

PARSONS

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August 24, 1998
Docket No. 50-336
Parsons NUM2-PPNR-1931-L

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

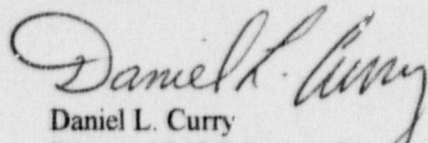
Millstone Nuclear Power Station Unit No. 2
Independent Corrective Action Verification Program (ICAVP)

Gentlemen:

This letter transmits summaries of telephone conferences between Parsons Power Group Inc., the U. S. Nuclear Regulatory Commission, NNECo and NEAC July 2, July 7, July 9, July 14, July 16, July 21, July 23, July 29 and July 30, 1998

Please call me at (610) 855-2366 if you have any questions.

Sincerely,


Daniel L. Curry
Parsons ICAVP Project Director

DLC:djv

Attachments Telephone Conference Notes for July 1998

cc: E. Imbro (2) - USNRC
J. Fougere - NNECo
R. Laudénat - NNECo
Rep. Terry Concannon - NEAC
Project Files

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CONFERENCE NOTES

July 2, 1998

DATE: 7/2/98

- PURPOSE: Telephone conference with NNECo, NRC, NEAC, and Parsons to discuss:
1. DR 0330 Response
 2. Closure of an Opening in the Auxiliary Building Floor at Elev. 38'-6" and its Security Licensing Basis
 3. Damper 2-AC-11
 4. DR-0137
 5. Corrective Action Process
 6. Support of the Discovery Complete Date

LIST OF ATTENDEES:

NNECo	NRC	NEAC	Parsons
Joe Fougere	Peter Koltay		Wayne Dobson
Bob Skwirz	Eric Benner		Don Marks
Fred Mattioli			Frank Cobb
Ken Fox			Clark Tracy
Marcel Ranieri			Dan Wooddell
Steve Heard			John Archer
Bill Cushman			Al Cross
Greg Tardif			Dom Ramos
Kalvin Angelin			Mike Akins
			Dale Pruitt

1. Topic: DR 0330 Response (Mike Akins)

Background: We do not find that RG 1.97, rev. 2, section 1.3.1.a. allows recorder UR-9862 to be isolated by a qualified isolation device and classified as non-category 1.

R.G. 1.97 paragraph 1.3.1.a states in part, "Qualification applies to the complete instrumentation channel from sensor to display where the display is a direct-indicating meter or recording device."

UR-9862 is a direct indicating recorder and is not computer driven.

Per paragraph 1.3.1.a, "Where the instrumentation channel is to be used in computer-based display, recording/ and or diagnostic program, qualification applies from the sensor to and includes the channel isolation device."

Clearly, UR-9862 falls under the first criteria, not the second.

This same discussion holds for paragraph 1.3.1.g. This is a direct indicating recorder, not computer driven and not a data logger. Also, it contains essential trend information, not available on indicators.

Questions:

- a) Please explain in some detail why NNECo believes that UR-9862 should be non-cat 1.

Response: PI-8113 and PI 8114 are Cat 1. The recorder is not Cat 1 according to NNECo's interpretation of RG 1.97, because it is used only to provide historical data.

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2. **Topic:** Closure of an opening in the Auxiliary Building floor at Elev. 38'-6" and its Security licensing basis. (Jim Glova)

References:

- 1) ACR 11878
- 2) NCR 296-073
- 3) DCN DM2-S-0378-96

Background: We are trying to determine if the physical change to the plant perform under NCR 296-073 bypassed the mod process.

The NCR and ACR 11878 identified an opening of approximately 14" x 32" in the Auxiliary Building floor at Elev. 38'-6" which connects the spent fuel pool compartment at Elev. 38'-6" to the Health Physics Lab at Elev. 14'-6". The NCR appears to be initially written to address a negative pressure HVAC concern. This opening is between a Protected Area and a Vital Area and there was an existing security barrier above the opening in the floor. The causal factors corrective action plan and the operability/reportability determination of the ACR addresses two concerns:

- The ability of the emergency spent fuel pool ventilation system to maintain a negative pressure with the subject opening unsealed.
- The acceptability of the existing security barrier above the opening.

The ACR states that no corrective action is required to address the ability of the emergency spent fuel pool ventilation system to maintain a negative pressure with the presence of the opening since testing has demonstrated the system meets requirements.

The causal factors corrective action plan also established that the presence of the opening does not create a security breaching issue. A memo from Patrick W. Anhalt to MP-UNIT2-1.BAUMAPH dated 5/7/96 stated that then existing security barrier was acceptable with respect to the standards at the time of its installation in the early 1980's, however, the standards have since been upgraded and barriers installed in 1996 must be more substantial than that currently in place above the subject opening. Security has concluded that the existing barrier does not constitute a security breach and it is not reportable. However, Security implement revised compensatory measures for the existing security barrier, and these compensatory measures were required to remain in effect until the existing security barrier was upgraded to current standards.

Questions:

- a) It appears to Parsons that the opening in the floor was closed with a new barrier to comply with Security requirements and not for operability of the emergency spent fuel pool ventilation system, which was the initial concern raised by the NCR. Is this correct?
- b) From the Patrick Anhalt memo statement that the existing security barrier was acceptable with respect to the standards at the time of its installation in the early 1980's, it appears that the security barrier in the plant meet approved design documents. If this is the case, then the new barrier was a design change, not rework which implies returning the configuration to the approved design. Since Parsons does not have, (or necessarily want) access to security design, please confirm whether or not the new barrier was a design change.

Response: *Deferred to 7/7/98.*

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3. **Topic:** Damper 2-AC-11 (Frank Cobb) (Continuation of Topic # 8 from 6/30/98)

Background: Ventilation system 2314B, CEBPS, consists of a supply fan and associated ducting / dampers to the containment. The exhaust portion of the system consists of ducting / and associated dampers all of which are attached to the Auxiliary Building Main exhaust. The supply side of this system is used to provide containment environment with outside air for access to the containment during modes 5 & 6. The exhaust portion of this system is used during modes 5 & 6 in conjunction with the supply side to help maintain pressure considerations within the containment.

During normal plant operations the exhaust portion of the system is used to ventilate the enclosure building by opening a flow path through air operated dampers 2-AC-8 and 2-AC-11. If a CIAS is received these dampers automatically change positions to re-direct air flow to the EBFS Filter system.

Questions:

- a) N/A response given on 6/30/98.

Follow up Question:

- a) Does the modification (damper / operator replacement) and supporting documentation provide analysis, evaluation or specify that the damper/operator must close against the flow pressure of the remaining main exhaust fan?

Response: *NNECo indicated that the design modification that replaced 2-AC-11 and its actuator did not have any supporting documentation (evaluations, calculations) that provided assurances the new operator has sufficient torque to close the damper against the pressure from the operating fan. They referenced some retest documentation that only captured flow velocities and pressure drops across the new damper. A review of the modification package (DCR-97002) reveals that no post modification testing was conducted to prove damper closure against fan flow. Further review of the 50.59 safety evaluation (S2-EV-97-0034) addresses failure of the damper to close but only concludes that a negative pressure will continue to be maintained. It does not identify the unfiltered bypass of the EBFS Filtration system. PARSONS will generate a DR to identify this discrepancy.*

4. **Topic:** DR-0137 (Al Cross) (Continuation of Topic # 4 from 6/30/98)

Background: AFW flow transmitters FT-5278A & B, shown on 28408 sht. 978, are separated by approximately one foot as per field walkdown. Spec 7604-MS-67 states physical separation between redundant vital channels is "open space- no direct probability of physical damage, requirement- 1.5 ft between channels."

NNECo's reply: non-discrepant because the physical separation for the transmitters meets licensing basis.

Questions:

- a) What is the licensing basis referred to in NNECo's reply?

Response: *Per R.G. 1.97, the flow meter indication is not performing a safety related function. Specification 7604-MS-67 only applies to instruments which perform a safety related function and applies to impulse lines and transmitters. Electrical Separation has met the requirements of SP-M2-EE-0016 and should apply in this case. Circuit protection of the two Class 1E flow transmitter circuits is not considered a safety related function. Therefore, the separation of the flow transmitters meets SP-M2-EE-0016 and is adequate.*

CONFERENCE NOTES

July 2, 1998

5. Topic: Corrective Action Process (Clark Tracy)

Background: N/A

Questions:

- a) How does MP2 administratively follow Corrective Actions that are 'OPEN' and have associated ARs that are scheduled for completion both pre-restart and post-restart?
- b) Additionally, how does MP2 administratively follow an AR that has a completion date which is prior to what would be a pre-restart mode restraint to ensure that the date is not revised to post-restart ?
- c) Some AR printouts indicate the AR action steps (-01, -02, etc.) to be complete yet the AR indicates otherwise. What does this mean? Is further administrative review by MP2 needed or is the AR indeed complete? (For example: A review of 44 'open' CRs/UIRs indicated 27 with an 'open' AR but each of the applicable AR action steps was complete.)
- d) As an adjunct: roll-up ARs with unrelated Action steps — should we consider the action steps complete and ready for review when it is marked 'complete'?

Response:

- a) *The ARs are tracked and "rolled up" to the Corrective Action document as they are closed.*
- b) *The AR mode call book defines the mode restraint if applicable. It takes precedence over the due date listed in the Action Request Report.*
- c) *NNECo stated that until their administrative review is complete and the "parent" AR is signed off, the document is not ready for review by Parsons.*
- d) *In this case, when the individual AR action step is signed off as complete, the document is ready for review by Parsons.*

6. Topic: Support of the Discovery Complete Date (Dale Pruitt)

Background: The following RAI's need to be expedited:

- RAI-1744, Job Order that installed PDCR 2-110-80 & DCN for Job Order 2-413-80. Please note this is over two weeks old.
- RAI-1770, Copies of the following PDCR's and related work documents.
 - a PDCR 2-131-76
 - b. PDCR 2-89-082
 - c. PDCR 2-90-040
- RAI-1801, Safety evaluation, retest & work order for PDCR 2-001-78.

Questions:

- a) What is the estimated transmittal date of the above RAI's?

Response: *RAI-1744 went out 7-2-98, RAI-1770 & 1801 to go out 7-6-98.*

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July 7, 1998

DATE: 7/7/98

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

1. Schedule Update for Tier-2 Accident Re-analyses
2. Enclosure Building Excessive Pressure Protection
3. Closure of an opening in the Auxiliary Building floor at Elev. 38'-6" and its Security licensing basis
4. DR-0086
5. DR-0034
6. EDG GL 89-13 Thermal Performance Test Results

LIST OF ATTENDEES:

NNECo	NRC	NEAC	Parsons
Bob Skwirz	Eric Benner		Wayne Dobson
Fred Mattioli			Don Marks
Geoffrey Neate			Dom Ramos
Alan Briggs			Jim Glova
Chris Scully			Rich Glaviano
Dan Van Duyne			George Zagursky
Gary Komosky			William Clemenson
			Dan Wooddell
			Mile Akins
			Gary Jackson
			Larry Wigley

1. Topic: Schedule Update for Tier-2 Accident Re-analyses (Rich Glaviano)

- a. The below accident analyses have been accepted by NNECo. Please provide an estimated date for transmittal to Parsons:

14.1.5 Main Steam Line Break (RCS Analysis) - Balance (1 Document)

Document Received by Parsons

- b. Please confirm the projected NNECo Accept date for the following analyses:

14.1.5 MSLB - CHP Trip Setpoint 7 Jul 98

Due 10 July 98

14.6.3 Steam Gen Tube Rupture - Mass Release 6 Jul 98

Sent 6 July 98

14.6.5.2 Small Break LOCA 31 Jul 98

As Listed Above

14.6.5.1 Large Break LOCA (RCS Analysis) 31 Aug 98

As Listed Above

- c. Design inputs are required for the below analyses. Please provide schedule for providing these to Parsons:

14.7.4.2.1 Fuel Handling Accident in Spent Fuel Pool

14.7.5 Spent Fuel Cask Drop

14.8.4 Radiological - Design Basis Accident (Balance from list provided on 12 June)

Draft Design Inputs to be provided on 8 Jul 98 for above events

- d. Please confirm the projected NNECo Accept date for the following radiological analyses:

14.6.3 Steam Gen Tube Rupture - Rad. Analysis 14 Aug 98

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14.7.4.2.1 Fuel Handling Accident in Spent Fuel Pool	14 Aug 98
14.7.4.2.2 Fuel Handling Accident in Containment	14 Aug 98
14.7.5 Spent Fuel Cask Drop	14 Aug 98
14.8.4 Radiological - Design Basis Accident	14 Aug 98

All dates as listed above

2. **Topic:** Enclosure Building Excessive Pressure Protection (Dom Ramos) (Continuation of Topic # 9 from 6/30/98)

Background: To prevent damage to the Enclosure Building (EB) by over pressurization or by drawing excessive negative pressure during EB purge mode of operation, PDCR 2-91-77 proposed to install two 3' x 4' relief dampers set to relieve pressure in either direction at 0.5" wg. NU letter G/ME-78-1655 proposed an alternative solution using one power operated guillotine damper set to open on either a positive or negative pressure of 0.5" wg. The advantages of the alternative solution are described in the aforementioned letter.

The proposed alternative solution was accepted. PDCR 2-91-77 was canceled. Project Assignment PA 80-041 requested a detailed design/procurement to install a power operated guillotine damper.

Parsons could not find the PDCR that installed the damper, but found PDCR 2-32-84 that noted PA 80-041 as the applicable document. PDCR 2-32-84 is an entirely different modification than requested by the PA. The PDCR revised the controls to automatically stop the purge supply fan F-23 and close damper 2-AC-11. These actions occur if the EB pressure reaches the +0.4" wg setpoint. The PDCR's did not address the excessive negative pressure concern.

According to OP 2314B, Rev 16, page 5: the pressure in the EB must be maintained between +0.4 and -0.4" wg to prevent potential building damage, i.e., loss of integrity due to seam cracking.

Questions:

- What document Explains why an entirely different modification, from that requested by PA 80-041, was installed?
- What document justifies why the excessive negative pressure concern was not addressed?

Response: NU will provide the Project Description for PA 80-041 under an existing RAI-1661

3. **Topic:** Closure of an opening in the Auxiliary Building floor at Elev. 38'-6" and its Security licensing basis. (Jim Glova) (Continuation of Topic # 2 from 7/2/98)

References:

- 1) ACR 11878
- 2) NCR 296-073
- 3) DCN DM2-S-0378-96

Background: We are trying to determine if the physical change to the plant perform under NCR 296-073 by-passed the mod process.

The NCR and ACR 11878 identified an opening of approximately 14" x 32" in the Auxiliary Building floor at Elev. 38'-6" which connects the spent fuel pool compartment at Elev. 38'-6" to the Health Physics Lab at Elev. 14'-6". The NCR appears to be initially written to address a negative pressure HVAC concern. This opening is

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July 7, 1998

between a Protected Area and a Vital Area and there was an existing security barrier above the opening in the floor. The causal factors corrective action plan and the operability/reportability determination of the ACR addresses two concerns:

- The ability of the emergency spent fuel pool ventilation system to maintain a negative pressure with the subject opening unsealed.
- The acceptability of the existing security barrier above the opening.

The ACR states that no corrective action is required to address the ability of the emergency spent fuel pool ventilation system to maintain a negative pressure with the presence of the opening since testing has demonstrated the system meets requirements.

The causal factors corrective action plan also established that the presence of the opening does not create a security breaching issue. A memo from Patrick W. Anhalt to MP-UNIT2-1.BAUMAPH dated 5/7/96 stated that then existing security barrier was acceptable with respect to the standards at the time of its installation in the early 1980's, however, the standards have since been upgraded and barriers installed in 1996 must be more substantial than that currently in place above the subject opening. Security has concluded that the existing barrier does not constitute a security breach and it is not reportable. However, Security implement revised compensatory measures for the existing security barrier, and these compensatory measures were required to remain in effect until the existing security barrier was upgraded to current standards.

Questions:

- a) It appears to Parsons that the opening in the floor was closed with a new barrier to comply with Security requirements and not for operability of the emergency spent fuel pool ventilation system, which was the initial concern raised by the NCR. Is this correct?
- b) From the Patrick Anhalt memo statement that the existing security barrier was acceptable with respect to the standards at the time of its installation in the early 1980's, it appears that the security barrier in the plant meet approved design documents. If this is the case, then the new barrier was a design change, not rework which implies returning the configuration to the approved design. Since Parsons does not have, (or necessarily want) access to security design, please confirm whether or not the new barrier was a design change.

Response:

- a) *No, it is not correct that the opening was sealed for Security concerns. The opening was sealed to assist the emergency spent fuel pool ventilation system in maintaining a negative pressure.*
- b) *No, the new plate added between the column flanges to seal the opening is not a design change. As stated in a) above, the opening was sealed to assist the HVAC system. The operability determination concluded, based upon successfully completion of two system tests, that the emergency spent fuel pool ventilation system is operable with the subject opening in place. However, the system did not meet its design basis with the opening unsealed. Therefore, the opening was reworked to bring the emergency spent fuel pool ventilation system into compliance with its design basis.*

4. Topic: DR-0086.

Background: NNECo requested topic to discuss this DR.

Response: *Discussion focused on how the FSAR specified, 3D seismic model uses values for the horizontal and vertical spectra. NNECo's interpretation of the vertical spectra to be used, regardless of elevation, is 2/3 of the horizontal response spectra at ground level.*

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5. **Topic:** DR-0034.

Background: NNECo requested topic to discuss this DR.

Response: *Deferred until further notice from NNECo.*

6. **Topic:** EDG GL 89-13 Thermal Performance Test Results. (Bill Clemenson)

Reference:

1. AR 96027811-03, SWSOPI Req No. 82
2. AR 95050457-01, SWSOPI Req No. 138,

Background:

References 1 and 2 document deficiencies that was identified in the MP-2 SWSOPI Report. The corrective action associated with Reference 1 was to perform baseline thermal performance tests of the EDG GL 89-13 coolers. RAI 1028, dated 2-2-98, requested the results of this test. The NNECO response on 3-9-98 stated that the test was performed in October 1997 but that the final test report had not been reviewed and could not be transmitted.

Questions:

- a) What is the current status of the EDG GL 89-13 thermal performance test results?
- b) What is the thermal performance test procedure number for the EDG HXs?
- c) Was the accuracy of the instrumentation used recorded in the test procedure and was it evaluated for its impact on the test results?
- d) How were test conditions extrapolated to design conditions for the EDG HXs?
- e) What is the status of the Heat Exchanger Plugging Program and what procedure will be used to control this program?

Response:

- a) *Test was completed last fall and an outside engineering firm, Proto Power, is still evaluating data. Completion of their review is scheduled for 7-13-98.*
- b) *Test procedure number is EN-21228.*
- c) *A pretest evaluation was performed to evaluate the impact of this uncertainty and others on the test results.*
- d) *Test was performed as close to design conditions as possible. Final results will be extrapolated to design conditions using computer models.*
- e) *Program is still underdevelopment.*

CONFERENCE NOTES

July 9, 1998

DATE: 7/9/98

- PURPOSE: Telephone conference with NNECo, NRC, NEAC, and Parsons to discuss:
1. 2-AC-130
 2. Support of the Discovery Complete Date
 3. In Containment Sensors for AFW described in FSAR Section 7.3.1.2.6, Codes and Standards

LIST OF ATTENDEES:

NNECo	NRC	NEAC	Parsons
Joe Fougere	Ralph Architzel		Don Marks
Bob Skwirz			Dale Pruitt
Fred Mattioli			Bill Clemenson
Rich Ewing			Dan Wooddell
Mike O'Meara			

1. Topic: 2-AC-130 (Bill Clemenson)

References:

- 1) DM2-S-1158-95
- 2) PDCR MP2-041 95

Background: During implementation of reference 2, it was discovered that 2-AC-130 would not fully close. To resolve this issue, reference 1 was issued to change the counterbalance arm position of 2-AC-130 from 9 to 45° CCW and increased the torque on the dampers by 3.5 ft/lbs

Questions:

- a) Which work order performed this field change and documented that the damper returned to the full open position when the fan was energized?

Response: AWO: M2-95-11161.

2. Topic: Support of the Discovery Complete Date (Dale Pruitt)

Background: The following RAI's need to be expedited:

- 1) RAI-1764, Copies for various documents.
- 2) RAI-1780, Work document and closure documentation for 2-97-034

Questions:

- a) What is the estimated transmittal date of the above RAI's?

Response:

RAI-1764 should arrived at Parsons on 7/14/98.
RAI-1780 has already been sent.

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3. **Topic:** In Containment Sensors for AFW described in FSAR Section 7.3.1.2.6, Codes and Standards (Dale Pruitt)

Background: The section in the FSAR requires in containment mounted sensors for AFW to conform to IEEE 323-1974 edition. The in containment S/G level transmitters are used to initiate AFW. Modification 2-094-80 installed S/G level transmitters but they were installed to the IEEE-1971 edition.

Questions:

- a) What document upgraded the steam generator level transmitters to conform to IEEE 323 1974 edition?
- b) Are the S/G level transmitters the only "in containment" mounted sensors that this section applies to?

Response:

- a) *Foxboro document 83-6076*
- b) *EEQ-TRA-106.0 rev. 1*

CONFERENCE NOTES

July 14, 1998

DATE: 7/14/98

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

1. Schedule Update for Tier-2 Accident Re-analyses
2. DR-0060
3. DR-0133
4. DR-0182
5. DR-0055
6. Status of Engineering Programs
7. Support of the Discovery Complete Date
8. DR-0555
9. DR-0333
10. DR-0592 (Note: not on original agenda; added by the NRC)
11. DR-0593 (Note: not on original agenda; added by the NRC)
12. DR-0575 (Note: not on original agenda; added by the NRC)

LIST OF ATTENDEES:

NNECo	NRC	NEAC	Parsons
Joe Fougere	Ralph Architzel		Don Marks
Fred Mattioli	Gene Imbro		Dale Pruitt
Bob Skwirz	Peter Koltay		Mike Akins
Rich Ewing			Jack Lawton
Jim DiLuca			Dan Wooddell
Farid Elsabee			Ron Smith
Rick Bonner			Rich Glaviano
Rich Laudenat			Larry Wigley
Bob Lawrence			Joe Groncki
Greg Tardif			Roger Mauchline
Dan VanDuyne			Samir Serhan
Bob Weth			
Norbert Carte			

1. Topic: Schedule Update for Tier-2 Accident Re-analyses (Rich Glaviano)

a. Please confirm the projected NNECo Accept date for the following analyses:

14.1.5	MSLB - CHP Trip Setpoint	10 July 98	<i>sent 7/14/98</i>
14.6.5.2	Small Break LOCA	31 July 98	<i>on track</i>
14.6.5.1	Large Break LOCA (RCS Analysis)	31 Aug 98	<i>on track</i>

b. Design inputs are required for the below analyses. Please provide schedule for providing these to Parsons:

- 14.7.4.2.1 Fuel Handling Accident in Spent Fuel Pool
 - 14.7.5 Spent Fuel Cask Drop
 - 14.8.4 Radiological - Design Basis Accident (Balance from list provided on 12 June)
- [Draft Design Inputs to be provided on 8 Jul 98 for above events.] *all above sent 7/9/98*

c. Please confirm the projected NNECo Accept date for the following radiological analyses:

14.6.3	Steam Gen Tube Rupture - Rad. Analysis	14 Aug 98	<i>on track</i>
14.7.4.2.1	Fuel Handling Accident in Spent Fuel Pool	14 Aug 98	<i>on track</i>
14.7.4.2.2	Fuel Handling Accident in Containment	14 Aug 98	<i>on track</i>
14.7.5	Spent Fuel Cask Drop	14 Aug 98	<i>on track</i>
14.8.4	Radiological - Design Basis Accident	14 Aug 98	<i>on track</i>

Response: *Noted above in Italics.*

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July 14, 1998

2. **Topic:** DR-0060.

Background: NNECo requested topic to discuss this DR.

Response: *NNECo confirms that this is a level 4 DR.*

3. **Topic:** DR-0133.

Background: NNECo requested topic to discuss this DR.

Response: *Deferred to 7/16/98.*

4. **Topic:** DR-0182.

Background: NNECo requested topic to discuss this DR.

Response: *NNECo will send DR disposition for Parsons' review.*

5. **Topic:** DR-0055.

Background: NNECo requested topic to discuss this DR.

Response: *Deferred to 7/16/98.*

6. **Topic:** Status of Engineering Programs

Background: Parsons requested this topic.

Questions: What is the implementation status of the following programs:

- a) EQ?
- b) HELB?
- c) SBO?
- d) Appendix R?

Response:

- a) *ECD 10/8/98 for EQRs*
- b) *Deferred to 7/16/98*
- c) *ECD 9/1/98*
- d) *Compliance Report ECD is mid October; Fire Hazards Report ECD is mid October; AOP evaluations ECD is first week of August.*

CONFERENCE NOTES

July 14, 1998

7. **Topic:** Support of the Discovery Complete Date (Dale Pruitt / Jack Lawton)

Background: The following RAI's need to be expedited:

- RAI-1613, Analysis for Potential Transformers Burdens.
- RAI-1647, Question on removal of Diesel bearing temperature trip.
- RAI-1780, Work Document and closure documentation for jumper.
- RAI-1988, Copies of various documents.
- RAI-2010, Copies of various documents.
- RAI-2024, Copy of a calculation.

Questions:

- a) What is the estimated transmittal date of the above RAI's?

Response:

- RAI-1613, to be sent 7/17/98
- RAI-1647, to be sent 7/17/98
- RAI-1780, already sent
- RAI-1988, to be sent 7/17/98
- RAI-2010, to be sent 7/17/98
- RAI-2024, document sent per RAI 646

8. **Topic:**DR-0555.

Background: NRC requested topic to discuss the significance level of this DR.

Discussion: NRC agrees that this is a level 3.

9. **Topic:** DR-0333.

Background: NRC requested topic to discuss the significance level of this DR.

Discussion: NRC agrees with downgrading this to a level 4.

10. **Topic:**DR-0592.

Background: NRC requested topic to discuss the significance level of this DR.

Discussion: NRC is not sure that this is a level 3. Rare violations of design basis/license basis items that in and of themselves do not compromise the functionality of the system, can be called an level 4. The point in time when it shifts from a material condition issue to one whereby the engineer deems that it can now compromise the functionality of the system it would become at least an level 3.

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July 14, 1998

11. **Topic:** DR-0593 (added by NRC during conference)

Background: NRC requested topic to discuss the significance level of this DR.

Discussion: *NRC agrees with starting this as a level 3.*

12. **Topic:** DR-0575 (added by NRC during conference)

Background: NRC requested topic to discuss the significance level of this DR.

Discussion: *NRC agrees that this is a level 3, but not for reason Parsons stated. This would be a level 3 because analysis didn't consider all design characteristics.*

CONFERENCE NOTES
July 16, 1998

DATE: 7/16/98

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

1. "MINIMUM CHANNELS OPERABLE"
2. PDCR 2-87-86
3. PDCR 2-083-79
4. AFW Automatic Initiation System Analytical Limits
5. PDCE MP2-90-030, Diesel Oil Day Tank A Level Alarm Relay
6. Status of Engineering Programs
7. DR Discussion

LIST OF ATTENDEES:

NNECo	NRC	NEAC	Parsons
Joe Fougere	Ralph Architzel		Wayne Dobson
Fred Mattioli	Peter Koltay		Don Marks
George Pitman			Jack Lawton
Roy Terry			Dick Cronk
Norbert Carte			Ron Smith
Bob Borchert			Larry Wigley
Greg Tardif			Amrit Kaplish
Harold Thompson			Richard Boyd
Don Brown			Mike Akins
Rick Bonner			Joe Groncki
Bob Carritte			Tom Harris
Cris Cristallo			Cliff Marks
Farid Elsabee			John Hilbish
Bob Weth			Trent Powers
Bob Skwirz			Fletcher Downey
Rich Laudanat			Gordon Chen
Ken Fox			Rich Glaviano
			Gordon Chen

1. **Topic:** "MINIMUM CHANNELS OPERABLE" requirements in the Technical Specifications for the following radiation monitors: Containment Particulate and Gaseous Monitors; the Spent Fuel Monitors; and Containment High Range Monitors. (Tom Harris)

References:

- 1) FSAR 7.3.2.3.i
- 2) FSAR 7.3.1.2.1
- 3) Tech Spec Table 3.3-3
- 4) Tech Spec Table 3.3-6
- 5) GL80030, April 10, 1980, Generic Letter from the NRC to all reactor licensees

Background:

It appears that the Tech Specs allow operation of these safety monitors with half of each system operable which exposes these systems to single failure. No Tech Spec ACTION is required if the redundancy is lost.

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1. For the Particulate and Gaseous monitors (RM8123A, RM8123B, RM8262A, RM8262B), Tech Spec Table 3.3-3.7a "MINIMUM CHANNELS OPERABLE" requirement is 1 Gaseous Monitor and 1 Particulate Monitor. The ACTION item does not require any action if the redundant system fails.

With the plant operating with just one particulate and gaseous system, and not in an LCO, this will expose the safety system to single failure. If the sample pump(F39A/B) on the operating skid fails when the safety function is required the Containment Purge Isolation Valves will not actuate due to loss of sampling capability.

FSAR 7.3.1.2.1 Specifies that emphasis has been placed on the single failure criteria and that system functions are implemented by means of redundant sensors, instrument, loops, logic and actuation devices.

2. For the Spent Fuel Pool monitors (RM8139, RM8142, RM8156, RM8157) Tech Spec Table 3.3-6.1.a "MINIMUM CHANNELS OPERABLE" requirement is 2 monitors. The ACTION item does not require any action if 2 out of the 4 monitors fail.

FSAR 7.3.2.3.i states that an AEAS will occur on high radiation in the fuel handling area with 2/4 or 2/3 logic. If the Tech Specs only require 2 monitors operable, the FSAR logic requirements cannot be achieved. With just 2 monitors operable it exposes the safety actuation to single failure since it requires both of the remaining operable channels to actuate.

3. For the Containment High Range Monitors(RM8240, RM8241) Tech Spec Table 3.3-6.1.c "MINIMUM CHANNELS OPERABLE" requirement is 1 monitor. The ACTION item does not require any action if 1 of the 2 monitors fail.

These monitors in high alarm will close the hydrogen purge valves(4) on high alarm. With just one monitor operable only two of the valves will close. With just 1 monitor operating it exposes the safety action to several avenues of single failure.

In addition to the redundancy requirements of the FSAR, the monitors also must satisfy Reg Guide 1.97 Rev 2 for C-07 and E-01 variables. As a Category C variable, two monitors are required and the monitors must comply with the single failure criteria in 1.3.1.b of the Reg Guide. One monitor operable cannot satisfy this single failure criteria.

Generic Letter, GL80030, issued to all power reactor licensees, clarifies the meaning of the OPERABLE term as it applies to the single failure criterion for safety systems in power reactors. The letter states that the single failure criterion is preserved by specifying Limiting Conditions for Operation (LCO) that require **ALL REDUNDANT COMPONENTS OF SAFETY RELATED SYSTEMS** to be **OPERABLE**. When the required redundancy is not maintained either due to equipment failure or maintenance outage, **ACTION** is required.

Questions:

- a) On the surface, it appears that there is conflict in the licensing basis where the FSAR requires redundancy to prevent single failure while the Tech Specs do not maintain the redundancy. We would expect that Millstone has addressed this issue already. We would like to discuss how does the Millstone Unit 2 Tech Specs ensure compliance to licensing commitments for meeting single failure criteria?
- b) Since the Tech Specs do not require the monitors to be repaired under ACTION Statements, what are the actual actions normally performed when these redundant monitors fail?

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Response:

- a) *NNECo feels that the design of the Radiation Monitors meets redundancy requirement of the FSAR. Since the design meets the redundancy requirements of the licensing basis, the single failure criterion is fulfilled. Tech Spec Operability requirements are determined from Safety Analysis. For example, the safety analysis allows the plant to operate with just 2 Spent Fuel Handling monitors without action. NNECo feels that the number of monitors OPERABLE has nothing to do with the Single Failure Criterion since the system design has the required redundancy. The NRC representative stated that if Parsons has a problem with the Tech Specs, then a letter should be sent to the NRC office.*
- b) *If was not clear from the discussion what NNECo would do if redundant monitors were lost since their safety analysis allows continued operation without the redundant systems.*

2. Topic: PDCR 2-87-86 (Jack Lawton)

Background: This PDCR removed the EDG SIAS auto-start feature. Wiring diagrams 32041, sheets 3 and 15 indicate the SIAS auto-start feature was restored.

Questions:

- a) What modification restored the EDG SIAS auto-start feature?

Response: *PDCR 2-114-92.*

3. Topic: PDCR 2-083-79 (Amrit Kaplish / Ken Mayers)

Background: PDCR 2-083-79 installed Stack Gas Flow Monitor Equipment to measure the total gas flow of MP-1 and MP-2.

Per System Scope & Boundary Definition, the review of Unit 1 Stack Monitoring System is limited to the Nozzle and impulse lines from the nozzle to the first isolation valve.

Per drawing 25202-28021 (F-10,C-5), the Annubars, instrument isolation valves, and instrument tubing are located inside the Millstone Unit #1 Stack. The instrument isolation valves are not accessible. Also, per this drawing, the Annubars are QA Category 1. The classification of the transmitters is not identified in PMMS.

Questions:

- a) Does the licensing/design basis require the boundary from the annubar to the transmitter to be maintained?
- b) If yes, What is the QA Category of the instrument isolation valves, tubing and the transmitters, and are these seismically supported? What documents show the QA Category of these items?

Response:

- a) *MEPL evaluation (1 CD 2031) will be RAI'd.*
- b) *FIT-20-30 is in Unit 1 PMMS.*

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4. Topic: AFW Automatic Initiation System Analytical Limits (John Archer)

Background: The Auxiliary Feedwater System is automatically initiated to perform the safety function of mitigating Chapter 14 Accidents by providing cooling water to the steam generators soon enough to prevent the steam generators from reaching an unacceptable low level to preclude steam generator dryout and tube failure.

NNECo has performed Chapter 14 Accident Mitigation Safety Analyses that assessed Steam Generator accident thermodynamic conditions and minimum water inventory necessary to prevent dryout. The current Millstone 2 Cycle 10 Loss of Feedwater Analysis, E-5272-595-006, 3/91 assumed that initiation of the event started when there was a reactor trip which occurred at a low S.G. level of 34%. This AFW initiation resulted in a flow of 600gpm at 600 seconds after reactor trip. The new LOF analysis E-6855-595-1, 3/15/98, Loss of Feedwater Analysis for Millstone 2, is based on the motor driven feedwater pumps actuated by low steam generator level of 10% with a 240 second time delay. This analysis also investigated a 0% S.G. AFW actuation and temporary SG dryout occurred.

Calculation 92-030-1254E2 Rev. 0, S.G. Low Level Trip Setpoint Analysis established a new value for the Technical Specification's "Allowable Value" and calculated an analytical limit for the AFW S.G. automatic initiation.

Questions:

- a) Is the 0% narrow range the highest level S.G. AFW automatic initiation analytical limit value where failure was found?
- b) If 0% is not the highest analytical limit value where failure was found to exist, what is that highest analytical limit value where the failure was found?
- c) For the S.G. level actuation loop, Is the analytical limit value the lowest level at which the AFW automatic initiation signal is assumed to occur?
- d) Why did the new LOFW Analysis use an instrument uncertainty value of 2% in its AFW automatic initiation analysis? Calculation 92-030-1254E2 Rev. 0 uses an uncertainty value of 5.16% which appears to be more appropriate to use.
- e) For the different types of Chapter 14 Accidents for which AFW is required to perform automatic initiation, what are their respective analytical limits, allowable values, setpoints, and appropriate normal condition or post accident condition, AAFWIS "TPE" instrument uncertainties (relative to the low level instrument tap)?
- f) What is the assumed accuracy of both the current and new LOF analysis?
- g) What Safety Limit has been established for the S.G. level, how much engineering margin is associated with it and which analysis established the Safety Limit? Where are the Safety Limits documented?
- h) Is the analytical limit methodology implemented by Calculation 92-030-1254E2 Rev. 0 the same as ISA 67.04 Part II, 1994 Method #2; and if not, what are the differences?
- i) Has the monthly as-found trip setpoint calibration data for the AFWAI loops exceeded the difference between the AFWAI Setpoint Value of 12% of NR level and the Allowable Value of 11.7% of NR level as established by Calc. 92-030-1254E2 Rev. 0 and if so, by how much?
- j) Has the monthly as-found trip setpoint calibration data for the AFWAI loops exceeded the difference between the AFWAI Setpoint Value of 12% of NR level and the Allowable Value of 10. % of NR level as established by Calc. 92-030-1254E2 Rev. 0 and if so, by how much?

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- k) Please explain how the Calc. 92-030-1254E2 Rev. 0 "acceptance criteria" for the "as-found" or the "as-left" values be in excess of the difference between the Technical Specification's Setpoint Value and Allowable Value?

Response: *Deferred to 7/21/98.*

5. **Topic:** PDCE MP2-90-030, Diesel Oil Day Tank A Level Alarm Relay (Amrit Kaplish / Ken Mayers)

Background: The above PDCE added a varistor (transient suppression diode) across HGA relay LS-7002X holding coil. This relay as well the varistor is not shown on any drawings.

Questions:

- a) What drawings (wiring, loop, location) show the relay as well the varistor?
b) If the relay has been replaced/removed, what is the documentation that authorized it?

Response:

- a) *Rev. 4 of 25203-28500, Sheet 749 will be RAI'd.*
b) *PDCR 2-057-95.*

6. **Topic:** Status of Engineering Programs (Continuation of Topic # 6 from 7/14/98)

Background: Parsons requested this topic.

Questions: What is the implementation status of the following programs:

- a) EQ (N/A response provided on 7/14/98.)
b) HELB?
c) SBO (N/A response provided on 7/14/98.)
d) Appendix R (N/A response provided on 7/14/98.)

Response:

- a) N/A
b) *ECD of 9/1/98 except for some documentation.*
c) N/A
d) N/A

7. **Topic:** DR Discussion

Background: NNECo requested topic to discuss the DRs listed below.

DRs for Discussion:

CONFERENCE NOTES

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- a) DR-0057
- b) DR-0156
- c) DR-0055 (Continued from 7/14/98)
- d) DR-0133 (Continued from 7/14/98)
- e) DR-0319
- f) DR-0264
- g) DR-0207
- h) DR-0499

Response:

- a) *Discussion to be continued at NNECo's discretion.*
- b) *NNECo and Parsons agree that this is a level 4 DR; associated CR: M2-98-1321.*
- c) *Deferred to 7/21/98.*
- d) *NNECo and Parsons disagree on whether there is a discrepant condition.*
- e) *Discussion without resolution.*
- f) *Agreement on non-discrepancy because change was made prior to NNECo taking ownership.*
- g) *Addressed previously.*
- h) *Resolved by NNECo conversation with Wayne Dobson.*

CONFERENCE NOTES

August 11, 1998

DATE: 8/11/98

- PURPOSE: Telephone conference with NNECo, NRC, NEAC, and Parsons to discuss:
1. Discrepancies in Calculation MP2CRANC "MP2 Control Room Cabinets Anchorage Evaluation"
 2. Parsons Requested DRs for Discussion
 3. Parsons Requested DRs for Discussion

LIST OF ATTENDEES:

NNECo	NRC	NEAC	Parsons
Joe Fougere	Eric Benner		Colin Patton
Bob Skwiz			Don Marks
Fred Mattioli			Trent Powers
Bob Weth			Roger Mauchline
Tom Moore			Bob Moyer
Farid Elsabee			Dan Wooddell
Vere Joseph			Richard Boyd
Roy Terry			
Harold Thompson			

1. **Topic:** DR-0133 - Discrepancies in Calculation MP2CRANC "MP2 Control Room Cabinets Anchorage Evaluation" (Roger Mauchline)

Background: We would like some clarification of Response M2-1RF-02275 on DR-0133

Questions:

- a) On page 3, bulleted item: Please explain "7 anchor locations". The MP2CRANC calculation p. 18 shows 3 anchors per side of cabinet, which would give a total of 9 anchor locations for a line-up of three cabinets.
- b) On page 4, bulleted item: Is the 1.375" eccentricity based on an assumed location of the cabinet on the 6" channel or an "as built" location?

Response:

- a) *Number of anchor locations clarified.*
- b) *NNECo will walkdown the cabinet to verify weld placements.*

2. **Topic:** DRs

Background: Parsons requested topic to discuss the DRs listed below.

DRs for Discussion:

- a) DR-0346, Service Water Pump "C" Repair Package (Larry Collier) Item #3 - We need an explanation of the NNECo response. The documents we have state that the depth of one cavity is 1 1/2 inches and the depth of the other cavity is 1 inch. The response to this discrepancy did not state if the material thickness at the first point of repair would accommodate the 1 1/2 inch excavation. Also, NU did not at all address the 2nd repair cavity which was recorded as 1 inch. Base on this we do not understand NNECo's interpretation of the repair documents.

CONFERENCE NOTES

August 11, 1998

Response: *Deferred to 8/18/98.*

3. **Topic:** DRs

Background: NNECo requested topic to discuss the DRs listed below.

DRs for Discussion:

- a) DR-056 PRT Member: Bob Weth and Vere Joseph. Follow-up Response. NU to present information to show that LB is met and to provide clarification of FSAR statements.
- b) DR-359 PRT Member: Farid Elsabee, Roy Terry, Harold Thompson. Discuss Items 1 & 2 Response. Clarification of Topic 3.

Response:

- a) *NNECo will provide a follow-up response which shows that Aux Feed initiation during increasing power between 20 and 25% with an ATWS event is already bounded in an existing evaluation of system performance.*
- b) *NNECo will provide a follow-up response which explains how Unit 2 is protected from conditions related to a possible cask drop.*

CONFERENCE NOTES

July 21, 1998

DATE: 7/21/98

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

1. DCR/MMOD# M2-97010, MP-2 EBFS Dampers 2-EB-42, 43, 52 & 54 and Ductwork Replacement
2. AFW Automatic Initiation System Analytical Limits
3. DRs

LIST OF ATTENDEES:

NNECo	NRC	NEAC	Parsons
Joe Fougere	John Nakoski		Wayne Dobson
Bob Skwirz			Dan Wooddell
Gary Komosky			F. C. Downey
Greg Tardif			Ken Gabel
Mario Capogrosso			Joe Groncki
Tom LaFauci			Mike Akins
Rick Bonner			Eric Blocher
Bob Weth			Trent Powers
Glenn Gardner			Larry Wigley
Ken Moore			Mark Fitzgerald
Dan Van Duyne			
John Lockaby			
George Howard			
Joe Nochera			
Geoff Neate			

1. **Topic:** DCR/MMOD# M2-97010, MP-2 EBFS Dampers 2-EB-42, 43, 52 & 54 and Ductwork Replacement (Irwin Zinnes)

Background: N/A

Questions:

- a) What is the status of this modification?
- b) Has the Final Release/Engineering Turnover for operability encompassing all of the EBFS occurred?

Response: NNECo stated that there were no open items on the mod and that the system draw-down test was the only remaining item. The test will be done prior to Mode 4, however, no specific date scheduled. The damper testing was reported completed.

NOTE: Parsons identified RAI # 2048 which requested test plan results and Final Turnover Transmittal and Modification Completion Report as they become available.

2. **Topic:** AFW Automatic Initiation System Analytical Limits (John Archer) (Continuation of Topic # 4 from 7/14/98)

Background: The Auxiliary Feedwater System is automatically initiated to perform the safety function of mitigating Chapter 14 Accidents by providing cooling water to the steam generators soon enough to prevent the steam generators from reaching an unacceptable low level to preclude steam generator dryout and tube failure.

CONFERENCE NOTES

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NNECo has performed Chapter 14 Accident Mitigation Safety Analyses that assessed Steam Generator accident thermodynamic conditions and minimum water inventory necessary to prevent dryout. The current Millstone 2 Cycle 10 Loss of Feedwater Analysis, E-5272-595-006, 3/91 assumed that initiation of the event started when there was a reactor trip which occurred at a low S.G. level of 34%. This AFW initiation resulted in a flow of 600gpm at 600 seconds after reactor trip. The new LOF analysis E-6855-595-1, 3/15/98, Loss of Feedwater Analysis for Millstone 2, is based on the motor driven feedwater pumps actuated by low steam generator level of 10% with a 240 second time delay. This analysis also investigated a 0% S.G. AFW actuation and temporary SG dryout occurred.

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Questions:

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- d) Why did the new LOFW Analysis use an instrument uncertainty value of 2% in its AFW automatic initiation analysis? Calculation 92-030-1254E2 Rev. 0 uses an uncertainty value of 5.16% which appears to be more appropriate to use.
- e) For the different types of Chapter 14 Accidents for which AFW is required to perform automatic initiation, what are their respective analytical limits, allowable values, setpoints, and appropriate normal condition or post accident condition, AAFWIS "TPE" instrument uncertainties (relative to the low level instrument tap)?
- f) What is the assumed accuracy of both the current and new LOF analysis?
- g) What Safety Limit has been established for the S.G. level, how much engineering margin is associated with it and which analysis established the Safety Limit? Where are the Safety Limits documented?
- h) Is the analytical limit methodology implemented by Calculation 92-030-1254E2 Rev. 0 the same as ISA 67.04 Part II, 1994 Method #2; and if not, what are the differences?
- i) Has the monthly as-found trip setpoint calibration data for the AFWAI loops exceeded the difference between the AFWAI Setpoint Value of 12% of NR level and the Allowable Value of 11.7% of NR level as established by Calc. 92-030-1254E2 Rev. 0 and if so, by how much?
- j) Has the monthly as-found trip setpoint calibration data for the AFWAI loops exceeded the difference between the AFWAI Setpoint Value of 12% of NR level and the Allowable Value of 10. % of NR level as established by Calc. 92-030-1254E2 Rev. 0 and if so, by how much?
- k) Please explain how the Calc. 92-030-1254E2 Rev. 0 "acceptance criteria" for the "as-found" or the "as-left" values be in excess of the difference between the Technical Specification's Setpoint Value and Allowable Value?

Response:.. This topics was not discussed. The NRC requested the topic be removed from the agenda. Parsons will proceed in preparing a DR based on the information available in documents.

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3. Topic: DRs

Background: NNECo requested topic to discuss the DRs listed below.

DRs for Discussion:

a) DR-0333

Discussion: *Parsons and NNECo discussed the evaluation of this DR. NNECo will provide a second response to the DR.*

b) DR-0055 (Continued from 7/16/98)

Discussion: *NNECo promised to send closure documentation that would detail how AFW valves taken out of technical specification alignment would be handled. After receiving this information Parsons closed the DR as follows: After further review, Parsons has concluded that if the AFW manual alignment of the AFW regulating valves is tracked against an open Technical Specification Action Statement and OP 2322 procedural steps 4.10 and 4.11 are in fact used to restore the regulating valves to Auto that this DR is considered non-discrepant and the matter is considered closed. However, it is considered a weakness that no specific procedure exists that details the step-by-step process of entering/ exiting and tracking of Technical Specification action statements.*

c) DR-463

Discussion: *Parsons and NNECo discussed the evaluation of this DR. NNECo personnel stated that they knew of no PM changes or deferrals that resulted in a LB/DB non-conformance.*

d) DR-205

Discussion: *Currently this DR is in an open pending status. NNECo has scheduled the corrective action prior to restart, but believes it is not necessary that the name plate information be changed prior to restart. Parsons agrees. As a general practice, it was agreed with the NRC that Parsons can revise its last comment on NNECo's response based on conferences. Parsons will revise its response to DR-0205 and change the status to closed.*

e) DR-593

Discussion: *NNECo asked that Parsons identify the drawing number which details the modified pipe straps referenced in Item 1A of the DR. Parsons advised that detailed drawings do not exist because these supports are typical small bore installations based on standardized design drawings. The discrepant conditions were discovered during walkdown activities and are only a sample of multiple discrepant installation applications.*

f) DR-119

Discussion: *No resolution was reached and DR 119 has been sent to the NRC.*

CONFERENCE NOTES

July 23, 1998

DATE: 7/23/98

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

1. DRs Requested by NNECo to Discuss
2. DR-0395 Valve Specification & Piping QA Classification
3. DR-0325 Jumper, Lifted Lead and Bypass Control
4. DR-0538, Issue No. 8, Acceptance criteria used for testing torque wrenches
5. Control Room Free Volume
6. EWR -97-176
7. PDCR 2-241-76

LIST OF ATTENDEES:

NNECo	NRC	NEAC	Parsons
Joe Fougere	John Nakoski		Wayne Dobson
Ray Necci			Dan Wooddell
Bob Skwirz			Claude Didier
Gary Komosky			Tom McLean
Rich Laudanat			Cliff Marks
Greg Tardif			Richard Boyd
Steve Unikewicz			Eric Blocher
Chris Scully			Trent Powers
Bob Carrite			Gary Jackson
Joe Nochera			Dave Lengel
Morris Sanders			
George Howard			
Bob Byrnes			
Norbert Carte			
Dan Van Duyne			
Bob Lawrence			
Bob Crittenden			

1. Topic: DRs Requested by NNECo to Discuss

- a) DR-0463 (Continued from 7/21/98) Further discussion on NNECo's proposed response.
 - Information on when INPO inspection occurred
 - Further discussion on evidence of past problems regarding PM deferrals as an indication of process deficiency.
- b) DR-0186 - Piping Hanger. NNECo will present additional information on a follow-up response.
- c) DR-0113 - Pressure Locking Containment Sump Isolation Valves. NNECo will present additional information on a follow-up response.

Response:

- a) Further discussion on NNECo's proposed response to DR-0463 NNECo provided the following information: CR M3-97-2555 was issued on 8-8-97 as a result of an INPO inspection. This action resulted in the creation of procedure CBM MECH 203, but did not result in the creation of procedure U2-PROG-500. A discussion on evidence of past problems regarding PM deferrals as an indication of process deficiencies was held. Parsons noted that six specific ACRs/CRs indicate that this is a program problem. NNECo follow-up is required.
- b) Parsons agreed to close the DR as non-discrepant.
- c) NNECo provided a listing of information being transmitted to Parsons as a follow-up response to DR-0113. This listing includes AWOs, completed test procedures including the as found and as left test results, and the 50:59 evaluation.

CONFERENCE NOTES

July 23, 1998

2. **Topic:** DR-0395 Valve Specification & Piping QA Classification (Claude Didier)

- a) Item #2, We would like to understand NNECo's basis for why this is consider a level 4 discrepancy.
- b) Item #3, the DR response is different than information provide during the 2/5/98 and 3/10/98 conference call. We would like clarification on which process is used to determine the QA classification of piping.

Response:

- a) *NNECo has considered this as a failure to initiate a DCN to change the Piping Specification. Parsons identified the Piping Specification as a design input document and part of the design basis of the plant. Initiating the PDCR and not considering the piping specification is a failure to address the design basis of the plant in making a plant modification.*
- b) *NNECo in clarification stated that for piping in determining the classification used for work there are three areas considered. If the piping is in PMMS it has a classification yes, no, undetermined. If not in PMMS the hard copy MEPL QA classification is used and lacking any information here, then the system QA designation is used. The system designation uses the classification of the highest QA level component in the system.*

3. **Topic:** DR-0325 Jumper, Lifted Lead and Bypass Control (Wayne Dobson)

- a) Attached to the FAX copy of these conference topics is the Jumper Device Control Sheet 2-95-126 provided to Parsons for the Tier 3 ICAVP review. This document does not support the DR response nor does it agree with the copy of the Jumper Device Control Sheet 2-95-126 attached to the DR response, (specifically sections 4, 8, and 16). Please explain..

Response:.. The copy sent to Parsons in response to RAI-555 on 10/17/97 was an attachment to the AWO used to install the temp. mod. It was not the official record of the Jumper Device Control Sheet which would have been in the control room. The installation verification signature on the copy provided in response to RAI-555 is not the same as the copy provided with the DR response. NNECo believes the signature on the RAI-555 response was a mistake, but NNECo will investigate further.

4. **Topic:** DR-0538, Issue No. 8, Acceptance criteria used for testing torque wrenches. (D. L. Wooddell)

Background: CR M2-98-1551 and corrective actions No. 5 & 6, 98010755-05 and 98010755-06 respectively, list the corrective actions being taken to resolve this discrepancy item. The corrective actions provided are not specific as to exactly what is being done.

Questions:

- a) Corrective action No. 5 states that counter clockwise acceptance criteria in CMP 716B will be changed.
 - What value is the acceptance criteria being changed to?
 - Does NNECo have documentation that shows this change?
- b) Corrective action No. 6 is a change to WC 8 to add the statement "unless otherwise specified by the manufacturer" and to delete any reference to torque wrench calibrated accuracies.
 - Where is the statement "unless otherwise specified by the manufacturer" being inserted into WC 8?
 - Why are references to torque wrench calibrated accuracies being deleted from this procedure?
 - Does NNECo have documentation that shows these changes?

CONFERENCE NOTES

July 23, 1998

Response:.. NNECo provided the following information for Questions a) and b). Torque wrench acceptance criteria will be changed to 4% unless otherwise specified by the manufacturer. This is in accordance with a federal specification. The phrase "unless otherwise specified by the manufacturer" will replace the accuracy requirement currently in WC 8. Torque wrench accuracies are being deleted from WC 8 to eliminate confusion. Documentation showing these changes does not exist at this time. NNECo has these items scheduled as a post startup item

5. **Topic:** Control Room Free Volume (Dave Lengel)

Questions:

- a) Is calculation 97-CRV-02048M2 the calculation of record for control room volume? If not, what is?
- b) Are there any new calculations involving the control room free volume being developed or any revisions to current calcs in process?
- c) Has any test been performed to measure control room free volume?
- d) If so, what procedure or other mechanism was used to conduct the test?
- e) What were the results of the test?

Response:

- a) *Yes, 97-CRV-02048M2 is the calculation of record for the control room.*
- b) *No, there are no new calculations.*
- c) *No, no test has been performed for control room free volume.*
- d) *N/A*
- e) *N/A*

6. **Topic:** EWR -97-176 (William Clemenson)

Background: Reference : EWR-97-176 & CR-1610. EWR-97-176 was generated to evaluate the effects of design basis tornado generated pressure effects on the EDG HVAC systems.

Questions:

- a) What is the current status of this engineering work request?

Response:.. Deferred to 7/30/98.

7. **Topic:** PDCR 2-241-76 (T. L. McLean)

Background: PDCR 2-241-76 added a load shed block to the under-voltage protection circuit that is initiated when the Diesels begin load sequencing.

Questions:

- a) Please explain how is this feature reset? Is operator action required?

Response: The under-voltage protection feature is reset by the operator when he resets the under-voltage ESAS trips and the sequencer is cleared.

CONFERENCE NOTES
July 29, 1998

DATE: 7/29/98

- PURPOSE:** Telephone conference with NNECo, NRC, NEAC, and Parsons to discuss:
1. EWR -97-176
 2. Local indicators and recorders for the Containment Particulate and Gaseous Monitors
 3. Final Disposition of UIR 2765
 4. DR-0231 Incomplete Incorporation of PDCR M2-96053
 5. NNECo Requested DRs for Discussion

LIST OF ATTENDEES:

NNECo	NRC	NEAC	Parsons
Bob Skwirz	Ralph Architzel		Wayne Dobson
Rich Laudanat			Mark Fitzgerald
Greg Tardif			William Clemenson
Cris Cristallo			Tom Harris
Jim Nicholson			San Wooddell
Bill Cushman			Trent Powers
John Kapinos			
Norbert Carte			
Fred Mattioli			

1. **Topic:** EWR -97-176 (William Clemenson) (Continuation of Topic # 6 from 7/23/98)

Background: Reference : EWR-97-176 & CR-1610. EWR-97-176 was generated to evaluate the effects of design basis tornado generated pressure effects on the EDG HVAC systems.

Questions:

- a) What is the current status of this engineering work request?

Response: *A technical evaluation and position paper is being prepared. It is scheduled to be complete by 9/1/98.*

2. **Topic:** Local indicators and recorders for the Containment Particulate and Gaseous Monitors (Tom Harris)

References:

- 1) PORC meeting #2-96-307
- 2) PORC meeting #2-96-309
- 3) Jumper Device Control Sheet 2-96-089
- 4) Jumper Device Control Sheet 2-96-088
- 5) DCN DM2-00-1498-96

Background:

Jumper Device Control Sheet 2-96-089 and Jumper Device Control Sheet 2-96-088 temporarily disconnected non-QA components from QA components. Recorders were disconnected, local horns and indicators were disconnected, jumpers and resistors were installed to bypass non-QA components.

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Question:

- a) Since this change is temporary, what actions are planned for a permanent solution.
- b) If a permanent solution has been identified, what is the schedule for its implementation?
- c) What documents track the permanent solution?

Response: *DCR M2-97-033 has been released for installation and is currently being implemented in the plant. This modification will be completed prior to restart.*

3. **Topic:** Final Disposition of UIR 2765 (Bill Clemenson)

Reference:

UIR 2765
AR 97020898-01
FSAR Figure 9.9-24

Background:

The Final Disposition of UIR 2765 which addresses EDG HVAC has three required actions for CMP:

1. Revise calculations 2N20-18, 2N20-20, 2N20-23
2. Review EDG HVAC airflow and balancing test results from DCR-2-97005 to verify adequacy and sufficient margin of safety
3. Revise FSAR sections, if required.

These actions were assigned to AR 97020898-01. The status of AR 97020898-01 is COMPLETE, 11/14/97. A review of the AR provides documentation for completion of item 1, but we have not found documentation with regard to items 2 & 3.

Questions:

- a) How did CMP document the evaluation of the TAB data from DCR-2-97005 for adequacy and sufficient safety margin?
- b) What is the status of the CMP review of FSAR Figure 9.9-24, how was this review documented and will the subject FSAR figure require revision?

Response: *UIR will be revised to include information on this evaluation.*

4. **Topic:** DR-0231 Incomplete Incorporation of PDCR M2-96053 (D. L. Wooddell)

Parsons wishes to discuss CR M2-98-0070 and NU's response to this Discrepancy Report.

- a) We do not understand how the failure of a PDCR to change an effected maintenance procedure can be called non-discrepant.
- b) Also, the DR response that MP 2719A was changed "during the normal procedure review process" does not appear to match CR M2-98-0070, its AR 98000205, and Procedure and Form Change Request for MP 2719A rev. 8, change 5 which refer to DR-0231 as the reason for the change.

Response: *NNECo will provide a supplemental response to DR-0231 stating that the DR is a Confirmed Significance Level 4.*

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5. Topic: DRs

Background: NNECo requested topic to discuss the DRs listed below.

DRs for Discussion:

- a) DR-0330 - Containment Pressure Recorder UR-9862 / RG 1.97 Requirements
Bill Cushman, NU to provide R.G. 1.97 position on subject recorders.

Discussion: NNECo's interpretation of Reg. Guide 1.97 is that since the recorder is not the primary recorder, it does not need to be 1E. NNECo will issue DCN DM2-02-0816-98 against specification ee-012 to add clarification notes to change the current 1E designation. NNECo believes this interpretation of Reg. Guide 1.97 was approved by the NRC in inspection report 50-336/91-16. Parsons will need to review this inspection report and the 1986 summary compliance table before a decision can be reached.

- b) DR-0313 - RPS Trip Setpoint for Reactor Coolant Low Flow Trip Function
Greg Tardif, NU to provide discussion for basis of designating current Significance Level 3 item as Significance Level 4.

Discussion: NNECo position - the error resulted in only .5% change in DNBR and does not make the event a limiting event. Since the limiting event did not change, there is no reduction in margin. NNECo procedure RAC 12 supports this definition of margin. Parsons agrees that the limiting event did not change, however, there was a margin reduction in accident case being evaluated. Parsons will review RAC 12 and discuss NNECo's definition of margin with the NRC.

- c) DR-0499 - Motor H.P. Discrepancy Between Calculation and Installed MOV'S
Norbert Carte, NU to provide explanation of why calculation in question is non-discrepant.

Discussion: The NU response referenced the wrong calculation, Parsons has obtained the correct calculation; 97-ENG-0840E, Rev.01, change 13, dated 2-23-98. Based on this calculation, Parsons will revise its last comment and close this DR.

- d) DR-0158 - Technical Specification 4.6.1.4 Read Off Meter that does not Cover Full Scale
Norbert Carte, NU to provide explanation and references to show item was pre-discovered.

Discussion: NNECo indicated that the CRM2-97-2375 was part of a effort that started in 1996 with a NRC Notice of Violation against Tech Spec surveillances. Parsons stated that if the Notice of Violation issue or NNECo's response to the notice was specific to instrumentation not being adequate to support Tech Spec requirements, then Parsons could agree the issue was pre-discovered. Otherwise, Parsons will continue in its position that this is a valid DR.

- e) DR-0325 - Improper Use of WC-10, Jumper, Lifted Lead, and Bypass Control
Norbert Carte, NU to provide results of investigation from Thursday's 7/23/98 conference call regarding subject B/J.

Discussion: The Jumper Control Sheet provided for the ICAVP review was an attachment to one of two AWO's used to install the temporary modification. This is not the official record of the Jumper Control Sheet. NNECo should not have provided this document as representing the Jumper Control Sheet. Based on this information, Parsons will close this DR.

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DATE: 7/30/98

- PURPOSE:** Telephone conference with NNECo, NRC, NEAC, and Parsons to discuss:
1. PDCR 2-244-76
 2. Single Failure assumptions of the AFW system for Chapter 14 transient analyses
 3. Unit 1 Impacts on Millstone Unit 2
 4. IPEEE and IPE Site Flooding
 5. "A" AFW Pump Inadequate Performance
 6. NNECo Requested DRs for Discussion

LIST OF ATTENDEES:

NNECo	NRC	NEAC	Parsons
Bob Skwirz	Eric Benner		Wayne Dobson
George Pitman			Jack Lawton
Bob Carrite			Richard Boyd
Peter Talbot			Ron Smith
Harold Thompson			Larry Collier
Cris Cristallo			Trent Powers
Lloyd Baird			Dan Wooddell
Ken Moore			
George Howard			

1. Topic: PDCR 2-244-76 (Jack Lawton)

Background: This PDCR installed a voltage sensing network in the ESAS cabinets to trip the RSST feed to the vital 4.16 kV buses, after a time delay, to allow for normal equipment starting during load sequencing. The current revision of the drawings listed in the PDCR do not appear to contain the equipment installed by this modification.

Question:

- a) Was this configuration later changed? If so what modification package accomplished this?
- b) If this PDCR represents the current plant configuration, what drawings do these modifications appear on?

Response:

- a) PDCR 2-063-92 upgraded the ESAS cabinets, removing the components installed by PDCR 2-244-76.
- b) Not Applicable.

2. Topic : Single Failure assumptions of the AFW system for Chapter 14 transient analyses (Gordon Chen)

Background : For the analyses of Loss of Normal Feedwater (E-6855-595-1, Rev. 0) and Small Break LOCA (M2-EV-98-0070, Rev.0), the single failure of the AFW system is based on the failure of one AFW pump. The AFW flow is available to both Steam Generators through control valves FW-43A and FW-43B, with values provided by the Proto-Power calculation (97-ENG-02053-M2, Rev. 2). The control valves are opened by AFW initiation signal.

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Question :

- a) If one of the AFW control valves, FW-43A or FW-43B, were to fail closed on AFW initiation, then the resultant AFW flow is available to only one Steam Generator. Please identify what justifies control valve failure as being bounded by the AFW pump failure case?

Response:.. Postponed to 8/4/98

3. **Topic:** Unit 1 Impacts on Millstone Unit 2. (Ron Smith)

Question:

- a) Based on the recent announcement regarding Unit 1 what is NNECo's plan for addressing those Unit 1 features/functions for which Millstone Unit 2 has taken credit for operation?

Response:.. Postponed to 8/4/98

4. **Topic:** IPEEE and IPE Site Flooding (Ron Smith)

Questions:

- a) What is the Millstone procedure(s), such as that used for the floor drain features covered in MP 2701J, that cover inspection and repair of all plant features that are taken credit for mitigation of site flooding for both IPEEE and IPE. Features of concern are building seals for the structures such as the EBFS, duct banks and other building penetrations.?

Response:.. The question was clarified and the response was Postponed to 8/4/98

5. **Topic:** "A" AFW Pump Inadequate Performance (CR M2-98-0714) (D. L. Wooddell)

Background: Parsons' copy of CR M2-98-0714 identifies that the root cause of the "A" AFW pump inadequate performance is to be determined.

Questions:

- a) Has the root cause of the "A" AFW pump inadequate performance been determined?
b) If yes, what was the cause of the inadequate pump performance?
c) If no, what is the schedule for performing the root cause analysis?
d) What is the modification number that changed the "A" AFW pump internals after it failed the high flow test after installation of the cavitating venturis?

Response: The cause of the AFW flow test failure was that the "A" AFW pump impellers were not backfiled. The entire pump was shipped to Ingersoll-Rand for repairs. I-R has completed the repairs and is expected to ship the pump to MP2 shortly. NNECo stated that a new pump curve is expected to be provided along with the I-R NCR.

6. **Topic:** DRs

Background: NNECo requested topic to discuss the DRs listed below.

DRs for Discussion:

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- a) DR-0463 - Preventive Maintenance Program Changes and Deferrals (Dan Wooddell)
George Howard, Continuation of Discussions of 7/21 & 7/23. NU to present findings of CR investigation.

Discussion: NNECo discussed the results of their internal CR investigation and provided reasons why they do not consider the CRs previously discussed in the 7-23 conference call to be in violation of procedure U2-CBM-105. Parsons disagrees with NNECo's position concerning this DR. Parsons and NNECo agreed to release this DR to the NRC for a final determination of a discrepancy and significance level as soon as processing allows.

- b) DR-0263 - High Pressure Safety Injection Inservice Inspection Program (Larry Collier)
Ken Moore, NU to identify additional documentation to support position that they're in the "Third Ten Year Inspection".

Discussion: In previous discussions with NNECo, Parson was told that the third 10 year interval would start with mode 4 during restart. The DR response and this conference identified that NNECo considers the third 10 year interval to have actually started on 12/26/96. This interval started without NRC approval of the ISI Program. NNECo plans to extend the third 10 year interval by the length of the outage after the 12/26/96 date. Based on this information, Parsons agreed that the issue in this DR is non-discrepant. NOTE: Parsons needs to assess the impact of the start of the third 10 year interval on all of the rest of its ISI reviews.