Sargent & Lundy "

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> July 11, 1997 Project No. 9583-100

Document No. 50-423

Northeast Nuclear Energy Company Millstone Nuclear Power Station, Unit No. 3 Independent Corrective Action Verification Program

United States Nuclear Regulatory Commission Attention: Document Control Desk Washington, D.C. 20555

I have enclosed the following discrepancy report (DR) identified during our Programmatic Review activities for the ICAVP. This DR is being distributed in accordance with the Communications Protocol, PI-MP3-01.

DR No. DR-MP3-0003

Please direct any questions to me at (312) 269-6078.

Yours very truly,

D. K. Schopfer

Vice President and ICAVP Manager

A001/1

DKS:spr

Enclosures

Copies:

E. Imbro (1/1) Deputy Director, ICAVP Oversight

H. Eichenholz (1/1) NRC Site

T. Concannon (1/1) Nuclear Energy Advisory Council

J. Fougere (1/1) NU

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Northeast Utilities Millstone Unit 3

ICAVP Discrepancy Report

DR No. DR-MP3-0003

Review Group: Programmatic DR VALID Review Element: Change Process Potential Operability Issue Discipline: Other Yes MO NO Discrepancy Type: Design Control Procedure Date FAXed to NU: System/Process: N/A Date Published: Discrepancy: Environmental Screening Description: We have reviewed the following procedures as they relate to licensing documents: Design Control Manual (DCM), revision 05; Procedure NGP 4.03, revision 7 (effective 11/4/96), titled "Changes and Revisions to Final Safety Analysis Reports"; Procedure NGP 4.04, revision 9 (effective 1/12/97), titled "Review and Approval of Proposed Changes to Selected License Requirements"; and Procedure NGP 5.14, revision 11 (effective 4/1/96) titled "Non-Radiological Environmental reviews of Plant Design Change Records and Procedure Changes". Based on this review we have noted the following discrepancies. 1. Design changes such as new office buildings and warehouses are outside the scope of the DCM (reference Attachment 1-2 of the DCM). The above procedures do not require that these types of design changes or resulting changes to the Updated Final safety Analysis Report receive an environmental screening to ensure that they do not constitute an unreviewed environmental question as required by paragraph 2.C.2 of the Operating License and 10 CFR 51.90. 2. Procedure NGP 4.04 is internally inconsistent. Section 4.3 of NGP 4.04 states that changes to the following documents constitute license amendments: 1) the Environmental Protection Plan (Millstone 3), when effects are significant enough to exceed the effects previously reviewed and accepted by the NRC for the particular system or type of operation involved, or 2) the Millstone 3 Environmental Protection Plan. Review Valid invalid Needed Date Initiator: Sheppard, R. P. 7/7/97 \otimes VT Lead: Ryan, Thomas J \boxtimes 7/8/97 VT Mgr: Schopfer, Don K 7/10/97 \boxtimes IRC Chmn: Singh, Anand K X 7/11/97 Date: INVALID: Date: RESOLUTION: Review Accept Reject Needed Date Initiator: Sheppard, R. P. VT Lead: Ryan, Thomas J X VT Mgr: Schopfer, Don K IRC Chmn: Singh, Anand K Date: REJECTION: