

50-423



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

July 15, 1997

Daniel Curry, Project Director  
Parsons Power Group Inc.  
2675 Morgantown Road  
Reading, PA 19607

Dear Mr. Curry:

During a June 19, 1997, meeting with the Connecticut Nuclear Energy Advisory Council (NEAC), the NRC stated in response to questions from NEAC that the Independent Corrective Action Verification Program (ICAVP) contractors would provide a preliminary assessment of the potential significance of the discrepancies identified during the performance of the ICAVP at the Millstone Nuclear Generating Station. In addition, during a teleconference on June 26, 1997, with representatives from Sargent & Lundy (S&L), Parsons Power Group Inc. (Parsons), the NRC, and NEAC participating, the NRC stated that it would provide additional guidance to the ICAVP contractors regarding assessing the potential significance of identified discrepancies. The enclosure provides four levels of potential significance that the NRC staff has determined shall be used by the ICAVP contractors when assessing the significance of all discrepancies they identify during the performance of the ICAVP at the Millstone site.

You are requested to modify your procedures for documenting discrepancies discovered during the implementation of your ICAVP audit plan to reflect the added requirement for conducting a preliminary assessment of the potential significance. You should base your assessment on the information that is readily available at the time the discrepancy is identified and the technical judgement of your organization. The discrepancy reports should include a brief discussion of the rationale for the selection of the significance level. The NRC recognizes that as new information becomes available or after the licensee completes its review of the discrepancies, the actual significance of the discrepancies may change. However, when implementing this requirement, a reasonable effort should be made to classify each of the identified discrepancies to one of the four significance levels provided in the enclosure at the time the discrepancy report is prepared.

In addition, the NRC requests that any discrepancies that may already have been documented before incorporation of this requirement into your procedures be updated to reflect your preliminary assessment of their significance. When updating the existing discrepancies, you should base your assessment on the information that you have readily available at the time you are updating the discrepancy and the technical judgement of your organization.

While the NRC requires the ICAVP contractors to provide a preliminary assessment of the potential significance of the discrepancies, it is important to reaffirm that Northeast Utilities (NU) remains the organization with the primary responsibility for assessing each of the discrepancies you identify during the ICAVP for impacts on the operations and maintenance of its licensed facilities.

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Don Schopfer

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If you have comments or there are further questions on assessing the significance of discrepancies identified during the implementation of the ICAVP at the Millstone site, please contact me at (301) 415-1490.

Sincerely,



Eugene Imbro, Deputy Director  
ICAVP Oversight  
Special Projects Office  
Office of Nuclear Reactor Regulation

Enclosure:  
Criteria for Categorizing the Relative Significance  
of Discrepancies Identified by the ICAVP

cc w/encl: See next page

Don Schopfer

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Sincerely,

Original signed by:

Eugene Imbro, Deputy Director  
ICAVP Oversight  
Special Projects Office  
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Docket Files (Docket 50-423)

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SPO R/F	PMcKee	JAnderson

\*See previous concurrence page.

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CRITERIA FOR CATEGORIZING THE RELATIVE SIGNIFICANCE OF DISCREPANCIES  
IDENTIFIED BY THE ICAVP

- SIGNIFICANCE LEVEL 1

A discrepancy<sup>(1)</sup> that identifies that the system does not meet its licensing and design bases and cannot perform its intended function, i.e., has the potential to **simultaneously affect redundant trains.**

- SIGNIFICANCE LEVEL 2

A discrepancy<sup>(1)</sup> that identifies that a single train of a redundant system does not meet its licensing and design bases and that the train cannot perform its intended function.

- SIGNIFICANCE LEVEL 3

A discrepancy<sup>(1)</sup> that identifies that a system does not meet its licensing and design bases but the system is capable of performing its intended function.

- SIGNIFICANCE LEVEL 4

A discrepancy<sup>(1)</sup> that identifies that the system meets its licensing and design bases, however, there exist minor errors such as minor arithmetic errors that do not significantly affect the results of a calculation or inconsistencies between documents of an editorial nature.

NOTE

- (1) A discrepancy may identify programmatic, procedural, or design issues or editorial inconsistencies.