

# PARSONS

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August 20, 1997  
Docket No. 50-336  
Parsons NUM2-PPNR-0438-L

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

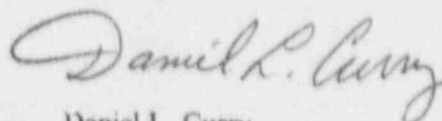
Millstone Nuclear Power Station Unit No. 2  
Independent Corrective Action Verification Program (ICAVP)

Gentlemen:

This letter transmits a summary of a conference between Parsons Power Group Inc., the U. S. Nuclear Regulatory Commission, and NNECo held in Waterford, CT, on August 12, 1997. The purpose of this meeting was to discuss the NNECo design and modification and database processes.

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  
H. Eichenholz - USNRC  
R. Laudens - NNECo  
J. Fougere - NNECo  
Rep. Terry Concannon - NEAC

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ADMINISTRATIVE CONFERENCE NOTES

**PURPOSE:** Administrative conference with NNECo, NRC and Parsons to discuss NNECo design/modification process, data base process and inter-relationship and configuration control.

**Place:** NNECo Millstone Training Center

**Date:** August 12, 1997

**List of Attendees**

NNECo	NRC	Parsons	S&L
Michael Ahern	Howard Eichenholtz	D. Curry	Don Schopfer
Fred Mattioli	Ralph Architzel	J. Ioannidi	
Richard Laudenat		J. Hilbish	
Tom McCarthy		M. Akins	
Barbara Wilkins		W. Dobson	
Jim Petrowski		K. Mayers	
		J. Hopko	

**A. DESIGN/MODIFICATION PROCESS**

1. ARE THERE ANY ENGINEERING PROCEDURES, DESIGN GUIDES, DEPT PROCEDURES, ETC THAT PROVIDE A "FLOW PROCESS" THROUGH THE VARIOUS DESIGN DOCUMENTS?

PROVIDE HOW THE NNECo DESIGN DOCUMENTS ARE INTER-RELATED AND UTILIZED (IE THE CULTURAL PROCESS PRACTICES USED TO PROPAGATED A DESIGN).

**Discussion**

1. NNECo indicated that the inter-relationships are addressed in procedure U2-OA12. Of significant benefit is a "flow chart" depicting this process. OA12 is a procedure on how to implement the modification process at Unit 2. The modification design control procedures are the same for different units, but implementation can be different.
2. NNECo PI-7 Report and procedure documents the system review process used by NNECo during the discovery phase to generate UIR's. This may be a good source of reference documents.

**ACTION:**

Parsons to prepare a RAI requesting (1) PI-7, (2) PI-7 Report and (3) procedure U2-OA12.

2. PROVIDE SCORECARD AND BREAKDOWN ON HOW THE COMPUTER DATA BASES (GRITS, PMMS, OSCAR, PASSPORT, ETC) ARE USED AND INTER-RELATED TO:

- (1) OTHER DATA BASES
- (2) THE DESIGN PROCESSES

**Discussion**

1. NNECo indicated long term data base plans are in process for key databases.

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2. Scorecard or "roadmap" can be found in procedures NGP 2.37 , NGP 6.10, SP ME944 (MEPL spec) and WC1.
3. MEPL is source of Quality Class of equipment. This is used as source of safety related, associated safety related, and references for justification.
4. "U" in a data base is undefined or unknown and according to NNECo procedure, the item defaults to safety related seismic/qualified classification unless stated and justified differently.
5. Quality Class between PMMS Equipment ID and BOM may be different because a part in the BOM may be non-quality even though the equipment it belongs to is quality. For this situation there will be a MEPL Evaluation to document why it is non-quality.
6. The Unit 2 BOM may not list a part because they use Unit 3.

ACTION:

Parsons to prepare RAI requesting (1) procedures and specification (NGP 2.37 , NGP 6.10, SP ME944 (MEPL spec) and WC1), (2) a stated purpose of each database or sub-database used by the plant or unit, and (3) to provide "roadmap" of how the databases are inter-related.

3A. HOW ARE PROGRAMMATIC PROCESSES PROMULGATED?

Question was addressed in discussion of 3B and 3C.

3B. ARE ALL THE 19 PROGRAMS IDENTIFIED IN THE CMP STILL ACTIVE? IF NOT, PROVIDE A LIST OF ALL MAINTAINED PROGRAMS AND DATES THAT THOSE NOT MAINTAINED WERE STOPPED?

Discussion:

1. Programs that are active are indicated in NNECo DCM Form 3-2C. All programs are still actively evaluated during the modification process.

3C. WHAT MECHANISM(S) DEFINE THE CURRENT DATA DESIGN BASIS FOR EACH ACTIVE PROGRAM?

Discussion:

1. The EQ program was selected for discussion purposes. Where is the source of EQ environmental profiles contained? Is it the SCEW sheets contained in the EQ report or has the information migrated total into the program?
2. NNECo stated they are not in compliance with the licensing basis and have self disclosed this fact to the NRC and are presently evaluating EQ environments within the unit.
3. NNECo stated that the "topical program" should be the basis for how to navigate with EQ arena. Likewise, the other topical area programs should be utilized as the basis for the respective program.
4. In addition to the EQ program, NNECo maintains an (1) EQ Master List, (2) EQ Reports and (3) EQ Spec.

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5. Similarly to the system discussion (item A.1 above), NNECo has through the discovery process evaluated topical areas per NNECo procedure PI-21 and the resulting PI-21 Assessments. This assessment may provide a source of reference documents.
6. NNECo asked the NRC if the PI-7 Report and the PI-21 Assessments could be distributed to Parsons. NRC agreed.
7. NNECo indicated the basis for seismic qualification is contained with A-46 (Seismic Qualification Review) program area.

ACTION:

Parsons to prepare RAI requesting (1) EQ Master List, (2) EQ Reports and (3) EQ Spec, (4) PI-21, and PI-21 Assessments and (5) latest revision of A-46 document.

4. CURRENTLY ONLY DCRS HAVE BEEN PROVIDED, WHERE CAN ALL THE OTHER TYPES OF MODIFICATION CHANGE MECHANISMS BE LOCATED BY SYSTEM FROM PLANT START UP TO PRESENT?

Discussion:

1. NNECo stated that the four modification mechanisms are identified in the current revision to the DCM. Parsons indicated that they also need a list of change mechanisms that were used in earlier procedures.
2. PMMS contains information back to the 1981-82 time frame. Current work orders (W.O.) were previously called Job Orders and before that Maint. Requests.

ACTION:

Parsons to prepare an RAI requesting a listing of all modification changes mechanisms used for the given systems.

B. CONFIGURATION CONTROL

1. IDENTIFY WHAT DOCUMENTS/DRAWINGS ARE MAINTAINED BY NNECo IN AN "AS BUILT" STATUS (LIVING DOCUMENTS)?

Discussion:

1. NNECo uses GRITS as the basis to track and list controlled documents and drawings.
2. NNECo has defined any document that has a NU drawing number as a living document.
3. As an example, are logic drawings maintained as part of the "as built" program? NNECo stated Yes.
4. DCNs are tracked in GRITS until they are fully incorporated into design documents.
5. A drawing will have on it the complete revision history along with what DCNs were incorporated into the drawing.
6. P&ID normal valve line up is not maintained current. Operations work to procedures not the P&ID. The P&ID do reflect current locked valve positions.

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7. There is no easy way to identify non-mod related DCNs. They will have to be sorted through.

2. WHAT FIELDS IN THE COMPUTER DATA BASES THAT ARE USED AS PART OF THE DESIGN MODIFICATION PROCESS ARE QA?

LIST BY DATA BASE AND FIELD.

Discussion:

1. NNECo indicated that there are fields with in given data bases that are QA and controlled.

ACTION:

Parsons is to prepare a RAI requesting a listing of the QA/controlled fields within a given database.

3. IS ALL PLANT DESIGN INFORMATION CONTAINED ON APERTURE CARDS?

Discussion

1. Aperture cards are comprised of drawings and other documents that Bechtel turned over.
2. NNECo suggested using the aperture card drawing index and the 5 volume Bechtel data book as a source.

G. SPECIFIC

1. WHAT DOES NNECo USE AS THE EQUIVALENT OF:

- (1) A VALVE INDEX (HOW TO GET FROM NUMBER ON P&ID TO SPEC, DWG, INSTRUCTION BOOK)
- (2) A INSTRUMENT INDEX
- (3) EQ MASTER LIST

Discussion:

1. NNECo confirmed that a Unit 2 valve list exists.
2. NNECo confirmed that a Unit 2 EQ Master List (in a drawing format) exists.
3. NNECo stated that MS-60(Bechtel Spec) and SP-EE 329 (for the current set point change basis) may provide the requested information.

ACTION:

Parsons to prepare RAI requesting (1) valve list/index, (2) EQ Master List, (3) MS-60 and (4) SP-EE 329.

2. GIVEN THE LACK OF A DBD FOR HPSI, WHAT SHOULD PARSONS REQUEST TO OBTAIN THE INITIAL COMBUSTION ENGINEERING DESIGN BASE/NNECo LETTERS FOR HPSI?



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Discussion:

1. NNECo noted that U2 does not have DBD's but have prepared DBDP's.
2. NNECo has not prepared a DBDP specifically for HPSI but as a part of a group of other ECCS systems.

ACTION:

Parsons to prepare a RAJ requesting the DBDP that describes the HPSI system.

OTHER

1. Subsequent to the meeting Parsons reviewed which documents they have received and will request additional documents only.
2. Parsons will request a conference with NNECo and NRC to administratively review completed Modifications packages and topical areas.

ACTION:

Parsons to formally request a conference.