RAS 1779

June 2, 2000

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of:	)	
	)	
Northeast Nuclear Energy Company	)	Docket No. 50–423–LA–3
	)	
(Millstone Nuclear Power Station, Unit No. 3)	)	ASLBP No. 00–771–01–LA

NORTHEAST NUCLEAR ENERGY COMPANY'S RESPONSE TO CONNECTICUT COALITION AGAINST MILLSTONE AND LONG ISLAND COALITION AGAINST MILLSTONE'S THIRD SET OF INTERROGATORIES

Consistent with the directions of the Atomic Safety and Licensing Board ("Licensing Board") during the May 26, 2000, conference call, Northeast Nuclear Energy Company ("NNECO") hereby files its response to certain interrogatories included in the Connecticut Coalition Against Millstone ("CCAM") and the Long Island Coalition Against Millstone ("CAM") (collectively, "Intervenors") "Third Set of Interrogatories and Requests for Production" ("Intervenors' Third Discovery Requests").[1] Document requests, again consistent with the Licensing Board's directions, will be handled separately, by making certain information available at Millstone Station.

Specifically, on May 26, 2000, the Licensing Board held a teleconference with counsel for the parties and NRC Staff to rule on NNECO's motion for protective order with respect to Intervenors' Third Discovery Requests. During the teleconference, the Licensing

[1] Although Intervenors refer to the subject request as their third, in reality it is their second.

Template = Secy-035

SECY-02

Board issued oral orders ("Board Order") that eliminated several specific discovery requests and limited the scope of several others. The Board Order also provided that: (1) NNECO's responses to the Intervenors' remaining interrogatories are due on June 2, 2000; and (2) documents requested by the Intervenors are not required to be turned over to the Intervenors, rather, the documents are to be made available to the Intervenors for their inspection starting June 2, 2000, with all the responsive documents made available by June 9, 2000. Pursuant to the Board Order, this initial response is directed to the Intervenors' *interrogatories*. Attached to this submittal is the affidavit of the individual who was responsible for collecting the information used in NNECO's responses to the various interrogatories herein.[2]

Discovery Requests

A1 Industry Experience

(1) Attachment 1 to an NNECO letter of May 5, 2000 provides responses to an NRC Staff Request for Additional Information (RAI) of March 14, 2000. Page 5 of Attachment 1 describes an industry Operating Experience ("OE") Program. Please provide details of the OE Program and the scope of its database on events relevant to criticality in spent fuel pools. Also, please provide the descriptions of all such events that are in the database. Relevant events include, but are not limited to, fuel mispositioning events, errors in managing and measuring soluble boron and boron dilution events.

NNECO's Response: Pursuant to the Board Order, NNECO is addressing this request by providing an opportunity for additional key word searches of the Millstone Action Item Tracking and Trending System ("AITTS"). AITTS is the database which incorporates, among other things, operating experience evaluations performed by NNECO.

[2] Affidavits are not required with respect to NNECO's responses to the document production requests, and are not provided here for responses that merely discuss documents that will be made available.

Pursuant to the Board Order, and at Intervenors' request, NNECO will perform searches on the AITTS database for operating experience evaluations with other relevant keywords identified by Intervenors.

A2 Boron Dilution

Explanatory Note: The Intervenors seek to identify and characterize scenarios in which the concentration of soluble boron in the Millstone 3 spent fuel pool is reduced through dilution. To that end, the Intervenors seek information about all systems and mechanisms that could add water to the pool or remove water from the pool. Specific questions follow.

(1) Please identify all boron dilution analyses performed for this pool, and provide copies of relevant documents.

NNECO's Response: NNECO's April 4, 2000, response to Interrogatory No. J – 1 identified and provided the only identified analysis specifically relating to a "boron dilution event." That analysis confirmed that boron concentration would remain within the current Technical Specification 3.9.1.2 limit of 1,750 ppm should the pool be inadvertently drained to the level of the spent fuel pool cooling suction line and refilled with pure water.

As part of its past resolution of Boraflex integrity concerns, NNECO amended the Millstone Unit 3 Technical Specifications to credit soluble boron. In conjunction with this amendment, NNECO evaluated the design capability of piping systems in the vicinity of the spent fuel pool for their capability to remain leak tight following a seismic event. The acceptance criteria used in the analysis were: (1) piping will not leak following a seismic event; (2) piping may leak but flow will not enter the spent fuel pool; or (3) piping may lose pressure boundary integrity, but locations of overstress have been isolated from flow. The documentation related to this review will be available for inspection at Millstone Station.

(2) Please identify and describe in detail all actions (including backfits and procedural changes) that have been taken to reduce the potential for boron dilution at this pool. Please provide copies of relevant documents.

NNECO's Response: NNECO implemented plant modifications to address the analyses described in A2(1) associated with the Boraflex resolution. The more significant modifications included upgrade of portions of the spent fuel pool cooling system piping to meet seismic design criteria, capping of the fuel building elevation 106'-0" roof drain, which is directly above the spent fuel pool, and modification of two glycol preheating system lines. Pursuant to the Board Order, NNECO will make documents related to these modifications available to the Intervenors for their review at Millstone Station by June 9, 2000.

(3) Please identify and describe in detail all piping and systems that could remove water from this pool and from the pool cooling and purification systems. For the purposes of this question, include all water removal pathways, not only those pathways allowed by present procedures. Please provide diagrams, drawings and specifications of relevant piping and systems.

NNECO's Response: Pursuant to the Board Order, no response is required to this request.

(4) Please identify and describe the potential effect on the pool water inventory of ruptured or broken tubes in a pool cooling heat exchanger. Please provide relevant documents.

NNECO's Response: Pursuant to the Board Order, no response is required to this request.

(5) Please identify and describe the potential effect on the pool water inventory of pipe leaks, pump seal leaks, inadvertent opening of drain valves, or other water loss pathways from the pool cooling and purification systems. Please provide relevant documents.

NNECO's Response: Pursuant to the Board Order, no response is required to this request.

(6) Please identify and describe in detail all piping and systems that could add water to this pool and to the pool cooling and purification systems. For the purposes of this section, include all water addition pathways, not only those pathways allowed by present procedures. Please provide diagrams, drawings and specifications of relevant piping and systems.

NNECO's Response: Pursuant to the Board Order, no response is required to this request.

(7) Please identify and describe in detail all piping that passes through the pool building that could, through leakage, opening of a valve or flange, or addition of couplings,

hoses or spool pieces, cause a flow of water into the pool. Please provide diagrams, drawings and specifications of relevant piping and systems.

NNECO's Response: Pursuant to the Board Order, no response is required to this request.

(8) Please provide the volumes of the fuel pool, the cask pit, the transfer canal and the reactor refueling cavity.

NNECO's Response: The following are the requested volumes:

- Spent Fuel Pool: approximately 60,759 cubic feet
- Shipping Cask Area: approximately 14,955 cubic feet
- Fuel Transfer Canal: approximately 9,118 cubic feet

Note that the above values are at the normal water level and do not account for volumes of structures and components within the areas.

- Refueling Cavity Volume (including containment side fuel transfer canal): approximately 44,085 cubic feet

Note that this final volume corresponds to the elevation of the operating floor at 51'-4", which is above the normal operating level of 49'-10". It does not account for volumes of structures and components within the area.

(9) Please describe the rainwater flow paths on and in the vicinity of the roof of the fuel pool building and provide estimates of rainwater flow volumes.

NNECO's Response: The Millstone Unit 3 design basis probable maximum precipitation ("PMP") value of 6.5 inches per hour was used in the supporting calculations associated with the modifications to the fuel building roof drain. In all cases, rainwater will accumulate on the elevation 106'-0" roof (i.e., the area with the capped drain) to the point where it overflows the elevation 106'-0" roof parapet to the adjacent roof area at elevation 93'-6" which is provided with three roof drains. This adjacent roof area does not overlap the spent fuel pool and the

associated drain piping was shown to remain leaktight following a seismic event. The original design basis required three roof drains to divert the PMP design flow for the two roof areas combined, with a total of four drains provided. Consequently, sufficient drain capacity exists within the current configuration to manage the removal of rain water under PMP conditions. Additionally, the roof at elevation 106'-0" is designed to accommodate the dead load associated with an accumulation of water up to the level of the parapet. As a final matter, calculations were performed to demonstrate that the water passing through the elevation 93'-6" roof drains would not rise up to the elevation of the weak flange associated with the elevation 106'-0" roof drain and thereby leak into the spent fuel pool.

A3 Design Codes

(1) Attachment 5 to the NNECO license amendment application contains Section 2.3 on Codes, Standards and Practices. At page 2-3, this Section lists the design code ANSI N210-1976. The American Nuclear Society has revised this code and has incorporated the revision in the code ANSI/ANS-57.2-1983. Is NNECO bound by the ANSI/ANS-57.2-1983 for the purposes of the requested license amendment?

NNECO's Response: NNECO is not bound by ANSI/ANS-57.2-1983. ANSI N210-1976 is the bounding standard for the design of the Millstone Unit 3 spent fuel pool. Since the plant was licensed, two applications invoking ANSI/ANS 57.2-1983 have been submitted and approved by the NRC through the license amendment process. Millstone Unit 3 relied on the provisions of ANSI/ANS 57.2-1983 for use of burnup credit in its application to use 5.05 weight percent enriched fuel. Additionally, Technical Specification changes to address Boraflex degradation credit the allowance for soluble Boron credit contained in ANSI/ANS 57.2-1983. The Millstone Unit 3 spent fuel pool rerack application dated March 19, 1999, preserves this licensing basis and references both standards in Attachment 5, Section 4.0, "Criticality Safety Evaluation," under subsection 4.1, "Design Basis."

A4 Calculations of K_{eff}

(1) Given the implementation of the proposed re-racking of the Millstone 3 pool, and assuming an absence of soluble boron, what would be the calculated k-effective in each of the regions of the pool if various combinations of fresh fuel assemblies were placed in the racks? For this purpose, various combinations of fresh fuel assemblies would include one assembly, two adjacent assemblies, four adjacent assemblies, and a full rack, where in each case the surrounding cells would be occupied by assemblies of the highest reactivity allowed by the Technical Specifications.

NNECO's Response: Pursuant to the Board Order, NNECO is not required to respond to this Interrogatory by June 2, 2000. Instead, NNECO has already provided the results of certain licensing basis criticality calculations in the March 19, 1999, amendment application. Additionally, for this proceeding, NNECO is preparing certain additional beyond-design-basis criticality calculations. In accordance with the Board Order, once these calculations are finalized, NNECO will supplement this response with the results (assumptions and calculated K_{eff}) of the calculations that it will rely on in its written filing for the Subpart K proceeding.

A5 Pages from the FSAR

(1) Please provide the following pages from the Millstone 3 FSAR:

Text Pages:

1.2-5
3B-16 through 3B-80
3B-90 through 3B-99
3B-125 through 3B-129
3B- 134 through 3B-135
7.6-4 through 7.6-5
9.2-1 through 9.2-54
9.4-10 through 9.4-16
15.7-4 through 15.7-6

Tables:

1.7-2
2.4-12
2.4-13

9.2-5
9.2-6
9.4-3
15.7-8
15.7-9

Figures:

3.8-20
3.8-79
3.8-80
3.8-81
4.3-3
6.3-6
9.1-2A
9.1-6
9.1-9
9.1-10
9.1-11
9.1-12
9.1-13
9.1-18
9.2-2
9.3-9
15.1-11
15.1-14

NNECO's Response: Pursuant to the Board Order, NNECO will make these documents and the entire Final Safety Analysis Report available to the Intervenors for their review at Millstone Station.

A6 Control Room Operator Logs

(1) Please provide the complete control room operator logs for Millstone Units 1, 2 and 3 during each refueling, from the time of reactor shutdown to the time of reactor startup.

NNECO's Response: Pursuant to the Board Order, NNECO will make documents responsive to this request available to the Intervenors for their review at Millstone Station by

June 9, 2000. In accordance with the Board Order, the logs to be made available will be limited to Unit 3 logs for the time period specified by the Licensing Board.

A7 Reactor Engineering Refueling Outage and Fuel Handling Logs

(1) Please provide the complete reactor engineering refueling outage and fuel handling logs for Millstone Units 1, 2 and 3 pertaining to each refueling.

NNECO's Response: Pursuant to the Board Order, NNECO will make documents responsive to this request available to the Intervenors for their review at Millstone Station by June 9, 2000. In accordance with the Board Order, the logs to be made available will be limited to Unit 3 logs for the time period specified by the Licensing Board.

A8 Contention 4

(1) Please describe all procedures currently used during fuel movements in and around the spent fuel pool at Millstone 3. Please provide all relevant documents.

NNECO's Response: NNECO previously described certain procedures in its April 4, 2000, response to Interrogatory No. E – 1. In addition, NNECO has already provided documents responsive to this request to the Intervenors as cited in Attachment A to NNECO's responses dated April 20, 2000. More detailed descriptions of the procedures previously provided are included in NNECO's response to NRC questions dated May 5, 2000, which was also provided to the Intervenors. Beyond this, there are numerous procedures that may be responsive to this request — far too many to describe for the purposes of this response. Therefore, NNECO will make available for Intervenors' review at the Millstone Station, indexes of potentially relevant Millstone Unit 3 procedures. Intervenors can then identify any other specific and relevant procedures, and NNECO will make them available for review at Millstone Station.

(2) Please describe all procedures currently used to test and maintain equipment used during fuel movement in and around the Millstone 3 spent fuel pool.

NNECO's Response: There are numerous procedures that may be responsive to this request — far too many to describe for the purposes of this response. Therefore, NNECO will make available for Intervenors' review at the Millstone Station, indexes of potentially relevant Millstone Unit 3 procedures. Intervenors can then identify any other specific and relevant procedures, and NNECO will make them available for review at Millstone Station.

(3) Please provide all audit reports by internal (e.g., QA/QC) and external (NRC/INPO) sources of fuel handling practices at Millstone 3.

NNECO's Response: Pursuant to the Board Order, NNECO will make any documents responsive to this request available to the Intervenors for their review at Millstone Station by June 9, 2000.

(4) Please provide all non-conformance reports, NRC inspection findings, conditions adverse to quality, adverse condition reports and quality assurance/quality control reports regarding fuel handling equipment and spent fuel storage at Millstone 3.

NNECO's Response: Pursuant to the Board Order, the scope of this request has been limited to: (1) Unit 3; and (2) documents generated since startup from the extended outage that ended in July 1998. NNECO will make any documents responsive to this request available to the Intervenors for their review at Millstone Station by June 9, 2000.

(5) Please provide all follow-up, resolution and close-out reports associated with the documents provided in response to item (4) above.

NNECO's Response: Pursuant to the Board Order, NNECO will make any documents responsive to this request available to the Intervenors for their review at Millstone Station by June 9, 2000.

(6) Please provide all documented evaluations and assessments performed by or on behalf of Millstone 3 of nuclear industry events involving fuel handling events and mispositioned components.

NNECO's Response: Pursuant to the Board Order, no response is required to this request.

(7) Please provide all design basis documents on the fuel handling equipment, spent fuel pool (including storage racks) and spent fuel pool cooling system.

NNECO's Response: Pursuant to the Board Order, no response is required to this request.

(8) Please provide all calculations, evaluations and assessments regarding fuel handling accidents in the spent fuel pool or in the reactor at Millstone 3.

NNECO's Response: Pursuant to the Board Order, NNECO will make documents responsive to this request available to the Intervenors for their review at Millstone Station by June 9, 2000. Consistent with the Board Order, this will be limited to the spent fuel pool and will not include the reactor.

(9) Please describe the training provided to persons performing and/or supervising spent fuel handling activities at Millstone 3, including the lesson plans and handouts presented to students. Please provide all relevant documents.

NNECO's Response: NNECO documents individual qualification on Task Qualification Records ("TQR"). Individuals performing physical tasks associated with fuel handling, whether they are NNECO direct employees or contractors, are required to complete the associated TQR prior to performing the activity. Requirements for qualification are spelled out on the TQR under the headings of "Required Procedure Reviews," "Required Training/Prerequisites," and "Required Tasks." The degree to which proficiency in each qualification requirement must be demonstrated is also indicated on the TQR. Demonstration of proficiency for procedures ranges from detailed knowledge of procedural requirements to knowing the location of and how to access the applicable procedure. The specific level of demonstration is determined on the basis of the degree to which the specific procedure is directly utilized in performance of the activity. Formal training requirements, certifications and medical requirements, as well as related task qualifications are detailed under the Required Training and Prerequisites. Formal training requirements can be satisfied either through NNECO-provided classroom training if available, by

an external training facility, or through on-the-job training. Additionally, NNECO credits equivalent training when supporting documentation is provided either by the individual or their employer in the case of contract personnel. The "Required Task" section of the TQR specifies the elements of the job that must be demonstrated through either physical performance, simulation, or discussion under the direction of a qualified supervisor or designee.

To the extent that this request asks for the production of documents, and pursuant to the Board Order, NNECO will make documents responsive to this request available to the Intervenors for their review at Millstone Station by June 9, 2000.

A9 Contention 5

(1) Please describe all procedures currently used to control boron concentration in the spent fuel pool at Millstone 3, including systems and components used to add boron or borated water to the pool, remove boron or borated water from the pool, and monitor the amount of boron in the water. Please provide all relevant documents.

NNECO's Response: NNECO has previously described these procedures in its April 4, 2000, response to Interrogatory No. E – 2. In addition, NNECO has already provided documents responsive to this request to the Intervenors as cited in Attachment A to NNECO's responses dated April 20, 2000. Beyond this, there are numerous procedures that may be responsive to this request — far too many to describe for the purposes of this response. Therefore, NNECO will make available for Intervenors review at Millstone Station, indexes of potentially relevant Millstone Unit 3 procedures. Intervenors can then identify any other specific and relevant procedures, and NNECO will make them available for review at Millstone Station.

(2) Please describe all procedures currently used to test and maintain equipment used to control boron concentration in the Millstone 3 spent fuel pool. Please provide all relevant documents.

NNECO's Response: There are numerous procedures that may be responsive to this request — far too many to describe for the purposes of this response. Therefore, NNECO will make available for Intervenors review at the Millstone Station, indexes of potentially relevant Millstone Unit 3 procedures. Intervenors can then identify any other specific and relevant procedures, and NNECO will make them available for review at Millstone Station.

(3) Please provide all audit reports by internal (QA/QC) and external (NRC/INPO) sources of spent fuel pool water chemistry management at Millstone 3. Please provide all relevant documents.

NNECO's Response: Pursuant to the Board Order, NNECO will make any documents responsive to this request available to the Intervenors for their review at Millstone Station by June 9, 2000.

(4) Please provide all non-conformance reports, NRC inspection findings, conditions adverse to safety, adverse conditions reports and quality assurance/quality control reports regarding spent fuel pool water chemistry and equipment used to control boron concentration at Millstone 3.

NNECO's Response: Pursuant to the Board Order, the scope of this request has been limited to: (1) Unit 3; and (2) documents generated since startup from the extended outage that ended in July 1998. NNECO will make any documents responsive to this request available to the Intervenors for their review at Millstone Station by June 9, 2000.

(5) Please provide all follow-up, resolution and close-out reports associated with documents provided in response to item (4) above.

NNECO's Response: Pursuant to the Board Order, NNECO will make any documents responsive to this request available to the Intervenors for their review at Millstone Station by June 9, 2000.

(6) Please provide all documented evaluations and assessments performed by or on behalf of MP3 of nuclear industry events involving spent fuel pool water boron dilution events.

NNECO's Response: Pursuant to the Board Order, no response is required to this request.

(7) Please provide all design basis documents on the systems/components used to control boron concentration in Millstone 3 spent fuel pool.

NNECO's Response: Pursuant to the Board Order, no response is required to this request.

(8) Please provide all relevant documentation of the training provided for performing/supervising boron monitoring/testing at Millstone 3.

NNECO's Response: Pursuant to the Board Order, no response is required to this request.

A10 Errors in Fuel Handling

(1) Please identify the names of all personnel and their positions who provided and reviewed the information submitted by NNECO in its response to Intervenors' Interrogatory No. F-1 of April 4, 2000.

NNECO's Response: The development of the document list provided as NNECO's responses to Interrogatory Nos. F – 1 through F – 4 was managed by Mr. David Dodson, who is the Supervisor of Millstone Unit 3 Licensing. Mr. Dodson, together with Unit 3 Licensing Engineers, Ms. Diane Fredericks and Mr. Rod Peterson, developed a set of search terms to be used in searching the various electronic data sources maintained by NNECO. The search terms were selected to provide the broadest possible document sets for further review. Mr. Dodson also provided direction as to how document review and handling should occur. Ms. Fredericks and Mr. Peterson performed the actual document searches on the active data sources. Mr. Peterson solicited the services of Mr. Robert Kastner, a supervisor in the Corrective Action Department, to support searching archived records. Mr. Kastner conducted the requested searches himself in accordance with the search parameters provided by Mr. Peterson.

Documents identified in this fashion were further reviewed by Mr. Peterson and Ms. Fredericks, in either electronic or hard copy formats, to eliminate non-responsive material. Remaining documents were compiled and transmitted to NNECO counsel, Mr. Donald Ferraro,

for review and compilation. Following NNECO counsel review of the documents, the "draft final" list of documents was provided to the individuals sponsoring the original interrogatory responses (i.e., Messrs. Jensen, McDonald, Parillo, and Dodson) for final review based upon their experience.

(2) Please identify all databases relied upon as sources for the information provided by NNECO in its response to Intervenors' Interrogatory No. F-1 of April 4, 2000.

NNECO's Response: Attachment A provides a matrix of the databases searched and their contents.

(3) Please describe in detail the criteria used to identify errors as disclosed in NNECO's response to Intervenors' Interrogatory No. F-1 of April 4, 2000.

NNECO's Response: Attachment A provides a matrix of the databases searched and the search terms utilized. It should be noted that these databases are not of the same format, and therefore, different search strategies were required. Search strategies were selected on the basis of being most efficient for the volume of material contained in the data base. For example, the Condition Report database is indexed to multiple criteria (i.e., keyword, cause codes, system codes, etc.). This database was searched using keyword capability because it was the most efficient method. The Licensing Information Search Tool, however, is a full text database that allows much more flexibility in searching on discreet words or full phrases, as well as proximity searching. Approximately eight person-weeks worth of effort was expended in searching and reviewing documents in fulfillment of the original request.

Pursuant to the Board Order, and at Intervenors' request, NNECO will perform additional searches on the relevant databases with other relevant keywords identified by intervenors.

A11[3] Full Core Off-Load

(1) Please identify the source of information provided to the NRC as to when Millstone Unit 3 will lose the capacity in the spent fuel pool to perform a full core off-load. Please provide copies of relevant documents.

NNECO's Response: NNECO is unaware of the source of the information that led to the erroneous statement in the *Federal Register* notice of September 7, 1999, that Millstone Unit 3 would lose its full-core offload capacity following cycle six.[4] NNECO correctly stated in its March 19, 1999, submittal to the NRC that Millstone Unit 3 "will lose its full-core reserve discharge capacity at the end of its seventh cycle."[5]

(2) Please state when Millstone Unit 3 will lose the capacity in the spent fuel pool to perform a full core off-load if the proposed license amendment is not granted. Please provide copies of relevant documents.

NNECO's Response: Millstone Unit 3 will lose its full-core reserve discharge capacity at the end of its seventh cycle, i.e., upon completion of its next refueling outage.

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3 Although Intervenors denote this discovery request as A9, it is actually A11, and will be referred to as such here.

4 64 Fed. Reg. 48672, 48675.

5 Letter from R. P. Necci, Vice President – Nuclear Oversight and Regulatory Affairs, Northeast Nuclear Energy Company, to U.S. Nuclear Regulatory Commission, forwarding "Proposed Revision to Technical Specification; Spent Fuel Pool Rerack," Attachment 5, "Non-Proprietary Version of Licensing Report for Spent Fuel Rack Installation at Millstone Nuclear Station Unit 3," at 1-1 (March 19, 1999).

Respectfully submitted,

David A. Repka
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Lillian M. Cuoco
NORTHEAST UTILITIES SERVICE COMPANY
107 Selden Street
Berlin, Connecticut 06037

ATTORNEYS FOR NORTHEAST NUCLEAR ENERGY COMPANY

Dated in Washington, D.C.
this 2nd day of June 2000

NNECO Responses to Interrogatory Nos. A10(2) and A10(3)

Database Name	Description	Keywords or Search String	Description of Search	Screening	Notes
Action Item Tracking and Trending System (AITTS) database using the CR Search Engine	All Condition Reports (CRs) and Adverse Condition Reports (ACRs) written at Millstone since inception of the condition reporting program (approximately January 1995)	Boron Fuel Pool Fuel Assembly Fuel Rack Refueling	Keywords produced a list of ACRs/CRs	List was reviewed for relevant documents and those appearing relevant were opened and reviewed for responsiveness to the discovery request. Responsive documents were then printed out from another database which has more comprehensive information regarding issue resolution (but not the same search capability)	Search performed for all three Millstone units. Separate search was performed for calculations in response to the first discovery request
Licensing Information Search Tool (LIST)	Includes separate collection of LERs prior to 1996, and a collection of Docketed NNECO and NRC Correspondence, such as FSAR Annual Report, NRC Inspection Reports, NOVs	Cavity fail* Seal fail* Fuel rack* Fuel rack event Dropped fuel assembly event Fuel misload Fuel assembly misplacement fuel load* Boron concentration, decrease/increase/ dilut*/event Fuel handl* events	Keywords produced a list of LERs or correspondence	Search focused on licensee event reports, however relevant correspondence was also reviewed	Search performed for all three Millstone units. LIST is updated to approximately the June 1999 time frame

Database Name	Description	Keywords or Search String	Description of Search	Screening	Notes
PIR Database	All Plant Information Reports and Plant Incident Reports	Fuel pool Spent fuel Fuel Boron Pool level Pool cooling Burnup Pool surveillance	Searched PIR titles for keywords. Also, identified anything coded against all system numbers associated with Spent Fuel Pool systems. Search produced one list for each Millstone unit.	Lists were visually screened by title for responsiveness to the discovery request. Each relevant PIR was reviewed for final screening.	Search performed for all three Millstone units. PIRs exist for 3/95 and earlier; superseded by the ACR/CR process.
Corrective Actions Department Search for Non-Conformance Reports (NCRs)	NCRs cover hardware and installation non-conformances	Fuel pool Spent fuel Fuel Boron Pool level Pool cooling Burnup Pool surveillance	Search produced a unit 2 and Unit 3 list of NCRs from approximately 1996 through 1998.	Lists were visually screened by title for responsiveness to the discovery request. No relevant NCR titles were identified in this population.	Search performed for Millstone Units 2 & 3. NCR process superseded by CR process in 1998. Based on these results no further manual search of earlier NCRs was performed
MP2 & MP3 Submitted LERs	Regulatory Affairs Department Database	Titles visually searched for relevancy to contentions back to 1998	Based on this review, no LERs were determined to be relevant.	N/A	This was performed to catch LERs that were missed because LIST was out of date by 8-12 months

*any form of word

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Northeast Nuclear Energy Company	)	Docket No. 50–423–LA–3
	)	
(Millstone Nuclear Power Station, Unit No. 3)	)	ASLBP No. 00–771–01–LA

AFFIDAVIT OF DAVID W. DODSON

DAVID W. DODSON hereby declares under penalty of perjury that the following statements are true and correct of his own knowledge:

1. For more than two (2) years, I have been employed by Northeast Nuclear Energy Company at Millstone Nuclear Power Station. I currently am the licensing supervisor for Millstone Nuclear Power Station Unit 3.

2. Prior to my current position, I held various positions in the areas of design engineering, operations, and licensing, over a period of approximately thirteen (18) years.

3. Information provided in NNECO's response to the Connecticut Coalition Against Millstone and the Long Island Coalition Against Millstone's "Third Set of Interrogatories and Requests for Production," dated May 19, 2000, identified as A1(1), A2(1), A2(2), A2(8), A2(9), A3(1), A4(1), A8(1), A8(9), A9(1), A10(1), A10(2), A10(3), A11(1), and A11(2) was prepared either by myself or by individuals working under my direct supervision. The information contained in these responses was derived from my review of existing design documents, docketed correspondence, or other relevant internal documentation. Information prepared by others was reviewed by me for completeness prior to its incorporation.

4. The information in these responses is true and correct to the best of my knowledge and belief.

David W. Dodson

Subscribed to and Sworn before me personally, on this 2 day of JUNE, 2000.

Notary Public

My Commission expires:

DIANE M. PHILLIPO
Notary Public
My Commission Expires Dec. 31, 2000

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(Millstone Nuclear Power Station, Unit No. 3)	)	ASLBP No. 00–771–01–LA

CERTIFICATE OF SERVICE

I hereby certify that copies of "NORTHEAST NUCLEAR ENERGY COMPANY'S RESPONSE TO CONNECTICUT COALITION AGAINST MILLSTONE AND LONG ISLAND COALITION AGAINST MILLSTONE'S THIRD SET OF INTERROGATORIES AND REQUEST FOR PRODUCTION" in the captioned proceeding, have been served on the following by deposit in the United States mail, first class, this 2nd day of June 2000. Additional e-mail service and fax service has been made this same day as shown below.

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