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The Northeast Utilities System

OCT 30 1998

Docket No. 50-336
B17442

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

Millstone Nuclear Power Station, Unit No. 2
Update Concerning The Emergency Operating Procedure Revision Effort and
The Procedure Revision Process

The purpose of this letter is to provide the NRC Staff with an update of the Emergency Operating Procedure (EOP) Revision effort that is ongoing at Millstone Unit No. 2.

During the recovery effort to restore the unit Licensing and Design Basis of Millstone Unit No. 2, significant portions of the accident analysis were recognized as requiring reanalysis. The ongoing reanalysis has resulted in changes to the actions necessary for accident mitigation as described in the EOPs.

As explained in a letter from the Northeast Nuclear Energy Company (NNECO) to the NRC Staff on May 7, 1997,⁽¹⁾ the EOPs are being revised in order to ensure that the EOPs continue to meet industry and NRC standards. This will be accomplished by the incorporation of the following into the revised EOP set:

- o Comments from licensed operator reviews of the EOPs
- o Comments from licensed operator training feedback
- o Modifications required by Configuration Management Program evaluations

⁽¹⁾ Letter from Martin L. Bowling, Jr., to U.S. Nuclear Regulatory Commission, "Millstone Nuclear Power Station, Unit No. 2, Emergency Operating Procedures Upgrade Program Update," dated May 7, 1997.

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- o Modifications resulting from Millstone Unit No. 2 responses to industry issues such as NRC Information Notices and Generic Letters, Institute of Nuclear Power Operations (INPO) Significant Operating Experience Reports (SOER), and industry events
- o Modifications resulting from an evaluation of EOP support procedures conducted by a multi-discipline assessment team
- o Safety significant items identified as part of the Millstone Unit No. 2 Instrument Uncertainties study

The revised EOP set, having incorporated the majority of the above items, is close to completion. Since the unit Accident Re-Analysis was not completed until the end of September 1998, the final modifications to the revised EOP set could not be started until that time. As the duration of the accident reanalysis increased, the decision was made by unit management, in October of 1997, to begin operator training on the draft of the revised EOP set since the currently approved EOP set will not be used again.

The currently approved EOPs were placed in a "Do Not Use" status as required by the Millstone Station Administrative Controls procedures. The "Do Not Use" status is an administrative mechanism that is used, as committed to by NNECO in a letter to the NRC Staff dated October 1, 1993,⁽²⁾ to place procedures in an inactive status while reviews or technical upgrades are being conducted. Typically, the "Do Not Use" status is a very short term mechanism for procedures that need a technical upgrade or biennial review. In the case of the revised EOP set, the length of the outage and the recently completed accident re-analysis effort has resulted in a condition where the currently approved EOP set has been in "Do Not Use" for an extended period of time.

Since the unit will be restarted using the revised EOP set, the decision was made to leave the currently approved EOPs in an inactive status (Do Not Use) and to conduct operator training using the revised EOP set. While these procedures have not yet been approved, they have been through verification and validation in accordance with the Unit 2 EOP Validation Program and the Unit 2 EOP Verification Program procedures. Although additional changes will be needed, training on the revised EOP set allows the operators to become familiar with EOPs very similar to how they will exist at the time of unit restart. Once the revised EOP set receives final approval, they will replace the currently approved EOPs and the operators will receive any additional training needed prior to unit startup.

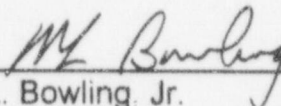
⁽²⁾ Letter from W. D. Romberg to U.S. Nuclear Regulatory Commission, "Millstone Nuclear Power Station, Unit No. 1, Reply to a Notice of Violation, Inspection Report No. 50-245/93-20," dated October 1, 1993.

Millstone Unit No. 2 has approximately 1,645 technical procedures. As of October 6, 1998, there were 130 technical procedures in an inactive (Do Not Use) status. Of the 130 inactive procedures, approximately 25 will be canceled due to new procedures being developed and approximately 15 others are not needed until the next refueling outage. A Key Performance Indicator (KPI) is being established to track the number of procedures in an inactive condition. Procedures required for specific operating modes will be revised and approved prior to mode entry in accordance with the mode change assessment process.

Attachment 1 contains any regulatory commitments associated with this letter.

If you have any additional questions concerning this submittal, please contact Mr. Ravi G. Joshi at (86C) 440-2080.

Very truly yours,
NORTHEAST NUCLEAR ENERGY COMPANY



Martin L. Bowling, Jr.
Recovery Officer - Technical Services

Attachment

cc: H. J. Miller, Region 1 Administrator
E. V. Imbro, Director, Millstone ICAVP Inspections
W. M. Dean, Director, Millstone Project Directorate
W. D. Lanning, Director, Millstone Inspections
J. P. Durr, Chief, Inspections Branch
D. G. McDonald, Jr., NRC Senior Project Manager, Millstone Unit No. 2
S. Dembeck, NRC Project Manager, Millstone Unit No. 1
D. P. Beaulieu, Senior Resident Inspector, Millstone Unit No. 2

Attachment 1

Millstone Nuclear Power Station, Unit No. 2
Information Concerning The Emergency Operating Procedure Revision Effort And
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Commitments

October 1998

Attachment 1

**Regulatory Commitment Enclosure
List of Regulatory Commitments**

The following table identifies those actions committed to by NNECO in this document.

REGULATORY COMMITMENT	COMMITTED DATE OR OUTAGE
Once the revised EOP set receives final approval, operations personnel will receive any additional training necessary prior to unit startup.	Prior to entry into Mode 4