



**Northeast  
Nuclear Energy**

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The Northeast Utilities System

**AUG 31 2000**

Docket No. 50-336  
B18210

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

Millstone Nuclear Power Station, Unit No. 2  
Revised Commitment Due Date  
for Review of Abnormal Operating Procedures (AOP) and  
Alarm Response Procedures (ARP) for Consistency (VIO 50-336/98-202-06)

In a letter dated June 11, 1998,<sup>(1)</sup> the Nuclear Regulatory Commission (NRC) transmitted the results of a Safety System Functional Inspection conducted at Millstone Nuclear Power Station, Unit No. 2 (MP2). The NRC Inspection and Notice of Violation (NOV) Report concluded that certain activities at MP2 were not in compliance with NRC regulations. In particular, the alarm response procedures (ARPs) for the Reactor Building Closed Cooling Water (RBCCW) system contained inconsistencies, had differing levels of detail, and did not integrate with existing operating and abnormal operating procedure (AOP) 2564, "Loss of RBCCW," Revision 3.

Northeast Nuclear Energy Company (NNECO) transmitted a revised reply to the NOV via letter dated November 9, 1998,<sup>(2)</sup> in which it committed to review MP2 AOPs and their applicable ARP window steps and instructions to correct actions and wording which are inconsistent. This action was to be completed as part of the procedure's biennial review process prior to August 31, 2000.

<sup>(1)</sup> E. V. Imbro letter to M. L. Bowling, "NOTICE OF VIOLATION AND SAFETY SYSTEM FUNCTIONAL INSPECTION OF MILLSTONE UNIT 2 (NRC INSPECTION REPORT NO. 50-336/98-202)," (VIO 50-336/98-202-06), dated June 11, 1998.

<sup>(2)</sup> M. L. Bowling to U.S. Nuclear Regulatory Commission, "Millstone Nuclear Power Station Unit No. 2 Revised Reply to a Notice of Violation Safety System Functional Inspection, Nuclear Regulatory Commission Inspection Report 50-336/98-202," dated November 9, 1998.

A001

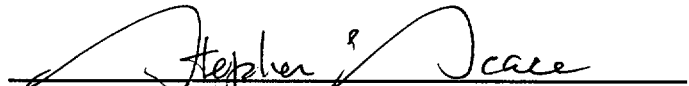
The MP2 AOPs are currently undergoing an upgrade. As part of this upgrade the ARP window steps and instructions applicable to each AOP have been reviewed for consistency. No significant problems have been found. The next step is to validate the draft AOPs with the assistance of the Operations department. Due to operator training obligations and simulator unavailability, the AOP validation must be postponed. Once the Operations resources and the simulator are available, the AOP validation process will commence and continue for approximately eight weeks. Because this upgrade has been undertaken, the commitment will be addressed by the upgrade rather than during the biennial reviews and, therefore, the wording of the commitment is being amended. NNECO will complete the revised commitment prior to December 31, 2000.

Attachment 1 contains NNECO's commitments associated with this letter.

Should you have any questions regarding this submittal, please contact Mr. David W. Dodson at (860) 447-1791, extension 2346.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

A handwritten signature in dark ink, appearing to read "Stephen E. Scace", is written over a horizontal line.

Stephen E. Scace  
Director - Nuclear Oversight and  
Regulatory Affairs

cc H. J. Miller, Region I Administrator  
J. I. Zimmerman, NRC Project Manager, Millstone Unit No. 2  
S. R. Jones, Senior Resident Inspector, Millstone Unit No. 2

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Attachment 1

Millstone Nuclear Power Station, Unit No. 2

List of Regulatory Commitments

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The following table identifies action committed to by NNECO in this document.

Number	Commitment	Due
B17491-17	Unit 2 AOPs and their applicable ARP window steps and instructions will be reviewed to correct actions and wording which are inconsistent.	December 31, 2000