

PARSONS

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September 2, 1998
Docket No. 50-336
Parsons NUM2-PPNR-1964-L

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Millstone Nuclear Power Station Unit No. 2
Independent Corrective Action Verification Program (ICAVP)

Gentlemen:

This letter transmits summaries of telephone conferences between Parsons Power Group Inc., the U. S. Nuclear Regulatory Commission, NNECo and August 4, August 6, August 11, August 13, August 18, August 20, August 25, and August 27, 1998.

Please call me at (610) 855-2366 if you have any questions.

Sincerely,

Daniel L. Curry
Daniel L. Curry
Parsons ICAVP Project Director

DLC:djv

Attachments Telephone Conference Notes for August 1998

A001

cc: E. Imbro (2) - USNRC
 J. Fougere - NNECo
 R. Laudenat - NNECo
 Rep. Terry Concannon - NEAC
 Project Files

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CONFERENCE NOTES
August 4, 1998

DATE: 8/4/98

PURPOSE: Telephone conference with NNECo, NRC, NEAC, and Parsons to discuss:
1. Single Failure Assumptions of the AFW System for Chapter 14 Transient Analyses
2. Unit 1 Impacts on Millstone Unit 2
3. IPEEE and IPE Site Flooding
4. Parsons Requested DRs for Discussion

LIST OF ATTENDEES:

NNECo	NRC	NEAC	Parsons
Joe Fougere	Eric Benner		Wayne Dobson
Ray Necci			Gordon Chen
Dave Bajumpaa			Richard Boyd
Peter Talbot			Dan Woodell
Bob Skwirz			Colin Patton
Ron Jackson			Trent Powers
Fred Mattioli			
Greg Tardif			

1. **Topic :** Single Failure assumptions of the AFW system for Chapter 14 transient analyses (Gordon Chen) - (Continuation of Topic # 2 from 7/30/98)

Background : For the analyses of Loss of Normal Water (E-6855-595-1, Rev. 0) and Small Break LOCA (M2-EV-98-0070, Rev.0), the single failure of the AFW system is based on the failure of one AFW pump. The AFW flow is available to both Steam Generators through control valves FW-43A and FW-43B, with values provided by the Proto-Power calculation (97-ENG-02053-M2, Rev. 2). The control valves are opened by AFW initiation signal.

Question :

- a) If one of the AFW control valves, FW-43A or FW-43B, were to fail closed on AFW initiation, then the resultant AFW flow is available to only one Steam Generator. Please identify what justifies control valve failure as being bounded by the AFW pump failure case?

Discussion: NNECo indicated the single failure of the AFW control valve, FW-43A or FW-43B, was not included in the safety analyses. A DR will be generated to initiate the evaluation of the impact to the affected analyses.

2. **Topic:** Unit 1 impacts on Millstone Unit 2. (Ron Smith) - (Continuation of Topic # 3 from 7/30/98)

Question:

- a) Based on the recent announcement regarding Unit 1 what is NNECo's plan for addressing those Unit 1 features/functions for which Millstone Unit 2 has taken credit for operation?

Discussion: Unit 1 is still a licensed plant and will be maintained within its Tech. Specs. The formal interface plan between Unit 2 and Unit 1 will continue to be maintained. Based on this, the ICAVP will assume that Unit 1 will continue to provide features/functions for which Millstone Unit 2 has taken credit for.

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3. **Topic:** IPEEE and IPE Site Flooding. (Ron Smith) - (Continuation of Topic # 4 from 7/30/98)

Questions:

- a) What is the Millstone procedure(s), similar to that used for the floor drain features covered in MP 2701J, that cover inspection and repair of all plant features that are taken credit for mitigation of site flooding for both IPEEE and IPE. Features of concern are building seals for the structures such as the EBFS, duct banks and other building penetrations?

Discussion:.. Other procedures that address this issue are SP-2665 rev 4 which covers inspection of building flood gates and doors, and ONP-514A, rev. 7 which addresses preparations for natural events. NNECo described design features used to mitigate site flooding such as building seals, etc. and stated normal operations rounds would identify if any of these items were allowing leakage.

4. **Topic:** DR. (Trent Powers)

Background: Parsons requested topic to discuss the DRs listed below. So far there has not been resolution on the issues described below. This discussion should focus on if agreement can be obtained. Otherwise, Parsons suggests the item(s) be referred to the NRC for resolution.

DRs for Discussion:

- a) DR-0036 - Item #1 of DR - Parsons does not concur that SP 21136 satisfies the requirement to verify 2-SI-659 and 260 fail open on loss of air to the valve operator.

Action:.. Parsons will provide NNECo with its response. NNECo will review the response and inform Parsons if this DR should be sent to the NRC for resolution.

- b) DR-0046 - Items # 1&2 - Not addressed in M2-PR101-0222EM Rev 1- data appears to still be missing in Section 6.8.4. Attachment D lists Cavitating Venturi in Table of Contents but is not attached to stress report. Attachment F Interface Information memo in TOC but not in report. Data from Stress Problems 25 & 100 not included in anchor loading tabulations on Section 6.12, pages 42 & 43.

Action:.. NNECo agrees the DR response did not provide all of information. They will provide a supplemental DR response. Parsons will hold its comment for the additional information.

- c) DR-0048 - Item #6 - M2PR101-222EM Rev 1 dated 3-18-1998 does not resolve Item 6. 27 of the 34 supports listed on pages 36 thru 40 of section 6.12 show that design loads exceed the design loads listed on the support drawings. No explanation of this has be identified.

Action: *NNECo agrees the DR response did not provide all of information. They will provide a supplemental DR response. Parsons will hold its comment for the additional information.*

CONFERENCE NOTES

August 6, 1998

DATE: 8/6/98

PURPOSE: Telephone conference with NNECo, NRC, NEAC, and Parsons to discuss:

1. Containment High Range Radiation Monitors - PDCR 2-116-80
2. Parsons Requested DRs for Discussion

LIST OF ATTENDEES:

NNECo	NRC	NEAC	Parsons
Joe Fougere	Eric Benner		Wayne Dobson
Bob Skwirz			Trent Powers
Greg Tardif			Amrit Kaplish
Rich Ewing			
Norbert Caric			

1. Topic: Containment High Range Radiation Monitors - PDCR 2-116-80 (Amrit Kaplish / Ken Mayers)

Background:

Rockbestos coaxial cable RSS-6-104 was bought and used in the above Modification package.

Rockbestos letter dated July 28, 1981 from G.G. Littlehales to NUSCO Quality Assurance Manager confirmed that Rockbestos coaxial cables RSS-6-100 through RSS-6-112 may be subject to failures at temperatures above 230° F. Rockbestos advised NUSCO not to use these coaxial cables in an environment where they may be subject to temperatures above 230° F. In their above referenced letter, Rockbestos confirmed that testing and qualification of modified prototype cables was expected by November, 1981.

NUSCO Letter No. GEE-81-657, dated August 10, 1981 from J. S. Nicosia to R. M. Kacich also informed their Licensing about the Rockbestos coaxial cable RSS-6-104 problem that was used at NUSCo's three operating Units.

NUSCo's Inter Office Memo from Ralph Bates to Mark Bates dated 2/24/82 stated that the four cables listed in Reference GEE-81-992 have been replaced and the associated containment high radiation monitors RM8240 and RM8241 have been placed in service.

There are no documents in the PDCR package that indicate what replacement coaxial cable was supplied and installed in this modification.

Questions:

- a) What replacement coaxial cable was supplied by Rockbestos and under what documents (Purchase Order etc.)?
- b) What are the Specifications of the replacement coaxial cable, i.e., the environment (temperature, pressure, humidity, radiation etc.) for which it is suitable?

Response: Rockbestos cable RSS-6-104-1081 was procured per NNECo Specification #SP-GEE-34 and Purchase Order #808659. The specifications of this cable have been put into EQR 121-01 (draft). The cable has been tested to 345°F, 122.4 psig, 100% relative humidity, chemical spray and 171 Mega RAD. It is good for Containment for 402 days post-accident. It meets or exceeds requirements of MP2.

2. Topic: DRs

Background: Parsons requested topic to discuss the DRs listed below.

CONFERENCE NOTES
August 6, 1998

DRs for Discussion:

- a) DR-0499 - Motor H.P. Discrepancy Between Calculation and Installed MOV'S (Trent Powers)

This DR was discussed on a previous conference, at which Parsons agreed it could be closed. We are in the process of closing this DR and want to clarify the final disposition. We agree that the current plant configuration matches the current design basis, (i.e. Calculation 97-ENG-01840E2, Rev.01, dated 2-23-98). However, this calculation was dated 2/23/98. At CMP complete it appears that the calculation of record, (PA84-063-0714-GE, Rev. 0, Change 01) used a A.C Motor Performance Curve for a 5.3 hp motor when the plant had a 6.6 hp motor installed. NNECo's last written response identified this as non-discrepant.

Discussion:.. For the calculation PA84-063-0714-GE, Rev. 0, Change 01 done in 1990, the 5.3 hp curve was used because NNECo was not able to obtain a curve for a 6 hp motor. The calculation used a locked rotor factor to account for the difference between 5.3 and 6 hp. It was judged that this approach was acceptable because the thermal overload sizing only affected an alarm function. The calculation, however does not document the factor or why it is used. NNECo and Parsons agreed this will be closed as a level 4 DR, since the calculation was deficient in documenting its assumptions. No corrective action is needed as this calculation has been superseded.

CONFERENCE NOTES

August 11, 1998

DATE: 8/11/98

PURPOSE: Telephone conference with NNECo, NRC, NEAC, and Parsons to discuss:

1. Discrepancies in Calculation MP2CRANC "MP2 Control Room Cabinets Anchorage Evaluation"
2. Parsons Requested DRs for Discussion
3. Parsons Requested DRs for Discussion

LIST OF ATTENDEES:

NNECo	NRC	NEAC	Parsons
Joe Fougere	Eric Benner		Colin Patton
Bob Skwirz			Don Marks
Fred Mattioli			Trent Powers
Bob Weth			Roger Mauchline
Tom Moore			Bob Moyer
Farid Elsabee			Dan Wooddell
Vere Joseph			Richard Boyd
Roy Terry			
Harold Thompson			

1. **Topic:** DR-0133 - Discrepancies in Calculation MP2CRANC "MP2 Control Room Cabinets Anchorage Evaluation" (Roger Mauchline)

Background: We would like some clarification of Response M2-1RF-02275 on DR-0133

Questions:

- a) On page 3, bulleted item: Please explain "7 anchor locations". The MP2CRANK calculation p. 18 shows 3 anchors per side of cabinet, which would give a total of 9 anchor locations for a line-up of three cabinets.
- b) On page 4, bulleted item: Is the 1.375" eccentricity based on an assumed location of the cabinet on the 6" channel or an "as built" location?

Response:

- a) *Number of anchor locations clarified.*
- b) *NNECo will walkdown the cabinet to verify weld placements.*

2. **Topic:** DRs

Background: Parsons requested topic to discuss the DRs listed below.

DRs for Discussion:

- a) DR-0346, Service Water Pump "C" Repair Package (Larry Collier) Item #3 - We need an explanation of the NNECo response. The documents we have state that the depth of one cavity is 1 ½ inches and the depth of the other cavity is 1 inch. The response to this discrepancy did not state if the material thickness at the first point of repair would accommodate the 1 ½ inch excavation. Also, NU did not at all address the 2nd repair cavity which was recorded as 1 inch. Base on this we do not understand NNECo's interpretation of the repair documents.

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Response: *Deferred to 8/18/98.*

3. Topic: DRs

Background: NNECo requested topic to discuss the DRs listed below.

DRs for Discussion:

- a) DR-056 PRT Member: Bob Weth and Vere Joseph. Follow-up Response. NU to present information to show that LB is met and to provide clarification of FSAR statements.
- b) DR-359 PRT Member: Farid Elsabee, Roy Terry, Harold Thompson. Discuss Items 1 &2 Response. Clarification of Topic 3.

Response:

- a) *NNECo will provide a follow-up response which shows that Aux Feed initiation during increasing power between 20 and 25% with an ATWS event is already bounded in an existing evaluation of system performance.*
- b) *NNECo will provide a follow-up response which explains how Unit 2 is protected from conditions related to a possible cask drop.*

CONFERENCE NOTES
August 13, 1998

DATE: 8/13/98

PURPOSE: Telephone conference with NNECo, NRC, NEAC, and Parsons to discuss:
1. Document Status and Program Planning
2. Accident Analysis Tracking
3. NNECo Requested DRs for Discussion

LIST OF ATTENDEES:

NNECo	NRC	NEAC	Parsons
Joe Fougere	Eric Benner		Richard Boyd
Bob Skwirz			Don Marks
Fred Mattioli			Ron Smith
Hugh McKenney			Rich Glaviano
Rich Ewing			Cliff Marks
Ron Jackson			Clark Tracy
Norbert Carte			Ken Mayers
Zack LaPlante			John Hilbush
Greg Tardif			

1. **Topic:** Document Status and Program Planning (Ron Smith)

Background: The following information is needed to allow Parsons to develop program review plans utilizing a sampling approach.

Questions: Please provide completion dates or the dates when the following documents will be made available to Parsons:

- a) EQ Program Manual--- *EQ program manual is not undergoing revision and the current revision is Rev 3..*
- b) SP-EE-352--- *Will include the EQ reports and will be issued when program is done.*
- c) SP-EE-332---8/31/98
- d) Appendix R Compliance Report---10/15/98
- e) Appendix R AOPs---10/15/98
- f) Appendix R Manual Action Evaluations---10/15/98
- g) Unit 2 Fire Hazards Analysis Report---10/15/98
- h) A listing of all EQ Test Report Assessments and EQ Qualification Reports--- *Millstone to provide list and schedule for issue of each via e-mail to Ron Smith.*

Note: *Appendix R items can not be released in stages.*

Response: *Indicated above in italics.*

2. **Topic:** Accident Analysis Tracking (Ron Smith)

Background: N/A

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Questions:

- a) Please describe how NNECo is tracking and resolving changes resulting from the revised accident analysis from the current analysis of record.
- b) Are these changes identified and tracked in your corrective action program?

Response:

- a) *Millstone uses the DCM ERC process for controlling inputs to accident analysis from engineering. Vendor analysis changes are also handled through the FSARCR process. Millstone performs a review of the vendor analysis for acceptance which is done to a procedure. This procedure does not have a formal review checklist process. Set point changes would be handled through the coordination efforts with engineering. If an analysis results in changing input values, this is handled by engineering via the issue of a revised ERC. For non numerical changes such as added manual actions these are handled through an informal process.*
- b) *Not Applicable.*

3. Topic: DRs

Background: NNECo requested topic to discuss the DRs listed below.

DRs for Discussion:

- a) DR-553 PRT Member: Ron Jackson, Bo Pokora. Follow-up response. NU to present information to show that Steam Driven AF Pump Room doesn't require emergency light units.
- b) DR-508 PRT Member: Norbert Carte. Discussion of Drawings 25203-28400 & 25203-28402 Sht. D12A

Discussion:

- a) *NNECo will send DR response to Parsons.*
- b) *The central issue of the DR was clarified and NNECo will supply a response.*

CONFERENCE NOTES
August 18, 1998

DATE: 8/18/98

PURPOSE: Telephone conference with NNECo, NRC, NEAC, and Parsons to discuss:

1. DR Level Clarification
2. Parsons Requested DRs for Discussion
3. NNECo Requested DRs for Discussion

LIST OF ATTENDEES:

NNECo	NRC	NEAC	Parsons
Joe Fougere	Eric Benner		Trent Powers
Bob Skwirz			Don Marks
Tom Moore			Jon Winterhalter
Farid Elsabee			Ken Mayers
Greg Tardif			Larry Collier
Rich Laudenat			Roger Mauchline
Bob Weth			Dan Cardinale
Norbert Carte			Larry Wigley
Stan Du Brut			Mike Akins
Rod Peterson			Dan Curry
Kalvin Anglin			Eric Blocher
Bill Cushman			

1. Topic: DR Level Clarification (Trent Powers)

Background: DR-0606 and DR-0070 are examples of a difference of severity level classification. Parsons issued these DRs as Level 3. The NNECo response was that the issues are confirmed Level 4.

Question: Parsons would like to discuss the criteria for classification of Level 3 vs. Level 4 Severity Levels for FSAR changes. It is Parsons' position that when there are conflict between the FSAR and documents such as calculations, and the corrective action results in an FSAR change (e.g. FSAR was incorrect and calculation was correct) that this represents a change to the licensing bases of the plant. Parsons considers FSAR changes that are editorial in nature (e.g. misspelled words, clarifying discussion that does not change values of numbers, etc.) as Level 4 issues. The above DRs contain issues that we do not classify as editorial in nature.

Response:

- a) DR-0606: NU agreed that this is a level 3 with a status of "Open, pending completion of correction action".
- b) DR-0070: Items 1 & 2 deferred to 8/20/98.

2. Topic: DRs

Background: Parsons requested topic to discuss the DRs listed below.

DRs for Discussion:

- a) DR-0346, Service Water Pump "C" Repair Package (Larry Collier) Item #3 - We need an explanation of the NNECo response. The documents we have state that the depth of one cavity is 1 ½ inches and the depth of the other cavity is 1 inch. The response to this discrepancy did not state if the material thickness at the first point of repair would accommodate the 1 ½ inch excavation. Also, NU did not at all address

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the 2nd repair cavity which was recorded as 1 inch. Base on this we do not understand NNECo's interpretation of the repair documents.

- b) DR-210, Non-conformance of Instrument P102B-1 to Requirements of RG 1.97 (Dan Cardinale). To fully understand the NNECo response to this DR, Parsons discussed this issue with NRC NRR (Mr. Barry Marcus). Parsons would like to relate the results of this discussion as it pertains to resolution of DR-210. During the discussion, NRC stated that the M2 configuration (RCS pressure) was accepted for design bases for everything except ATWS transient. NRC believed NNECo committed to evaluate upgrade of RCS pressure instrument and would evaluate/approve bases for ATWS transient based upon that submittal. NNECo made that submittal in early 1998 and NRC approved configuration for ATWS transient in SER dated April, 1998.

Response:

- a) *Item # 3 closed as a S. L. 4. Items 1 & 2 deferred to 8/20/98.*
b) *Closed as non-discrepant because NU discovered prior to CMP complete (NU to fax CR: m2-96-0609). [Note: Parsons will take the LB/DB issue up with the NRC.]*

3. Topic: DRs

Background: NNECo requested topic to discuss the DRs listed below.

Questions:

- a) DR-508, Absence of Calc to Support Compliance with RG 1.11 (Kent Russell). PRT Member: Norbert Carte, Stan Du Brul. Initial Response. NU to discuss requirements for bases documentation.
b) DR-0133 (Roger Mauchline)(Continued from 8/11/98). NU to discuss results from cabinet walkdown to verify weld placements.

Response:

- a) NNECo will send a response.
b) Based on measurements taken in a walkdown, DR-133 is non-discrepant. NNECo will fax the walkdown results to Parsons.

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August 20, 1998

DATE: 8/20/98

PURPOSE: Telephone conference with NNECo, NRC, NEAC, and Parsons to discuss:

1. Parsons Requested DRs for Discussion
2. Status and Schedule
3. NNECo Requested DRs for Discussion

LIST OF ATTENDEES:

NNECo	NRC	NEAC	Parsons
Joe Fougere	Eric Benner		Wayne Dobson
Bob Skwirz	John Nakoski		Don Marks
Fred Mattioli			Jon Winterhalter
John Calderone			Dan Wooddell
Ken Moore			Larry Collier
Geoff Neate			Tom Fleming
Dan Van Duyne			Trent Powers
Chris Scully			Gary Jackson
Ken Lanham			Dan Curry
Ron Jackson			Colin Patton
Peter Talbot			Dom Ramos
Sing Chu			Dan Cardinale
Bob Weth			Dick Boyd
John Kapinos			Ron Smith
Bill Cushman			
Rich Laudenat			
Vere Joseph			
Tom Moore			
Norbert Carte			
Roy Terry			

1. Topic: DRs

Background: Parsons requested topic to discuss the DRs listed below.

DRs for Discussion:

- a) DR-0346, Service Water Pump "C" Repair Package (Larry Collier) Except Item #3.
- b) DR-0070, (Jon Winterhalter) Items 1 &2.
- c) DR-0221 - Two issues were initially presented: 1) Leak Testing of 2-SI-659 and 2-SI-660, and 2) Fail position of these valves described in SP 21136.

The CRs mentioned in the NU response for Item 1 are all post 6/30/97, although the 7/3/97 date for M2-97-1248 is sufficiently close to discuss prior discovery. The response references also ACR 7394 and that this ACR was addressing the leak testing concern via TRMCR 96-2-5. Is this a correct understanding of the NU response?

For item 2, the response addresses dates that are all in 1998. Prior discovery is based upon a draft revision to SP 2616A dated 5/28/97. The topic Parsons wishes to address here is what documentation needs to have been in place at CMP complete to support a statement of previous discovery.

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- d) DR-0086 - Parsons has reviewed the second NU response and wishes to discuss those portions of the response pertaining to FSAR sections 5.8.3.2.2 and 5.8.4. Base issue is the assumption that the vertical structural elements can be considered rigid.
- e) DR-0411, "EBFS-Dampers 2-EB-60 and 2-EB-61 Single Failure During AEAS Operation": (Dom Ramos)
Item 1, Case 1 NU states that the EBFS is fully capable of fulfilling the system function of producing -0.25 in. wg. within one minute after an EBFAS even if damper 2-EB-60 or 2-EB-61 fails to close. No justification was provided to substantiate the statement. This is the issue being raised by the DR.
Item 1, Case 2: Please clarify the second paragraph that states: "It is true...."
Item 2: No justification was provided to the claim that there is no deficiency, thus no CR is required. NU is requested to review the results of calc. 97-EBF-02000-M2, Rev 1 as they are relevant to the resolution of this DR.
- f) DR-0517 - Parsons considers the 1% rule defined by NU as setting an industry precedent. As such Parsons is prepared to classify this DR as "Unresolved".
- g) DR-0223 - TMR-084 seems to calculate the combined dead weight and thermal stress at 26.8% of minimum yield strength for SB-166 material, in excess of the allowable of 20%. Parsons does not understand why this is considered acceptable.
- h) DR-0300 - Parsons wishes to discuss the previously identified statement as being a generic trend discrepancy in CR-97-0829.
- i) DR-0175 - Parsons wishes to discuss requirements for qualification of valves to 3g's and the bases for this requirement.
- j) DR-0569 - Parsons wishes to discuss the following: Current requirements on MF 2701J-92F require an inspection every 2 years and does not appear to have been done. (Level 4 item). Item 2 of the DR addresses surveillance requirements for fire dampers that may not be properly implemented since the deletion of MF 2701J-92H.
- k) DRs 0046 & DR-0048 - These are Level 4 DRs for which Parsons has comments on the 2nd NU response. Parsons wishes to address the rationale for continuing these Level 4 discussions in light of more recent guidance for the resolution of Level 4 DRs.
- l) DR-210; (Dan Cardinale) Follow-up from 8/18/98 with regard to CR: M2-96-0609.

Discussion:

- a) Parsons agrees that item # 1 is a S.L. 4. Item # 2 was deferred to 8/25/98.
- b) NU agrees that this is a S.L. 3 and will take appropriate corrective action. [Note: In light of this conference, Parsons will re-classify DR-71 from a S.L. 4 to a S. L. 3.]
- c) Parsons agrees that the DR-221 items were previously discovered and that the DR will be closed as a S. L. 4.
- d) NNECo will send additional technical evaluation documentation.
- e) NNECo will provide further technical analysis.
- f) Parsons will submit DR-517 to the NRC for resolution.
- g) Deferred to 8/25/98.
- h) Closed as non-discrepant.
- i) Parsons will evaluate stress curves and will revise DR-175 accordingly.
- j) Item # 1: NNECo will research damper classification and provide a response. Item # 2: NNECo will provide a follow-up response.
- k) Deferred to 8/25/98.
- l) NNECo clarified the issue as being previously identified.

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2. Topic: Status and Schedule. (Ron Smith)

Background: N/A

Questions:

- a) What is the schedule for providing the schedule of program documentation for EQ and Appendix R as discussed in the 8/17 Status meeting at NNECo?
- b) What is the status of the out processing procedures that Parsons is to follow for personnel badged at Unit 2? (For example: Do these people need whole body counts?)
- c) What is the status of Parsons request for maintaining badges of site walkdown personnel beyond 21 days without badging in? (Note: Parsons has requested that key personnel badges remain active beyond the current 21 day limit.)

Response:

- a) *Appendix R date is now end of November. Program is being discussed with the NRC and Senior Millstone management. EQ dates are being faxed to Wayne Dobson. The first group of deliverables is early September. These documents will be in the QA draft status.*
- b) *Whole body count is not required to badge out from Millstone. Joe will send forms for out processing of Parsons currently badged personnel.*
- c) *Badged personnel going beyond 21 days between badging in the plant will not result in loss of site access. Not badging in does not present a major problem until such time as the individuals go beyond 120 days. Parsons will notify Joe when personnel are coming to the site and have the required paperwork ready to expedite plant re-activation of un-escorted access.*

3. Topic: DRs

Background: NNECo requested topic to discuss the DRs listed below.

Questions:

- a) DR-056; (Colin Patton). PRT Member: Bob Weth, Vere Joseph, J. Kapinos. Follow-up to previous ATWS discussion. NU to present additional information.
- b) DR-531; (Tom Flemming). PRT Member: Norbert Carte. Initial Response - NU is looking for basis of Parsons statement in "Current Design Specification / Classification" section, (last statement), which reads, "...which by definition requires QA Category 1 classification".

Response:

- a) *NNECo will submit a revised response.*
- b) *Parsons clarified the basis for the Category 1 interpretation of Seismic Category 1.*

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August 25, 1998

DATE: 8/25/98

PURPOSE: Telephone conference with NNECo, NRC, NEAC, and Parsons to discuss:

1. Parsons Requested DRs for Discussion
2. Proposed Tech Spec Change for AFW Analytical Limit
3. Proposed Tech Spec change for Condensate Storage Tank Volume
4. ACR 05584
5. NNECo Requested DRs for Discussion

LIST OF ATTENDEES:

NNECo	NRC	NEAC	Parsons
Fred Mattioli	Peter Koltay		Wayne Dobson
Norm Hanley			Don Marks
Steve Stadnick			Dick Boyd
Norbert Carte			Trent Powers
Ed Foster			Eric Blocher
Josh Spalter			Larry Collier
Bob Weth			Clark Tracy
Prem Godha			Gary Jackson
Bob Lawrence			Rich Glaviano
Dan Van Duyne			Ken Mayers
Greg Tardif			Gordon Chen
Dave Bajumpaa			
Mike Short			
Bob Skwirz			

1. Topic: DRs

Background: Parsons requested topic to discuss the DRs listed below.

DRs for Discussion:

- a) DR-0223 - (T. Lee) [Continued from 8/20/98.] TMR-084 seems to calculate the combined dead weight and thermal stress at 26.8% of minimum yield strength for SB-166 material, in excess of the allowable of 20%. Parsons does not understand why this is considered acceptable.
- b) DRs 0046 & DR-0048 - (Powers) [Continued from 8/20/98.] These are Level 4 DRs for which Parsons has comments on the 2nd NU response. Parsons wishes to address the rationale for continuing these Level 4 discussions in light of more recent guidance for the resolution of Level 4 DRs.
- c) DR-0179 - (Jackson) - Parsons wishes to discuss the process by which nozzle loads are evaluated against allowable loads and to understand how AR97002778 can be credited for Previous Identification.
- d) DR-0396 (Colin Patton) - Parsons wishes to discuss NNECo's response to DR-0396, Procedure Biennial Reviews Generic Discrepancy. Specifically, NNECo's response states that this should be a significance level 4 DR. Technical specification 6.8.2.c requires procedures to be reviewed periodically as set forth in administrative procedures. How does failure to update procedure references, as required by DC-1 and DC-2, satisfy this technical specification requirement?
- e) DR-269 - (Jack Lawton for C. Segar) - Parsons wishes to discuss NU's proposed Corrective Actions.

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Discussion:

- a) Parsons agrees that DR-223 is a S.L. 4 and will close the DR based on the content of the 8/25/98 conference call where NU acknowledged that CE was cognizant of the limit issue.
- b) Deferred to 8/27/98.
- c) Parsons will review DR-200 and respond on 8/27/98.
- d) Deferred to 8/27/98.
- e) ESAR on Fuse Control is the NU prior discovery vehicle. NU will add corrective action plan to the CR and send a copy to Parsons.

2. **Topic:** Proposed Tech Spec change for AFW Analytical limit does not meet the analyzed condition. (Dick Boyd)

References:

- 1. Siemens Calculation EMF-98-015, Rev. 0, June 1998, "Millstone Unit 2 Loss of Normal Feedwater Flow Transient With Reduced Auxiliary Feedwater Flow"
- 2. NNECo letter B17190, "Proposed Revision to Technical Specification Reactor Protection and Engineered Safety Features Trip Setpoints," dated July 21, 1998PORC meeting #2-96-309

Background:

The Tech Spec change specified in the letter states the new analytical limit as 5% of Narrow Range SG level. The analysis referenced used a value of 10% of Narrow Range.

Question:

- a) What allows the new tech spec limit to be lower than the analyzed condition?

Response: The analytical limit for the AFW initiation is 5% of narrow range with a 'harsh' environment and is 10% of narrow range for 'normal' operating, from 25203-ER-98-0044-1. Because the harsh environment uncertainty plus the harsh environment analytical limit is greater than the non-harsh environment uncertainty plus the non-harsh environment analytical limit the trip setpoint and allowable setpoint are based on the harsh environment analytical limit. This results in the trip setpoint being 26.8% of narrow range and the allowable setpoint being 25.2% of narrow range (see calc 92-030-1254E2, Rev 01, 4/17/98).

3. **Topic:** Proposed Tech Spec change for Condensate Storage Tank (CST) volume does not include the losses through valve 2-CN-241 (hotwell makeup valve) (Dick Boyd)

References:

- 1. Calc 97CST-01999-M2, Rev. 0, "MP2 CST Inventory Evaluation"
- 2. NNECo letter B16902, "Proposed Revision to Technical Specifications, Condensate Storage Tank and Atmospheric Steam Dump Valves," dated 8/4/98

Background: The Tech Spec change specified in the letter states the new CST Volume as 165,000 gallons. This is 159,000 gallons required for Loss of Offsite Power and for Station Blackout, PLUS 6,000 gallons margin. The calculation for CST volume identified a loss of inventory to the condenser through valve 2-CN-241 of 25,993 gallons. This loss is not identified in the volume specified for the Tech Spec.

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The valve is a control valve which requires local manual action to close (EOP-2540D). Until the time of its closure, evaluated at 30 minutes, the valve allows CST inventory to flow to the condenser. The valve receives no safety grade signal and is not currently isolated on AFW initiation.

Questions:

- a) What change allows this valve to be considered closed such that it's loss to the condenser need not be considered in CST volume requirements?

Response: *The TS change is based on eliminating the problem of losing CST inventory through valve 2-CN-2412. Therefore, Calc 97CST-01999 has been revised and is now Rev. 1. TS Amdt 63 required operator action in 20 minutes to take action to maintain CST inventory if CST reaches its low level. A technical evaluation is documented in M2-EV-98-0155, Rev. 0, which evaluates three methods of meeting this requirement: 1) relocate suction piping of valve 2-CN-241 to a level above the minimum inventory required for AFW; 2) meet single failure requirements; and 3) credit operator action. No PDCR has been written but the TS proposed change is based on the passive approach of changing the piping.*

4. Topic: ACR 05584. (Clark Tracy)

Background: ACR 05584 was initiated 10/30/95. The issue was that procedure SP 21136, issued in 1979, required 2 HPSI pumps to be powered from the same EDG. This would cause excessive loads on the EDG if a Loss of Normal Power and a Loss of Coolant Accident occurred. As part of the "Causal Factors and Corrective Action Plan" (Form RP4-7 Rev 1), section 2 states: "The plant operating philosophy at the time the Inservice Inspection Procedure was generated (1979) time frame permitted alignment of two pumps to one facility. The PORC approved procedure had been in use for a long period of time. This condition or event is a very subtle condition that is not readily apparent to the normal procedure reviewer. The effectiveness of the oversight groups in this case is not applicable because the procedure was approved quite a long time ago and these particular groups do not go back and review documents that have been in use. They typically only review new documents."

Questions:

- a) How does this statement reflect the requirements of Technical Specification 6.8.2 and DC 1?

Response: *MP2 stated that currently all active procedures, old or new, are covered by the biennial review process as defined in DC-1 and DC-3. This adequately addresses the concern that old procedures do not receive reviews as implied in the review package for ACR 05584.*

5. Topic: DRs

Background: NNECo requested topic to discuss the DRs listed below.

DRs for Discussion:

- a) DR-700 - [Dale Pruitt] PRT Member: Norbert Carte, Ed Foster. Initial response. NU System Engineer to discuss operation of Terry Turbine.
- b) DR-202 - [Rich Glaviano] PRT Member: Norbert Carte, Joshua Spalter. Follow-up response. Discussion by NU regarding modeling of safety valves.

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- c) DR-346 - [Larry Collier] Follow-up response. Discussion of extent of condition sample.

Discussion:

- a) *NU to send follow-up response to correct vendor manual reference.*
- b) *Parsons will review information provided in the conference and respond to NU on 8/27/98.*
- c) *NU to send follow-up response based on the 8/25/98 conference.*

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DATE: 8/27/98

PURPOSE: Telephone conference with NNECo, NRC, NEAC, and Parsons to discuss:
1. Parsons Requested DRs for Discussion
2. Single Failure Analysis of Minimum Flow Recirculation Check Valves
3. MOVATS Testing of SI Valves
4. DR-0269 Concerns

LIST OF ATTENDEES:

NNECo	NRC	NEAC	Parsons
Joe Fougere	John Nakoski	Terry Concannon	Larry Collier
Fred Mattioli			Don Marks
Bob Skwirz			Dom Ramos
Greg Tardif			Rich Glaviano
Rich Laudenat			Colin Patton
Ken Moore			Trent Powers
Norbert Carte			
Bill Chalfant			
Stephen Rovin			
Lloyd Baird			
Josh Spalter			
Madison Long			

1. Topic: DRs

Background: Parsons requested topic to discuss the DRs listed below.

DRs for Discussion:

- a) DR-0559, "EBFS Missing Fire Dampers" (Dom Ramos): Parsons needs to clarify that the required corrective action is tied to Appendix R final evaluation. The NU response for action completion date may need to change.
- b) DRs 0046 & DR-0048 - (Powers) [Continued from 8/25/98.] These are Level 4 DRs for which Parsons has comments on the 2nd NU response. Parsons wishes to address the rationale for continuing these Level 4 discussions in light of more recent guidance for the resolution of Level 4 DRs.
- c) DR-0262 (Larry Collier): Parsons would like to discuss closure of DR-0262 as a difference in documents. Clarification in the procedure would close this out as a Significance Level 4 DR.
- d) DR-0396 - (Colin Patton) [Continued from 8/25/98.] Parsons wishes to discuss NNECo's response to DR-0396, Procedure Biennial Reviews Generic Discrepancy. Specifically, NNECo's response states that this should be a significance level 4 DR. Technical specification 6.8.2.c requires procedures to be reviewed periodically as set forth in administrative procedures. How does failure to update procedure references, as required by DC-1 and DC-2, satisfy this technical specification requirement?
- e) DR-0710 (Larry Collier): Parsons would like to discuss closure of DR-0710 as an inconsistency in the ISI program which does not identify the 3 zones taking credit for the zone drawings in lieu of having ISI Boundary drawings. Clarification of this matter would close this out as a Significance Level 4 DR..
- f) DR-202 (Rich Glaviano): Parsons will respond to information provided by NU in the 8/25/98 conference.

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- g) DR-0179 (Gary Jackson): Parsons will respond to information provided by NU in the 8/25/98 conference.
- h) Parsons has not yet received initial responses (as of 8/21) for the following preliminary Severity Level 3 DRs that have DR numbers less than 300. Parsons wishes to discuss if NU has received these or if there is additional information required before NU prepares a response for #s: 30, 77, 106, 116, 128, 155, 163, 203, 212, 213, 216, 239, 294.

Discussion:

- a) *Will be closed as a S.L. 4. Appendix R Evaluation will be completed prior to restart. The missing fire damper issue will be resolved prior to restart and not prior to RF-013 restart.*
- b) *Parsons and NU agreed on closure process for S.L. 4s which were S.L. 3s. And for DRs with a status of Open/Disagree, the decision was to continue the current process.*
- c) *Closed as a S.L. 4. NU will follow-up with a CR # on 9/1/98.*
- d) *Parsons will close DR-396 as S.L. 4.*
- e) *Parsons will close DR-710 as S.L. 4 in light of CR M2 97-02135.*
- f) *Parsons will close DR-202 as non-discrepant.*
- g) *Deferred 9/8/98.*
- h) *NNECo supplied status of DR response process.*

2. Topic: Single Failure Analysis of Minimum Flow Recirculation Check Valves (Rich Olson)

Background: FSAR section 6.3.4.1 states (page 6.3-10, item h.): "The safety injection system have (sic) been designed to meet the single failure criterion."

FSAR section 6.3.4.1 states (page 6.3-12): "There is no undue risk to the health and safety of the public from the failure of a single active component during the injection mode of operation or from a single failure of any passive or active component during the recirculation mode of operation."

FSAR section 6.3.4.1 states (page 6.3-12) that the following assumptions were used in performing the failure modes analysis:

- b. Only one active failure is considered for the injection mode and only one passive or active failure is considered for the recirculation mode.
- c. Failures of check and stop valve internals are credible during the recirculation mode of operation.

Questions:

- a) Is there an evaluation of the event: single passive failure (open) of a minimum flow recirculation check valve during the recirculation mode of operation?

Response: *Deferred to 9/1/98.*

3. Topic: MOVATS Testing of SI Valves. (Larry Collier)

Background: Regarding 2-SI-616, 2-SI-617, 2-SI-626, 2-SI-627, 2-SI-636, 2-SI-637, 2-SI-646 and 2-SI-647.

Questions / Discussion: Would like to discuss recent MOVATS testing, or if not recently tested, any proposed MOVATS testing:

- a) When was MOVATS testing performed or when will it be performed?

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- b) How was functional Delta P achieved across these valves just prior to test?
- c) Records and results of open to close, if already tested.
- d) Process of trimming (throttling) valves during test.
- e) How the valves are trimmed (throttled) when using AOP-2552?
- f) Records and results of trimming (throttling) test of valves.

Response:

- a) MOVTS testing has already been performed on valves 2-SI-616, 2-SI-626, 2-SI-636, and 2-SI-646.
- b) Using system pressure.
- c) Results of open to close were satisfactory.
- d) Not a requirement but testing these valves to the approximate throttle position is an enhancement to the MOVATS testing process
- e) Will be presented at a later time, week of 8/31/98.
- f) Will be presented at a later time, week of 8/31/98.

4. Topic: DR-0269 Concerns (Jack Lawton)

Background: CR No. M2-97-1699 corrective action plan item: Verify that all currently installed safety related fuses conform to 'controlled' design documents prior to restart.

Questions / Discussion:

- a) How is verification of currently installed safety related fuses accomplished? What are the "controlled design documents" used to perform this verification?
- b) How was the Master Fuse List developed - calculations, vendor information, walkdowns?
- c) The ESAR did not identify any calculation discrepancies, as identified in the DR. Part of the response to the DR should have addressed this issue.
- d) The DR states that a corrective action will be added to the CR to replace the listed fuses. Is any evaluation going to be performed to determine if the incorrect fuses could have a potentially adverse impact on the associated circuits and penetrations?

Response: Deferred to 9/1/98.