



50-336

UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

July 15, 1997

Don Schopfer, Verification Team Manager  
Sargent & Lundy  
55 E. Monroe Street  
Chicago, IL 60603

Dear Mr. Schopfer:

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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Daniel Curry

2

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,

A handwritten signature in dark ink, appearing to read "EY Imbro".

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/enc!: See next page

Daniel Curry

2

July 15, 1997

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,

Original signed by:

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

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

cc w/encl: See next page

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\*See previous concurrence page.

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OFFICE	ICAVP/SPO	E	LA	ICAVP/SPO	ICAVP/SPO	SPO: D
NAME	JANakoski*		LBerry <i>LB</i>	SReynolds*	EVImbro <i>EE</i>	WTravers
DATE	7 / 11 / 97		7 / 11 / 97	7 / 11 / 97	7 / 15 / 97	1 / / 97

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Northeast Nuclear Energy Company

cc:

Lillian M. Cuoco, Esquire  
Senior Nuclear Counsel  
Northeast Utilities Service Company  
P. O. Box 270  
Hartford, CT 06141-0270

Mr. Kevin T. A. McCarthy, Director  
Monitoring and Radiation Division  
Department of Environmental  
Protection  
79 Elm Street  
Hartford, CT 06106-5127

Mr. Allan Johanson, Assistant Director  
Office of Policy and Management  
Policy Development and Planning  
Division  
450 Capitol Avenue - MS 52ERN  
P. O. Box 341441  
Hartford, CT 06134-1441

Regional Administrator, Region I  
U.S. Nuclear Regulatory Commission  
475 Allendale Road  
King of Prussia, PA 19406

First Selectmen  
Town of Waterford  
Hall of Records  
200 Boston Post Road  
Waterford, CT 06385

Deborah Katz, President  
Citizens Awareness Network  
P. O. Box 83  
Shelburne Falls, MA 03170

Mr. Wayne D. Lanning  
Deputy Director of Inspections  
Special Projects Office  
475 Allendale Road  
King of Prussia, PA 19406-1415

Mr. M. R. Scully, Executive Director  
Connecticut Municipal Electric  
Energy Cooperative  
30 Stott Avenue  
Norwich, CT 06360

Millstone Nuclear Power Station  
Units 2 and 3

Citizens Regulatory Commission  
ATTN: Ms. Susan Perry Luxton  
180 Great Neck Road  
Waterford, Connecticut 06385

Mr. F. C. Rothen  
Vice President - Nuclear Work Services  
Northeast Nuclear Energy Company  
P.O. Box 128  
Waterford, CT 06385

Charles Brinkman, Manager  
Washington Nuclear Operations  
ABB Combustion Engineering  
12300 Twinbrook Pkwy, Suite 330  
Rockville, MD 20852

Mr. D. M. Goebel  
Vice President - Nuclear Oversight  
Northeast Nuclear Energy Company  
P. O. Box 128  
Waterford, CT 06385

Mr. M. L. Bowling, Jr.  
Millstone Unit No. 2 Nuclear  
Recovery Officer  
Northeast Nuclear Energy Company  
P. O. Box 128  
Waterford, CT 06385

Senior Resident Inspector  
Millstone Nuclear Power Station  
c/o U.S. Nuclear Regulatory Commission  
P. O. Box 513  
Niantic, CT 06357

Mr. J. K. Thayer  
Recovery Officer - Nuclear  
Engineering and Support  
Northeast Nuclear Energy Company  
P. O. Box 128  
Waterford, CT 06385

Burlington Electric Department  
c/o Robert E. Fletcher, Esq.  
271 South Union Street  
Burlington, VT 05402

Northeast Nuclear Energy Company

cc:

Mr. William D. Meinert  
Nuclear Engineer  
Massachusetts Municipal Wholesale  
Electric Company  
P. O. Box 426  
Ludlow, MA 01056

Ernest C. Hadley, Esq.  
1040 B Main Street  
P. O. Box 549  
West Wareham, MA 02576

Joseph R. Egan, Esq.  
Egan & Associates, P.C.  
2300 N Street, NW  
Washington, D.C. 20037

The Honorable Terry Concannon  
Co-Chair  
Nuclear Energy Advisory Council  
Room 4035  
Legislative Office Building  
Capitol Avenue  
Hartford, Connecticut 06106

Mr. Evan Woolacott  
Co-Chair  
Nuclear Energy Advisory Council  
128 Terrys Plain Road  
Simsbury, CT 06070

Ms. P. Loftus  
Director - Regulatory Affairs for  
Millstone Station  
Northeast Nuclear Energy Company  
P. O. Box 128  
Waterford, CT 06385

Mr. N. S. Carns  
Senior Vice President and  
Chief Nuclear Officer  
Northeast Nuclear Energy Company  
P. O. Box 128  
Waterford, CT 06385

Millstone Nuclear Power Station  
Units 2 and 3

Mr. John Buckingham  
Department of Public Utility Control  
Electric Unit  
10 Liberty Square  
New Britain, CT 06051

Mr. James S. Robinson  
Manager, Nuclear Investments and  
Administration  
New England Power Company  
25 Research Drive  
Westborough, MA 01582

Mr. B. D. Kenyon  
President and Chief Executive Officer  
Northeast Nuclear Energy Company  
P. O. Box 128  
Waterford, CT 06385

Mr. M. H. Brothers  
Vice President - Millstone Unit 3  
Northeast Nuclear Energy Company  
P. O. Box 128  
Waterford, CT 06385

Mr. John C. Markowicz  
Nuclear Energy Advisory Council  
9 Susan Terrace  
Waterford, CT 06385-3515

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 meeting 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 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 systems meets its licensing and design bases, however, there exists 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.