PARSONS

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October 14, 1998
Docket No. 50-336
Parsons NUM2-PPNR-2081-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 NEAC on September 1, September 2, September 3, September 8, September 9, September 10, September 15, September 16, September 17, September 22, September 23, September 24, September 29 and September 30, 1998.

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

Sincerely,

Daniel L. Curry
Parsons ICAVP Project Director

DLC:djv

Attachments

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

CONFERENCE NOTES
September 1, 1998

DATE: 9/1/98

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

1. **Parsons Requested DRs for Discussion**
2. **M2-IRF-02477 response to DR-0555**
3. **Single Failure Analysis of Minimum Flow Recirculation Check Valves**
4. **DR-0269 Concerns**
5. **NNECo Requested DRs for Discussion**

LIST OF ATTENDEES:

NNECo	NRC	NEAC	Parsons
Joe Fougere	Eric Benner		Wayne Dobson
Fred Mattioli			Don Marks
Bob Skwirz			Trent Powers
Ray Necci			Evans Goodling
John Calderone			Dick Diederich
Ken Moore			Roger Mauchline
Farid Elsabee			Joe Groncki
Sing Chu			Claude Didier
Norbert Carte			Mike Akins
K'Chebe Grace			Dick Boyd
Dick Faubert			Larry Collier
Rich Laudenat			
Greg Tardif			

1. **Topic:** DRs

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

DRs for Discussion:

a) DR-0262, High Pressure Safety Injection Inservice Testing Program Discrepancies (Larry Collier): Discussion about associated CR.

b) DR-0023 Mounting of Pressure Transmitter PT 5281 and DR-0024 Mounting of Pressure Transmitter PT 5289 (Joe Groncki): Discussion about seismic evaluations associated with pressure boundaries.

Discussion:

a) DR-262 will be closed as a S.L. 4. Parsons concurs that the NU corrective action is appropriate.

b) DR-0023 and DR-0024: NU will research and provide a response.

2. **Topic:** M2-IRF-02477 response to DR-0555. (Roger Mauchline)

Background: The DR-0555 significance level was based on the sampling nature of the II/I walkdown, i.e. if specific concerns were found, similar concerns could exist elsewhere in the plant.

Questions:

a) Please explain how CR-M2-98-2147 (attached to M2-IRF-02477), which is a promised evaluation of three specific items, answers the generic concern expressed in the DR. Note that the A-46 walkdown covered equipment and raceways but not in general the types of items identified in the ICAVP sampling walkdown.

b) With regard to "A" Safeguards Pump Room, - Item 1: Please explain how tight screws on the Item 1 cover plate supporting the swinging light, offers assurance that all screws are always tight in all such cover plates for swinging lights over safe shutdown items. If NU's position is that the electrical wires can support the light in case of cover detachment, please explain how the electrical connections at the box are adequate to provide the necessary wire retention.

Response:

a) In light of the following NU response: if specifics are refuted, then there is no generic issue; Parsons will review the A46 II/I inspection criteria.

b) Parsons and NU disagree on whether swinging lights are a II/I concern as an initiator.

3. Topic: Single Failure Analysis of Minimum Flow Recirculation Check Valves (Rich Olson) [Continued from 8/27/98.]

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:

a) There is no evaluation of this event in FSAR Table 6.3-6. The amount of water which might be lost from the HPSI injection flow is insignificant compared with the pump flow. The min flow recirculation line to the RWST is isolated during the recirculation mode of HPSI operation, so water would not be lost to the RWST.

4. Topic: DR-0269 Concerns (Dick Cronk) [Continued from 8/27/98.]

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: *Parsons will put DR-259 into rejected status.*

5. **Topic:** DRs

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

DRs for Discussion:

a) DR-557, Lack of System Testing (Andrew J. O'Connor) PRT Member: Norbert Carte. Initial response. NU would like Parsons to clarify the issue of testing the Alternate Shutdown Panel as a whole versus the testing of individual channels on a regular basis.

b) DR-665, EDG Piping System Walkdown Observations (E. C. Goodling / S.J. Serhan) PRT Member: K'Chebe Grace> Initial response. NU would like Parsons to describe all piping configuration and pipe support discrepancies on the four drawings described in DR-0655, Items 1 &2.

Discussion:
a) NU will provide a response.
b) NU will walkdown the pipe and send a response.

CONFERENCE NOTES
September 2, 1998

DATE: 9/2/98

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

1. **Parsons Requested DRs for Discussion**
2. **NNECo Requested DRs for Discussion**

LIST OF ATTENDEES:

NNECo	NRC	NEAC	Parsons
Joe Fougere	John Nakoski		Wayne Dobson
Fred Mattioli	Eric Benner		Don Marks
Bob Skwirz			John Archer
Greg Tardif			Trent Powers
Sing Chu			Mike Akins
Norbert Carte			Ken Mayers
			Joe Groncki
			Tom Flemming

1. **Topic:** DRs

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

DRs for Discussion:

a) DR-0310 - (Powers) Parsons wishes to discuss the difference in Significance Level classifications by NU and Parsons.
This DR addressed omission of DG Cooling Water Tanks T-80A/B from the Safe Shutdown List. It is our understanding that these tanks were added to the Safe Shutdown List after the concern raised by Parsons and NU agreed that the tanks should be on the SSL. Corrective actions were addressed by NU in CR No. M2-098-0115.
We also understand that the applicable analysis/evaluation for the acceptability of the tanks was not performed until after this issue was raised. With this understanding, Parsons does not understand why NU concluded that this issue is a Significance Level 4. Parsons considered the issue to be a Significance Level 3 because of the lack of analysis/evaluation to demonstrate that the tanks satisfied design basis requirements.

b) DR - 0252 (Powers) Disagreement exists concerning Previous Discovery. UIRs 2548 and 2655 are cited as evidence that this concern was identified. However, these UIRs address SOV on other drawings, there is no reference in either of these UIRs to the drawings addressed in DR-0252.
The NU response to DR-0252 states that the scope of the UIRs was expanded and that CR M2-97-2918 was issued to address the corrective items for the items addressed in DR-0252. However, CR M2-97-2918 was not issued until 12/17/97. Since the UIRs did not address the specifics of the items addressed in the DR and did not contain corrective action requirements to examine other drawings and because the CR to address these items was not issued until after the CMP complete date, Parsons does not understand why this is a previously discovered item. Parsons does agree that the corrective actions being taken address the concerns raised in the DR.

Discussion:
a) DR-310: Parsons will close as a S.L. 4.
b) DR-252: Parsons will confirm from references provided by NNECo that this is a previously discovered item.

2. **Topic:** DRs

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

DRs for Discussion:

a) DR-704 PRT Member: Norbert Carte. Initial Response. FSAR Section 7.6.4.4.2 says that C21 is tested in accordance with the TS. NU requests Parsons' clarification of the testing requirements.

Discussion:

a) DR-704:Parsons will review information provided in NNECo's initial response and continue discussion on 9/3/98..

CONFERENCE NOTES
September 3, 1998

DATE: 9/3/98

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

1. **Program Status**
2. **DR-0456 Response**
3. **MR2-IRF-02373 Response to DR-0329**
4. **Parsons Requested DRs for Discussion**

LIST OF ATTENDEES:

NNECo	NRC	NEAC	Parsons
Joe Fougere	Eric Benner		Wayne Dobson
Fred Mattioli			Don Marks
Ray Necci			Larry Collier
Bob Skwirz			Ron Smith
Ken Moore			Claude Didier
Dan Van Duyne			Ken Gabel
			Eric Blocher
			Trent Powers
			Richard Boyd

1. **Topic:** Program Status

Background: N/A

Question: Please provide update to Millstone Unit program dates (as discussed in 8/13/98 conference) for

a) EQ

b) Appendix R

Response:

a) *9/18/98 for SPEE 332 and 9/30/98 for SPEE 352.*

b) *N/A. Appendix R has been removed from Parsons' scope.*

2. **Topic:** DR-0456 Response (Larry Collier)

Background: The following two statements were included in the RBCCW DR-0456 response from NU. There was no signature or date or identification that would attest to the authenticity of this type-written justification.

Justifications Used in RBCCW Reference Value Determinations

1. One set of vibration criteria covers high and low flow tests.

Vibration criteria is derived from historical average of vibration readings taken at high flow test conditions. The flow spectra has been compared with high flow data and very limited difference is noted. It is conservative to utilize the high flow reference data as it is taken closer to the Best Efficiency Point of the RBCCW Pumps and tends toward lower overall values.

2. Minimum Re circ Flow and Rad Monitor Flow is not measured and credited toward the reference flow value.

Minimum recirc valves have been isolated for the last year of testing due to the need to isolate non-qualified piping. Flowrates in these lines with these valves open were measured on 9/7/97 under AWO M2-97-07969 at approximately 10 GPM. Flow rate in the rad-monitor sample lines is maintained at 2 GPM. The total of these flow paths is an insignificant portion of the total flow for IST tests and is less than the accuracy uncertainty of the instrumentation utilized.

Questions:

a) Is there a signed and dated copy of this justification on file?

b) Is this an accurate type written justification and how does it fit into a present day technical evaluation program?

c) Does the present day technical evaluation program require a signature and a date, as a minimum, to identify and substantiate the authenticity of an evaluation?

Response:

a) No.

b) *Yes. Not all technical evaluations are signed on the sheet. May be signed on another page without linking.*

c) *Not every page is signed.*

3. **Topic:** MR2-IRF-02373 Response to DR-0329. (Claude Didier)

Background: DR-0329 identifies a lack of design basis and installation documentation for vent and drain piping and valves as a generic discrepancy across many systems. MR2-IRF-02373, AR 97024138, CR M2-98-2038 provides NNECo response and recommended corrective action for the DR.

Discussion:

a) The CR recommended corrective action for DR-0329 items a) and b) is to do a field verification and make additions to drawing for the missing items. Please explain NNECo's logic of how the resolution of these two items resolves the generic condition of lack of design and installation documentation (drawings of record for vents and drains) existing in multiple systems. Please describe the extent of condition review that has been done.

b) The corrective action also states "None of the cited conditions compromise the operability of the R.B.C.C.W. and Condensate systems as the analysis of record meets LB and DB requirements." Since the response does not address the generic issue that Millstone indicated during the 1/22/98 conference call that no documentation could be identified that could verify that vent and drain valves were installed in accordance with design requirements, please explain how this conclusion was made.

c) The proposed corrective actions in CR M2-98-2038 is to perform a field verification and make additions to drawing for the missing items. Since DR-0329 was written against the fact that no documentation could be identified for either the design basis or verification that vent and drain valves were installed in accordance with design requirements, what will the basis for determining the plant configuration is correct and therefore the valves can be added to drawings?

Response:

a) *NNECo's response indicated they thought it was a level 4 discrepancy based on their identifying items c), d), and e) as non-discrepant and addressing the items c) and d) that remained. Parsosn identified that this condition existed as a generic condition and the examples do not constitute all the conditions found. Some discussion occurred on consideration of doing an extent of condition review.*

b) *NNECo responded that the specifications and procedures identify what the design basis is in the plant and identifies the plant installation is in accordance with its design basis.*

c) *Discussion on the corrective action of walking down the plant and adding information to drawings without determining whether the plant is correct or not. (DR-034 related issue.) NNECo pointed out that this was a recommended corrective action and that action would be taken in accordance with the DCM.*

4. **Topic:** DRs

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

DRs for Discussion:

a) DR-262, (Larry Collier): Need to obtain a CR number to close as a Level 4.
b) DR-704, (John Archer): [Continued from 9/2/98.] Parsons will respond based on information provided in 9/2/98 conference.

Discussion:

a) *No CR was issued, but changes to the program have already been completed.*

b) *DR-704 is deferred. NU will reconsider its response and put this DR on the agenda at a future date.*

CONFERENCE NOTES
September 8, 1998

DATE: 9/8/98

PURPOSE: Telephone conference with NNECo, NRC, NEAC, and Parsons to discuss:
No Topics or Questions were submitted for discussion.

LIST OF ATTENDEES:

NNECo	NRC	NEAC	Parsons

The 9/8/98 Conference was cancelled.

CONFERENCE NOTES
September 9, 1998

DATE: 9/9/98

PURPOSE: Telephone conference with NNECo, NRC, NEAC, and Parsons to discuss:
No Topics or Questions were submitted for discussion.

LIST OF ATTENDEES:

NNECo	NRC	NEAC	Parsons

The 9/9/98 Conference was cancelled.

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CONFERENCE NOTES
September 10, 1998

DATE: 9/10/98

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

1. **Parsons Requested DRs for Discussion**
2. **NNECo Requested DRs for Discussion**

LIST OF ATTENDEES:

NNECo	NRC	NEAC	Parsons
Joe Fougere	Eric Benner		Wayne Dobson
Fred Mattioli	John Nakoski		Don Marks
Ray Necci			Milt Capiotis
Bob Skwirz			Richard Boyd
Ron Jackson			Joe Groncki
Greg Tardif			Dan Curry
Farid Elsabee			Trent Powers
Dave Bajumpaa			Eric Blocher
Harold Thompson			Mike Akins
George Howard			Larry Wigley
Steve Wainio			
Sing Chu			
Norbert Carte			

1. **Topic:** DRs

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

DRs for Discussion:

a) DR-0095, (Wayne Dobson): NU's last response indicated that this DR was non-discrepant because the calculation identified drawing 25203-29170 sheet 5 via an attachment of its title block. The copy of calculation #2-ENG-007 provided to Parsons for ICAVP review did not include the title block to drawing 25203-29170 sheet 5 as an attachment. Consequently, we saw nothing in the calculation that would lead someone to realize this drawing was a necessary input. Based on NNECo's response that this attachment exists in the master calculation files, Parsons agrees that DR-0095 is not a Level 3 deficiency. We propose closing this DR as a Level 4 deficiency since drawing 25203-29170 sheet 5 is not cross referenced in GRITS by either the system number (i.e., 2306) or component number (i.e., T-39A, B, C, and C). This is inconsistent with the objectives of GRITS, the tracking requirements applied to other safety related drawings, and makes identifying the correct drawing extremely difficult.

b) DR-0091, This DR addresses concerns with assumptions, inputs, and resulting conclusions with two AFW design basis calculations. The NU response to this DR is that this issue was Previously Identified via UIR 2778 and that the calculations addressed in DR-0091 were superseded by Siemens Evaluation EMF-98-049, dated August 98.
Parsons has reviewed the Siemens Evaluation and is unclear as to why this calculation replaces the two AFW design basis calculations referenced in DR-0091, and the calculation in DR-0730. The Siemens Evaluation uses some inputs that are inconsistent with the design basis (example: 70F water is assumed while the maximum design temperature for the AFW suction from the Condensate Storage Tank is 100F) and does not appear to address the scenarios identified in the FSAR Chapter 14 analysis. Parsons could find no description in this evaluation as to how this evaluation bounds the

Chapter 14 analysis requirements for AFW under design basis conditions.
The conclusions of this evaluation also appear to conflict with recent Chapter 14 analysis, which concludes that two AFW pumps are required to operate to remove RCS decay heat in a specific Chapter 14 event. Parsons wishes to understand if this Siemens Evaluation is truly intended to be the Design Basis calculation for AFW or if other calculations or evaluations provide the design basis previously provided by calculations W2-517-231-RE and W2-517-232-RE. If this evaluation is the design basis for AFW, then Parsons needs to understand the scenario and design input differences between this evaluation and the Chapter 14 analysis.

c) DR-0730, This DR addresses concerns with a calculation performed to demonstrate that the then existing safety analyses were still bounding for the replacement steam generators. The NU response to this DR is that the issue was previously identified by UIR2778 and that the calculation is replaced by Siemens Evaluation EMF-08-049, dated August 98. A discussion similar to that for DR-0091 is needed for this DR.

Discussion:
a) Parsons and NNECo agreed to close DR-0095 as a S.L. 4. NNECo agreed that PMMS will be updated.
b) Parsons will provide a response in a future conference.
c) *Parsons will provide a response in a future conference.*

2. **Topic:** DRs

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

DRs for Discussion:

a) DR-756 PRT Member: Sing Chu, Farid Elsabee, Steve Wainio, Norbert Carte. Initial Response. NU to initiate general discussion on MP2's Seismic Program including available original seismic documentation and the current A-46 Program. NU will also highlight that the current A-46 Program is not used to "seismically qualify non-SSEL components" but to provide a level of assurance of the seismic adequacy of components.

Discussion:
a) Parsons will reconsider the NNECo Technical Evaluation (TE No. M2-EV-98-0110) and provide a response in a future conference.

CONFERENCE NOTES

DATE: 9/15/98
TIME: 2:00 p.m.

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

1. **Status of HVAC Calculation**
2. **M2-IRF-02634 response to M2-RAI-02086**
3. **Parsons Requested DRs for Discussion**
4. **NNECo Requested DRs for Discussion**

LIST OF ATTENDEES:

NNECo	NRC	NEAC	Parsons
Don Brown	John Nakoski		Mike Akins
Norbert Carte			Eric Blocher
Joe Fougere			Bill Clemenson
Bob Lawrence			Frank Cobb
Fred Mattioli			Larry Collier
Tom Pryhoda			Claude Didier
Greg Tardif			Wayne Dobson
Martin Vezina			Joe Groncki
			John Hilbish
			Gary Jackson
			Trent Powers
			Jon Winterhalter

1. **Topic:**. Status of HVAC Calculation (William Clemenson)

Reference:

1. 2N10-1, Aux Feedwater Pump Room Ventilation - Turbine
2. 2N10-2, Auxiliary Feedwater Pumps - Motor
3. HVAC Calculation Initiative EWR 2-96-105

Background:
Auxiliary Feedwater pump room HVAC calculations, Ref 1 &2, are listed as being superseded by "New Calc 4" per reference 3.

Question:
What is the status of "New Calc 4"?

Discussion:

The status of the AFW pump room calculations is as follows:

1. Calc 2N10-1, has been superseded by 98-TBV-02643M2. Complete.
2. Calc 2N10-2, has been superseded by 98-TBV-02682M2. Forecast to be complete 9/18/98.

Both of these calculations will be transmitted to Parsons via RAI-2105 next week.

2. **Topic:** M2-IRF-02634 response to M2-RAI-02086. (Claude Didier)

Background:
The response on M2-IRF-02634 indicated for VTM 25203-308-003 "No procedures affected". Per DC-16 after a VTM is upgraded, it is reviewed against plant Maintenance, Operational, Surveillance and Test Procedures. Attachment 6, "Procedure Reference Sheet" is then completed.

Question:

a) What does the response for VTM 25203-308-003 "No procedures affected" mean? It seems unusual that there are no procedures for work on the pumps that are identified in the VTM. We thought the DC-16 procedure reference sheet was supposed to have identified all the procedures that the VTM COULD impact.

b) What, if any procedures were reviewed that enabled Millstone to arrive at the conclusion stated?

Discussion:

a) The initial response from NNECo was that there were no procedures which had to be modified and "not sure procedure DC-16 requires that the procedures be listed." In further review, NNECo indicated that the procedure reference sheet is provided to several departments and that Maintenance department indicates review of maintenance procedure MP 2 703 C4. Parsons had one procedure reference sheet from the RAI response which is identified as "I&C."

b) NNECo was going to review further and respond in the 9/17/98 teleconference.

3. **Topic:** DRs

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

DRs for Discussion:

a) DR-0632, (Larry Collier) The purpose of this discussion is to 1) clearly communicate Parson's issue on ITEM #1, and 2) identify the need for additional information to close out ITEM #2.

- ITEM #1 The NNECo response appears to be inconsistent. It accurately states that Technical Specification 6.8.1(a) requires the applicable procedures recommended per the Regulatory Guide 1.33 Appendix A be established, implemented and maintained. However, the response then sets this requirement aside and puts forth an argument that the Regulatory Guide 1.33 recommend procedures do not need to be put in place. Technical Specification 6.8.1(a) states, Written procedures shall be established, implemented, and maintained covering the activities referenced below:

  a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, February, 1978.

  Note that the Technical Specification requirement uses the word "shall" to explicitly specify that applicable procedures recommended in Regulatory Guide 1.33 are to be established, implemented and maintained. The fact that the Regulatory Guide makes a distinction between guidance and requirements is not relevant since the licensing basis, (i.e. Technical Specification 6.8.1(a)) commits Millstone Unit 2 to all of the procedures recommended in Appendix "A" of Regulatory Guide 1.33, February, 1978.
- We fail to see the relevance of the discussion presented in parts A), B), & C). Why was this information provided? Part A) is particularly of concern since previous information from Millstone

Unit 2 indicated it was plant practice to not use vendor technical manuals to control work, but rather relevant information and requirements are put into plant procedures. This plant practice was the basis for concluding past and present maintenance activities were acceptable even though the CMP review identified that vendor technical manuals had not been properly kept up to date.

- ITEM #2 - The NNECo response took a simplistic approach to addressing possible stud over stressing in prior reinstallation activity. The response to this discrepancy did not recognize nor address some typical anomalies that can occur when threaded fasteners are repeatedly used in the same application. Each of the anomalies, separate or in combination, are capable of having an effect on the amount of torque needed to properly seat a gasket for its sealing function.

  - Cold springing of piping components,
  - Misalignment of bolt holes,
  - Excessive radial offset of flanges,
  - Irregular pattern tightening sequence,
  - Over compensation of torque for limited access of adjacent stud(s), and
  - Gouging or high risers at the bottom of the stud threads

  However, based on the NNECo statement that the congested nature of the area around the Safety Valves makes use of extenders (cheater bars) for multiplying torque unlikely, we concur that for this example over stressing was unlikely. The NNECo response was silent on consideration of extent of condition. The statement that use of extenders (cheater bars) is not a standard maintenance work practice doesn't mean they have not been used when space was available. When Millstone Unit 2 recognized the need for a torque control program and implemented procedure C-MP-715Ain 1994, it is logical that an assessment was performed to determine if threaded fasteners had been overstressed prior to implementation of the controls and needed to be replaced. For Parsons to close this issue we need some information on the determination that was done, or the basis for the NNECo believe that the plant safety systems are not likely to contain overstressed treaded fasteners.

Discussion:

NNECo said that Code Case N-508 allows the rotation of valves in this manner. NNECo also said that prior to the implementation of C-MP-715A, other procedures and instructions were followed. Parsons requested a list of those procedures/instructions. NU agreed to fax a copy of the torque program that was applicable to threaded fasteners prior to 1994 and Code Case N-508.

4. **Topic:** DRs

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

   DRs for Discussion:

   a) DR- 158, (Norbert Carte) NU to initiate discussion to show that condition described in DR was Prediscovered.

b) DR-0182 & 0183, (Bob Lawrence) In a previous conference phone call with Parsons, it was agreed that DR-0182and 0183 were confirmed significance Level 4 Discrepancies and that Parsons would close them. The follow-up DRs have them "open".

c) DR-0651, (Tom Pryhoda) NU would like to discuss DR-0651 with Parsons because two of the three "issues" called discrepant are repeated from two previously submitted and answered DRs. Issue 2: Repeats the discrepancy reported in DR-0412, a confirmed SL3, that resulted in CR M2-98-1335 for corrective action. Issue 3: Repeats the discrepancy reported in DR-0585 and answered as a non-discrepant (seismic qualifications of HVAC equipment).

d) DR-0142, (Bob Lawrence) NU is calling this issue NON-DISCREPANT on the basis of Technical Evaluation M2-EV-98-157 which demonstrates that, with regard to integral welded attachments, the plant piping systems are, and have been, in compliance with design requirements.

a) Since the Notice of Violation did not specifically address this issue, Parsons contends that this condition was not Prediscovered. (Reference also the 9/14/98 discussions with the NRC regarding this topic.)

b) Parsons will close DR-0182 by referencing CR M2-98-2112 and DR-0183 by referencing CR M2-98-2183.

c) Issue 3: Hold this item pending discussions with the NRC regarding GIP for modifications which are not necessarily safe shutdown equipment.

d) NNECo agrees that DR-0142 is a CONFIRMED SL 4 and Parsons will close on this basis.

CONFERENCE NOTES

DATE: 9/16/98
TIME: 2:00 p.m.

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

1. **Parsons Requested DRs for Discussion (DR-0600, DR-0514, & DR-0640)**

LIST OF ATTENDEES:

NNECo	NRC	NEAC	Parsons
Sing Chu	Eric Benner		Eric Blocher
Peter Duff			Wayne Dobson
Joe Fougere			Tom Flemming
Fred Mattioli			Joe Groncki
Geoff Neate			Trent Powers
Tom Pryhoda			Jon Winterhalter

1. **Topic:** DRs

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

DRs for Discussion:

a) DR-0600, (Dom Ramos) Calculation 97-CPI-02077M2, Rev 0 superseded and placed information contained in four calculations into historical records. It states that prior to any future modification, a new or revised calculation will be required to demonstrate that the EBFS adequately meets its requirements. Contrary to the above, two calculations, 1K15-2 and 78-828-425 GM, were not revised prior to MOD DCR M2-97008. According to the 6/16/98 conference notes, topic #3, the MOD is complete except for testing.
Parsons need to understand why the above does not constitute a discrepancy condition, and how calc. 97-CPI-02077M2 whose sole purpose is to remove obsolete calcs. from "calculation of records" can be used to justify licensing basis in FSAR Section 6.7.

b) DR-0514, (Joe Groncki) DR-0514 was written as a Significance Level 4. It was closed as a CONFIRMED SIGNIFICANCE LEVEL 4 that will be resolved under Condition Report-M2-98-2158. The actual resolution of this DR was never detailed. Please describe how NNECo plans to respond to this DR, because the answer to this DR will have an impact on other DRs that Parsons now has in-house for review.

c) DR-0640, (Thomas Flemming) Reference M2-IRF-02638, NNECo Response. DR-0640, concerning lack of qualification of the Diesel Generator Intake Filter Housings for Normal Wind, Tornado Wind, and Seismic loads was written due to Parsons' observation that UIR 2679 failed to include the Filter Housings in its discussions of the deficiencies.
UIR 2679 stated that the Intake piping system was qualified for Normal Wind, Tornado Wind, and Seismic loads. Parsons noted in DR-0640 that no documentation could be located which addressed any of these loads for the Filter Housings, and additionally that NNECo has classified the L-727/728 Filters as Non-QA Category 1.
The NNECo response supplies a very detailed and complete calculation on the Diesel Exhaust System, including Tornado Wind Load calculations. None of the attachments, including Stress Analysis 77-619-58GM CCN#1 Rev 1 dated 11/18/97 included with the response appear to address the Filter Housings.

Questions:

1. What documents in NNECo's response to DR-0640 are intended to address wind and seismic

qualification of the Filter Housings?

2. Since the filter housings are classified as non-safety in the PMMS data base, does NNECo assume that damage or destruction of these units will not affect the performance of the diesels?

Discussion:

a) The MP2 calculation that resolves the DR issues is 78-772-17RA, Rev 3. NU inadvertently omitted this calculation number in their response to the DR.

b) Since the resolution of DR-0514 will be handled under a common CR later, NNECo requested that Parsons add the specific question to the 9/17/98 agenda.

c) NNECo replied that the resolution of DR-0581 will answer the concern raised in DR-0640 and that DR-0581 is forecast to be completed this week. Parsons will review DR-0581 and raise the DR-0640 concern later if required.

CONFERENCE NOTES

DATE: 9/17/98
TIME: 2:00 p.m.

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

1. **M2-IRF-02634 response to M2-RAI-02086**
2. **Should Diesel Air Compressors be included on the Safe Shutdown Equipment List?**
3. **Parsons Requested DRs for Discussion**
4. **NNECo Requested DRs for Discussion**

LIST OF ATTENDEES:

NNECo		NRC	NEAC	Parsons
Don Brown	George McGovern	Eric Benner		Mike Akins
John Calderone	Ken Moore			Eric Blocher
Sing Chu	Tom Moore			Larry Collier
Bob Crittenden	Tom Pryhoda			Claude Didier
Dan Dougherty				Wayne Dobson
Joe Fougere				Joe Groncki
Fred Mattioli				Trent Powers
Tom Mawson				Jon Winterhalter

1. **Topic:** M2-IRF-02634 response to M2-RAI-02086. (Claude Didier) This topic is a continuation from the 9/15/98 teleconference.

   Background:
   The response on M2-IRF-02634 indicated for VTM 25203-308-003 was "No procedures affected." Per DC-16 after a VTM is upgraded, it is reviewed against plant Maintenance, Operational, Surveillance and Test Procedures. Attachment 6, "Procedure Reference Sheet" is then completed.

   Continuation Issue:

   NNECo to review M2-IRF-02634 response and determine if it is complete. Parsons needs to have a list of the procedures which could be affected by a VTM upgrade. This was thought to be Attachment 6, Procedure Reference Sheets.

   Discussion:

   Procedure MP 2703C4 was identified on one of the other Attach. 6 forms which will be sent via RAI-2086.

2. **Topic:** DR-0514 (Joe Groncki) As a follow-up to our discussions in the 9/16/98 teleconference regarding DR-0514, please clarify the seismic classification of the Diesel Air Compressor Skids (Components # F10A, B, C, and D). Should these components be included on the Safe Shutdown Equipment List?

Discussion:

NNECo said that the compressor skids are not on the Safe Shutdown Equipment List (and are not required to be on the list).

3. **Topic:** DRs

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

DRs for Discussion:

a) DR-0345, (Larry Collier) A further explanation of the response to DR item 2 is needed so that Parsons can properly comment.

Background: Item #2 concerns 2-CH-515 and 2-CH-516 Appendix J reverse direction testing. Parsons agrees with NNECo that this item was previously discovered and requires correction, but we need a further explanation why the corrective action is not required to be completed prior to startup.

During CMP NNECo discovered that, since valves 2-CH-515 and 2-CH-516 are capable of being tested in the LOCA direction, Appendix J requires testing in the direction of the accident flow. The DR response states that CR M2-97-1248 includes an assignment to revise procedure SP 2605D, but this is not required prior to start-up because results from reverse direction testing are conservative.

Question:
We have reviewed NU Memo TS2-94-861, dated November 11, 1994, which documented the justifications for performing Appendix J Type C testing in a direction opposite the accident (reverse direction) for valves 2-CH-515, 2-CH-516, 2-SI-651 and 2-RW-232, but we do not understand how reverse direction testing will provide more conservative test results than testing in the direction of the accident. Per chance are these valves' maximum and recommended leakage limits lower than other CIVs of the same size and general design which are or have been tested in the proper direction? Please explain.

b) DR-0456, (Larry Collier) We believe something may be missing from the information provided regarding Item # 1. The NNECo response indicates that vibration data was collected for reference values at two separate flows, and an engineering evaluation of the data was performed. We can only find one set of reference data taken at a single flow rate for each of the RBCCW pumps. We would like to go over this item and have NNECo walk us through the documents or information that supports the response.

c) DR-0632, (Larry Collier) Follow-up on the 9/15/98 conference, Item #1. Parsons would like to discuss its review of the code case and NRC approval of its use at Millstone. These documents allow Millstone to not prepare an ASME Section XI Replacement Plan, but provide no relief of Technical Specification requirements for having maintenance procedures call for in Regulatory Guide 1.33, Appendix A.

d) DR-0592, (Joe Groncki) In response to DR-0592, NNECo stated that Item #1 was a non-discrepant condition based on the fact that the NNECo walkdown identified the loose support as a fire protection support and not a cable tray support. Parsons' walkdown identified the support in question as a

trapeze type with loose nuts and a 1/4-inch gap between the support and the cable tray and believe that possibly NNECo personnel looked at a different support in their walkdown. We would like to discuss how to ensure both parties are talking about the same support. Possibly NNECo could fax or E-mail us a picture of the support identified in their response.

Discussion:

a) NNECo has documentation to show why reverse direction testing is more conservative than forward direction testing. Parsons will close this item of the DR.

b) The page provided to Parsons is the vibration reference value acceptance criteria. Parsons was not sent the raw vibration data. Parsons will close this item of the DR.

c) NNECo says a valve "rotation" is not a "replacement." Parsons tabled this discussion.

d) The loose support at the cable tray is actually a fire protection pipe support that spans across the tray. The gap was provided by design. NNECo will send a photo of this support.

4. **Topic:** DRs

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

DRs for Discussion:

a) DR-0473, (Bob Crittenden) NNECo believes this issue is non-discrepant and would like to discuss the ASME XI index that is referenced by Parsons within the DR.

b) DR-0474, (Bob Crittenden) NNECo believes this issue is non-discrepant and would like to discuss why the application of Belsona coating is not considered a Section XI issue.

Discussion:

a) NNECo said that the global calculation index satisfies the Section XI requirements to maintain an index of "repair and replacement" work.

b) NNECo said application of a coating to the pump head was not a "repair/replacement" activity. Parsons said that the work should have been treated as a Modification. NNECo agreed. Parsons will close the DR as a Confirmed SL 4 upon receipt of a CR number.

CONFERENCE NOTES

DATE: 9/22/98, Rev. 0
TIME: 2:00 p.m.

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

1. **M2-IRF-02485 response to DR-0034 - Process Deficiencies in As-Built DCNs.**
2. **M2-IRF-02769 response to DR-0556.**
3. **Forecast issue date of NU's response to DR-611?**
4. **DR Disposition and Conclusion Process**
5. **Parsons Requested DRs for Discussion**
6. **NNECo Requested DRs for Discussion**

LIST OF ATTENDEES:

NNECo		NRC	NEAC	Parsons
Don Becker	Fred Mattioli	Eric Benner		Mike Akins
John Calderone	Jim Petrosky	John Nakoski		Eric Blocher
Norbert Carte	Mark Pupillo			Bill Clemenson
Sing Chu	Bob Skwirz			Larry Collier
Dan Van Duyne				Claude Didier
Joe Fougere				Wayne Dobson
George Howard				Trent Powers
Ken Lanham				Jon Winterhalter

1. **Topic:** M2-IRF-02485 response to DR-0034 - Process Deficiencies in As-Built DCNs (Wayne Dobson)

Background:

The current NU response refers to a Unit 3 self assessment of DCNs not associated with a parent change document. From the copy of ACR M3-97-0506 provide with the response, we found memo MP3-DE-97-1212 which describes that the 154 safety related DCNs that were reviewed included those that caused work in the field and DCNs that were initiated to document as-built conditions.

Question:

a) Of the 154 DCNs how many were as-built DCNs?

b) The memo contains proposed guidance for reviewing as-built DCNs. Did the review use this guidance or was something else used?

c) The DR response summarizes the result of the review of DCNs that caused work in the field, (i.e. 12 DCNs exceeded the MSEE criteria) but what was the result of the review of the as-built DCNs?

Answers:

a) 93 were as-built; 71 electrical, 22 civil/structural.

b) Yes.

c) NNECo will Fax the one page summary.

2. **Topic:** M2-IRF-02769 response to DR-0556. AR 98016198 (Claude Didier)

   Background:

   DR-0556 was written against the KSREL and essentially concluded that the KSREL was insufficient in breadth and depth in the identification of Key Safety Related components. The response states "Currently, with approximately 75% of the KSREL manuals completed, an additional 522 related QA components have been identified. Technical Evaluation M2-EV-98-0038 will be revised to reflect the full scope of equipment addressed in the Millstone Unit 2 KSREL."

   Question:

   a) Does this statement mean that NNECo will be adding these 522 components to the KSREL? If not, what does this statement mean?

   b) Does NNECo consider Technical Evaluation M2-EV-98-0038 to have completely identified the key safety related equipment meeting the requirements of GL 90-03, or is this a work in progress with more components to be added as the VTM recovery effort continues?

   c) What is the definition or methodology for identifying a 'component', (as opposed to a 'part') at Millstone Unit 2?

   Discussion:

   a) Yes. These are associated components supporting the primary components. It does not change the VTMs being upgraded as these components were always included and are included in the upgraded VTMs, but were identified in doing the upgrades.

   b) The associated safety significant components are being identified and added, the primary components have already been identified.

   c) There is no clear definition of component and part. A stand-alone solenoid valve could be a component, supplied as part of a skid package it could be a part. Assignment of component ID is correspondingly not clear cut.

      There was some discussion on the VTMs and with NNECo stating that it did not matter if the subcomponents had a component ID, that the manual was comprehensive and for an assembly contained vendor documents from multiple vendors and that each subcomponent like solenoid valves, gears, bearings, limit switches, and other parts were reviewed and had the vendor information in the VTM.

3. **Topic:** DR-0611 affects response of other DRs (Bill Clemenson)

   Background:

   Parsons has two EDG HVAC DRs that require our response to NU's resolutions, DR-610 and DR-615. DR-0611 is related to the issues described in these DRs.

   Question:

   What is the forecast issue date of NU's response to DR-611?

Answer:

October 1, 1998

4. **Topic:** DR Disposition and Conclusion Process (K. Gabel)

   Background: NU's responses to DR's 0195 and 0242 included actions taken, i.e., engineering and Technical Evaluations, to address conditions sited by the DR's. However, the DR Dispositions concluded that these conditions were non-discrepant.

   Discussion: Parsons wants to clarify the position that when corrective action is required, a discrepant condition does exist.

Response:

NNECo position: MS-66 is only a design guide. It allows for deviations from the guide with engineering approval. A signed drawing is evidence of Bechtel engineering approval. The technical evaluation that NNECo performed documented, to today's standards, the adequacy of something that did not follow the design guide. Therefore, there was no technical discrepancy and no documentation discrepancy.

5. **Topic:** DRs

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

   DRs for Discussion:

   - DR-0247, (Larry Collier) Parsons agrees with NU on items 1 through 5, and item 8.

     - Item 2 - In response to RAI-1776 NU provided information to support a conclusion of non-discrepant. While we agree item 2 is non-discrepant, the information sent has a level 4 discrepancy. The form used to collect the DP reference data on 9/17/98 is incomplete. The "required action range" information is not filled in.

     - Item 6 & 7. The NU response did not fully address the issues of concern. The subject of the discrepancy identified in Item no. 6 & 7 was the lack of a test date and signature on the test record, and no identification that ties the test record to the cover sign-off sheet. The NU response identified that the test record is considered to be the cover sheet and its attached data sheets. The response also associated the signature requirements of ASME Code Section XI, IWP 6240 to the signature descriptions use on the cover sheet form. Based on this information, Parsons agrees that the test record contains a test date and the required signatures.

       However, the response does not address the issue of no identification that ties the data sheet to the cover sign-off sheet. This is a document control issue of ensuring the attachments can be associated with the cover sheet after the test record is complete. In addition, it appears that lack of a test date and signatures on the attached data sheets is a failure to meet the requirements of MP2 procedure EN 21100, Revision 5, Dated 1/31/97. Section 1.3.3.e, of this procedure requires the date of test and signatures to be recorded on the data sheets.

Without a test date or some other identification that ties the data sheets to the cover sheet, it is difficult to assure that the requirements of ASME Code Section XI, IWP-6240 are met, and assure the proper data sheet are attached to the correct cover sheet. If Parsons understands the requirements of procedure EN 21100, Revision 5 properly this would serve as a means of associating the data sheet with the cover sheet. Based on this procedure requirement, Parsons would classify this as a Significance Level 4 discrepancy of the data sheet form not being complete.

NOTE: DR-0345, item 12 found a similar issue regarding the lack of identification that ties Appendix J test results to the test package. NU issued CR M2-98-2552 to correct that Significance Level 4 discrepancy.

- If NU concurs with the remaining Level 4 items and provides a CR number, Parsons will close this DR.

b) DR-0030 (Trent Powers) - Parsons wishes to discuss the difference in Significance Level determination for this DR. Parsons issued as a Level 3, NU identified as a Level 4.

In the NU response, NU stated that FSAR section 5.7.3.1.4 will be revised to reflect CST design requirements for tornado wind and depressurizations, and FSAR section 10.4.5.3 was revised to incorporate the correct FSAR references.

The response also stated that the calculation that documented the design described in Question 9.44, (this question was included in Amendment 23 to the FSAR, dated 11/11/73) could not be found and that 5 calculations were prepared to support FSARCR 98-MP2-93. This FSARCR includes the revision to FSAR Section 5.7.3.1.4.

Parsons considers these changes to the FSAR to be of a non-editorial nature. Consistent with previously held discussions on the significance level of DRs associated with FSAR changes, Parsons considers these FSAR changes to satisfy the criteria for classification as Significance Level 3.

Parsons does concur that the corrective actions addressed in the DR satisfy the DR concerns.

c) DR-0255, (K. Gabel) Reference M2-IRF-02515.

1. DR disposition references U-Bolt drawing detail on page 32 of document WO-30. This drawing details two (2) nuts required on each U-bolt post.
2. DR disposition references drawing 25203-22200 sheet 611148 as the specific detail for the DR subject support. This drawing details one (1) nut on a U-bolt post; BOM does not specify any nuts.

Question: How many nuts are currently installed on each U-bolt post?

Discussion:

a) Item 2: Parsons agrees that this item is non-discrepant, however, the documentation sent by NNECo to answer this item contained a SL 4 discrepancy and will be closed upon receipt of a CR number.

Items 6 & 7: Parsons agrees that these items are non-discrepant since the trending of the data is performed prior to being sent to records.

Discussion (cont.):

b) NNECo agreed with Parsons that the revision to the FSAR was not an editorial change and the SL is 3. Parsons will close this DR as the corrective action is essentially complete.

c) NNECo's position: WO-30 is only a guidance document, that allows for deviation from the guide with engineering approval. The DR response is confusing by referring to both WO-30 and a specific support drawing and calculation as being the basis for the support. The design basis is the drawing and calculation which has only one nut per U-bolt post.

CONFERENCE NOTES

DATE: 9/23/98, Rev. 0
TIME: 2:00 p.m.

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

Parsons Requested DRs for Discussion

LIST OF ATTENDEES:

NNECo		NRC	NEAC	Parsons
Lloyd Baird		Eric Benner		Eric Blocher
Bob Crittenden		John Nakoski		Larry Collier
Joe Fougere				Dick Diederich
Rich Fuller				Wayne Dobson
Fred Mattioli				Trent Powers
Bob Skwirz				Jon Winterhalter
Bob Wesemen				

1. **Topic:** DRs

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

   DRs for Discussion:

   a) DR-0341, (Larry Collier) Ultrasonic Examination Procedures

   - Item 1 - Omission of 1% Estimate Requirement.

     NU response: Confirmed Level 4. Even though the procedure does not contain the ASME Code requirement, NU's use of digital equipment assures settings and readings are estimated to the nearest 1% of full screen.

     Parsons Comment: We would agree with this position if digital equipment has been used for all UT exams during the 2nd interval. Is this the case? Or has non-digital equipment been used? If non-digital equipment was used, do the UT exams meet ASME Code requirements?

     Response:

     Digital equipment was not used for all exams during the second interval. The practice of the NDE examiners was to estimate to 1%. NNECo will sample the data sheets to verify that 1% estimation was used.

   - item 2 - Omission of Frequency For Setup Calibration

     NU response: Non-discrepant because procedures require system calibration check to verify the DAC curve and the sweep range calibration at the start and finish of each examination, each time a different calibration is used during an examination, with any change in personnel, transducers, cables, shoes, batteries, couplants, and at least every 4 hours during an examination.

     Parsons Comment: The response seems to equate a calibration check to a calibration. They are not the same however. The requirement for calibration frequency can be found in

Appendix III, III-3320. III-3320 states, "Complete ultrasonic examination system calibration, establishing the DAC curve, shall be performed within one day prior to use of the system for examination of those welds for which the examination is applicable, and at least once each week during the examination.

In contrast, a calibration check is addressed in III-3210. III-3210 states, "Any change in search units, shoes, couplants, cables, ultrasonic instruments, recording devices, or any other parts of the examination system shall be cause for the calibration check. The original calibration shall be performed on the basic calibration block. Calibration checks may be performed on either a basic calibration block simulator or the basic calibration block, but must include a check of the entire examination system." Additionally, III-3500 (k), states, "The following data shall be recorded on a calibration data sheet: times of initial calibration and subsequent calibration checks."

Calibration check is, for the most part, self defined in that it is a check of the initial or setup calibration; a simulator block may be used in lieu of the basic calibration block. Initial or setup calibration does not allow the use of a simulator block and the DAC must be established using the basic calibration block.

NU-UT-1, section 7.1 states, "Setup and calibration shall include the complete ultrasonic examination system. Any change in search units, calibrations, shoes, couplants, cables, ultrasonic instruments, personnel recording devices, or any other part of the examination system shall be cause for calibration check. Section 7.3.1, states, ... A system calibration check shall verify the DAC curve ..... at least every 4 hours during an examination" ..... Calibration simulator and reflectors used shall be documented on the Calibration Data Sheet."

NU-UT-1 specifies no time based frequency for the initial, setup calibration, or routine, setup calibration after the initial calibration. Both frequencies are required pursuant to III-3320. Also, there is a notable, important and prominent difference between 1) establishing a DAC Curve, and 2) verifying a DAC curve. The frequencies, (within 1 day prior to use and at least once each week) for establishing the DAC curve are not in NU-UT-1. Nor are these frequencies listed on the calibration data sheet, Figure 7.3, as required by III-3500 (k). These omitted frequencies do not meet the licensing basis, Technical Specification and ASME Code Section XI, Appendix III, III-3320. Thus this discrepancy remains as a Significance Level 3.

Discussion:

Parsons and NNECo agreed to call this a Confirmed Level 4. The procedure was already corrected by CR MP2-98-0864.

b) DR-0244, (Larry Collier) Magnetic Particle Examination Procedures

- Item 3 - Demagnetization not Actively Addressed in the Procedure

NU response: Previously discovered and corrected under ACR 5425 written 11/13/95.

Parsons Comment: Disagree. The referenced ACR 5425 written on 11/13/95was prepared because job supervisors had been signing the job supervisor block on NU-LP-1 and NU-MP-1 Attachment 1, prior to performing NDE testing as required in steps 2.6.1 . Nothing in the discrepant issue identified in this ACR, or corrective actions described in the ACR, talk about

demagnetization problems. We have no basis for concluding this ACR would identify and fix the fact that demagnetization is not actively addressed in the procedures as required by ASME Code Section V Article 7.

Parsons considers this a Confirmed Significance Level 3, which has been corrected provided MP2 NDE training addresses the particulars of when, how and where demagnetization is required.

Response:

NNECo will transmit to Parsons a copy of the draft revision of the procedure that will demonstrate that the discrepancy was discovered by NNECo prior to "CMP Complete" date.

c) DR-0245, (Larry Collier) Liquid Penetrant Examination Procedures

- Item 1 - No Identification of Material, Shape, and Size Limitations This same issue applies to DR-0244, Item # 1.

NU response: Non-discrer : ASME Section V, Article 6 (Article 7 for DR-0244) only requires specific materials, shapes, and sizes to be considered when preparing a procedure and does not necessarily require them to be identified in the procedure.

Parsons Comment:

The Code requirements:

ASME Section V, article T-732 "Procedure Requirements",(for DR-0244 Magnetic Particle Exam)

"Examination procedures shall be based on the following information:
(a) the materials, shapes, or sizes to be examined and extent of examination;

ASME Section V, article T-632 "Procedure Requirements",(for DR-0245 Liquid Penetrant Exam)

"Liquid penetrant examination shall be performed in accordance with a written procedure. Such procedure shall consider at least the following information:
(a) the materials, shapes, or sizes to be examined and the extent of examination;

It appears that NU is using a letter of the law argument, (i.e. a procedure writer can keep materials, shapes, and size requirements or limitations in mind while preparing a procedure, but the Code does not require those items be documented in the procedure.) Parsons does not agree with this. It is not enough for a procedure writer to consider requirements or limitations and not communicate those items to the person who will be using the procedure. The Code uses the word "shall" to indicate a requirement. While one article uses the word "based" and the other the word "consider," the intent is for the written procedure to identify the materials, shapes, and sizes for which the procedure is applicable. Failure to identify this can lead to use of the procedures outside of the bounds for which the procedure was intended.

Previous revisions of NU-MP-1 identified the yoke method procedure could be used for examining welds in plate and piping, but not for examining bolting, castings, and forging. In addition, direct current electromagnetic yokes or permanent magnet yokes were not to be used in materials 1/4 inch or less. The revision reviewed as part of the ICAVP contained no materials, shapes, or sizes limitations on the use of NU-MP-1. Since the procedure did not document material, shape, or size requirements or limitations, Parson has no documentation that would demonstrate the procedure was used in a manner that met the Code requirements.

Parsons considers this to be a level 3 item that has been corrected by the recent revision to the procedures. This is a level 3 because the licensing basis, (ASME Code requirement) was not followed.

Discussion:

Parsons does not agree with NNECo's interpretation of the code, however, the procedure has been revised to incorporate Parsons' concern. Parsons will close the DR as non-discrepant.

- Item 3 - Documentation of Low Temp. Procedure Qualification

  NU response: Non-discrepant. NU agrees the documentation does not address the temperature of the chemicals used, but the qualification testing was witnessed by the Authorized Nuclear Inservice Inspector who is intimately familiar with the requirements of the ASME Code.

  Parsons Comment: NU response confirms no documented evidence exists to indicate that the penetrant examination materials such as cleaning fluid, penetrant dye or developer were cooled to the proposed temperature before the examination. Therefore a conclusion of non-discrepant is not possible. If the materials were indeed cooled to the proper temperature, a documentation discrepancy exist. If the materials were not cooled to the proper temperature, the procedure was not properly qualified. Based on the information contained in the CR that investigated this item, Parsons agrees there is a high probability that the chemicals were at the proper temperature for the test and there is no need to question those low temperature examinations performed with this procedure. However, the qualification is not properly documented. Parsons considers this a level 4 discrepancy.

Response:

NNECo agrees that this is a Confirmed Level 4 discrepancy.

- Item 5 - Limits on the Size of Examination Area

  NU response: Previously discovered. ACR 10103 written on 3-8-96 resulted in issuing a revision to NU-LP-1, approved on 12/24/97 which corrected this discrepancy.

  Parsons Comment: Disagree. The referenced ACR 10103 written on 3-8-96 was prepared because an LP examination did not include the inside diameter of Class I piping as required by ASME III, NB5000. The discrepant issue identified in this ACR, and the long term corrective action described in the ACR, (i.e. revise all NDE procedures to include the code examination coverage for each type of exam) is not related to the issue of this DR such that we could conclude that 21 months later work on this ACR would identify and fix the fact that the procedure is deficient in limiting the size of the examination area per ASME Code Section V Article 6.

  Parsons considers this a confirmed level 3, which has been corrected.

Response:

NNECo will provide documentation that links the ACR to the Parsons concern to demonstrate prior discovery.

d) DR-0246, (Larry Collier) ISI Visual Examination Procedures

- Item 1 - Procedure would allow non-qualified person to perform the examination. This same issue applies to DR-0341 Item #3, DR-0244 Item #2, and DR-0245 Item #2.

  NU response: Non-discrepant. ASME Code allows a Level I individual to perform the examination under the guidance of a higher level individual provided they are qualified to perform specific setups, calibrations, tests and record data according to written instructions. The procedures in question require at least a Level II or higher individual be part of the team. Procedure NOQP-4.04 defines levels of qualification for trainee, Level I, II and III and the tasks they are capable of performing. This is sufficient to ensure only a qualified Level I or higher individual perform the exam.

- *Parsons Comment:* Parsons disagrees that this item is non-discrepant. Parsons agrees with NU's statement of ASME Code requirements, but we fail to see how a program procedure, (NOQP-4.04) on training, qualification and certification of NDE personnel will assure that a trainee will not be the individual who performs the NDE examination. In our review of NOQP-4.04 we find nothing that implements the ASME Code requirement that the person performing the examination be at least a Level II or a Level I under the guidance of a higher level individual. This procedure only addresses training and qualifications of NDE personnel. The Parsons review of MP2 procedures and the NU response has not identified a procedure that implements the ASME Code requirements in question. Of the procedures that are the subject of this DR, Section 4 of NU-UT-1 requires a Level II individual be part of the team and "the remaining members of the team shall have a minimum qualification of trainee." This specific statement further calls into questions the procedure controls that would prevent a trainee from performing the exam.

- Parsons considers this a level 3 DR which is in the process of being corrected by NU.

Discussion:

Parsons and NNECo agree this is a SL 4. Procedures are currently being revised.

CONFERENCE NOTES

DATE: 9/24/98, Rev. 0
TIME: 3:00 p.m.

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

1. **DR-0288 and DR-0756 (NNECo initiated)**
2. **DR-0345**
3. **DR-0610**
4. **DR-0615**
5. **DR-0647**

LIST OF ATTENDEES:

NNECo		NRC	NEAC	Parsons	
Prasad Bandaru	Wadie Girgis	Eric Benner	none	Eric Blocher	Rich Schmehl
Sing Chu	Fred Mattioli			Larry Collier	Samir Serhan
Bob Crittenden	Tom Pryhoda			Bill Clemenson	Jon Winterhalter
Dan Dougherty	Bob Skwirz			Dick Diederich	
Wally Djordjevic	Harold Thompson			Wayne Dobson	
Faird Elsabee	Steve Wainio			Joe Groncki	
Joe Fougere				Trent Powers	

1. **Topic:** DR-0288 and DR-0756

   Background: (Sing Chu, Steve Wainio, and Wally Djordjevic of Stevenson & Assoc.)

   NNECo requested topic to discuss the DRs listed above. NNECo to initiate discussions on:

   - Additional information regarding the applicability A46 to MP2.
   - GIPPER Software from Stevenson & Assoc.
   - Inner workings of Anchorage Program and "100-40-40."

   Discussion:

   Wally Djordjevic explained some of the aspects of the Anchor 4.0 program. Anchor 4.0 is the Windows version of Anchor 3 version. The "100-40-40" load combination method was always the only method used by the program. There were no other options.

   Parsons told NNECo that we understood the explanation and will review the DR responses when they are issued.

2. **Topic:** DR-0345, IST Appendix J, Containment Leak Test Type "C" (Larry Collier)

   Background:

   Item 3 - After reviewing the containment leak test surveillance procedure, SP2605D, Parsons wrote the discrepancy because we could not find a work control procedure that would ensure "as-found" testing of the leakage rate of a valve prior to any maintenance which may have an effect on the valve's leakage integrity criteria. The NNECo response uses WP 28001 and CWP C3 as the basis for concluding this item is non-discrepant. We have not found any thing in CWP C3 that would ensure that "as-found" testing would be planned and specified prior to maintenance work.

Question:

What sections of this procedure apply to this concern?

We agree WP 28001 adequately corrects the discrepancy identified in item #3, but this procedure was not in effect until 1/31/98, approximately 4 months after CMP complete.

Discussion:

WP 28001 replaced CWP C2, Rev. 1. Section 1.6.1 of CWP C2, Rev. 1 addressed the requirement for as-found testing and was in effect prior to "CMP complete." Parsons will close this item as non-discrepant.

3. **Topic:** DR-0610 (Bill Clemenson)

Background:

DR-0610 identified issues associated with Rev 2 of calculation 02FFP-0849ES, "Diesel Engine Rooms Heating and Cooling Requirements." NU concurred with the issues and stated that this calculation was revised (Rev 3) to correct these issues. Parsons has reviewed this revised calc and it appears that most all of the issues identified in DR-0610 have been addressed with the exception of item 7 of DR-610 which addresses the Effect of Recirculation on Ventilation Requirements. Allowable recirculation rates are described in sections 3.2, 3.5.4 and 8.0 of the revised calc.

Questions:

a) RE: Section 8.0, page 45. A list of equations is included at the bottom of this page. What is the basis for the second to last equation:

$$Te(X+Y+Z) + To\{Q-(X+Y+Z)=QTm$$

b) RE: Section 3.5.4 and 8.3, Maximum recirculation rate. The equation provided here is listed as the basis for maximum recirculation rate. How will this value be verified?

Discussion:

The sketch contained in the calculation is incorrect and made it difficult for Parsons to understand later portions of the calculation. Parsons will continue reviewing the calculation based upon the information provided by NNECo.

4. **Topic:** DR-0615 (Bill Clemenson)

Background:

Section 3.0 of Engineering Evaluation M2-EV-96041, Rev 1, makes reference to the test performed under AWO M2-96-08165 and how it proved that Train A recirculation air flow rate is less than 12%. Parsons has a copy of M2-EV-97016 and that portion of AWO M2-96-08615 which is attached to it. We cannot locate where this 12% is calculated.

Question:

Please provide direction on where this 12% calculation is documented.

This topic was deferred to the 9/29/98 teleconference.

5. **Topic:** DR-0647 (Dick Diederich)

Background:

The NU response focused on two issues related to this DR:

a) The flow rate from a failed seal which is appropriate for use in evaluating the circumstances identified in CR M2-97-0761, and,
b) The credibility of a pump seal as a licensing basis event.

Parsons' comments on these issues follow.

Failed Seal Flow Rate: The information provided by Duratmetallic is documented in a letter from the manufacturer (dated 5/15/97) and an internal NU telephone memorandum (dated 5/27/97). The letter is not specific and conclusive, which is probably why NU followed up to clarify statements in the letter. The NU telephone memorandum is much clearer, stating that the maximum flow rate would be "...something less than 2 time (sic) the calculated 3 gpm leak rate." Judging from the dates on the seal information and the Evaluation Report, the telephone information was late input and the higher leak rate may have been overlooked in revising the memo. Looking back on events, the higher 6 gpm leak rate should be viewed as a conservative value to use in evaluations of plant safety.

Credibility of Seal Failure: The discussion in the CR, as well as the CR Evaluation Memorandum, covers operation in the long term recirculation mode. The MP-2 FSAR (Section 6.3.4.1) states that "only one passive or active failure is considered for the recirculation mode." In discussing this regulatory requirement, the NRC states: "During the long-term ECCS recirculation cooling mode the most limiting active failure, or a single passive failure equal to the leakage that would occur from a valve or pump seal failure, is assumed." (SECY-77-439, p.7) Failure of the pump seal, therefore, should be viewed as credible.

Question:

MP-2 FSAR Table 6.3-6 contains the licensing evaluation of other passive failures during recirculation mode. Does an event in this table provide a bounding case for the 6 gpm seal leakage?

Discussion:

NNECo maintained that additional information is or was available from Duratmetallic. They will provide the information and the topic will be again be raised.

CONFERENCE NOTES

DATE: 9/29/98, Rev. 0
TIME: 2:00 p.m.

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

1. **DR-0615**
2. **DCR M2-96-062**
3. **92FFP-849ES, EDG HVAC Calculation**
4. **DR-0248**
5. **DRs, Parsons requested topic to discuss DRs**
6. **DRs, NNECo requested topic to discuss DRs**

LIST OF ATTENDEES:

NNECo		NRC	NEAC	Parsons	
Bob Crittenden	Fred Mattioli	Eric Benner	none	Mike Akins	John Hilbish
Joe Fougere	Tom Pryhoda	John Nakosky		Eric Blocher	Trent Powers
Wadie Girgis	Chris Scully			Bill Clemenson	Dom Ramos
Ron Jackson	Bob Skwirz			Wayne Dobson	Jon Winterhalter

1. **Topic:** DR-0615 (Bill Clemenson)

   Background:

   Section 3.0 of Engineering Evaluation M2-EV-96041, Rev 1, makes reference to the test performed under AWO M2-96-08165 and how it proved that Train A recirculation air flow rate is less than 12%. Parsons has a copy of M2-EV-97016 and that portion of AWO M2-96-08615 which is attached to it. We cannot locate where this 12% is calculated.

   Question:

   Please provide direction on where this 12% calculation is documented.

   Response:

   No formal calculation was performed to determine the 12% value. The value was based upon the review of test data contained in AWO M2-96-08165.

2. **Topic:** DCR M2-96-062, "Lower FSAR HVAC Outdoor Design Basis Summer Dry Bulb from 95°F to 86°F," (Bill Clemenson)

   References:

   - DCR M2-96-062.
   - 92FFP-849ES, MP2 EDG Room Heating and Cooling Requirements

   Background:

   The subject DCR changed the outdoor design basis temperature from 95°F to 86°F. The DCR indicates that this new temperature is based on ASHRAE Fundamentals for a 2 1/2% design exceedance value for New London CT. As stated in the DCR, this 2 1/2% design basis is equivalent to 76 hours/year of temperatures above this value. The DCR stated that site temperatures have exceeded the 86°F 17 times including temperatures of up to 91°F.

The safety margin that was once part of the Reference 2 design basis EDG system calculations (i.e., 95°F) has been decreased to the point where ambient conditions will exceed the design basis ambient temperature on a routine basis.

Question:

What actions and/or procedures address plant operation when the ambient air temperature exceeds the new FSAR outdoor design temperature of 86°F.

Response:

Procedure OP 2266, Rev. 0, "Response to Low or High Outside Air Temperature," was developed in 1997 to address the issue. The procedure will be faxed to Parsons.

3. **Topic:** 92FFP-849ES, EDG HVAC Calculation, (Bill Clemenson)

Background:

Section 8.3 of the subject calc indicates that the more conservative case has been found to be that calculated using the derived equation from section 8.2. Per our calculations using field temperature data from M2-EV-97016, this is not correct. The more conservative equation would be from section 8.1.

Question:

What is the basis for using the 8.2 equation?

Response:

The subject equation was discussed at length. Parsons will evaluate and complete the review.

4. **Topic:** DR-0248 (Trent Powers)

Background:

Parsons wishes to discuss the difference in Significance Classifications between Parsons and NNECo. This DR is one of the 3 Significance Level 3 DRs written addressing the MOV program in existence at "CMP complete". Parsons classified as a SL 3, NNECo classified as a SL 4. Parsons concurs that the corrective action taken is appropriate and that the issues in the DR were applicable to the "old" MOV program. The DR can be closed once agreement on significance level is achieved.

Parsons considers the SL 3 classification as appropriate. Compliance to the requirements of GL 89-10 was part of the Design and Licensing basis at "CMP complete." This DR addresses problems with that compliance in the "old" program that have now been corrected. These problems were not minor discrepancies between documents and do not satisfy the definition of SL 4.

Discussion:

Parsons agrees that the corrective action is appropriate. Based on the historical nature of this DR, Parsons will close it as a SL 4.

5. **Topic:** DRs

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

DRs for Discussion:

a) DR-0603 "EBFS Charcoal Cooling Discrepancies." (Dom Ramos)

Parsons would like to discuss the difference in Significance Level determination. Parsons issued as a Level 3, NU response as PREVIOUSLY IDENTIFIED Condition.

Item 1. Charcoal Cooling

Calculation 97-EBF-01955-M2 states that a minimum of 45 CFM of air is required for charcoal cooling. The calculation recognizes that this quantity is theoretical and recommended a higher flow rate to ensure uniform flow across the filter face and to ensure no channeling or axial airflow. The calculation did not specify a recommended cooling air quantity. No other document was found that provides this information. The DR noted that 45 CFM is equivalent to a filter face velocity of 0.21 FPM. The industry standard, ERDA 76-21, recommends a face velocity of 8 to 10 FPM. The point is for charcoal cooling, theoretical values are very informative but have no practical values.

There is no test that measures the airflow rate through the EBFS charcoal cooling tie-in duct and there is no document that provides the recommended or the accepted airflow value. Thus, there is no document that demonstrates proper cooling of the charcoal filters as committed in the FSAR.

NU's response referenced calculations 1K21-11, 1K21-13, 98-EBF-02377-M2 and 97-EBF-01955-M2; and FSARCR 98-MP2-94. None of these documents indicates pre-discovery of the issue.

Item 2: FSAR & Calculation Discrepancies

NU response states minor editorial omission does not justify revising the calculation. Calculation 97-EBF-01955-M2 stated that it supports licensing, but indicated that a change document is not applicable. A change document should have been identified since the calculation results differ from those stated in the FSAR. This is not a minor editorial omission.

b) DR-0501, "Calculation 98-EBF-02377M2 Discrepancy." (Dom Ramos)

Parsons issued as a Level 3. NU response as CONFIRMED SIGNIFICANCE LEVEL 4.

Parsons agrees in part with the corrective action to revise calculation 98-EBF-02377M2 by supplementing it with calculation 97-EBF-01955-M2. This corrective action is considered partial because both calculations do not demonstrate the expected flow rate through the charcoal cooling tie-in duct. With no testing for the actual flow rate through the tie-in duct, adequate charcoal cooling as stated in the FSAR can not be assured.

c) DR-0620, "Containment Venting Mode (Following a DBA) Discrepancies." (Dom Ramos)

Parsons issued as Level 3. NU response as NON-DISCREPANT.

The issues raised by the DR are applicable to the system regardless of DCR M2-97008. According to 6/16/98 conference notes, topic #3, the DCR is complete except for testing. ICAVP decided to include the DCR because its date is within "CMP complete", it is a new document, and its review would be a good CMP indicator.

Revising the DCR safety evaluation and other associated documents at the last stage of the DCR, even though it is still not totally complete, is a weakness in the process and is not a valid reason for categorizing the DR issues as NON-DISCREPANT.

Discussion:

a) This Item was discussed and will be addressed again in the 10/1/98 teleconference.

b) This Item was discussed and will be addressed again in the 10/1/98 teleconference.

c) Another Safety Evaluation and a procedure will be sent to Parsons. This topic will be raised again following review of those documents.

6. **Topic:** DRs

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

DRs for Discussion:

a) DR-0538, (Charles Chace, Tien Nguyen, Bob Byrnes)

Initial Response - NNECo to discuss discrepancy topics and initiate discussion regarding Significance Level (SL) assigned by Parsons.

b) DR-0395, (Bob Crittenden)

Follow-up Response - This DR has been classified as SL 3 by Parsons. NNECo believes that it is a SL 4 due to the fact that it involves discrepancies involving supporting documentation for Design Bases.

c) DR-0409, (Bob Crittenden)

Follow-up Response - NNECo to initiate discussions concerning the SL assigned by Parsons.

d) DRs-0158 and -0269, (Greg Tardif)

Follow-up Response - NNECO would like to initiate discussions regarding Pre-discovery of discrepancy.

e) DR-0651, (Fred Mattioli, Tom Pryhoda)

Initial Response - NNECo believes that this discrepancy is the same as DR-0585. NNECo would like Parsons to explain the differences.

Due to the length of the conference, this entire Topic will be addressed in the 10/1/98 teleconference.

CONFERENCE NOTES

DATE: 9/30/98, Rev. 0
TIME: 2:00 p.m.

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

1. **DR-0155**
2. **DRs, Parsons requested topic to discuss DRs**
3. **DRs, NNECo requested topic to discuss DRs**

LIST OF ATTENDEES:

NNECo		NRC	NEAC	Parsons	
Charles Chace	Fred Mattioli	John Nakosky	none	Mike Akins	John Hilbish
Sing Chu	John Pizzi			John Archer	Ken Mayers
Bob Crittenden	Bob Skwirz			Eric Blocher	Trent Powers
Bill Cushman	Ray Necci			Dan Curry	Jon Winterhalter
Greg Hines				Wayne Dobson	

1. **Topic:** DR-0155 (Dan Wooddell)

   Background:

   DR-0155, Item No. 1, identifies that Procedure EN 21221 allows check valves to be reclassified to a lower priority in the event there are no problems discovered during the inspection. Once a valve is assigned a Priority of 4, no further inspections or reviews are required.

   Questions:

   a) How are changes to piping flow (flow rates and flow stability), resulting from changes in operating methods or modifications, considered when performing pre-inspection reviews?

   b) Where is this documented?

   NNECo requested that this Topic be postponed until the 10-1-98 teleconference.

2. **Topic:** DRs

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

   DRs for Discussion:

   a) DR-0079 (Trent Powers)

      Parsons wishes to discuss classification of this DR. Parsons issued as a Level 3, NNECo response was that the issue was Non-Discrepant. The NNECo response identifies CR M2-97-1119 and FSARCR 98-MP2-81 as addressing HPSI NPSH concerns raised in the DR.

      After review of the NNECo response, Parsons proposes that this DR be closed as Previously Identified.

b) DR-0441 (Trent Powers)

Parsons wishes to discuss classification of this DR. Parsons issued as a Level 3, NNECo response was that the issue was Non-Discrepant. This DR addressed the use of heat shrinkable tubing inside panels as an electrical separation barrier and that the 6" separation requirement contained in SP-M2-EE-0016, Rev. 1 was different than the 12" separation requirement of the FSAR.

In NNECo's response the background justification for the use of heat shrink is provided. The response continues by addressing an FSAR change (FSARCR 97-MP2-18), approved by PORC on 9/3/97 and received by licensing on 3/31/98, that revises the FSAR to reflect the 6" separation requirements of SP-M2-EE-0016.

After review of the NNECo response, Parsons proposes that this DR be closed as Previously Identified.

c) DR-0126 (Trent Powers)

Parsons wishes to discuss clarification of this DR. Parsons issued as a Level 3, NNECo response was that the issue was Non-Discrepant. This DR addressed an incorrect acceptance criterion used for HPSI Technical Specification revision (Amendment #159) and incorrect monthly HPSI performance acceptance criterion used in surveillance procedures.

During a conference call with Parsons on 5/19/98, it was agreed that item a) of this discrepancy report is not a discrepancy.

The NNECo response to the DR includes "....Regarding the issue detailed in item b), NU identified the same issue in CR M2-97-0773, written 5/14/97." This CR (attached) states: "While revising IST Pump Testing acceptance criteria to OM-6 limits, it was determined that the Technical Specification minimum differential pressure for HPSI Pumps exceeds the differential pressure of the manufacturer's characteristic curve. T.S. 4.5.2 a.1)b. requires verification of differential pressure greater than or equal to 1231 psi on recirculation flow. The manufacturer's characteristic curve, Figure 6.3.2 in the FSAR, and FSAR Table 6.3.2 all reflect a design pump head of 2750 ft. at minimum recirc flow of 25 gpm, which corresponds to 1190 psid. IST Pump Test data has historically met the T.S. criteria."

Parsons proposes to close this DR as Previously Identified based upon the NNECo response.

d) DR-0717 (Trent Powers)

Parsons seeks a clarification of the appropriate MEPL to use for ST4194.

The NNECo response to this DR states that the Item 1 is a significance level 4 issue since ST-4194 does not appear on drawing 25203-28408 Sh 144 (the drawing for instrument rack C-144). Item 2 was addressed as Non-Discrepant since all components mounted on the rack are Non-Safety Related. MEPL Nos. 3784 and 1443 were referenced as providing the Non-Safety classification for these components.

Parson reviewed MEPL 3444 and determined that ST-4194 is classified as a Cat 1 component in that MEPL.

Parsons wishes to understand which MEPL is correct (and current) for ST-4194. If MEPL 3444 is the appropriate classification, then Parsons does not concur that this is a Non-Discrepant issue based upon safety classification of the equipment.

e) DR-0510 (Trent Powers)

Parsons wishes to discuss the difference in Significance Level assignments. Parsons wrote as a SL 3, NNECo response as a SL 4. Parsons considers this to be a Level 3 based upon calibration of instrumentation used for ISI testing without entering the acceptance criteria on the cal data sheets.

Parsons concurs that the NNECo proposed corrective actions address the concerns in the DR.

Discussion:

a) Parsons will close DR-0079 as Previously Identified.

b) Parsons will close DR-0441 as Previously Identified.

c) Parsons will close DR-0126 as Previously Identified.

d) NNECo will fax to Parsons the latest MEPL which is 3784. Parsons explained that this DR is related to another DR.

e) Parsons will close DR-0510 as a confirmed SL 4.

3. **Topic:** DRs

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

DRs for Discussion:

a) DR-0466 (Charles Chace)

Follow-Up Response. NNECo's position is that this discrepancy is a Level 4. The FSAR is being revised (FSARCR 98-MP2-114) in response to DR-0011. Actions are defined in CR M2-97-1675. DR-0011 has been closed as a Level 4 Discrepancy.

b) DR-0636 (Bill Cushman)

Initial Response. NNECo requests clarification of separation discrepancies associated with relays as described in DR-0636. Is the concern the separation between the relays and the wiring terminated at the relays or other unrelated wiring in the vicinity of the relay?

Discussion:

a) Based upon a redefinition of SL determination, Parsons will close this as a Level 4.

b) Parsons said that since all the wires in the vicinity of the relays are black is was difficult to discern the channelization and separation.