

PARSONS

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September 9, 1997
Docket No. 50-336
Parsons NUM2-PPNR-0509-L

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

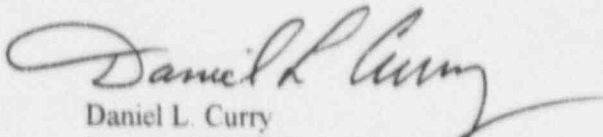
Millstone Nuclear Power Station Unit No. 2
Independent Corrective Action Verification Program (ICAVP)

Gentlemen:

This letter transmits a summary of a telephone conference between Parsons Power Group Inc., the U. S. Nuclear Regulatory Commission, NNECo and NEAC on August 26, 1997. The purpose of this telephone conference was to discuss the VDC's - Vault Drawing Changes, DCN's - Design Change Notice, Calculations and Document Retrieval.

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. Laudenat - NNECo
J. Fougere - NNECo
Rep. Terry Concannon - NEAC

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ADMINISTRATIVE CONFERENCE NOTES

PURPOSE: Administrative telephone conference with NNECo, NRC , NEAC and Parsons to discuss:

- VDC's - Vault Drawing Changes
- DCN's - Design Change Notice
- Calculations
- Document Retrieval

Date: August 26, 1997

List of Attendees

NNECo

Joe Fougere

Manager, ICAVP

Fred Mattioli

Supervisor, MP2 ICAVP

Jeff Putman

Supervisor, Nuclear Doc
Services

Ron Baldini

MP2 Design Engineering

Bob Skwiz

MP2 ICAVP

NRC

Steve Reynolds

John Nakoski

Ralph Rachitzel

NEAC

T. Concannon

Parsons

Wayne Dobson

Dan Curry

Eric Blocher

John Hilbish

Ken Kraynick

George Zagursky

Jim Glova

NOTE: NNECo asked that questions on EWRs and FSAR be postponed until 8/28/97.

A. VDC's - Vault Drawing Changes (Population = 3,352 VDC's listed on GRITS)

1. NEED A GENERAL DISCUSSION OF THIS CHANGE VEHICLE. WHAT PROCEDURE COVERS THIS PROCESS ? WHAT TIME FRAME WERE THESE USED ? ARE THEY PRESENTLY LISTED IN A DATABASE ? WHAT TYPE OF DRAWING CHANGES ARE COVERED BY THIS PROCESS ?

Discussion

1. Prior to 1990 VDCs were the change vehicle for revising a drawing. This function is now a DCN. Note: the VDC title is still in use, but it is just a tracking mechanism to determine whether the drawing is physically located in document control or has been signed out for revision.
2. The controlling procedure was NEO 5.03.
3. All VDCs are identified in GRITS.
4. Prior to 1990 the engineering organization use Drawing Change Requests (DCR) as an internal mechanism for minor drawing changes. After 1990 the Acronym of DCR was used for Design Change Records, (DCR)
5. In response to a Parsons comment that the number of VDCs listed in GRITS is smaller than would be expected based on the length of time they were used compared to number of DCNs and how long DCNs have been used, NNECo indicated that a VDC usually contained a large batch of changes, where as DCNs are more focused.

DCN's - Design Change Notice (Population - 6,038 listed on GRITS)

1. PARSONS POWER IS PRESENTLY IN RECEIPT OF DCN'S THAT GO BACK TO 1990. WERE DCN USED PRIOR TO THIS DATE?

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Discussion

See response to the first question.

2. ARE ALL DCN'S ON A COMPUTERIZED DATABASE ? WE BELIEVE THAT AFTER A DCN'S INCORPORATION IS COMPLETE, IT IS REMOVED FROM GRITS. IS THAT CORRECT? IF SO, WHERE CAN ONE FIND A RECORD OF DCNS NO LONGER IN GRITS?

Discussion

All DCNs are in GRITS. They are identified as either open or closed.

3. THERE ARE A NUMBER OF DCN'S (EARLY 1994 TIME FRAME) RELATED TO A P&ID UPGRADE PROGRAM AS A RESULT OF AN INPO EVALUATION. WAS THIS A SPECIAL FORMALIZED PROGRAM ? IS THERE DOCUMENTATION, BEYOND THE DCNS, THAT WOULD DESCRIBE THE EVALUATIONS PERFORMED TO DETERMINE WHETHER THE PLANT OR THE P&ID WAS CORRECT?

Discussion

1. These DCNs are identified with a project number 84024. In accordance with the procedures in place at the time, the P&ID changes were reviewed and approved by Plant System Engineering, Operations, the Design supervisor, and the Engineering supervisor. The signatures indicate the changes were acceptable. Currently, NNECo is not aware of any further documentation that was prepared at the time of the DCN processing. NNECo will look into this further

4. IT WAS OUR UNDERSTANDING FROM THE 8/12/97 CONFERENCE THAT DRAWING LISTED ALL REVISIONS AND THE DCNS INCORPORATED INTO THE DRAWING. RAI-0215, WHICH ASKED FOR THE DCNS ASSOCIATED WITH DRAWINGS 25203-26023 SHEET 1 & 2, WAS CLOSED BASED ON THE 8/12/97 CONFERENCE. USING THE DRAWINGS IN PARSONS OFFICE, WE FOUND SHEET 1 OF THE DRAWING LISTED REVISION 9 THRU 5, AND SHEET 2 LISTED REVISION 12 THRU 8. HOW CAN WE FIND REV 1 THRU 4 AND 1 THRU 7 RESPECTIVELY?

Discussion

The missing revisions are "dead" revisions. They are not carried on the drawing due to lack of space. If one looks at an older revision of the drawing it will list the missing previous revisions. For drawings with "dead" revisions, Parsons will have to prepare RAIs requesting older revisions of drawing or for a list of all DCNs/VDCs associated with a drawing.

Calculations

1. A LETTER FROM J.A. CHUNIS TO R.T. FOLEY DATED 12/31/92 STATED THAT NSSS AND A/E CALCULATIONS ARE NOT INCLUDED IN THE CALCULATION TRACKING PROGRAM AND THAT NUCLEAR RECORDS IS MAINTAINING THESE RECORDS. ADDITIONALLY, IT WAS INDICATED THAT THE NSSS VENDOR AND THE A/E HAVE COMPILED LISTS OF RECORDS BEING MAINTAINED IN THE NSSS AND A/E ARCHIVES. ARE ALL OF THE NSSS AND A/E CALCULATIONS CURRENTLY MAINTAINED IN CTP?

Discussion

1. The current CTP does not list all of the NSSS and A/E calculations. Originally these calculations were for reference only.

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2. In order to obtain the list(s) of NSSS vendor and the A/E calculations, Parsons should reference this conference call when preparing a RAI.

ACTION:

Parsons to prepare a RAI requesting list(s) of NSSS vendor and the A/E calculations.

Document Retrieval

1. MUCH OF THE OLD CHANGE PROCESS FORMS ONLY CONTAIN A SIGNATURE AS EVIDENCE OF REVIEW FOR CONFORMANCE WITH ENGINEERING AND LICENSING BASES. HOW CAN WE OBTAIN DOCUMENTATION:

1) PREPARED AT THE TIME OF THE CHANGE, OR

2) PREPARED AS PART OF MILLSTONE'S CMP THAT PROVIDES EVIDENCE OF CONFORMANCE WITH ENGINEERING AND LICENSING BASES?

Discussion:

1. It was primarily the responsibility of the Station Engineers to prepare/review Change documents in the late 1970's and 1980's. These documents were then reviewed and approved by the corporate engineering organization. Their signature indicated that the change was acceptable. If the change was not acceptable a PIR, (plant incident report) or ACR was prepared.
2. PI-6 and PI-7 document the CMP graded system reviews. These reviews looked at all of the change paper, (PDCR, DCR, RIE, NCR, etc.)
3. Parsons has already requested PI-7 for the two selected systems. Tier 3 will need PI-6 and PI-7 for all of the completed systems in order to review whether these old changes conform with engineering and licensing bases.
4. NNECo is planning to send Parsons the PI-6 and PI-7 summaries. There are volumes of information containing the detail of the reviews. Based on what Parsons finds in the summaries, they can request specific information.

ACTION:

Parsons to prepare a RAI requesting completed PI-6 and PI-7 summaries.