND BURDENS
- WHEN TECHNICALLY SUPPORTED AND COMMUNICATED, AND NOT AN
EMERGENCY CREATED DUE TO THE LICENSEE FAILING TO MAKE A
TIMELY APPLICATION, EMERGENCY AMENDMENT RELIEF IS APPROPRIATE

III.D REPORTABILITY/REFs

III.D REPORTABILITY/REFsReporting Initiatives

| | |
|-------------------|---|
| 1990-1991 | BWROG Reporting Guidance |
| June 20, 1990 | NUS-NRC LER Workshop |
| Fall 1990 | NRC LER Workshops |
| September 1990 | NRC Inspection on Reporting at NU |
| December 1990 | NU Reporting Guidance Document |
| February 20, 1991 | NRC Region 1 Utility Engineering Workshop |
| April to May 1991 | NU Reportability Training |
| May 9, 1991 | Utility Meeting at NU (Region 1 Plants) |

Ongoing

Keeping NRC Informed (NRR, Region,
Inspector)

NE&O Task Group Initiatives

III.E ALLEGATION MANAGEMENT

IV. ITEMS IDENTIFIED IN PREVIOUS MEETINGS

IV. ITEMS IDENTIFIED IN PREVIOUS MEETINGS
NRC

1. Control Room Habitability Follow-Up for Millstone 1 and Haddam Neck
2. Establish a Review Schedule for Issues Related to Fuel Conversion for Haddam Neck
3. Staff's Comments on 10CFR20 Changes
4. Staff's Comments on "No Significant Hazards Consideration" Process
5. JCO for Auxiliary Steam System--Millstone 2

IV. ITEMS IDENTIFIED IN PREVIOUS MEETINGS (Cont.)

NU

| <u>Action Item</u> | <u>Completed</u> |
|---|-----------------------|
| <u>Recently Completed Initiatives</u> | |
| MCPR Safety Limit Technical Specification Change--Millstone 1 | Submitted 11/19/90 |
| LOCA Analysis--Haddam Neck Plant--Submit WCAP | Submitted 11/30/90 |
| RCP Seal Leakage Submittal--Haddam Neck | Submitted 12/05/90 |
| GL 88-01 Related Technical Specifications for Millstone 1 | Submitted 12/31/90 |
| Appendix A GDC Review of Containment Penetrations--Haddam Neck | Submitted 01/61/91 |
| Zircaloy Conversion Technical Specifications for Haddam Neck Plant | Submitted 03/04/91 |
| Fire Protection/Spray/Sprinkler/Halon Technical Specifications--Millstone 2 | Submitted 03/18/91 |
| Enclosure Building Filtration System Technical Specifications--Millstone 2 | Cancelled |

II. ITEMS IDENTIFIED IN PREVIOUS MEETINGS (Cont.)
NU

| <u>Action Item</u> | <u>Target Date</u> |
|---|---|
| <u>Upcoming Initiatives</u> | |
| ISAP License Condition for Millstone 1 and Haddam Neck | Awaiting Staff Input to Arrange a Meeting |
| Initial Millstone 3 ISAP Submittal, ISAP Rankings and IIS | 05/24/91 |
| Guidance on Seismicity Technical Specifications for Millstone 2 | 05/31/91 |
| Response to NRC Purge/Vent Letter for Millstone 1 | 05/31/91 |
| October 1990 S/G Inspection Results for Millstone 2 | 05/30/91 |
| Millstone 1 IPE Submittal | 09/30/91 |
| Haddam Neck IPE Submittal | 07/30/92 |
| Millstone 2 IPE Submittal | 03/30/93 |

V. GENERAL LICENSING TOPICS

V.A PLANT-SPECIFIC REGULATORY ISSUES

V.A PLANT-SPECIFIC REGULATORY ISSUESMillstone 1Initiatives Recently Submitted

1. Postaccident Torus Temperature Evaluation
2. Additional Information Related to Intake Structure Event
3. Supplemental Reload Licensing Submittal
4. EOP Program Status Update
5. Appendix J Testing of Valves LP14A and 14B
6. Response to GL 83-28, Item 2.2
7. Plant Training Manual Update

Upcoming Initiatives

1. ISAP Topics Update Report
2. Response to RG 1.97 SER/RAI
3. Response to NRC's Purge/Vent Letter (Part of ISAP Update report)
4. FSAR Update
5. QA Topical Report Update
6. Decommissioning Material License Exemption
7. HELB JCO

Long-Term Initiatives

1. Longer Fuel Cycles
2. Removal of Containment Isolation Valves From Technical Specification
3. IPE Effort

V.A PLANT-SPECIFIC REGULATORY ISSUES (cont)Millstone 1 (cont)Long-Term Initiatives (cont)

4. Containment Analysis
5. GL 89-10--MOV Testing

Awaiting NRC Action

1. TMI Technical Specifications
2. EOPs
3. ISAP License Condition

Millstone 2Initiatives Recently Submitted

1. Fire Protection Spray/Sprinkler Halon Technical Specifications
2. CRDR Mods Completion Letter
3. Response to Open Items on RG 1.97 SER
4. SBO Safety Evaluation Response to Open Items
5. Withdrawal of Core Alteration Technical Specification
6. GL 89-14 Technical Specifications/Removal of 3.25 Time Interval
7. ISI Relief Request for Weld Examination
8. Response to GL 83-28, Item 2.2
9. Plant Training Manual Update

V.A PLANT-SPECIFIC REGULATORY ISSUES (cont)Millstone 2 (cont)Upcoming Initiatives

1. Core Operating Limits Report--Revision to Section 6--
Technical Specification Change Request
2. Submittal to NRC on October 1990 S/G Inspection Results
3. Special Test Exceptions--Shutdown Margin--Technical
Specification Change Request
4. Core Physics--INCA to INPAX Computer Code--Technical
Specification Change Request
5. Surveillance Acceptance Criteria--ECCS System--Technical
Specification Change Request
6. Relief Request for ISI Program (RR-10 and RR-11)
7. FSAR Update
8. QA Topical Report Update
9. Decommissioning Material License Exemption
10. Guidance on Seismicity in Lieu of Technical
Specification Change

Long-Term Initiatives

1. PRA Development/ISAP Implementation/IPE Implementation
2. Removal of Containment Isolation Valves From Technical
Specifications
3. Longer Fuel Cycles
4. S/G Replacement
5. Ultimate Heat Sink Study
6. GL 89-10--MOV Testing

V.A PLANT-SPECIFIC REGULATORY ISSUES (cont)Millstone 2 (cont)Awaiting NRC Actions

None.

Millstone 3Initiatives Recently Submitted

1. Electrical Power System--Technical Specification--
GL 84-15
2. Response to NRC Request for Additional Information on
IPE Submittal
3. Response to IE Bulletin 89-02
4. Response to GL 83-28, Item 2.2
5. Plant Training Manual Update

Upcoming Initiatives

1. Hydrogen Recombiners Technical Specification
2. Technical Specification Change--Snubber Visual
Inspection GL 90-09
3. Technical Specification Change--Reactor Vessel
Surveillance Capsule--GL 91-01
4. Technical Specification Change--ESFAS Surveillance
Interval
5. FSAR Update
6. QA Topical Report Update
7. Decommissioning Material License Exemption
8. Reactor Vessel Level Monitoring Instrumentation
Technical Specification
9. Initial ISAP Submittal

V.A PLANT-SPECIFIC REGULATORY ISSUES (cont)

Millstone 3 (cont)

Long-Term Initiatives

1. Longer Fuel Cycles--1991 to 1992
2. GL 89-10--MOV Testing

Awaiting NRC Action

None

Haddam Neck Plant

Initiatives Recently Submitted

1. Zircaloy Cladding Conversion/Proposed Technical Specification Changes, Large-Break LOCA Analysis
2. Appendix A GDC Review of Containment Penetrations
3. RCP Seal Leakage
4. Detailed CRDR: Final Resolution
5. March 28, 1991, ISAP Report--Six Month Update
6. Response to GL 83-28, Item 2.2
7. Plant Training Manual Update

Upcoming Initiatives

1. Proposed Technical Specification Changes--AFW Auto Initiation Upgrades
2. Proposed Technical Specification Changes--S/G Tube Alternate Plugging Criteria
3. Proposed Technical Specification Change--Alternate DG Cooling
4. Appendix J (Type B&C) Scheduler Exemption

V.A PLANT-SPECIFIC REGULATORY ISSUES (cont)Haddam Neck Plant (cont)Upcoming Initiatives (cont)

5. Proposed Technical Specification Change--Appendix J Type B&C Testing
6. Appendix J (Type A Exemption)--No ILRT This Outage
7. FSAR Update
8. QA Topical Report Update
9. Decommissioning Material License Exemption
10. Reload License Amendment/Non-LOCA Transient Analysis Technical Report Supporting Cycle Operations.

Long-Term Initiatives

1. Zircaloy Cladding Conversion/W Large Break LOCA Evaluation
2. Core-Melt Frequency Reduction Efforts/Tornado-Missiles Evaluation
3. GL 89-10--MOV Testing
4. IPE Efforts

Awaiting NRC Action

1. Appendix J Exemptions
2. ISAP License Condition

V.B STATUS OF USI, TMI ITEMS, SEP ITEMS, GSI

V.C STATUS OF NRC INSPECTION OPEN ITEMS

VI. SUMMARY AND CONCLUSIONS

VI. SUMMARY AND CONCLUSIONS

1. NRC Feedback and Observations
2. Future Meetings