Docket File

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

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)

A001
1/1

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
JPartlow
FMiraglia
SVarga
JCalvo
SNorris
DJaffe
AWang
GVissing
OGC
EJordan
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	:6/13/91

OFC	:PRPB:NRR	:Region I	:	:	:
NAME	:~~JLee~~ L Cunningham	:U Kelly By phone	:	:	:
DATE	:6/12/91	:6/13/91	:	:	:

Document Name: DISCUSSION OF LICENSING

cc:

Gerald Garfield, Esquire
Day, Berry and Howard
Counselors at Law
City Place
Hartford, Connecticut 06103-3499

W. D. Romberg, Vice President
Nuclear Operations
Northeast Utilities Service Company
Post Office Box 270
Hartford, Connecticut 06141-0270

Kevin McCarthy, Director
Radiation Control Unit
Department of Environmental Protection
State Office Building
Hartford, Connecticut 06106

Bradford S. Chase, Under Secretary
Energy Division
Office of Policy and Management
80 Washington Street
Hartford, Connecticut 06106

S. E. Scace, Nuclear Station Director
Millstone Nuclear Power Station
Northeast Nuclear Energy Company
Post Office Box 128
Waterford, Connecticut 06385

C. H. Clement, Nuclear Unit Director
Millstone Unit No. 3
Northeast Nuclear Energy Company
Post Office Box 128
Waterford, Connecticut 06385

Ms. Jane Spector
Federal Energy Regulatory Commission
825 N. Capitol Street, N.E.
Room 8608C
Washington, D.C. 20426

Burlington Electric Department
c/o Robert E. Fletcher, Esq.
271 South Union Street
Burlington, Vermont 05402

R. M. Kacich, Manager
Generation Facilities Licensing
Northeast Utilities Service Company
Post Office Box 270
Hartford, Connecticut 06141-0270

D. O. Nordquist
Director of Quality Services
Northeast Utilities Service Company
Post Office Box 270
Hartford, Connecticut 06141-0270

Regional Administrator
Region I
U. S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, Pennsylvania 19406

First Selectmen
Town of Waterford
Hall of Records
200 Boston Post Road
Waterford, Connecticut 06385

W. J. Raymond, Resident Inspector
Millstone Nuclear Power Station
c/o U. S. Nuclear Regulatory Commission
Post Office Box 811
Niantic, Connecticut 06357

M. R. Scully, Executive Director
Connecticut Municipal Electric
Energy Cooperative
30 Stott Avenue
Norwich, Connecticut 06360

Michael L. Jones, Manager
Project Management Department
Massachusetts Municipal Wholesale
Electric Company
Post Office Box 426
Ludlow, Massachusetts 01056

Mr. Edward J. Mroczka
Northeast Nuclear Energy Company

H. F. Haynes, Nuclear Unit Director
Millstone Unit No. 1
Northeast Nuclear Energy Company
Post Office Box 128
Waterford, Connecticut 06385

Charles Brinkman, Manager
Washington Nuclear Operations
C-E Power Systems
Combustion Engineering, Inc.
12300 Twinbook Pkwy
Suite 330
Rockville, Maryland 20852

J. P. Stetz, Nuclear Station Director
Haddam Neck Plant
Connecticut Yankee Atomic Power Company
RFD 1, Post Office Box 127E
East Hampton, Connecticut 06424

G. H. Bouchard, Nuclear Unit Director
Haddam Neck Plant
Connecticut Yankee Atomic Power Company
RFD 1, Post Office Box 127E
East Hampton, Connecticut 06424

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

J. S. Keenan, Nuclear Unit Director
Millstone Unit No. 2
Northeast Nuclear Energy Company
Post Office Box 128
Waterford, Connecticut 06385

Board of Selectmen
Town Hall
Haddam, Connecticut 06103

J. T. Shedlosky, Resident Inspector
Haddam Neck Plant
c/o U. S. Nuclear Regulatory Commission
Post Office Box 116
East Haddam Post Office
East Haddam, Connecticut 06423

ENCLOSURE 1

List of Attendees

NRC

A. Asars
J. Calvo
E. Kelly

D. Jaffe
J. Lee

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

NU

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

ENCLOSURE 2

NRC/NU COUNTERPARTS MEETING

MAY 23, 1991

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

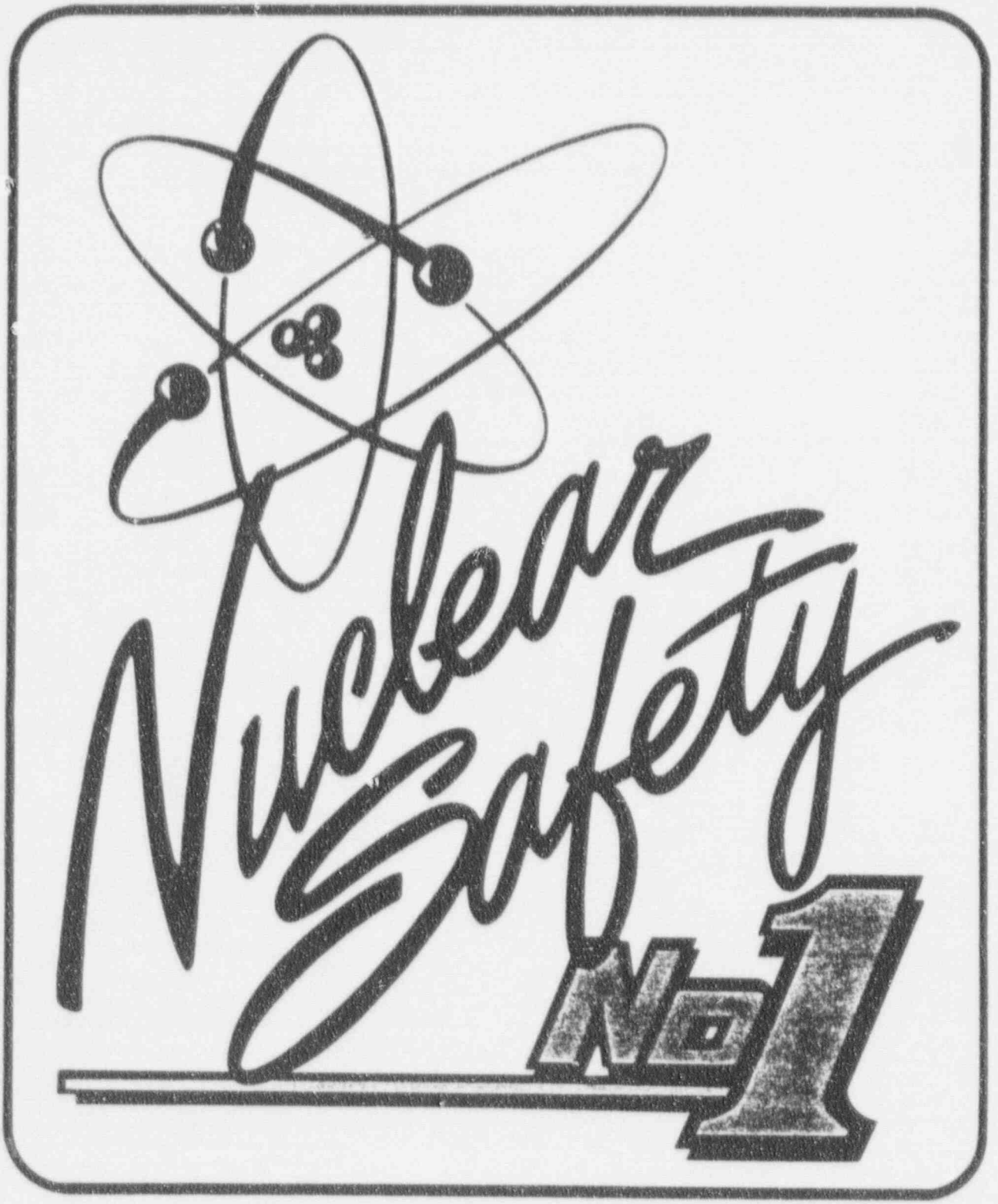
C. Status of NRC Inspection Open Items

VI. SUMMARY AND CONCLUSIONS

I. INTRODUCTION

II. SELECTED NU INITIATIVES

II.A NU SAFETY ETHIC PRESENTATION


Nuclear Safety
No 1

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

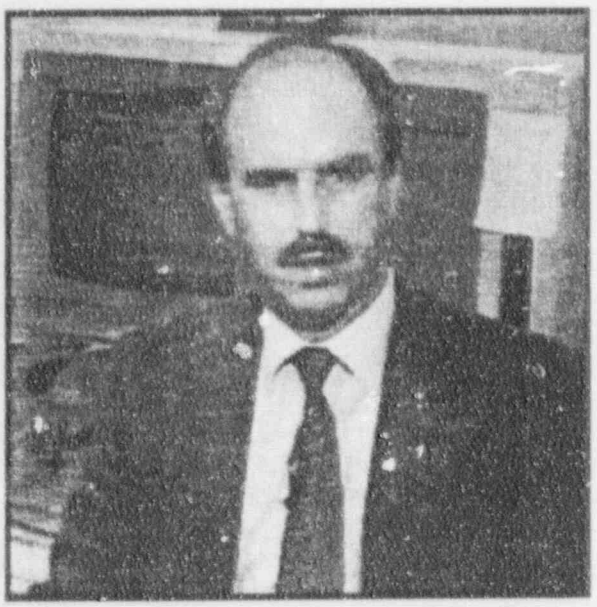
"The nuclear safety ethic of our company relies on each employee asking hard safety questions in every aspect of their work"

"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

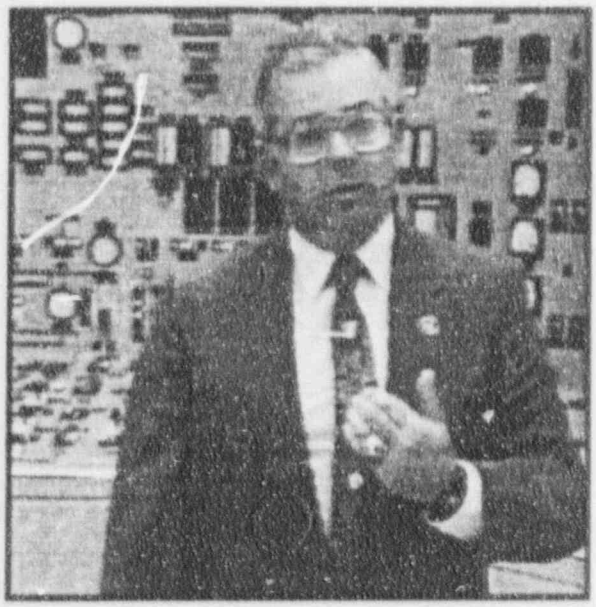
"Understanding the root cause of failures takes time, however, it is the only way in which we can prevent recurrence"

"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)

- KEY ADEQUACY MEASUREMENT TOOL--PEER REVIEW OF "BEST SISTER UNITS'
- MACRO RESULTS
  -- DATA FROM 1984 THROUGH 1986

NU/SISTER PLANT	O&M EXPENSE ($M)		CAPITAL COSTS ($M)	
	NU UNIT	SISTER	NU UNIT	SISTER
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

NU/SISTER PLANT	O&M EXPENSE ($M)		CAPITAL COSTS ($M)	
	NU UNIT	SISTER	NU UNIT	SISTER
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)

	ACTUAL STAFFING	O&M (LESS FUEL) $M	CAPITAL $M
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]

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(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

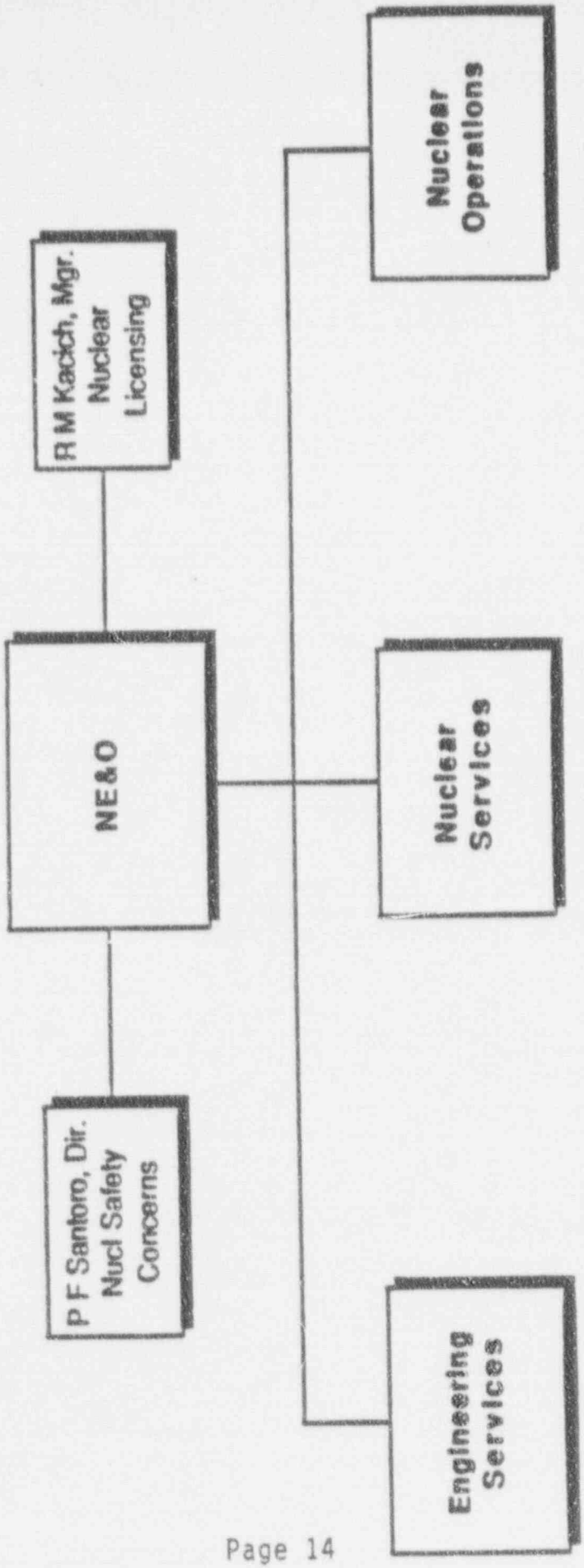
- Revitalize NE&O for the 1990's
- Improve Communication and Teamwork within NE&O
- Complete the Transition from Construction to Operational Focus
- Improve Decision Making Processes
- Capture Cost Effectiveness Opportunities
- Address Organizational Conflicts which Have Developed Over Time
- Clarify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

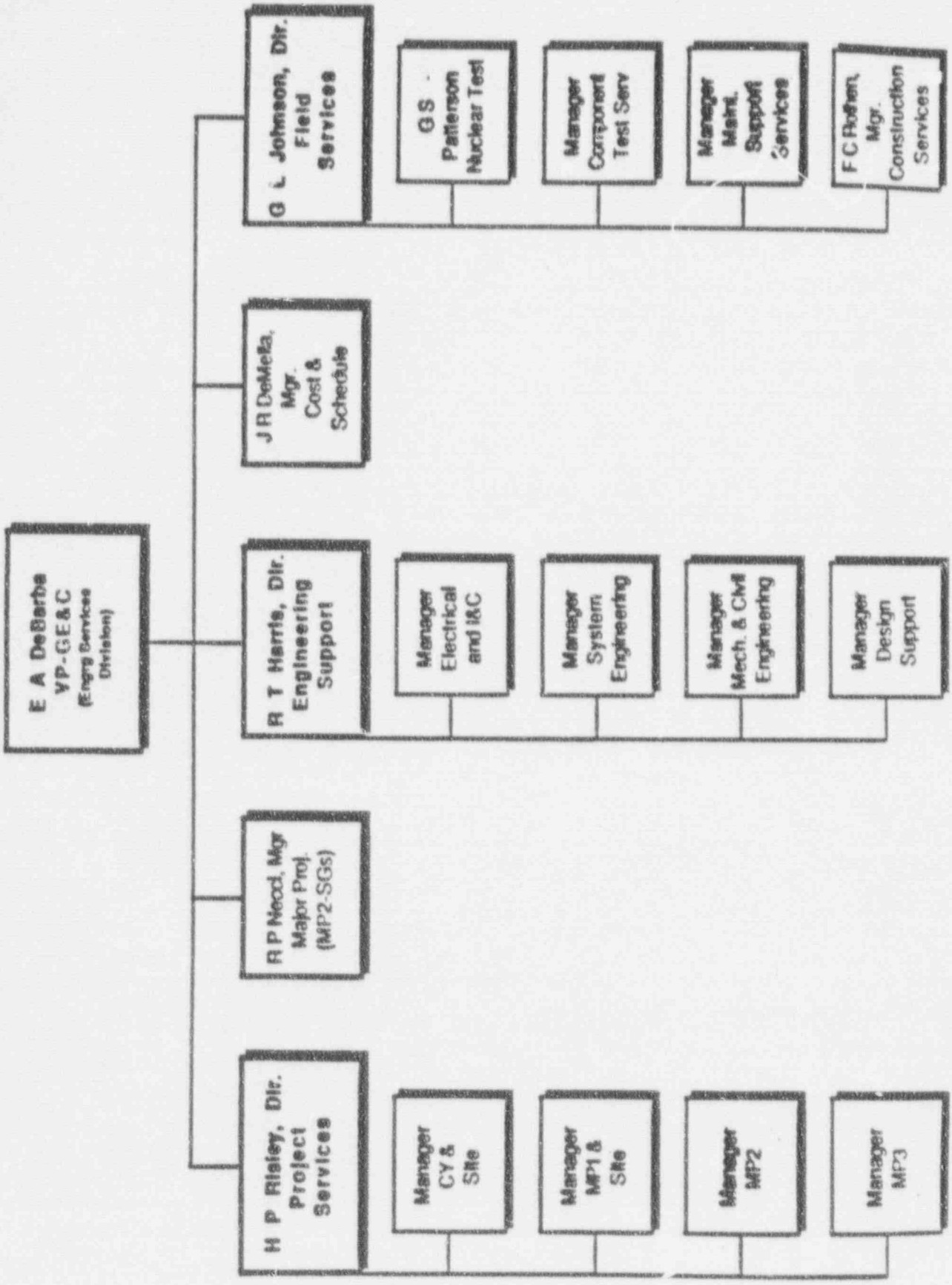
In Summary

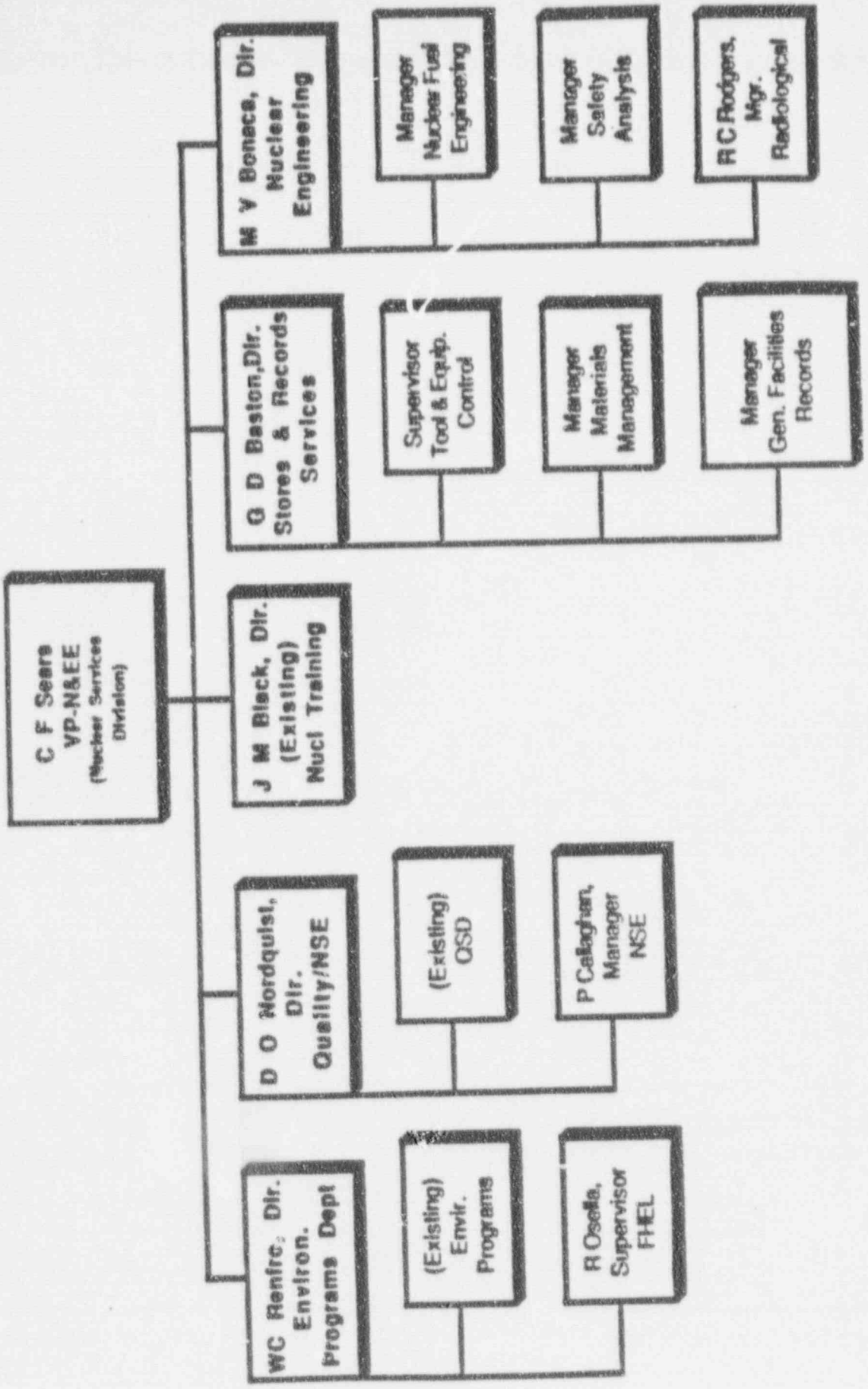
Improve Overall Performance of NE&O

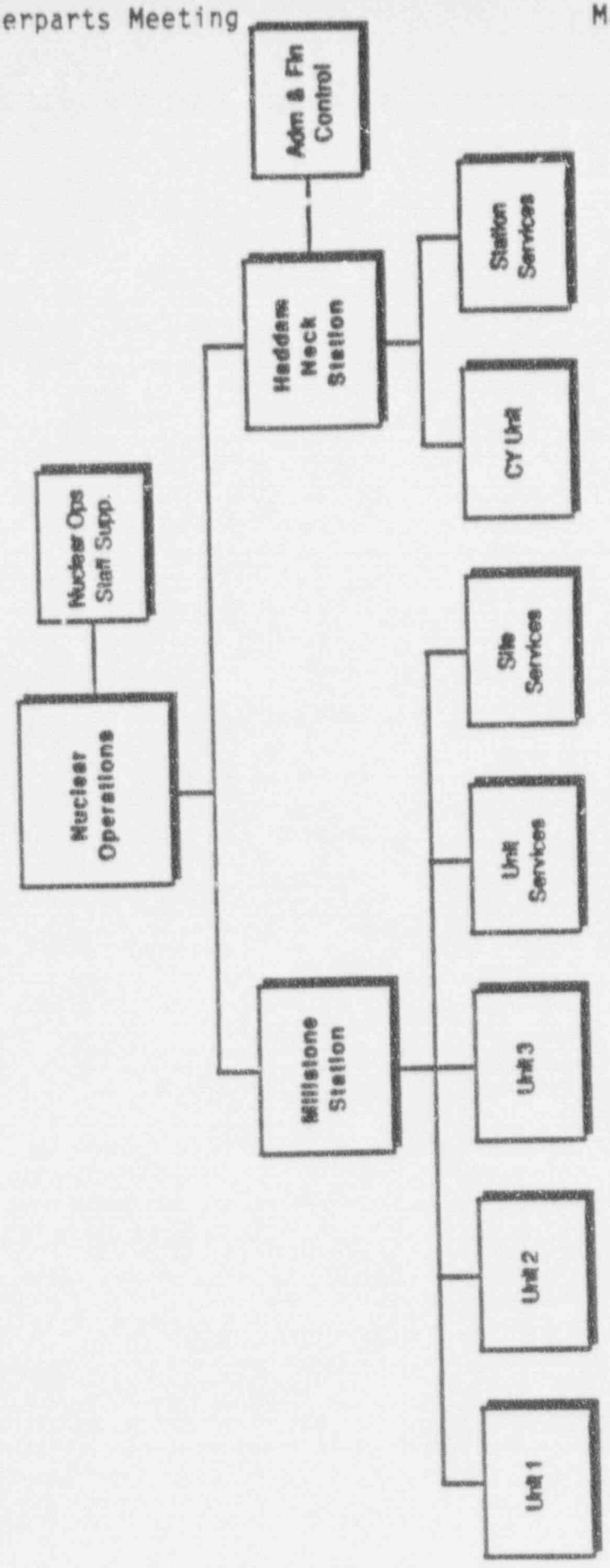
NE&O Restructuring

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.


Nuclear Operations
R M Kacich, Mgr. Nuclear Licensing
NE&O
Nuclear Services
P F Santoro, Dir. Nucl Safety Concerns
Engineering Services


E A DeBarba
VP-GE&C
(Engrg Services Division)
G L Johnson, Dir. Field Services
G S Patterson Nuclear Test
Manager Component Test Serv
Manager Maint. Support Services
F C Rothen, Mgr. Construction Services
J R DeMella, Mgr. Cost & Schedule
R T Harris, Dir. Engineering Support
Manager Electrical and I&C
Manager System Engineering
Manager Mech. & Civil Engineering
Manager Design Support
R P Nead, Mgr Major Proj. (MP2-SGs)
H P Risley, Dir. Project Services
Manager CY & Site
Manager MP1 & Site
Manager MP2
Manager MP3


C F Sears
VP-N&EE
(Nuclear Services Division)
M V Bonaca, Dir. Nuclear Engineering
Manager Nuclear Fuel Engineering
Manager Safety Analysis
R C Rodgers, Mgr. Radiological
G D Baston, Dir. Stores & Records Services
Supervisor Tool & Equip. Control
Manager Materials Management
Manager Gen. Facilities Records
J M Black, Dir. (Existing) Nucl Training
D O Nordquist, Dir. Quality/NSE
(Existing) QSD
P Callaghan, Manager NSE
WC Renfro, Dir. Environ. Programs Dept
(Existing) Envir. Programs
R Osella, Supervisor FHEL


Adm & Fin Control
Haddam Neck Station
Station Services
CY Unit
Nuclear Ops Staff Supp.
Nuclear Operations
Site Services
Unit Services
Millstone Station
Unit 3
Unit 2
Unit 1

II.C NU PERFORMANCE ISSUES

PERFORMANCE IMPROVEMENTS

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

NE&O PERFORMANCE TASK GROUP

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

NE&O PERFORMANCE TASK GROUP (CONT)

- 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
- MAJOR FINDINGS AND RECOMMENDATIONS FOR IMPROVEMENT TO BE PROVIDED TO SENIOR VICE PRESIDENT BY SEPTEMBER 1991

ALLEGATIONS ROOT-CAUSE TASK GROUP

- CHARTER IS TO EVALUATE EXISTING INFORMATION AND DOCUMENTATION WITH THE OBJECTIVE OF AGGRESSIVELY IDENTIFYING AND ADDRESSING THE ROOT CAUSE FOR EMPLOYEE SAFETY CONCERNS

- 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

- DESIGNED TO BE RESPONSIVE TO SALP BOARD RECOMMENDATION

- MAJOR FINDINGS AND RECOMMENDATIONS FOR IMPROVEMENT TO BE PROVIDED TO SENIOR VICE PRESIDENT BY AUGUST 1991

OPERABILITY, REPORTABILITY, AND COMMUNICATIONS

- CHAPTER IS TO DEVELOP AND IMPLEMENT IMPROVEMENTS TO NU OPERABILITY AND REPORTABILITY PROCEDURES AND GUIDANCE DOCUMENTS

- 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

- 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)

RESTORE REGULATOR CONFIDENCE

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

PERIODIC SELF-ASSESSMENTS TO MONITOR PROGRESS

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

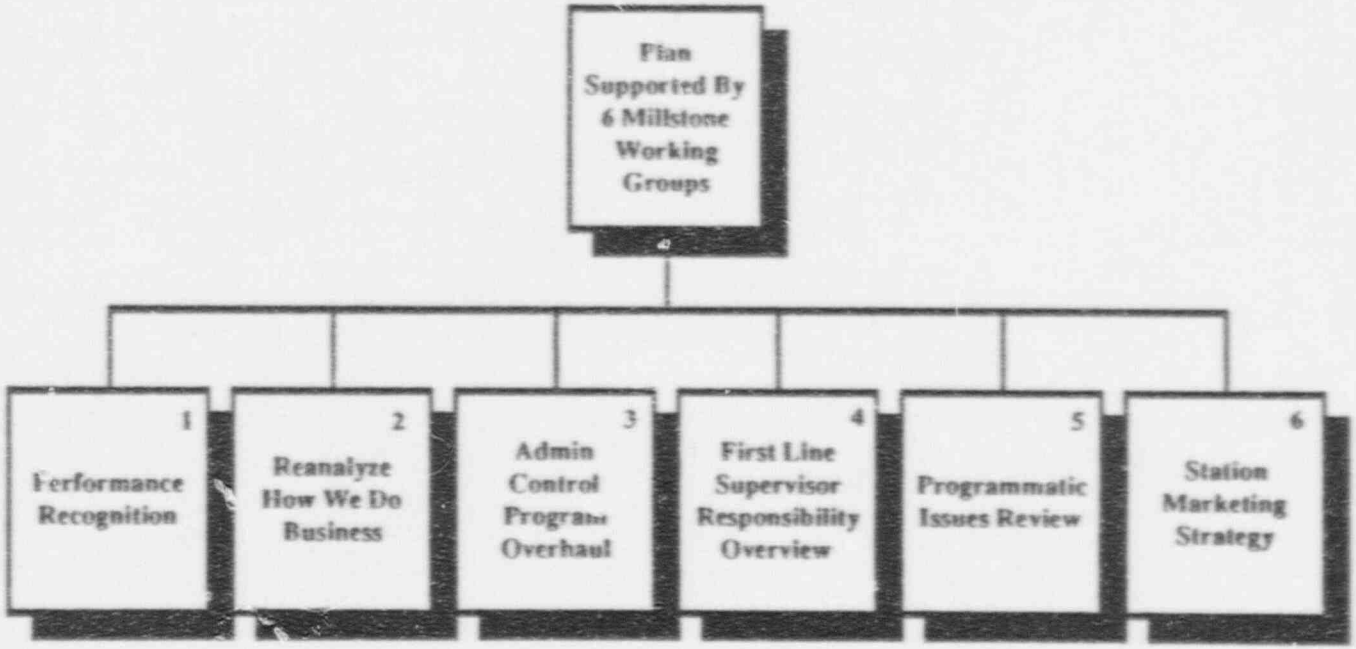
FIRST LINE SUPERVISOR TRAINING PROGRAM COURSES

Supervisory Courses	Duration
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

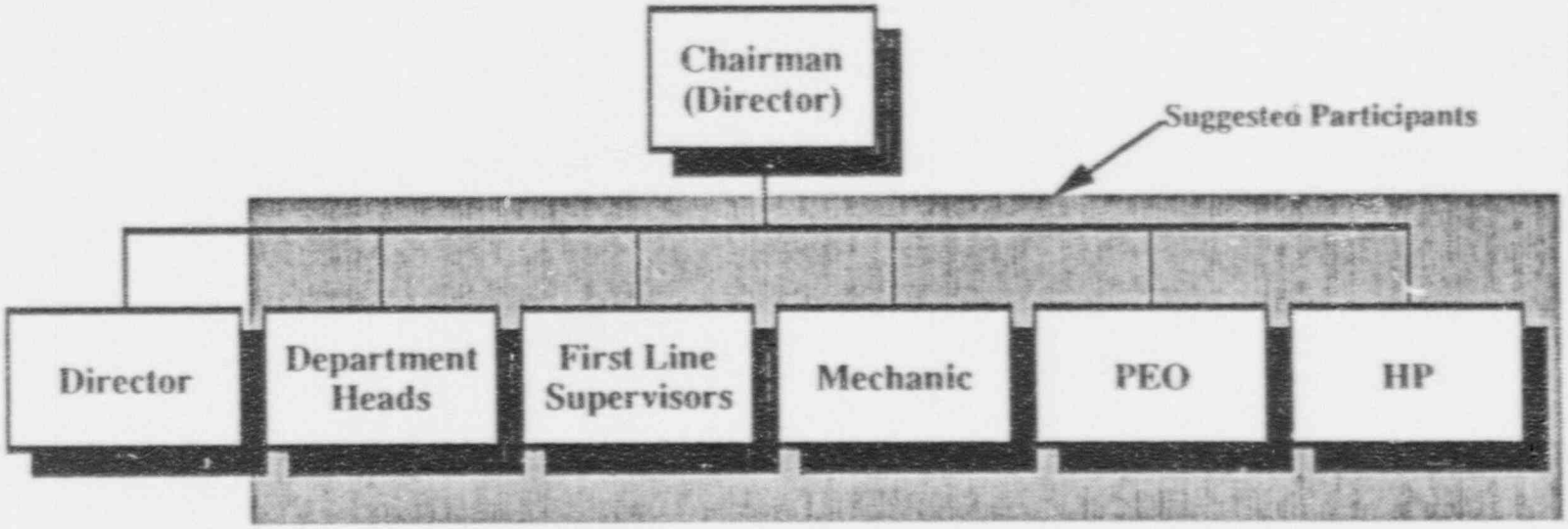
NNECo WORKING GROUPS



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

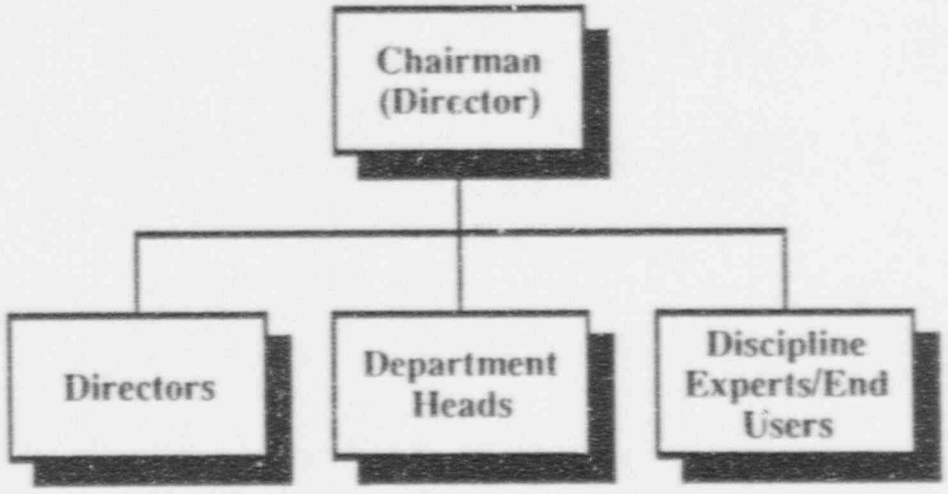
Employee of the Month Program

Photo/Parking Programs

Savings Bond Award Programs

Beneficial Solution Program

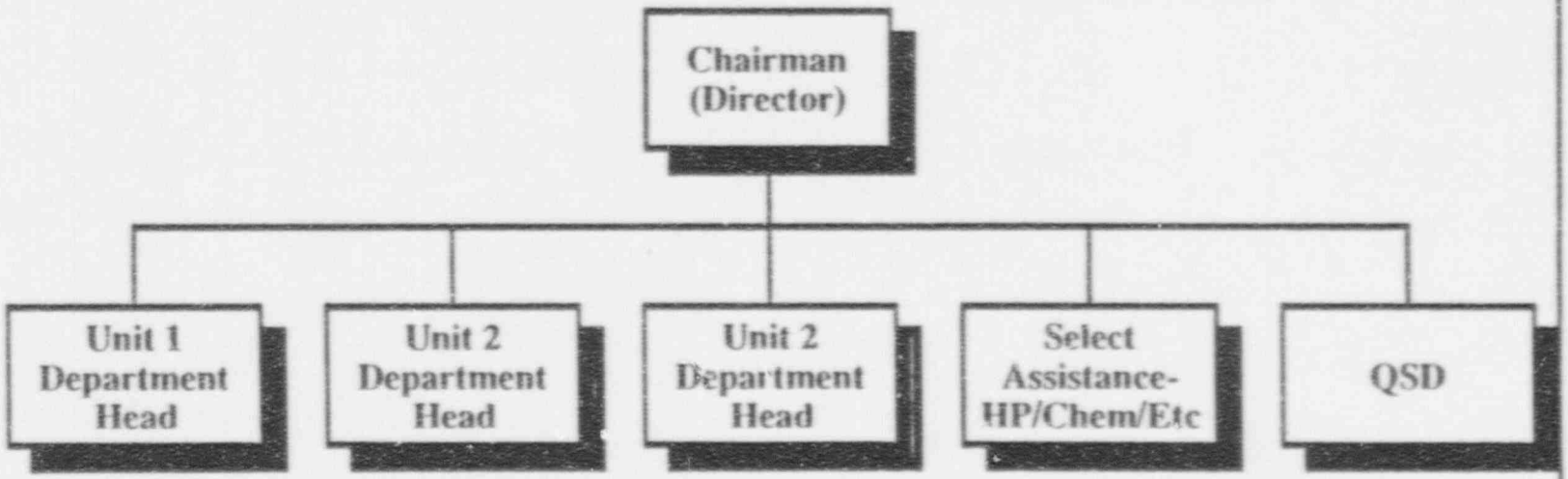
Re-Analysis of How We Do Business



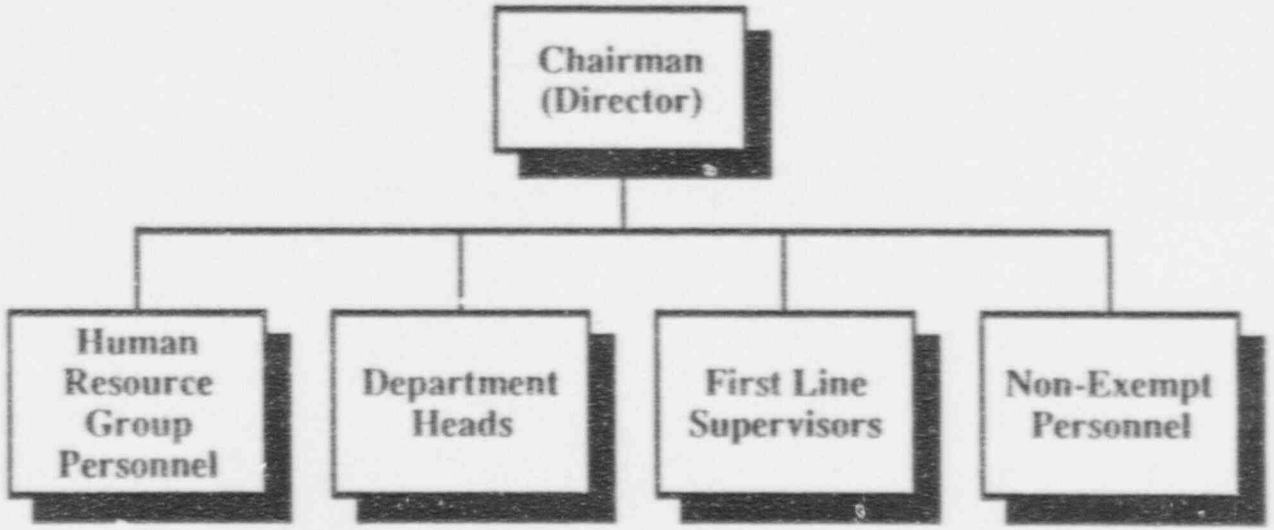
Potential Suggestions to Evaluate/Implement (How We Do Business Work Group)

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

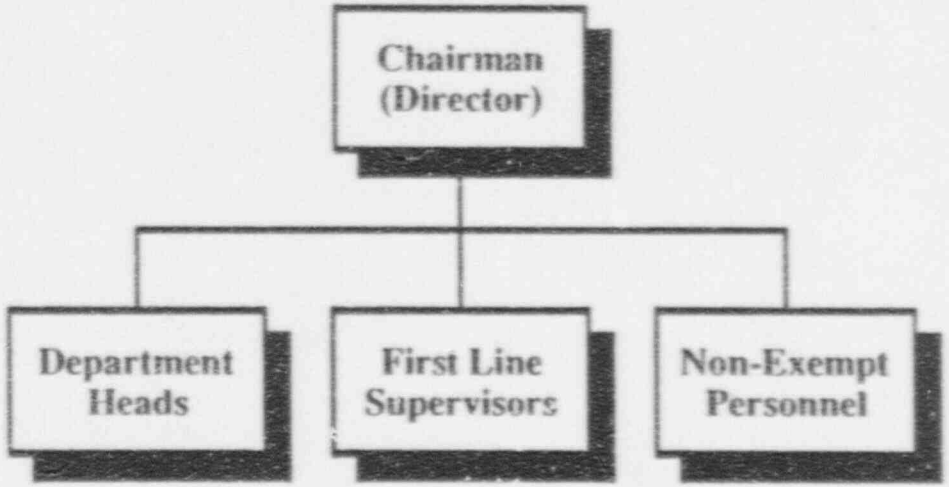
Administrative Control Program



First Line Supervisor Responsibility Review



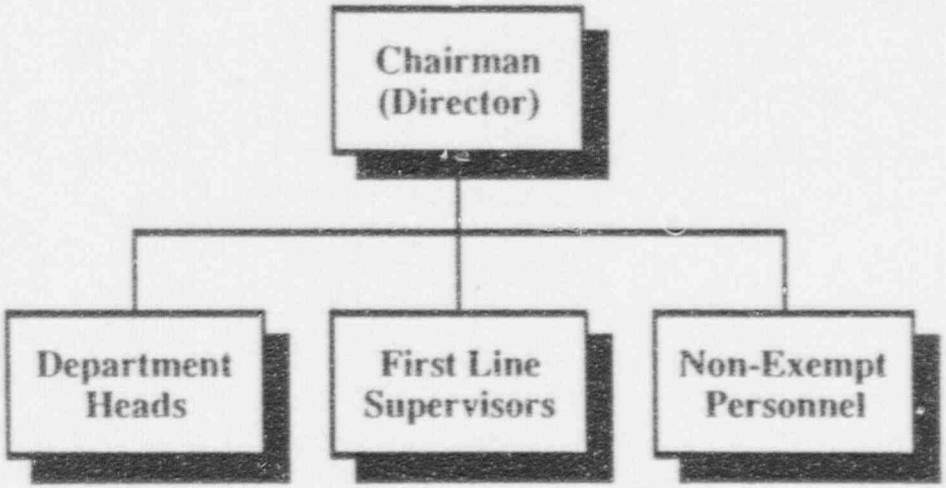
Programmatic Issues



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)

- 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 TOPICS

Region I

Meetings 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
Page 1

1991 NE&O CALENDAR OF EVENTS

PAST 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 Requalification 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

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

UPCOMING 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 Requalification Program Evaluation
June 10-14	Haddam Neck NRC Requalification 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)

- 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/REFs

Reporting 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

Action Item	Completed
Recently Completed Initiatives	
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

Action Item	Target Date
Upcoming Initiatives	
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	06/30/91
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 ISSUES

Millstone 1

Initiatives 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 2

Initiatives 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 3

Initiatives 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 Specifacation 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) Schedular 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