PROJECT INSTRUCTION	Sargent & Lundy LLC	INSTRUCTION PI-MP3-11 REV. 3

Client: Northeast Utilities

Station: Millstone Unit 3

Title: **DISCREPANCY REPORT SUBMITTAL AND CLOSURE**

☒ **Safety-Related** ☐ **Non-Safety-Related**

Reviewed By:						Approved By:
System Lead	Programmatic Lead	O&M Lead	Accident Mitigation Lead	QA Engineer	Internal Review Committee Chairman	Verification Team Manager Date: 6-23-97
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Description

Rev.3 Revised PI to require posting of DR interaction between S&L and NU on NU proposed resolutions on Internet Bulletin Board. Also replaced Attachment 6.2 to reflect current DR database screens.

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1.0 PURPOSE

This instruction establishes the requirements for the preparation, submittal and closure of Discrepancy Reports for descrepant conditions identified by the Independent Corrective Action Verification Program (ICAVP) Team. This instruction addresses the preparation of DRs by the ICAVP team, the review of proposed resolutions developed by Northeast Utilities and the trending of DRs generated by the Verification Team.

2.0 REFERENCE

2.1 NRC Confirmatory Order Establishing Independent Correction Action Verification Program - Millstone Nuclear Power Station, Units 1, 2, and 3

2.2 PI-MP3-01, ICAVP Communication Protocol

2.3 PI-MP3-02, Review of System Design for Compliance with Design & Licensing Basis

2.4 PI-MP3-03, Review of Plant Modifications Prepared After Receipt of Operating License for Technical Adequacy and for Configuration Control.

2.5 PI-MP3-04, Programmatic Reviews

2.6 PI-MP3-05, Physical Plant Configuration Walkdowns

2.7 PI-MP3-06, Operations and Maintenance and Testing Procedures and Training Documentation Reviews

2.8 PI-MP3-07, Review of Accident Mitigation Systems

2.9 PI-MP3-10, Differing Professional Opinions

2.10 PI-MP3-12, Project File Index

3.0 DEFINITIONS

3.1 **Accident Mitigation Review Group (ARG)** - The subgroup of the ICAVP Verification Team responsible for review of critical characteristics of accident mitigation systems to ensure those systems can perform their required safety functions.

3.2 **Internal Review Committee (IRC)** - A committee comprised of senior S&L management personnel responsible for overall technical oversight of the ICAVP.

3.3 **Operations & Maintenance and Testing Review Group (ORG)** - The subgroup of the ICAVP Verification Team responsible for the review of the operating, maintenance and testing procedures, and training materials for the systems within the scope of the ICAVP.

3.4 **System Review Group (SRG)** - The subgroup of the ICAVP Verification Team responsible for performing an in-depth review of the design of the systems in the scope of the ICAVP.

3.5 **Configuration Review Group (CRG)** - The subgroup of the SRG Verification Team responsible for walkdowns to verify the current as built conditions are in conformance with the design output documents.

3.6 **Programmatic Review Group (PRG)** - The subgroup of the ICAVP Verification Team responsible for review of the processes used to change the facility design or the operation, maintenance and testing of the facility. The PRG is also responsible for verifying the adequacy of NU's corrective actions.

3.7 **Discrepancy Report (DR)** - The mechanism for documenting the discrepant conditions identified by the ICAVP and reporting the condition to NU for resolution.

3.8 **Discrepancy** - A discrepancy is a condition, such as an error, omission or oversight which prevents consistency among the physical configuration, information sources (e.g. documentation and databases), design basis and/or regulatory requirements.

4.0 RESPONSIBILITIES

4.1 Initiator
- Responsible for preparation of DR in accordance with the instructions contained in this project instruction.
- Responsible for review of proposed NU resolutions in accordance with the instructions contained in this project instruction.

4.2 Verification Group Lead
- Responsible for first level review of DRs prepared by Initiator.
- Responsible for review of S&L's dispositions to proposed NU resolutions.
- Responsible for resolving comments with the Initiator.

4.3 Verification Team Manager
- Responsible for reviewing initial DRs and S&L dispositions to proposed NU resolutions.
- Responsible for resolving comments with the Verification Group Lead and the Initiator.
- Responsible for overall control of DR process including maintenance of DR log, trending data and external distributions.

4.4 IRC Members/Chairman
- Responsible for reviewing DRs and dispositions of proposed NU resolutions prepared by the Verification Team and for resolving any comments with the Verification Team.

5.0 PROCEDURE

The Nuclear Regulatory Commission (NRC) Confirmatory Order (Reference 2.1) requires Northeast Utilities (NU) to implement the ICAVP. References 2.3 through 2.8 provide the instructions for implementing the reviews included in the scope of the ICAVP. Discrepant conditions identified by the Verification Team members during the performance of these reviews will require the initiation of a DR. This project instruction provides the requirements for initiating, processing and closure of DRs. DRs shall not be generated for findings already identified by NU during implementation of their Configuration Management Plan.

Note: DRs shall be generated as soon as practical after the condition has been identified. Those DRs which may be potential operability concerns shall be expedited through the review and approval process and NU shall be notified per Subsection 5.5.1 of this instruction.

The DR process involves the following tasks:

a. DR initiation
b. DR resolution and closure
c. DR log and trending data
d. DR distribution

DRs shall be generated in an electronic format using a DR Access Database. Attachments 6.2 through 6.5 of this project instructions illustrate sample database input screens. Hardcopies of the DRs, a DR Log, DR status reports and DR trend reports can be generated from the database.

The detailed instructions for each of the above task are described in sub-sections 5.2 through 5.5. Attachment 6.1 is a flow chart illustrating the DR process.

5.2 DR Initiation

5.2.1 Members of the ARG, CRG, ORG, PRG and SRG Verification Teams shall initiate a DR for any discrepant condition identified during their respective reviews. The individual initiating the DR shall be referred to as the Initiator.

Note: Before initiating a DR, the Initiator shall ensure the condition has been thoroughly investigated and the total scope of the condition has been identified. Any additional information needed from NU shall be requested per PI-MP3-01.

5.2.2 The Initiator shall prepare the Discrepancy Report by entering the following data into the database's "Discrepancy Screen", Attachment 6.2:

Note: The fields listed below which are indicated with an asterisk have pulldown menus. Applicable entries in these menus are listed in Attachment 6.6.

Field	Instruction
Review Group*	Enter Applicable Review Group
Review Element*	Enter Applicable Review Element
Discipline*	Enter Applicable Organization
Discrepancy Type*	Enter Applicable Discrepancy Type
Potential Operability* Issue	Enter whether the Discrepancy is a Potential Operability Issue using the guidance in Attachment 6.7
System/Process	Enter by Full Name the system or process being reviewed.
Discrepancy	Enter brief title
Description	Enter detailed description of condition including specific references and basis for potential operability determination, if DR is determined to be potential operability issue.

Initiator — Enter your name; Last name first followed by first and middle initials (i.e. Doe, J. A.)

Date — Enter preparation date

The database will automatically assign DR Nos., revision level and status.

5.2.3 The VT Lead shall review the initial DR draft.

5.2.3.1 If the VT Lead has comments on the DR or determines that additional information is needed, the VT Lead shall resolve the comments with the Initiator.

5.2.3.2 If the VT Lead does not concur with the DR, the VT Lead shall complete the "Invalid Screen", Attachment 6.3, by entering his name, date and justification for the invalid disposition. The VT Lead shall review the invalid disposition with the Initiator.

5.2.3.3 If the Initiator agrees with the VT Lead's invalid disposition, the Initiator shall indicate his concurrence on the "Invalid Screen", Attachment 6.3. The initiator shall then file the invalid DR with the applicable element review file.

5.2.3.4 If the VT Lead and Initiator do not reach agreement, the VT Manager shall resolve the issue. If either of the parties has a safety concern related to the DR, the provisions of PI-MP3-10 for Differing Professional Opinions may be invoked.

5.2.3.5 If the VT Lead concurs with the DR, the VT Lead shall enter his name, and date on the Discrepancy Screen, Attachment 6.2.

5.2.4 The VT Manager shall review the DR. The review process shall be consistent with the instructions contained in Subsections 5.2.3.1 through 5.2.3.5 above, except that any comments or invalid dispositions shall be reviewed with both the Initiator and the VT Lead.

Note: The reviews associated with Subsections 5.2.3 and 5.2.4 can be concurrent in a group session.

5.2.5 The IRC shall review the DR. The review process shall be consistent with the instruction contained in Subsections 5.2.3.1 through 5.2.3.5 above, except that any comments or invalid dispositions shall be reviewed with the Initiator, VT Lead and VT Manager.

5.2.6 The VT Manager shall distribute approved DRs to the NRC, NEAC, NU and the Public in accordance with Subsection 5.5 of this project instruction.

5.3 DR Resolution and Closure

5.3.1 Proposed resolutions submitted by NU shall be reviewed in a manner similar to the DR initiation process described in Subsection 5.2 of this project instruction. The DR proposed resolution shall first be reviewed by the Verification Team and then the IRC. Concurrent review by VT members, Leads, and Manager are permitted.

5.3.2 The Initiator shall summarizes the NU resolution on the "NU Resolution Screen", Attachment 6.4. Concurrence by the VT members shall be indicated on the screen, Attachment 6.4. The DR shall be distributed to the NRC, NEAC, NU and the Public per Section 5.5 of this project instruction.

5.3.3 If the Initiator, VT Lead, VT Manager or IRC do not concur with the proposed resolution, the non-concurring party shall document their justification for rejecting the resolution on the "Rejection Screen", Attachment 6.5 and obtain concurrence from all other members on Attachment 6.5. Rejected Dispositions shall be distributed to the NRC, NEAC, and NU in accordance with Subsection 5.5 of this project instruction.

5.3.4 Revised proposed resolutions submitted by NU in response to S&L comments shall be reprocessed in accordance with Subsection 5.3.1 through 5.3.3. Only one additional resolution cycle per discrepancy is anticipated.

5.3.5 If all groups, (the VT members and the IRC) cannot reach agreement on acceptance of the proposed NU resolutions and anyone has a safety concern, then the provisions of PI-MP3-10 for differing professional opinions DPO may be invoked.

5.4 DR Log and Trending Data

5.4.1 DR Log

5.4.1.1 The DR database shall automatically assign DR Nos, status and revision. Hardcopy logs can be generated from the database.

5.4.2 Trending Data

5.4.2.1 The DR database can be sorted by the entries on Attachment 6.6 to generate trend reports.

5.5 DR Distribution

5.5.1 Initial Issues

5.5.1.1 The VT Manager shall distribute DRs to the NRC, NEAC, NU and the Public per Subsection 3.3 of PI-MP3-01. Distribution to the NRC, NEAC, and NU shall be in the form of hardcopies. Distribution to the public shall be via the electronic bulletin board. Posting of the DR's on the electronic bulletin board will be 48 hours after hard-copies are mailed to NU/NRC/NEAC. Since generation of DR's will be by electronic media with database security provisions, signatures shall not be required.

5.5.1.2 The VT Manager will fax DRs which may pose potential operability concern to the NU Point Of Contact identified in PI-MP3-01. The date sent shall be entered on the Discrepancy Screen.

5.5.2 Proposed Resolutions

5.5.2.1 The VT Manager shall distribute accepted (closed) DRs to the NRC, NEAC, NU and the Public in accordance with Subsection 3.4 of PI-MP3-01. Hardcopies shall be sent to the NRC, NEAC, and NU.

5.5.2.2 The VT Manager shall distribute S&L comments on proposed resolutions to the NRC, NEAC, and NU, in accordance with Subsection 3.4 of PI-MP3-01. Posting of DR interaction between NU and the VT on the electronic bulletin board will be 48 hours after hardcopies are mailed to NU/NRC/NEAC.

6.0 ATTACHMENTS

6.1 Process Flowchart, Processing Findings & Resolutions (1 page).

6.2 Sample Discrepancy Screen (1 page).

6.3 Sample Invalid Screen (1 page).

6.4 Sample Resolution Screen (1 page).

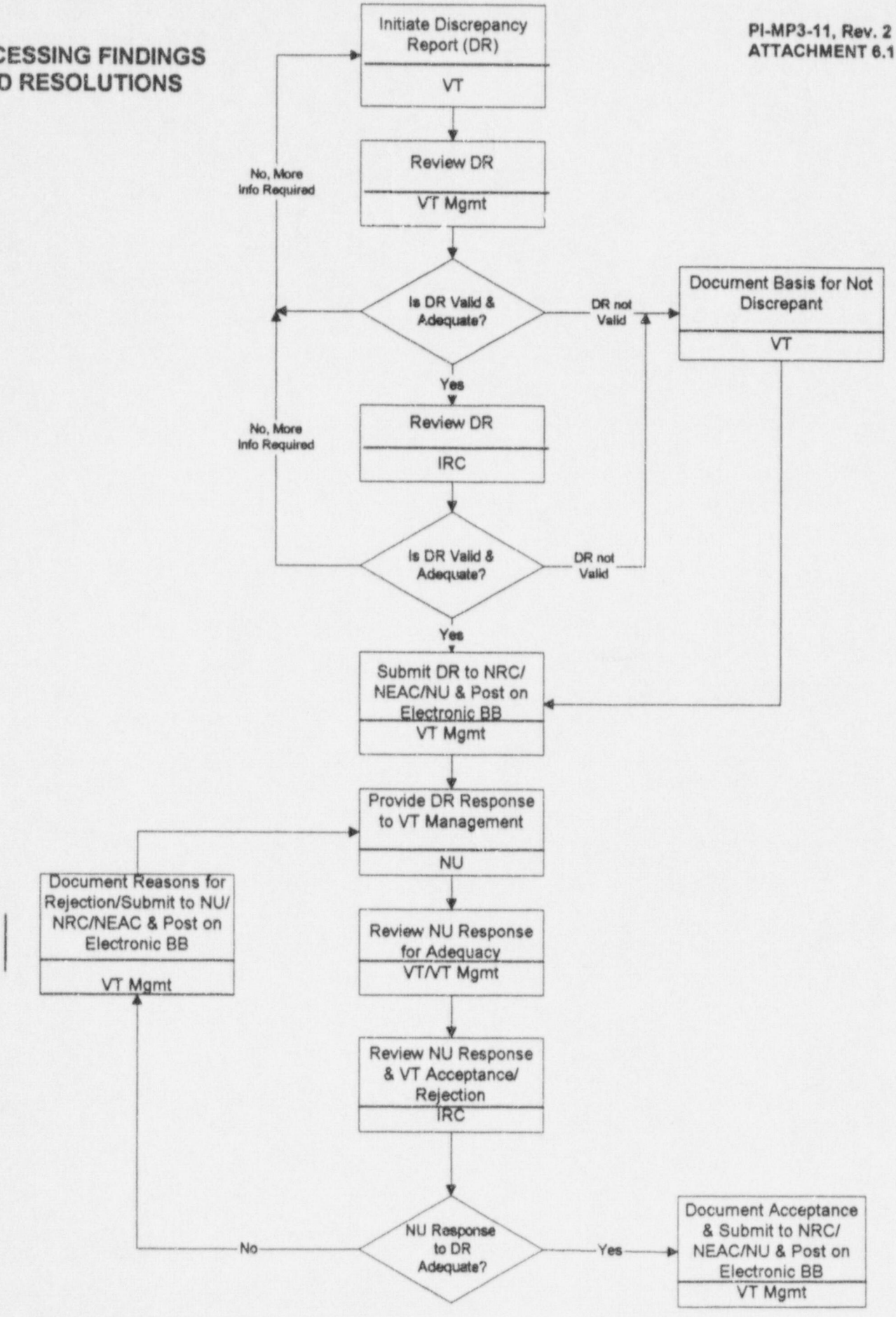
6.5 Sample Rejection Sheet (1 page)

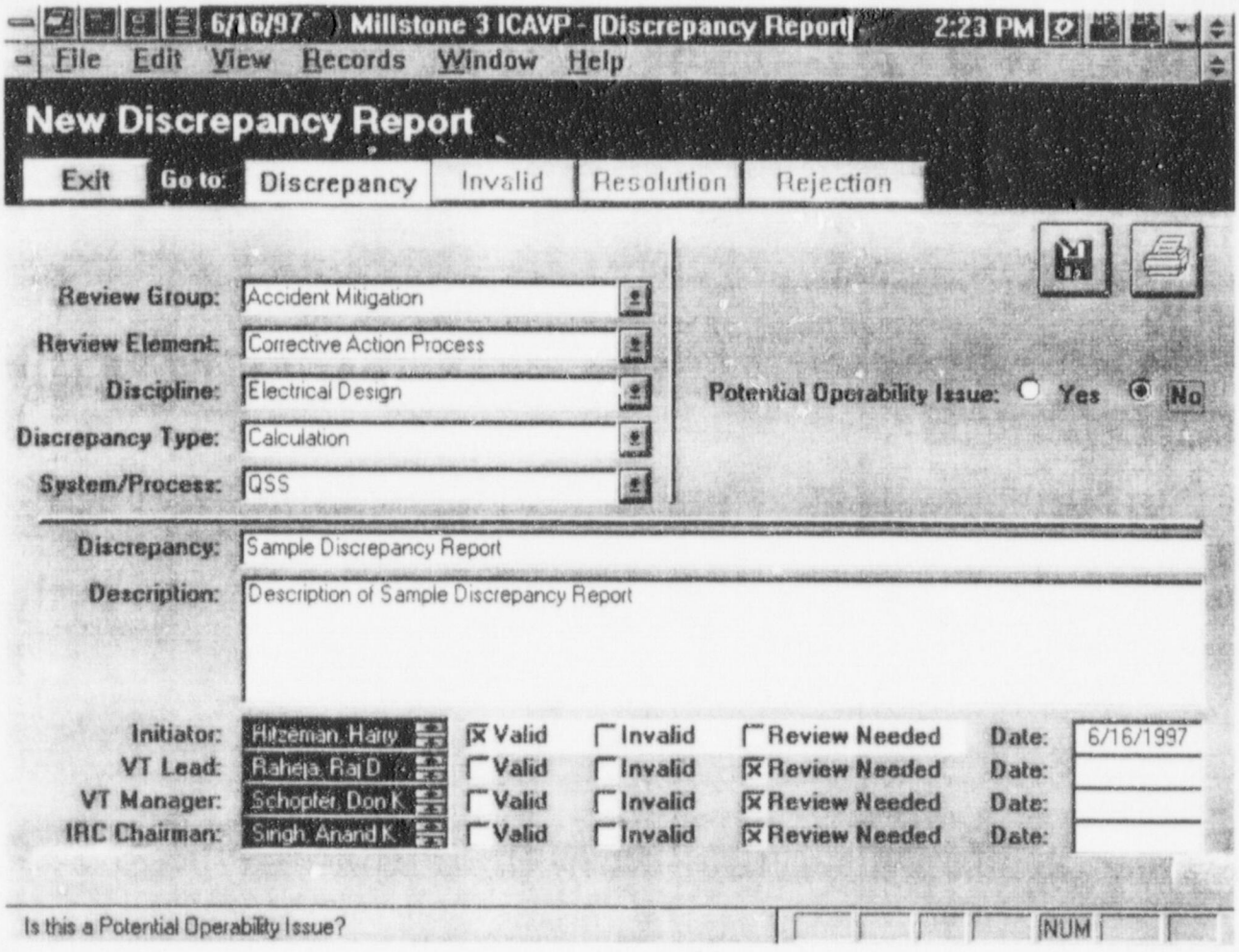
6.6 Summary of Available Entries for Pulldown Menus (1 page)

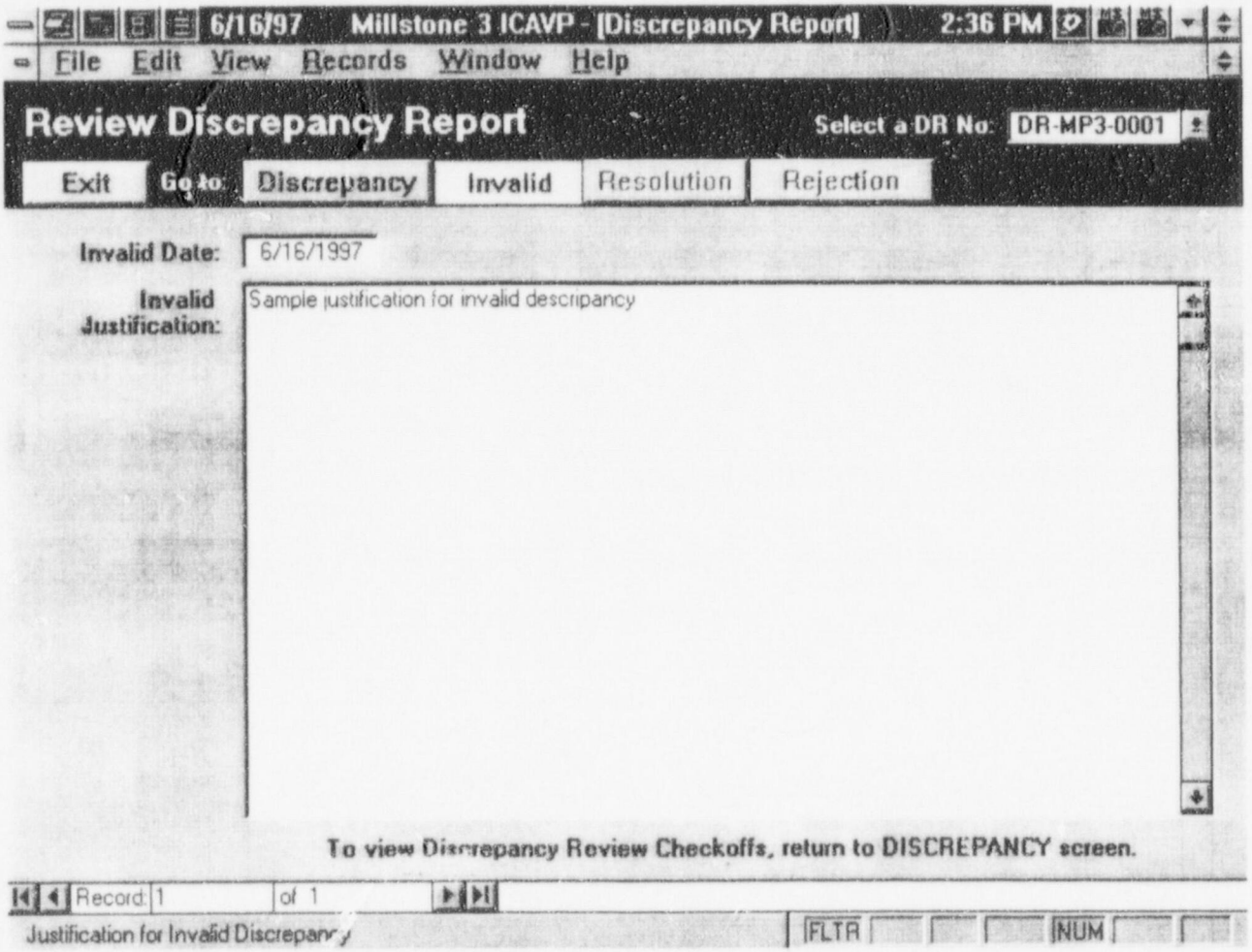
6.7 Criteria for Operability Determination (1 page).

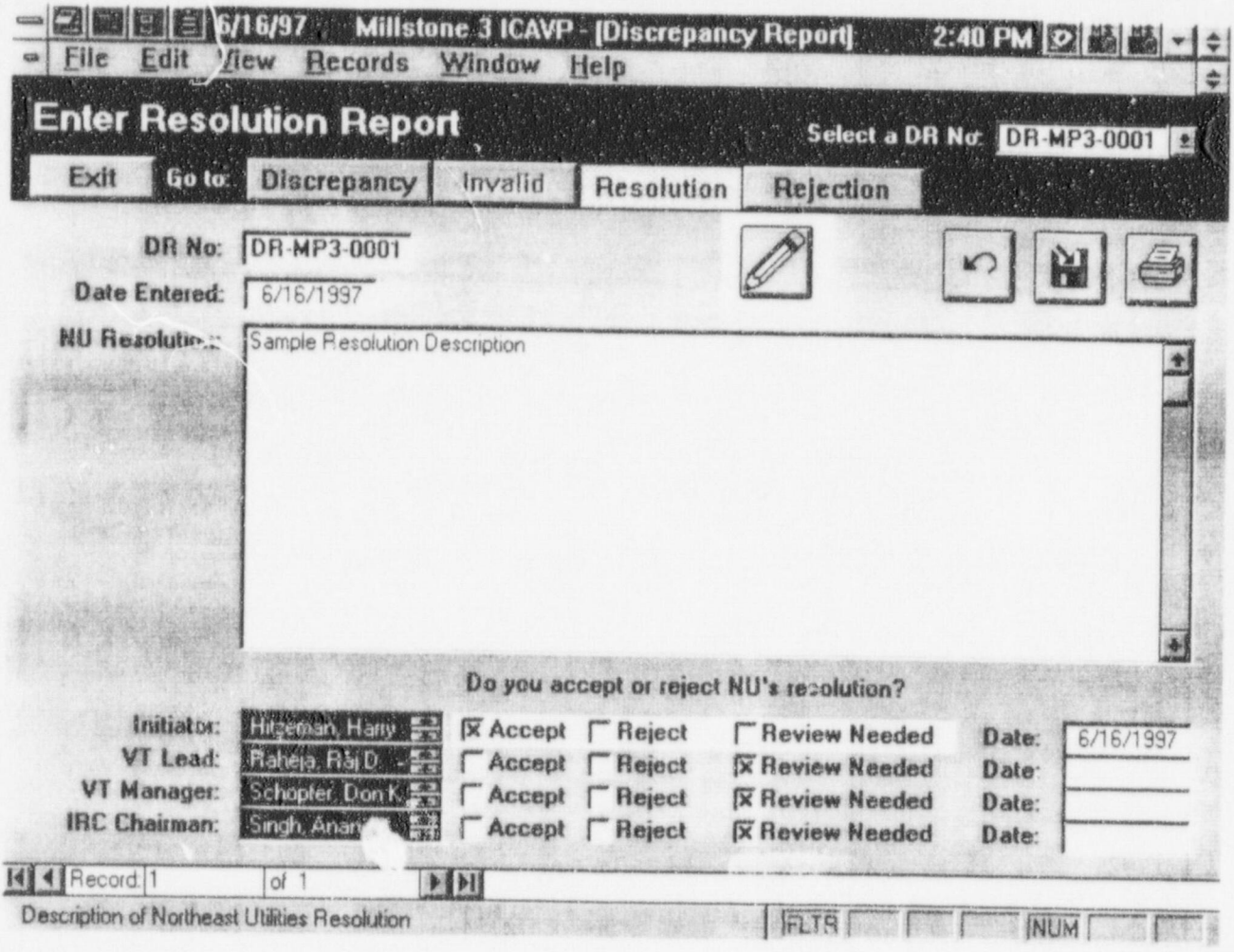
Note: Attachments 6.2 through 6.4 are sample illustrations of the DR Access Database data entry screens. This instruction will be revised if the data fields are revised. Revision to this instruction is not required for format changes to the data entry screens.

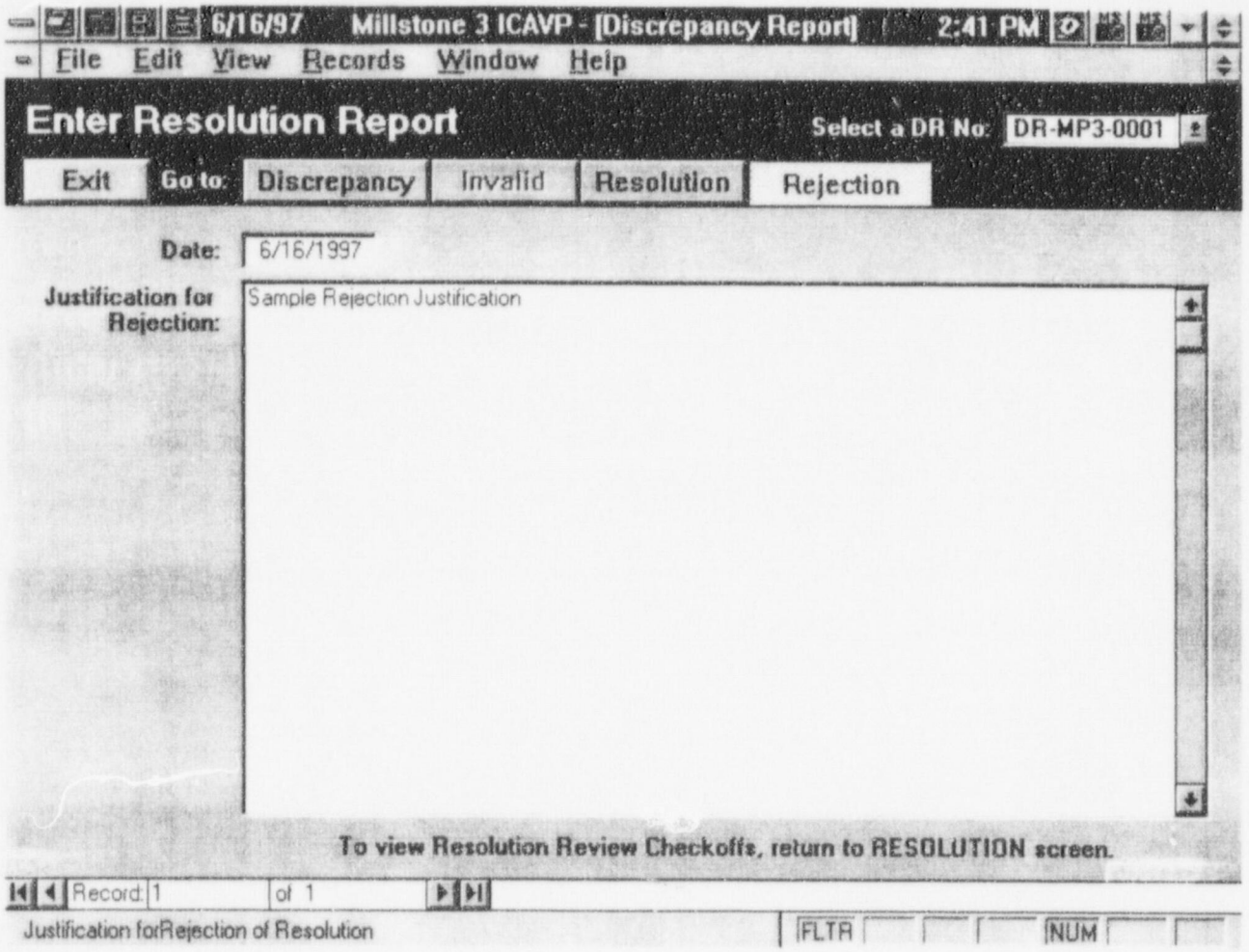
PROCESSING FINDINGS AND RESOLUTIONS




6/16/97 Millstone 3 ICAVP - [Discrepancy Report] 2:23 PM
File Edit View Records Window Help
New Discrepancy Report
Exit
Go to:
Discrepancy
Invalid
Resolution
Rejection
Review Group: Accident Mitigation
Review Element: Corrective Action Process
Discipline: Electrical Design
Discrepancy Type: Calculation
System/Process: QSS
Potential Operability Issue: Yes No
Discrepancy: Sample Discrepancy Report
Description: Description of Sample Discrepancy Report
Initiator: Hitzeman, Harry [x] Valid [ ] Invalid [ ] Review Needed Date: 6/16/1997
VT Lead: Raheja, Raj D [ ] Valid [ ] Invalid [x] Review Needed Date:
VT Manager: Schopfer, Don K [ ] Valid [ ] Invalid [x] Review Needed Date:
IRC Chairman: Singh, Anand K [ ] Valid [ ] Invalid [x] Review Needed Date:
Is this a Potential Operability Issue?
NUM


6/16/97 Millstone 3 ICAVP - [Discrepancy Report] 2:36 PM
File Edit View Records Window Help
Review Discrepancy Report
Select a DR No: DR-MP3-0001
Exit
Go to: Discrepancy
Invalid
Resolution
Rejection
Invalid Date:
6/16/1997
Invalid Justification:
Sample justification for invalid descripancy
To view Discrepancy Review Checkoffs, return to DISCREPANCY screen.
Record: 1
of 1
Justification for Invalid Discrepancy
FLTR
NUM


6/16/97 Millstone 3 ICAVP - [Discrepancy Report] 2:40 PM
File Edit View Records Window Help
Enter Resolution Report
Select a DR No: DR-MP3-0001
Exit Go to: Discrepancy Invalid Resolution Rejection
DR No: DR-MP3-0001
Date Entered: 6/16/1997
NU Resolution: Sample Resolution Description
Do you accept or reject NU's resolution?
Initiator: Hitzeman, Harry Accept Reject Review Needed Date: 6/16/1997
VT Lead: Raheja, Raj D. Accept Reject Review Needed Date:
VT Manager: Schopter, Don K. Accept Reject Review Needed Date:
IRC Chairman: Singh, Anan Accept Reject Review Needed Date:
Record: 1 of 1
Description of Northeast Utilities Resolution
FLTR NUM


6/16/97 Millstone 3 ICAVP - [Discrepancy Report] 2:41 PM
File Edit View Records Window Help
Enter Resolution Report
Select a DR No: DR-MP3-0001
Exit
Go to: Discrepancy
Invalid
Resolution
Rejection
Date: 6/16/1997
Justification for Rejection:
Sample Rejection Justification
To view Resolution Review Checkoffs, return to RESOLUTION screen.
Record: 1
of 1
Justification forRejection of Resolution
FLTR
NUM

SUMMARY OF AVAILABLE ENTRIES FOR PULLDOWN MENUS

FIELD	ENTRIES
Review Group	CRG ORG PRG SRG ARG
Review Element	System Design Modification Design System Installation Modification Installation Operating Procedures Test Procedure Maintenance Procedure Training Procedure Change Process Corrective Action Process
Discipline	Mechanical Design Electrical Design I&C Design Structural Design Piping Design Equipment Qualification Operations Maintenance Training Other
Discrepancy Type	Drawing Component Data Calculation Licensing Document Test Requirements Installation Requirements Installation Implementation O&M&T Procedure O&M&T Implementation Corrective Action Procedure Implementation Change Process
Potential Operability Issue	Yes No

CRITERIA FOR POTENTIAL OPERABILITY ISSUE

The following criteria shall be used to determine if a DR poses potential operability issue:

1. Any departure from the conditions of the operating license, Technical Specifications.

2. Any occurrence or plant condition that requires notification to the NRC or other regulatory agency in accordance with the Configuration Management Plan.

3. Failure to meet the provisions of the Technical Requirements Manual.

4. Conditions resulting in a Maintenance Rule Functional Failure (MRFF) (10CFR50.65).

5. Any occurrence that appears to jeopardize radiological protection, or may be a violation of a program, procedure or regulation with radiological implications.