



**Northeast
Nuclear Energy**

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The Northeast Utilities System

OCT 26 1999

Docket Nos. 50-245
50-336
50-423
B17906

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

Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3
Submittal of October 1999 Interim Little Harbor Consultants Assessment of the
Millstone Safety Conscious Work Environment

In a Northeast Nuclear Energy Company (NNECO) letter dated March 2, 1999,⁽¹⁾ we outlined our plans to continue to retain the services of Little Harbor Consultants (LHC) Inc. following closure of the NRC Order⁽²⁾ on independent oversight of the Millstone employee concerns program and safety conscious work environment (SCWE). Specifically, we indicated that LHC would be performing quarterly assessments of the Millstone SCWE during the one year period following closure of the Order. Additionally, we stated that the LHC assessment reports would be made available to the NRC and the public. Attached to this letter is the LHC interim assessment report for the assessment performed October 4 to October 8, 1999. NNECO is taking appropriate actions to address the observations in the report.

There are no regulatory commitments contained within this letter.

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- (1) NNECO Letter B17679, "Scope of Services of Little Harbor Consultants, Inc. Following Closure of the October 24, 1996 NRC Order," dated March 2, 1999.
- (2) NRC Order, dated October 24, 1996, Requiring Independent, Third-Party Oversight of NNECO's Implementation of Resolution of the Millstone Station Employees' Safety Concerns Issues. The Order was lifted on March 11, 1999.

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If there are any questions on the information provided in this letter, please contact Mr. John T. Carlin at (860) 437-5938.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

FOR: Raymond P. Necci
Vice President - Nuclear Oversight and
Regulatory Affairs

BY:



David A. Smith
Manager - Regulatory Affairs

Attachment (1)

cc: H. J. Miller, Region I Administrator
L. L. Wheeler, NRC Project Manager, Millstone Unit No. 1
D. P. Beaulieu, Senior Resident Inspector, Millstone Unit No. 2
R. B. Eaton, NRC Senior Project Manager, Millstone Unit No. 2
A. C. Cerne, Senior Resident Inspector, Millstone Unit No. 3
J. A. Nakoski, NRC Project Manager, Millstone Unit No. 3
R. J. Urban, Millstone Inspections Directorate
P. C. Cataldo, NRC Inspector

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Attachment 1

Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3

**October 1999 Interim Little Harbor Consultants Assessment of the Millstone
Safety Conscious Work Environment**

October 1999

Little Harbor Consultants, Inc.

44 Nichols Road
Cohasset, Massachusetts 02025-1166
Telephone (781) 383-9536 • Fax (781) 383-2027

October 19, 1999

Mr. William J. Temple
Manager, Industry Relations
Northeast Nuclear Energy Company
PO Box 128
Waterford, CT 06385

Subject: Interim Little Harbor Consultants Assessment Report

Dear Mr. Temple:

This letter is intended to serve as an interim report covering our activities during the week of October 4, 1999, when Ms. Billie Garde and I visited the Millstone site. As we stated both prior to and during our visit, we could not schedule a full two weeks of assessment at Millstone this quarter due to conflicting commitments by Little Harbor and other, previously scheduled activities at the site. We agreed that it would be beneficial for us to visit for a week in October, and then return in early January for a full two weeks of assessment activity. That visit has been scheduled to begin January 3, 1999 and exit on January 14, 1999.

Our objective for the short visit was to evaluate progress in responding to our observations from the June-July visit and meet with those persons who had indicated a desire to speak with us. Additionally, Ms. Garde was requested to make a presentation at the off-site management meeting on October 7th.

This interim report is preliminary in nature due to the time constraints and inability to follow up adequately on some of the observations.

During the week we met with twenty-seven individuals. Most had requested to meet with us, and the others were primarily members of management with whom we had requested to speak. We also attended the full day Millstone Leadership Meeting.

We observed that there has been improvement in most areas since our last visit, with some exceptions noted below. It is clear from a regulatory perspective, that the Millstone site is meeting and exceeding all regulatory requirements and expectations as far as a safety conscious work environment (SCWE) is concerned. All the programs and policies put in place to enhance site performance re SCWE are functioning reasonably well.

We noted that the Employee Concerns Program (ECP) is continuing to improve and is one of the best in the country. Management should, however, be attentive to how long it takes to close out some of the cases. There was one file which we reviewed and found a failure to follow procedures. The file was a potential 50.7 case, and contrary to the flow chart for evaluating such cases, an evaluation of "intent" was made. Management agreed to re-open this file.

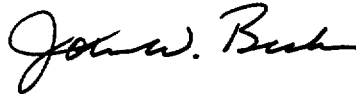
We observed that management should aggressively push to deal first-hand with employee concerns, rather than rely on the ECP to do so. There were some examples where individuals would go immediately to the ECP with concerns rather than escalate their issues up the management chain. Some of this may have been due to the recent management realignment and unfamiliarity with new management personnel. Whatever the reason, establishing trust by having line management resolve issues as soon as possible should eliminate this possible trend.

We observed that there is no clearly stated strategic plan for dismantling the extraordinary measures which Millstone has put in place to deal with SCWE issues. We agree that there should be a return to normalcy in this regard, but observe that management seems to be struggling to identify clearly stated objectives for which progress can be measured.

The Millstone Leadership Meeting was a very well organized and effective session. It portends well for the future provided follow-up is implemented as described at the meeting. The overall tenor was a marked difference from other such meetings we have attended in the past.

Should there be any questions regarding these comments and observations, please don't hesitate to contact me.

Sincerely yours,



John W. Beck
President, Little Harbor Consultants