



PARSONS

PP-04

MILLSTONE UNIT 2 ICAVP
PROJECT PROCEDURES

Title:

Regulatory Review Procedure

REVISION 2

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1/23/98

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1/28/98

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REVISION HISTORY

REVISION	DATE	REVISION DESCRIPTION
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1	06/09/97	Incorporation of NRC Comments
2	01/23/98	General Update



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1.0 PURPOSE

The purpose of this Project Procedure is to provide the guidance necessary to perform the Regulatory Review portion of the Millstone Unit 2 Independent Corrective Action Verification Program (ICAVP). The Regulatory Review portion of the program will be performed in order to provide a basis for an independent determination of whether Millstone Unit 2 licensing commitments have been appropriately incorporated into the licensing and design bases of the plant. The results of this review will be used to provide additional insight into Northeast Nuclear Energy Company's (NNECo) corrective action programs.

2.0 DEFINITIONS

- 2.1 Current Licensing Basis (CLB) - The Current Licensing Basis (CLB) is the set of NRC requirements applicable to a specific plant and the licensee's written commitments for ensuring compliance with and operation within applicable NRC requirements and plant specific design basis (including all modifications and additions to such commitments over the life of the license) that are docketed and in effect. The CLB includes the NRC regulations, orders, license conditions and technical specifications. It also includes the plant specific design basis information defined in 10 CFR 50.2 as documented in the most recent final safety analysis report (FSAR) as required by 10 CFR 50.71 and the licensing correspondence such as licensee responses to NRC Bulletins, generic letters, enforcement actions, as well as licensee commitments documented in NRC Safety Evaluations or licensee event reports (LERs).

3.0 RESPONSIBILITIES

The Regulatory Review is the responsibility of the Licensing Group Leader for the Project. Additional assistance will be provided by licensing engineers assigned to assist in this effort.



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4.0 PROCEDURE

As part of the Millstone Unit 2 ICAVP, a Regulatory Review will be performed of selected licensing documents that have been docketed for Millstone Unit 2 (Docket 50-336) necessary to support Tier 1, Tier 2 and /or Tier 3 reviews. This review will provide additional insight into NNECo compliance with the licensing bases at Millstone Unit 2. The Regulatory Review will be performed as shown on Exhibit 1.

4.1 IDENTIFICATION OF REGULATORY DOCUMENTS

4.1.1 Specific regulatory documents that will be evaluated in the Regulatory Review will be identified. Documents will be identified if applicable to Millstone Unit 2. The documents will include:

- NRC Bulletins and licensee responses
- NRC Generic Letters and licensee responses
- Safety Evaluation Reports associated with License Amendments
- Other Safety Evaluation Reports (not associated with License Amendments)
- Millstone Unit 2 Licensee Event Reports (1978 to 1997)

4.2 REVIEW AND SUMMARIZE REGULATOR'S DOCUMENTS

4.2.1 Documents in each category listed in Section 4.1.1 will be screened for applicability. In addition to documents which are not applicable to Millstone Unit 2, documents will not be included in the Regulatory Review for programmatic areas such as:

- Security related issues
- Fire Protection (reviewed in Tier 1)
- Environmental Qualification (reviewed in Tier 1)



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- Operator Licensing
- Emergency Planning and Response
- Radwaste Shipping
- Quality Assurance

4.2.2 Each applicable document will be summarized on a Regulatory Review Summary Form (Refer to Appendix A for example). The short discussion will key on required licensee action.

4.3 REVIEW AND SUMMARIZE LICENSEE'S RESPONSE TO REGULATORY DOCUMENTS

4.3.1 For each applicable document, the licensee's docketed response will be reviewed and summarized on the Regulatory Review Summary Form (Appendix A). The summary will focus on licensee's commitments which will be verified as part of the System and/or Process reviews as discussed in Section 4.5.

4.4 FSAR APPLICABILITY REVIEW

- 4.4.1 For each applicable document, a review of the current Updated Final Safety Analysis Report (UFSAR) will be performed to determine if an FSAR change was required, and if required, whether the FSAR was updated as required by 10 CFR 50.71.
- 4.4.2 Guidance from NEI Report # 96-05 "Guidelines for Assessing Programs for Maintaining the Licensing Basis" will be used as applicable, during this portion of the review.
- 4.4.3 The results of the FSAR review portion of the Regulatory Review will be provided on the Regulatory Review Summary Form (Appendix A). The results will include whether a change was required, and if required, which Section(s) of the FSAR were updated.



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4.5 SYSTEM AND/OR PROCESS VERIFICATION

4.5.1 The Regulatory Review Summary Form (Appendix A), which has been completed through at least the Summary of Licensee Response, will be provided to the System Vertical Slice Review teams (Tier 1 Review), the Accident Mitigation Systems Review team (Tier 2 Review), and/or the Process Modeling, Analysis, and Review team (Tier 3 Review) based upon its applicability. The Tier review teams will verify the commitments as part of their review.

4.5.2 A summary or reference of the verification results will be provided on the Regulatory Review Summary Form (Appendix A) and returned to the Regulatory Group.

4.5.3 Based upon the completion of the Verification Summary, the Regulatory Review of the specific item is considered closed when:

- The validation of the item is complete and no further action is required, or
- A Discrepancy Report (DR) has been issued in accordance with the Project Procedure PP-07 "Discrepancy Reports".

4.6 REGULATORY REVIEW SUMMARY REPORT

4.6.1 A report will be prepared summarizing the results of the Regulatory Review performed as part of the Millstone Unit 2 ICAVP. A summary will be provided for each category listed in Section 4.1.1 completed during the Regulatory Review. In addition, each of the completed Regulatory Review Summary Forms will be provided.

REGULATORY REVIEW SUMMARY FORM

Document title:

Document date:

Document subject:

Affected system or process:

Document Description (Include discussion)

Millstone Unit 2 response reference(s):

Summary of ☐ Licensee Commitments ☐ Basis for NRC Licensing Action (e.g., for SERs, etc.)

(Include sufficient details of s/s/c mods, process mods or required conditions to allow verification if recommended below)

Applicable ICAVP Tier: ☐ Tier 1 ☐ Tier 2 ☐ Tier 3 ☐ Regulatory review only

FSAR Verification

FSAR updated: ☐ Yes ☐ No ☐ N/A ☐ Not Required ☐ Not Verified (Discuss below)

FSAR section(s):

Discussion:

Verification Summary

Verify	Recommended by RR	Verification by Tier (Include Discussion*)
S/S/C/Tests/Proc.:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Verified okay <input type="checkbox"/> Not verified <input type="checkbox"/> Discrepancy per PP-07
Critical functions:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Verified okay <input type="checkbox"/> Not verified <input type="checkbox"/> Discrepancy per PP-07
Processes:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Verified okay <input type="checkbox"/> Not verified <input type="checkbox"/> Discrepancy per PP-07
Conditions:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Verified okay <input type="checkbox"/> Not verified <input type="checkbox"/> Discrepancy per PP-07

*Verification discussion and recommended disposition:

Verif. Complete

Tier Group Lead

Date

RR complete

RR Group Lead

Date



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EXHIBIT 1 REGULATORY REVIEW

