



PARSONS

PP-07

MILLSTONE UNIT 2 ICAVP
PROJECT PROCEDURES

Title:

Discrepancy Reports

REVISION 6

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Date: 5 Oct 98

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Date: 10/6/98

REVISION HISTORY

REVISION	DATE	REVISION DESCRIPTION
0	04/03/97	Procedure Initiation
1	06/09/97	Incorporation of Initial NRC Comments
2	06/26/97	Incorporate NRC Comments
3	07/29/97	Incorporate NRC Comments
4	09/12/97	Incorporate Technical Advisory Group Review
5	01/16/98	Incorporate NRC Comments
6	10/05/98	General Update



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1.0 PURPOSE

The purpose of this Project Procedure is to provide guidance and instructions for the initiation, evaluation, submittal and closure of Discrepancy Reports (DR) initiated for apparent discrepancies identified during the conduct of the Millstone Unit 2 Independent Corrective Action Verification Program (ICAVP).

2.0 REFERENCES

- 2.1 NRC Confirmatory Order dated August 14, 1996 establishing an Independent Corrective Action Verification Program (ICAVP)
- 2.2 Audit Plan, Millstone Unit 2 Independent Corrective Action Verification Program
- 2.3 Communication Plan, PLN-02, Millstone Unit 2 Independent Corrective Action Verification Program

3.0 DEFINITIONS

- 3.1 ICAVP - Independent Corrective Action Verification Program established by Reference 2.1 to verify the adequacy of Northeast Utilities' (NU) efforts to establish adequate design bases and design controls, including translation of the design bases into operating procedures and maintenance and testing practices, verification of system performance, and implementation of modifications since issuance of the initial facility operating license.
- 3.2 Discrepancy Report (DR) - The mechanism for documenting an apparent discrepancy identified during the Millstone Unit 2 ICAVP.
- 3.2 Discrepancy - A condition, such as an error, omission, or oversight which prevents consistence among the physical configuration, information sources (e.g. documentation and databases), design basis and/or regulatory requirements. A discrepancy may identify programmatic, procedural or design conditions.



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- 3.3 Design Bases - Information that identifies the specific functions to be performed by a structure, system, or component of a facility and the specific values or ranges of values chosen for controlling parameters as reference bounds for design. These values may be (1) restraints derived from generally accepted state-of-the-art practices for achieving functional goals or (2) requirements derived from analysis (based on calculation and/or experiments) of the effects of a postulated accident for which a structure, system, or component must meet its functional goals.¹
- 3.4 Originator - An ICAVP Team Member who identifies an apparent Discrepancy.

4.0 RESPONSIBILITIES

- 4.1 Project Director - Responsible for approval of DRs prior to concurrent reporting to NNECo, NEAC, and the NRC in accordance with the Communications Plan (PLN-02).
- 4.2 Deputy Project Director - Responsible for:
- review of DRs to ensure completeness and clarity and to identify possible duplications of existing DRs;
 - forwarding DRs to the Project Director for approval; ensuring tracking and monitoring of DRs;
 - approval of ICAVP Team comments concerning proposed corrective actions by Northeast Nuclear Energy Company (NNECo).
- 4.3 ICAVP Group Leader - Responsible for:
- evaluating DRs originated within his group;
 - validating their bases; closing those for which the bases are found to be invalid;

¹ 10 CFR Part 50, Paragraph 50.2



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- commenting on the proposed resolution by NNECo.

4.4 Originator - Responsible for documenting in accordance with this procedure any apparent Discrepancy identified during the conduct of the Millstone Unit 2 ICAVP. The Originator additionally may be asked by the ICAVP Group Leader to provide comments on the proposed resolution by NNECo.

4.5 Technical Advisory Group (TAG) - Responsible for reviewing and commenting on proposed actions from the sample population of valid Significance Level 1, 2 and 3 discrepancy reports.

5.0 PROCEDURE

5.1 IDENTIFICATION OF DISCREPANCIES

5.1.1 During the course of the Millstone Unit 2 ICAVP, any Team member may identify an apparent Discrepancy and originate a Discrepancy Report (DR) (Attachment 1). Further evaluation by the ICAVP Team may be required to confirm the basis for the Discrepancy, as documented on the DR form. The DR process is depicted in Exhibit 1.

5.1.2 The Originator will obtain a DR Log number from the Project Administrator. The following information, as a minimum, will be recorded for all DRs for tracking purposes:

- DR number
- Date
- Title
- NNECo response date
- Response/resolution review date



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- 5.1.3 The Originator will ensure that the Initiation portion of the DR form is filled out as completely as possible, including, as applicable, a description of the discrepancy, system or process name, procedure name and number, drawing name and number, affected engineering discipline, and source authority or reference used to identify the discrepancy.
- 5.1.4 The Originator should provide a categorization of the significance of the identified discrepancy to one of the four levels per the criteria of Attachment 2. This section should include a brief statement of the rationale for selection of significance level. Evaluation of discrepancies to the formal NRC reporting requirements is the responsibility of NNECo.
- 5.1.5 The Originator will sign the form, and forward it to the Group Lead for evaluation.
- 5.2 EVALUATION**
- 5.2.1 The DR will be evaluated by the responsible Group Lead, based on discussion with the Originator and other Team Members, as appropriate, to determine if its basis is valid and to ensure that all known aspects of the Discrepancy are adequately described on the DR. In addition, the Group Lead will review the significance level and discussion prepared by the originator.
- 5.2.2 If the basis for the DR is determined not to be valid, the responsible Group Lead may close the DR.
- 5.2.3 DRs for issues that are evaluated and found to have been identified previously by NNECo as part of their Configuration Management Plan shall be noted as such and closed following such evaluation.
- 5.2.4 The responsible Group Lead will record the results of the evaluation on the DR form, check the appropriate box(es), sign the form and forward it to the Deputy Project Director.



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5.3 REVIEW, APPROVAL AND FORWARDING

5.3.1 After a DR has been evaluated by the responsible Group Lead, it will be forwarded to the Deputy Project Director for review. Following that, the DR will be forwarded to the Project Director for approval. After approval, the DR will be reported concurrently to the NRC, NEAC, and NNECo in accordance with the Reference 2.3. The approval and forwarding of a Discrepancy Report is documented on the DR form (Attachment 1).

5.3.2 DRs will be posted on the World Wide Web in accordance with Reference 2.3. DRs will be reported on the Parsons World Wide Web page 48 hours (2 working days) after reporting the DRs to NNECo, NEAC, and the NRC. This includes DRs that were closed following a determination that the basis was not valid and for DRs that are evaluated and found to have been identified previously by NNECo as part of their Configuration Management Plan.

5.3.3 Questions that arise during the review or approval of DRs will be resolved by the Deputy Project Director following discussions with the Group Lead and Originator, as necessary.

5.4 REVIEW OF PROPOSED CORRECTIVE ACTION

5.4.1 Proposed corrective action by NNECo in response to a DR will be forwarded to the ICAVP Group Leader responsible for evaluating the DR.

5.4.2 The ICAVP Group Leader will prepare comments on the proposed corrective action, consulting with the originator, as necessary, to ensure the proposed resolution correlates to the original concern. Comments should focus on the perceived adequacy of the proposed action to resolve the discrepancy and prevent recurrence, consistent with the purpose of the ICAVP (refer to Definition 3.1 and Reference 2.2). Comments on the NNECo response will be documented on the DR form.

5.4.3 A copy of the proposed corrective action will be sent to the Originator after approval.



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- 5.4.4 The ICAVP Group Leader will forward the DR to the Deputy Project Director for review, prior to releasing the comments per Reference 2.3.
- 5.4.5 After comment resolution, the ICAVP Project Director will approve the DR and forward it to NNECo, NEAC, and the NRC per the Communications Plan (Reference 2.3).
- 5.4.6 A summary of the NNECo response and ICAVP review of the NNECo corrective action(s) will be posted on the WWW in accordance with the Communications Plan (PLN-02) (Reference 2.3).
- 5.4.7 TAG will review and comment on proposed corrective actions for all samples Significance Level 1, 2 and 3 DR's.

5.5 FINAL RESOLUTION

- 5.4.1 If the response and supporting documentation by NNECo will resolve the Discrepancy, the Deputy Project Director will close the DR by signing the Final Resolution section.
- 5.4.2 The DR can be closed for the following reasons.
- a. NNECo agrees that the DR is a new discrepant condition and Parsons agrees with the proposed corrective action (Closed-Confirmed DR).
 - b. NNECo has shown and Parsons agrees that the specifics of the DR were previously identified by NNECo during CMP (Closed-Previously Identified).
 - c. NNECo has shown through providing additional information and Parsons agrees that the condition identified in the DR is no longer valid (Closed-Non-Discrepant).
- 5.4.3 If, in the opinion of the ICAVP Team, the proposed corrective action by NNECo is not complete or is not likely to resolve the DR, the Deputy Project Director will identify the DR as an open item.



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- 5.4.4 Based upon the comments provided on the NNECo response additional information may be required from NNECo in order to close the response.
- 5.4.5 If after a minimum of two NNECo responses Parsons has not accepted the resolution, the DR may be classified as Unresolved. The NRC will make final determination on the condition of Unresolved DR's.



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ATTACHMENT 1 - DISCREPANCY REPORT

PARSONS POWER GROUP INC.

ICAVP MILLSTONE UNIT 2
DISCREPANCY REPORT

2675 Morgantown Road, Reading, PA 19607
(610) 855-2000 • FAX: (610) 855-2509

DR NUMBER: DR-XXXX
DR TITLE:
REVISION:
ISSUE DATE: XX/XX/XX
ORIGINATING GROUP:
SIGNIFICANCE LEVEL:

DISCREPANCY

Originator

Group

Date

EVALUATION
<input type="checkbox"/> BASIS VALID <input type="checkbox"/> BASIS INVALID - CLOSED <input type="checkbox"/> PREVIOUSLY IDENTIFIED BY NNECo - CLOSED

Group Lead

Date



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REVIEW AND APPROVAL

Reviewed: _____
Deputy Project Director Date

Approved: _____
Project Director Date

Forwarded to NNECo, NEAC, and NRC: _____ Date
Posted to WWW: _____ Date

SUMMARY OF NNECo PROPOSED CORRECTIVE ACTION

COMMENT ON NNECo RESPONSE

Prepared: _____
Group Lead Date

Reviewed: _____
Deputy Project Director Date

Approved: _____
Project Director Date

Forwarded to NNECo, NEAC, and NRC: _____ Date
Posted to WWW: _____ Date

FINAL RESOLUTION

Deputy Project Director Date



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ATTACHMENT 2
CRITERIA FOR CATEGORIZING THE RELATIVE SIGNIFICANCE OF
DISCREPANCIES IDENTIFIED BY THE ICAVP

- SIGNIFICANCE LEVEL 1

A discrepancy⁽¹⁾ 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⁽¹⁾ 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⁽¹⁾ 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⁽¹⁾ that identifies that the systems meet 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.

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



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EXHIBIT 1 EVALUATION OF DISCREPANCIES

