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March 1, 1985

Docket No. 50-423 B11453

Director of Nuclea: 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) W. G. Counsil letter to B. J. Youngblood, "Response to Requests for Additional Information", dated August 1, 1983.
 - (2) B. J. Youngblood letter to W. G. Counsil, "SER for Millstone Nuclear Power Station, Unit No. 3", dated August 2, 1984.
 - (3) W. G. Counsil letter to B. J. Youngblood "Response to SER Confirmatory item 70", dated December 10, 1984.

Dear Mr. Youngblood;

Millstone Nuclear Power Station, Unit No. 3 Response to SER Confirmatory Item 70

In Reference (1), Northeast Nuclear Energy Company (NNECO) transmitted responses to the 260 series questions concerning the Millstone Unit No. 3 Quality Assurance Program during the operational phase. In Reference (1), NNECO also committed to revise either the Millstone Unit No. 3 FSAR Section 17 or the Northeast Utilities Quality Assurance Program (NUQAP) Topical Report to include applicable responses to the 260 series questions. This was identified as Confirmatory Item 70 in Reference (2). In Reference (3), NNECO transmitted a response to Confirmatory item 70. Attached is the additional information concerning confirmatory item 70. The attached information was discussed and accepted by your Mr. J. Spraul, Quality Assurance Branch during a telecon with NNECO representatives on January 29, 1985. Therefore, confirmatory item 70 is considered fully resolved.

If there are any questions, please contact our licensing representative directly.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY et. al. BY NORTHEAST NUCLEAR ENERGY COMPANY Their Agent

W. G. Counsil

Senior Vice President

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 Licensees herein and that the statements contained in said information are true and correct to the best of his knowledge and belief.

My Commission Expires March 31, 1988

Attachment I

NRC Question No.	Changes to FSAR Section	NUQAP Topical Report (Revision 6) Reference	Comment
260.2	17.2	Figure 1.6	See attached FSAR change
260.17	17.1	None	See Attached FSAR change.
260.30		Section 6.2.2*	Note 1
260.33		Section 4.2.1*	Note 2
260.50	17.2	None	See attached FSAR change
260.57	17.2	None	See attached FSAR change

^{*}As agreed with the NRC during a telecon of January 29, 1985, the changes to the sections will be included in the NU topical report, NU-QA-1 during its annual (June 1985) submittal.

- Note 1: Add the following as the second sentence to paragraph 6.2.2. "Holders of controlled copies of document complete acknowledgement of receipt forms and return them to the distributor in order to assure that obsolete or superseded documents are removed from the work areas in a timely manner."
- Note 2: The second sentence of the fifth paragraph of 4.2.1 should read as follows: "The procurement of spare or replacement parts, for safety related systems, structures or components, is subject to the controls of the latest NU-QA program and NUSCO/NUPOC procedure requirements. The spare or replacement parts are subject to controls equivalent to the original or subsequent codes and standards.

CHAPTER 17

QUALITY ASSURANCE

- 17.1 QUALITY ASSURANCE DURING DESIGN AND CONSTRUCTION
- 17.1.1 Northeast Utilities Service Company's Quality Assurance Program

The Quality Assurance Program during Design and Construction was described in Chapter 17, Section 17.1 of the Millstone Nuclear Power Station Unit 3 Preliminary Safety Analysis Report (PSAR). Subsequently, the Quality Assurance Program was revised and described in the Northeast Utilities Quality Assurance Program Topical Report, NU-QA-1, Revision 3A, dated March 5, 1979, as approved by the Nuclear Regulatory Commission, March 13, 1979; NU-QA-1, Revision 4A, dated April 9, 1982, as approved by the Nuclear Regulatory Commission, April 9, 1982; and NU-QA-1, Revision 5, dated August 15, 1983, as approved by the Nuclear Regulatory Commission, August 9, 1983.

> INSERT 1'
17.1.2 Stone & Webster Engineering Corporation's Quality Assurance
Program

The contents of this paragraph can be found in the Millstone Project Quality Assurance Program Manual, Revision E. Table of Contents, dated April 6, 1985. This Program has been derived, without degradation, from the SWEC Topical Report SWSQAP 1-74A, Revision N/A, as approved by the Nuclear Regulatory Commission, December 31, 1974.

17.1.3 Westinghouse Water Peactor Division's Quality Assurance Plan

The original Quality Assurance Program implemented by Westinghouse for Millstone 3 was described in Chapter 17 of the PSAR.

Over the course of performing the design and initial procurement activities for Millstone 3, the Westinghouse Quality Assurance Program was upgraded to reflect changes in regulatory requirements (including Regulatory Guide 1.70) and industry standards. These changes first culminated in WCAP-8370, Revision 7A, which was applicable to activities from January 1, 1975 to October 1, 1977. This was superseded by Revision 8A which was applicable from October 1, 1977 to October 31, 1979, and by Revision 9A which was applicable from October 31, 1979 and by Revision 9A which was applicable from October 31, 1979 to November 32,1984.

The present Westinghouse Quality Assurance Program is described in Delete WCAP-8370, Revision 9A, Amendment 1, approved by the NRC, February 13, 1981, Westinghouse Water Reactor Divisions Quality Assurance Plan (Westinghouse 1979) and WCAP-7800, Nuclear Fuel Division Quality Assurance Program Plan (Westinghouse).

> INSERT '1' 17.1.4 References for Section 17.1

WCAP-7800, Westinghouse. Nuclear Fuel Division Quality Assurance Program Plan.

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WCAP-8370, Revision 9A, Westinghouse 1979. Westinghouse Water Reactor Divisions Quality Assurance Plan.

WCAP 8370/1800, Revision 10A/GA, "Westinghouse water Reactor Division quality Assurance Plan", November, 1984.

INSERT 1

The present Northeast Utilities Quality Assurance Program in effect is described in the Northeast Utilities Quality Assurance Program Topical Report, NU-QA-1, Revision 6 dated August 1, 1984 as approved by the NRC, August 1, 1984.

The remaining design and construction activities for Millstone Unit No. 3 will continue to be implemented in accordance with the NRC-approved NU-QA-1. The preoperational test program will be implemented in accordance with the requirements of FSAR Section 14.2, NU-QA-1 and the Millstone Unit No. 3 Startup Manual.

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The Northeast Utilities Quality Assurance Program for operation is invoked during the startup Test Program on systems turned over from construction to NNECO control. This program is in accordance with the NUSCO Quality Assurance Topical Report (NU-QA-1) and the Millstone Unit No. 3 Startup Manual. Audits are performed during the startup phase to assure Quality Assurance Program implementation. This program will be in effect more than 90 days prior to fuel loading.

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The Westinghouse Nuclear Fuel Division Quality Assurance Program described in Westinghouse Topical Report, WCAP-7800, Revision 5 was applicable to activities prior to November 30, 1984.

The present Westinghouse Water Reactor Divisions Quality Assurance Plan is described in WCAP 8370/7800 Revision 10A/6A and applies to all Westinghouse Water Reactor Division's (including Nuclear Fuel Division) activities subsequent to November 30, 1984.

MNPS-3 FSAR

17.2 QUALITY ASSURANCE DURING THE OPERATIONS PHASE

- August 1,1984

The Quality Assurance Program during operations is described in the Northeast Utilities Quality Assurance Program Topical Report, NU-QA-1, Revision (A), dated (April 9, 1982, as approved by the Nuclear Regulatory Commission (April 9, 1982.

-> INSERT A

Insert 'A'

Functions such as inspection, test, instrumentation and control operations and Q 260-2 maintenance for the operation phase of Millstone Unit 3 are detailed in Section 13.1. The plant organization will be as shown on Figures 13.1-6 through 13.1-8.

The Millstone Unit 3 Startup Manual describes the measures taken by the Millstone Unit 3 startup group to assure that safety related non-conformances shall be corrected prior to the initiation of the preoperational testing of the item. Q260.50 For the nonconformances that are not corrected prior to the initiation of the preoperational testing of the item, a deficiency report shall be issued and include an approved resolution of the deficient item prior to its use for its safety related purpose.

The Quality Assurance Program criteria included in Section C of Appendix A to the NRC Branch Technical Positions APCSB 9.5-1, Guidelines for Fire Protection Q 260-57 for Nuclear Power Plants Docketed Prior to July 1, 1976 (August 23, 1976), will be applied to the fire protection program (and related hardware) during the operations phase of Millstone Unit No. 3.

MNPS-3 FSAR

Question No. Q260.50 (SRP Section 17.2, 15.3)

Describe provision to assure that nonconformances are corrected or resolved prior to the initiation of the preoperational testing of the item.

Response:

Refer to the revised FSAR Section 17.2