Northeast Nuclear Energy

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Millstone Nuclear Power Station Northeast Nuclear Energy Company P.O. Box 128 Waterford, CT 06385-0128 (800) 447-1791 Fax (860) 444-4277

The Northeast Utilities System

FFB 9 1992

Docket No. 50-336 50-423 B17010

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

## Millstone Nuclear Power Station Unit Nos. 2 and 3 Proposed Treatment of Level 4 Discrepancy Reports from Independent <u>Corrective Action Verification Program</u>

As discussed with the NRC staff, Northeast Nuclear Energy Company (NNECO), in letter dated December 17, 1997,<sup>(1)</sup> committed to a process that is controlled by our Corrective Action Program, RP-4. Additionally, NNECO committed to establishing the corrective action plan for Level 4 Discrepancy Reports (DRs) prior to entry into Mode 2.

For DRs that require document revision (drawing, calculations, etc.), the proper change notice document (DCN, CCN, etc.) with a unique change number will be obtained and referenced in the RP-4 required corrective action plan.

These pending changes will be tracked via a computerized tracking system. These change numbers will be reflected against the parent document. NNECO will utilize either the PASSPORT program for calculations or the GRITS program for other design bases documents. These changes will appear as open items against the parent document and will be incorporated into the parent document as required by the Design Control Manual (DCM).

<sup>(1)</sup> M.L. Bowling, Jr. letter to U.S. Nuclear Regulatory Commission, "Millstone Nuclear Power Station, Proposed Treatment of Level 4 Discrepancy Reports from Independent Corrective Action Verification Program," dated December 17, 1998.

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U.S. Nuclear Regulatory Commission B17010\Page 2

In addition, NNECO will have DR Level 4 issues dispositioned (i.e. final corrective action to be taken to address the discrepancy) at the first opportunity prior to the completion of the next refueling outage on Millstone Unit 3, RFO 6 and prior to the completion of the next refueling outage for Millstone Unit 2, RFO 13. NNECO will provide at least quarterly status to the NRC of these items in the calendar quarter following each unit's return to operation (Mode 2) until the action plan is closed cut. NNECO will also advise the NRC of any significant changes to the Level 4 Discrepancy Report Corrective Action Plan.

NNECO's commitments made within this letter are included in Attachment 1.

If there are any further questions on the information provided in this letter, please contact Mr. Richard T. Laudenat 860-444-5248.

Very truly yours,

## NORTHEAST NUCLEAR ENERGY COMPANY

FOR: M. L. Bowling, Jr. Millstone Unit No. 2 - Recovery Officer

BY:

M. H. Brothers Vice President - Operations

cc: H. J. Miller, Region I Administrator

W. D. Lanning, Deputy Director, Inspections, Special Projects Office

W. D. Travers, Ph.D., Director, Special Projects Office

E. V. Imbro, Deputy Director, ICAVP Oversight, Special Projects Office

S. A. Reynolds, Branch Chief, ICAVP Oversight, Special Projects Office

D. K. Schopfer, Sargent and Lundy

D. L. Curry, Parsons Power

Docket No. 50-336 50-423 B17010

Attachment 1

4

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Millstone Nuclear Power Station, Unit No. 2, 3

Commitments

1998

U.S. Nuclear Regulatory Commission B17010\Attachment 1\Page 1

## Attachment 1 Regulatory Commitments Enclosure List of Regulatory Commitments

The following table identifies those actions committed to by NNECO in this document. Any other actions discussed in the submittal represent intended or planned actions by NNECO. They are described to the NRC for the NRC's information and are not regulatory commitments. The Director - Regulatory Affairs of Manager - Regulatory Compliance Unit 3 should be notified of any questions regarding this document or any associated regulatory commitments.

Regulatory Commitment	Committed Date or Outage
B17010-1: Submit quarterly reports on the status of open	Mode 2 until the
Level 4 DRs on Millstone Unit 3 from the time	action plan is
the unit returns to operation	closed out.
B17010-2: Submit at least quarterly reports on the status	Mode 2 until the
of open Level 4 DRs on Millstone Unit 2 from	action plan is
the time the unit returns to operation	closed out.
B17010-3: Submit any significant changes to the Level 4 Discrepancy Report Corrective Action Plan.	If any significant changes are made