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September 30, 1986

Docket No. 50-336 A02959 A05106

Office of Nuclear Reactor Regulation
Attn: Ashok C. Thadani, Director
PWR Project Directorate No. 8
Division of PWR Licensing - B
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Gentlemen:

Millstone Nuclear Power Station, Unit No. 2
Supplement 1 to NUREG-0737
Control Room Design Review Summary Report

In a letter dated June 14, 1984⁽¹⁾, the NRC issued an Order confirming various commitments made by Northeast Nuclear Energy Company (NNECO) on behalf of Millstone Unit No. 2 regarding the implementation of Supplement 1 to NUREG-0737. In accordance with that Order, NNECO submitted to the NRC Staff the Control Room Design Review (CRDR) Implementation Plan and a schedule for the submittal of the CRDR Summary Report in a letter dated February 26, 1985⁽²⁾. The Reference (2) schedule specified that the Summary Report would be transmitted to the NRC Staff by September 26, 1986. The NRC Staff subsequently confirmed this submittal date by issuance on July 27, 1985⁽³⁾ of a revision to the June 14, 1984 order. NNECO acknowledges its failure to provide this report in accordance with the schedule specified in References (2) and (3) by a period of two working days. Steps have been taken to prevent recurrence.

Accordingly, NNECO hereby submits fifteen (15) copies of the CRDR Summary Report for Millstone Unit No. 2.

It should be noted that the Safety Parameter Display System (SPDS) for Millstone Unit No. 2 is not required to be fully operational until March 25, 1987 or startup for Cycle 8 operation, whichever is later. Appropriate checklists from NUREG-0700 that apply to the SPDS cannot be executed until that time. Therefore, the results of that portion of the CRDR will be submitted to the NRC Staff on or about August 1, 1987 in the form of an addendum to this summary report. It is significant to note that those Human Factors personnel participating in the CRDR are also involved in the design and development of the SPDS. NNECO believes that this will provide a high degree of assurance that there will be positive results from the NUREG-0700 review of the SPDS.

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⁽¹⁾ J. R. Miller letter to W. G. Counsil, dated June 14, 1984.

⁽²⁾ W. G. Counsil letter to J. R. Miller, dated February 26, 1985.

⁽³⁾ E. J. Butcher letter to J. F. Opeka, dated July 27, 1985.

With regard to the implementation phase of the CRDR, the NRC Staff has indicated their intention to conduct a "pre-implementation" audit of the Millstone Unit No. 2 CRDR results. It is the position of NNECO that it is difficult to define a schedule for implementation in a meaningful way until such time as the NRC Staff completes their review of this effort. Accordingly, as specified in the confirmatory order, NNECO has submitted a schedule for implementation of resolutions for Human Engineering Discrepancies (HED's), in Figures 13 and 14 in the attachment to this letter. However, the proposed schedule is contingent upon receipt of NRC approval of the Millstone Unit No. 2 CRDR, by May 31, 1987. NNECO reserves the right to revise the implementation schedule if our planned corrections are not acceptable to the NRC Staff and changes are required based on the Staff's review of this report. If a Safety Evaluation (SE) is issued by the NRC Staff after May 31, 1987, NNECO will inform the Staff of any changes to the implementation schedule within ninety (90) days of receipt of the SE.

We remain available to discuss this matter with you and schedule the "preimplementation" audit.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

J. F. Opeka

Senior Vice President

Attachment