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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May 15, 1984

Docket No. 50-423
B11173

Director of Nuclear Reactor Regulation
Mr. B. J. Youngblood, Chief
Licensing Branch No. 1
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

References: (1) B. J. Youngblood to W. G. Counsil, Draft Safety Evaluation Report (DSER) for Millstone Nuclear Power Station, Unit 3, dated December 20, 1983.

(2) W. G. Counsil to B. J. Youngblood, B11078, dated March 20, 1984.

Dear Mr. Youngblood:

Millstone Nuclear Power Station, Unit No. 3
NRC Licensee Qualification Branch
Transmittal of Responses to Open Items

Reference (2) transmitted our responses to the majority of the NRC's Licensee Qualification Branch (LQB) open items identified to us in Reference (1). Attachment I of Reference (1) summarized the status of each LQB open item up to that time.

On April 10-12, 1984 the NRC's Licensee Qualification Branch visited our corporate office and the Millstone site as part of their review of our management and technical organization. The visit culminated in an exit interview which identified new open items and summarized the status of the remaining open items for the Licensee Qualification Branch. We are now providing responses to these remaining LQB open items.

Revised Attachment I provides the most current status for all of the LQB open items. Attachment II provides new or revised responses for open items OLB-01, LQB-01, and LQB-05.

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If you have any concerns related to the information contained herein or any questions related to our responses, please contact our licensing representative, Ms. P. Capello-Bandzes at (203) 665-3714.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY, et al
By Northeast Nuclear Energy Company, Their Agent

W. G. Counsil
Senior Vice President

cc: Mr. F. R. Allenspach
NRC Licensee Qualification Branch

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

Then personally appeared before me W. G. Counsil, who being duly sworn, did state that he is Senior Vice President of Northeast Nuclear Energy Company, an Applicant herein, that he is authorized to execute and file the foregoing information in the name and on behalf of the Applicants herein and that the statements contained in said information are true and correct to the best of his knowledge and belief.

Notary Public

My Commission Expires March 31, 1988

ATTACHMENT I
Status of Each LQB/OLB Open Item

Open Item	Subject	Status
LQB-01	Management and Technical Support Organization	Closed*
LQB-02(1)	Plant Staff Responsibility for Fire Protection	Closed
LQB-02(2)	Provisions for Additional Maintenance Force	Closed
LQB-02(3)	Clarification of Table 13.1-1	Closed
LQB-02(4)	Number of Shift Crews	Closed
LQB-02(5)	Composition of Shift Crews	Open
LQB-02(6)	Number of Individuals in RO/SRO Training	Closed
LQB-02(7)	Education and Experience Requirements for Electricians and Mechanics	Closed
LQB-02(8)	Shift Responsibility for Radiation Protection	Closed
LQB-03	Training Program to Phase-Out STA Function	Open
LQB-04	Fire Protection Training Program	Closed
OLB-01 (I.A.1.2)	Shift Supervisor Responsibilities for Nonsafety Duties	Closed
OLB-01 (I.A.1.3)	Limitation on Overtime Procedure	Closed
OLB-01 (I.B.1.2)	Independent Safety Engineering Group	Closed
OLB-01 (I.C.4)	Control Room Access Procedure	Closed

* In addition, we have agreed to provide updated resumes and organizational charts reflecting our current organization in an upcoming amendment for FSAR Section 13.1.

Open Item	Subject	Status
OLB-01 (I.C.5)	Feedback of Operating Experience	Closed
OLB-01 (I.C.6)	Verification of Operating Experience	Closed
OLB-02 (a)	Initial Operator Simulator Training Program	Confirmatory
OLB-02 (b)	Prelicense Evaluation for License Candidates	Closed
OLB-03 (a)	Control Manipulations for Licensed Operators	Closed
OLB-03 (b)	Simulator Requalification Training Program	Confirmatory
OLB-04	Simulator Replacement Training Program	Confirmatory
OLB-05 (I.A.2.1)	Simulator Requalification Training Program	Confirmatory
OLB-05 (I.A.2.3)	Administration of Training Programs	Closed
OLB-05 (II.B.4)	Training for Mitigating Core Damage	Closed
LQB-05	On-Shift Experience Requirements for Senior Reactor Operators	Open

ATTACHMENT II
Responses to LQB/OLB Open Items

Millstone Nuclear Power Station, Unit No. 3

Open Items
Operator Licensing Branch/Licensee Qualification Branch

OLB-01, (111) - TMI Action Items I.A.1.2, I.A.1.3, I.B.1.2, I.C.4, I.C.5, and I.C.6 Regarding Station Administrative Procedures (Draft SER Section 13.5.1)

Information is needed to show how the applicant plans to meet the following items:

I.A.1.2

Shift supervisor responsibilities in regard to the delegation of nonsafety duties

I.A.1.3

Content of the limitation on overtime procedure

I.B.1.2

Provisions for meeting the requirements for an Independent Safety Engineering Group

I.C.4

Control room access procedures content

I.C.5

The program for the feedback of operating experience

I.C.6

The content of the procedures for verification of the correct performance of operating activities

Response

I.A.1.2

The responsibilities of the shift supervisor in regard to the delegation of nonsafety duties are delineated in FSAR Sections 13.1.2.2.14.5a and 13.1.2.2.14.5k.

I.A.1.3

Northeast Utilities meets the intent of Generic Letter 82-12 by the following actions:

a. Licensed operators are explicitly limited on overtime in Station Administrative Control Procedures.

OLB-01 (cont.)

b. Station Administrative Control Procedures make all supervisors responsible to assure that all personnel assigned to perform safety related tasks are in proper physical condition and are capable of performing and accomplishing the assigned work so as not to degrade nuclear safety.

c. Company Overtime policy requires management review to minimize unnecessary overtime.

Since the intent of Generic Letter 82-12 is to ensure safe work practices, it is preferable to judge the physical condition of employees since nonmeasurable quantities such as illness, medication, or adverse working environment may have significant effects on employee performance. Supervisory review of overtime ensures management review of practices which, while not prohibited, are not satisfactory as a long-term solution.

The NRC previously accepted our overtime practice to meet TMI action item I.A.1.3 for Millstone Unit Nos. 1 and 2. (D. M. Crutchfield letter to W. G. Counsil, dated February 8, 1982.)

I.B.1.2

Refer to revised FSAR Section 13.4.4.

I.C.4

Station Administrative Control Procedures establish controls for access to the control room (refer to FSAR Section 13.5.1.3, Standing Orders to Operating Personnel).

In addition, the Shift Supervisor has sufficient management authority as described in FSAR Section 13.1.2.2.14.5a to manage under all plant conditions including the clearing of the control room and otherwise restricting access to the control room.

I.C.5

Northeast Utilities' program for the feedback of operating experience is delineated in Nuclear Engineering and Operations procedures (refer to FSAR Section 13.1.1.1(3)(f)).

Millstone Nuclear Power Station, Unit No. 3

Open Items
Operator Licensing Branch/Licensee Qualification Branch

OLB-01 (cont.)

I.C.6

Administrative Control Procedures establish the program for verification of the correct performance of operating activities and require a second verification checklist for important safety related components. Procedure checklists add the second verification checklist for valves, circuit breakers, and control switches of important safety related components having no control room indications or that are not verified by test, flow, or other positive means.

In addition, NNECO complies with the requirement that only SRO licensed personnel have the authority to release systems and equipment for maintenance, surveillance testing, or return to service. All independent verifications for valves, circuit breakers, and control switches are performed by qualified, licensed and nonlicensed operators.

13.4.4 Independent Safety Engineering Group

The NRC guidelines for the establishment of an Independent Safety Engineering Group (ISEG) for Millstone Unit No. 3 will be met as part of an overall integrated safety philosphy which Northeast Utilities has for its nuclear units.

The following review groups and activities are conducted to support and evaluate the effectiveness of Millstone Unit No. 3:

- Off-site Nuclear Review Boards (NRB)
- Plant Operations Review Committee (PORC)
- INPO evaluation and assistance division
- Joint Utility Audit Group
- Site Operating Review Committee (SORC)
- American Nuclear Insurers inspection teams
- Independent Consultants/task forces
- Quality Assurance Audit Teams
- Corporate Nuclear Safety Engineering Section
- Corporate Safety Analysis Section

In addition to the above, the Millstone Unit No. 3 ISEG function will be performed by a complement of dedicated personnel who will be part of the Nuclear Safety Engineering (NSE) section. This section will be directly involved in meeting the requirements for NUREG-0737, for items I.C.5 and I.B.I.2 for Millstone 3 as well as for all Northeast Utilities (NU) operating units. This section is independent of the PORCs and NRBs. This integrated approach is designed to eliminate duplication of work effort, maximize attention to important issues and to utilize experience as a combined effort rather than plant specific.

The NSE section is staffed with experienced people who have a variety of Engineering and Operations backgrounds. This multi-discipline section has personnel at both operating sites as well as in the corporate office. Individuals in this section report to an off-site corporate officer who is not in the direct chain of command of Power Production. This corporate officer reports to the Senior Vice-President of Nuclear Engineering and Operations. Qualification levels of persons performing this function will meet or exceed Section 4.7 of ANS 3.1 (1978).

The NSE currently has a Supervisor and 13 people to perform Operational Assessment and ISEG functions for the Millstone and Haddam Neck plants. Some of these people presently hold Senior Reactor Operator Licenses. By June of 1985, the NSE will have a total of sixteen people. Eight of these individuals will be located at the Millstone Site. The

remaining individuals will be located at the Haddam Neck Site and in the corporate offices. The NSE Section will be able to utilize the resources of other Northeast Utilities line organizations involved in evaluating safety concerns. Northeast Utilities has a professional corporate engineering staff of over 300 Engineers, Scientists, Analysts, and Technicians.

The functions performed by the ISEG will include independently reviewing and evaluating plant activities including maintenance, modifications and operational problems, operational analysis, and assisting in the establishment of programmatic requirements for plant activities. Another function of the ISEG will be to evaluate plant operations and maintenance activities to provide independent verification that these activities are performed correctly and that human errors are reduced as far as practicable. The ISEG is in a position to advise utility management on the overall quality and safety of operations. Where useful improvements can be achieved, it is expected that this group will develop and present detailed recommendations to corporate management for such things as revised procedures or equipment modifications. Monthly reports of completed significant evaluations will be made to corporate management to advise them on the overall quality and safety of operations.

Millstone Nuclear Power Station, Unit No. 3

Open Items
Licensee Qualification Branch

LQB-01 Management and Technical Support Organization (Draft SER Section 13.1.1)

The applicant has not provided sufficient information to support a conclusion regarding his management and technical support organization. The following information is needed:

(1) The number of individuals working under the Director Generation Engineering, Director Generation Projects, Vice President Nuclear and Environmental Engineering, and Vice President Nuclear Operations who will provide support to Millstone Unit 3. This information should include an estimate of the time these individuals are assigned to work on other nuclear power plants and on fossil-fueled units.

(2) The assignment of home office responsibility for fire protection, security, and training, and the nature of that responsibility.

Response

(1) See attached Table LQB-01-1.

(2) The following are descriptions of our home office assignments for the responsibility of fire protection, security, and training programs:

SECURITY

The Senior Vice President-Administrative Services will be the officer accountable for the overall company security function and will ensure the appropriate interpretation and administration of the security policy. The Senior Vice President - Administrative Services will delegate the day-to-day responsibilities, as deemed necessary, to facilitate accountability and management control of implemented measures and programs developed as a result of the policy.

The Director - System Security will report to the Senior Vice President - Administrative Services. The Director - System Security shall develop, and recommend for systemwide application, policies, programs, standards, and procedures to serve as guidelines.

Where nuclear plant security is involved, the Director-System Security shall review security plans relative to compliance with existing laws and regulations prior to submittal to regulatory bodies and prior to their implementation, it being recognized that final approval for security plans rests with the Nuclear Regulatory Commission (NRC), as prescribed by law. Upon approval of the security plans by the NRC, neccessary standards and procedures shall be developed by the NRC, necessary standards and procedures shall be developed by Vice President - Nuclear Operations for implementation, in accordance with approval by the NRC.

Millstone Nuclear Power Station, Unit No. 3

Open Items
Licensee Qualification Branch

FIRE PROTECTION

The NUSCO Senior Vice President - Nuclear Engineering and Operations has overall responsibility for the Fire Protection Program. The Vice President - Generation Engineering and Construction, has specific responsibility for developing and administering the program (with concurrence of affected division). The Vice President - Nuclear Operations is responsible for implementing all related plant Fire/Loss Prevention requirements at the nuclear stations. The Vice President - Generation Engineering and Construction is responsible for the engineering, design and construction of all new and/or modifications needed to meet program requirements.

TRAINING

Overall responsibility for the nuclear training program lies with the Senior Vice President - Nuclear Engineering and Operations. Specific responsibility for overall coordination of the nuclear training program and for development and implementation of generic, corporate, and site specific training programs rests with the Vice President - Nuclear and Environmental Engineering. Beginning in mid-1986, simulator training programs will also be the responsibility of the Vice President - Nuclear and Environmental Engineering. Until such time, the procurement, engineering, testing, and warranty of the simulators; the design and administration of the facility; and the development delivery of simulator training programs is the responsibility of a Nuclear Project Manager who reports to the Senior Vice President - Nuclear Engineering and Operations. The simulator complex is located at the Millstone site.

The Vice President - Nuclear Operations will work with Nuclear Training to assure appropriate training and retraining is provided for Nuclear Operations personnel and to provide periodic feed back regarding effectiveness of training programs.

TABLE LQB-01-1

Year	Total Number of Individuals	Commited To Millstone Unit 3		Committed to Other Nuclear Units		Committed To Fossil/Hydro Units	
		Number of Individuals	Percent Of Time	Number of Individuals	Percent Of Time	Number of Individuals	Percent Of Time
			Generation Engineering				
1984	234	60	26%	154	66%	20	8%
1985	259	70	27%	166	64%	23	9%
1986	267	75	28%	167	63%	25	9%
			Generation Projects				
1984	98	24	25%	62	63%	12	12%
1985	102	26	26%	57	56%	19	18%
1986	106	28	26%	59	56%	19	18%
			Nuclear and Environmental Engineering				
1984	421	68	16%	312	74%	41	10%
1985	445	71	16%	330	74%	44	10%
1986	450	90	20%	315	70%	45	10%
			Nuclear Operations				
1984	20	3	16%	17	84%	0	0
1985	20	4	20%	16	80%	0	0
1986	20	5	25%	15	75%	0	0

Millstone Nuclear Power Station, Unit No. 3

Open Items
Licensee Qualification Branch

LQB-05 On-Shift Experience Requirements
for Senior Reactor Operators

The NRC has expressed concern with the limited operating experience levels of operating crews at new nuclear power plants, as discussed in their meeting with OL Applicants on January 26, 1984 in Bethesda, Maryland.

Response

Northeast Utilities has submitted several letters to the NRC indicating our position on staff experience levels for Millstone Unit No. 3. Millstone Unit No. 3 has significant commercial operating experience with regard to its corporate management, unit management, and on-shift personnel. We feel that the staffing levels for Millstone Unit No. 3 satisfy the NRC's concern for safe operation of the plant through the selection of experienced, qualified individuals as shown in our W. G. Counsil letter to H. L. Thompson, B11084, dated March 19, 1984.