



**Northeast
Nuclear Energy**

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The Northeast Utilities System

JAN 18 2001

Docket Nos. 50-336
50-423
B18292

RE: 10 CFR 50.54(a)

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

Millstone Nuclear Power Station, Unit Nos. 2 and 3
Proposed Change to Revision 22 of the
Northeast Utilities Quality Assurance Program Topical Report

The purpose of this letter is to request changes in accordance with 10 CFR 50.54(a), to Revision 22 of the Northeast Utilities Quality Assurance Program (NUQAP) Topical Report. Recently Northeast Nuclear Energy Company (NNECO) implemented changes designed to convert the organization from a function based to a process oriented organization. This resulted in a streamlining of the organization and title changes due to the restructuring of functions and reporting relationships.

The first two changes listed below will enhance the efficiency of the overall organization but require prior U.S. Nuclear Regulatory Commission (NRC) review and approval pursuant to 10 CFR 50.54(a) as they may involve a reduction in commitment. The third change concerns a separate issue resulting in a reduction in commitment. The proposed changes are:

1. The Oversight organization will report to the Master Process Owner (MPO) - Assessment; however, as delegated and defined in Section 1.0 of the NUQAP Topical Report, the Process Owner (PO) - Oversight will have direct access to the Senior Vice President and Chief Nuclear Officer (SVP & CNO) for quality related matters.

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2. The proposed modifications will change the description of the Independent Safety Engineering Group (ISEG) within NUQAP Section 1.0, "Organization" and Appendix F, "Administrative Controls" to reflect the following:
 - ISEG will report to the PO - Performance Improvement.
 - Revise NUQAP Appendix F to indicate that ISEG reports to a member of management rather than designating a specific position title.
 - Clarify NUQAP Appendix F by indicating that the ISEG reporting relationship provides for access to a high-level, technically-oriented management position (officer).
 - ISEG quarterly reports will be submitted directly to the SVP & CNO.
3. Modify NUQAP Section 18.2.1, "Implementation – Program," to allow 'other documented oversight processes' to be utilized in lieu of audits when the conditions listed under this section occur. Because this change involves a reduction in commitment to ANSI N45.2.12-1977, "Requirements for Auditing of Quality Assurance Programs for Nuclear Power Plants," an exception to this standard within NUQAP Appendix E, "Program Exceptions," is also required.

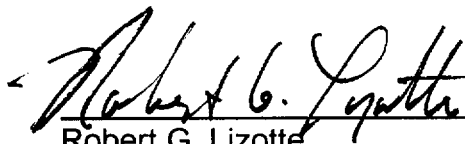
NNECO believes the proposed changes meet or exceed the requirements of 10 CFR 50 Appendix B. Since the proposed changes involve a reduction of commitment to NNECO's current quality assurance program, NNECO requests NRC review and approval of the changes. Attachment 1 to this letter provides a detailed description of the proposed changes to the NUQAP Topical Report and an evaluation of the effects of the changes. Enclosure 1 provides a copy of the proposed changes to NUQAP Topical Report Sections 1.0 and 18.0, and Appendices E and F. In accordance with 10 CFR 50.54(a), NNECO will implement the proposed changes upon approval by the NRC Staff or within 60 days from the date of this letter.

There are no regulatory commitments contained in this letter.

If you have any questions regarding this submittal, please contact Mr. Paul Willoughby at (860) 447-1791, extension 3655.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



Robert G. Lizotte
Master Process Owner - Assessment

cc: See next page

Attachment 1: Proposed Changes to the Northeast Utilities Quality Assurance Program, Organizational Changes Regarding Reporting Relationships and Modification of the Requirement to Perform a Special Audit

Enclosure 1: Proposed Changes to Revision 22 of the Northeast Utilities Quality Assurance Program Topical Report Sections 1.0 and 18.0, and Appendices E and F

cc: H. J. Miller, Region I Administrator (2 copies)
J. I. Zimmerman, NRC Project Manager, Millstone Unit No. 2
S. R. Jones, Senior Resident Inspector, Millstone Unit No. 2
V. Nerses, NRC Senior Project Manager, Millstone Unit No. 3
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RAL:rl

Docket Nos. 50-336
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Attachment 1

Millstone Nuclear Power Station, Unit Nos. 2 and 3

Proposed Changes to the Northeast Utilities Quality Assurance Program
Organizational Changes Regarding Reporting Relationships and
Modification of the Requirement to Perform a Special Audit

DESCRIPTION OF CHANGES

This letter requests changes in accordance with 10 CFR 50.54(a), to Revision 22 of the Northeast Utilities Quality Assurance Program (NUQAP) Topical Report. The first two changes listed below result from the conversion to a process based organization and involve changes in the reporting hierarchy for the Oversight Department and Independent Safety Engineering Group (ISEG). These changes will enhance the efficiency of the overall organization, but require prior U.S. Nuclear Regulatory Commission (NRC) review and approval pursuant to 10 CFR 50.54(a) as they are considered to involve a reduction in commitment. The third change involves a change in commitment to an ANSI standard and reflects current industry practice. The proposed changes are:

1. The Oversight organization will report to the Master Process Owner (MPO) - Assessment; however, as delegated and defined in Section 1.0 of the NUQAP Topical Report, the Process Owner (PO) - Oversight will have direct access to the Senior Vice President and Chief Nuclear Officer (SVP & CNO) for quality related matters.
2. The proposed modifications will change the description of ISEG within NUQAP Section 1.0, "Organization" and Appendix F, "Administrative Controls" to reflect the following:
 - ISEG will report to the PO - Performance Improvement.
 - Revise NUQAP Appendix F to indicate that ISEG reports to a member of management rather than designating a specific position title.
 - Clarify NUQAP Appendix F by indicating that the ISEG reporting relationship provides for access to a high-level, technically-oriented management position (officer).
 - ISEG quarterly reports will be submitted directly to the SVP & CNO.
3. Modify NUQAP Section 18.2.1, "Implementation – Program" to allow 'other documented oversight processes' to be utilized in lieu of audits when the conditions listed under this section occur. Because this change involves a reduction in commitment to ANSI N45.2.12-1977,⁽¹⁾ an exception to this standard within NUQAP Appendix E, "Program Exceptions" is also required.

⁽¹⁾ ANSI N45.2.12-1977, "Requirements for Auditing of Quality Assurance Programs for Nuclear Power Plants."

EVALUATION

The first two changes that Northeast Nuclear Energy Company (NNECO) are requesting to the NUQAP Topical Report result from the conversion to a process based organization and involve changes to the reporting relationship of the Oversight Department and ISEG. The third change involves a change in commitment to an ANSI standard to reflect current industry practice.

1. Oversight Reporting Relationship

It is proposed that Oversight report directly to MPO - Assessment; however, as delegated and defined in Section 1.0 of the NUQAP Topical Report, the PO - Oversight will have direct access to the SVP & CNO for quality related matters. This relationship provides for the independence of the Oversight organization for quality related issues.

10 CFR 50, Appendix B, Criterion I, "Organization" allows the organizational structure for executing the quality assurance program to "take various forms provided that the persons and organizations assigned the quality assurance functions" have the required authority and organizational independence to identify and report quality problems.

An NRC Safety Evaluation to GPU Nuclear⁽²⁾ stated, "Because of the many variables involved, such as the number of personnel and the type of activity being performed, the organizational structure for executing the QA program may take various forms provided that the persons and organizations assigned the QA functions have the required authority and organizational freedom. [10 CFR 50 Appendix B] Criterion I was written in a manner that would not dictate any particular organizational structure to assure independence, but rather that it would be flexible enough to accommodate the various organizational configurations that may be necessary to properly execute specific activities performed by a licensee. The acceptability of any given organizational structure remains predicated upon the effective implementation of the overall QA program by the license[e]s." Therefore, there are many acceptable quality assurance program organizational structures.

The proposed change does not modify the responsibilities of the PO - Oversight from those previously assigned to the Nuclear Oversight Director. Previously, the responsibility for implementing the quality assurance program was transferred from the Nuclear Oversight Director to the Nuclear Oversight Manager (renamed the PO - Oversight during the past reorganization). These

⁽²⁾ NRC Safety Evaluation for Revision 10 to the GPU Nuclear Operational Quality Assurance Plan, dated July 18, 1997.

functions and levels of authority are defined in Section 1.3.5 of the NUQAP Topical Report, which delegates the responsibility for the quality assurance program from the SVP & CNO.

The proposed change results in the Oversight Department reporting to the MPO - Assessment; however, under the process based organization recently implemented at Millstone, the PO - Oversight has direct access to the SVP & CNO for quality related matters. This relationship is indicated by the dotted line on Figure 1.0 in Section 1.0 of the NUQAP. The proposed organization thus provides Oversight the required authority and organizational freedom required by 10 CFR 50 Appendix B. However, due to the modifications in the reporting relationship, in accordance with 10 CFR 50.54(a)(4), this change is considered a reduction in commitment and is being submitted to the NRC prior to implementation.

2. Independent Safety Engineering Group Reporting Relationship

Modifications to the NUQAP are proposed to clarify the description of the Independent Safety Engineering Group within Section 1.0, "Organization" and Appendix F, "Administrative Controls" to reflect the following proposed changes:

- ISEG will report to the PO - Performance Improvement.
- Revise NUQAP Appendix F to indicate that ISEG reports to a member of management rather than designating a specific position title.
- Clarify NUQAP Appendix F by indicating that the ISEG reporting relationship provides for access to a high-level, technically-oriented management position (officer).
- ISEG quarterly reports will be submitted directly to the SVP & CNO.

These changes clarify the description of the reporting relationship within NUQAP Appendix F to coincide more closely with the wording within NUREG-0737⁽³⁾ and with a recently received NRC Safety Evaluation⁽⁴⁾ for Millstone Unit Nos. 2 and 3. NUQAP Appendix F, Revision 22, second paragraph under Function currently states:

"The ISEG shall report organizationally to a director (or higher) who is not in the direct chain of command of power production." The ISEG is directly involved in meeting the requirements of NUREG-0737 for Item I.B.1.2 for Millstone Units 2 and 3. The ISEG is independent of Plant

⁽³⁾ Clarification of TMI Action Plan Requirements, dated November 1980.

⁽⁴⁾ Millstone Nuclear Power Station, Unit Nos. 2 and 3, Change to Revision 22 of the NUQAP Topical Report, dated November 13, 2000.

Operation Review Committee (PORC) and Nuclear Safety Advisory Board (NSAB)."

It is proposed to add a new sentence within Appendix F before the first paragraph under Function to clarify the role of ISEG, stating:

"The ISEG shall function to advise the Senior Vice President and CNO - Millstone on matters related to nuclear safety."

It is also proposed to revise the second paragraph under Function to state:

"The ISEG reports to management who is not in the direct chain of command for power production. This relationship provides for access to a high level technically oriented management position such that the required authority and organizational freedom to perform assessment is not influenced by cost and schedule when opposed to nuclear safety considerations. The ISEG is directly involved in meeting the requirements of NUREG-0737 for item I.B.1.2 for Millstone Units 2 and 3. The ISEG is independent of the PORC and the NSAB. ISEG independence is similar to that of the Oversight function."

The proposed wording indicates that the ISEG will report "to management who is not in the direct chain of command for power production." The proposed wording also clarifies that "This relationship provides for access to a high level technically oriented management position" rather than specifying a precise title, as was the case previously.

Currently the ISEG reports to the Process Owner - Oversight. Implementing the proposed changes with the new organizational scheme results in the ISEG reporting organizationally to the Process Owner - Performance Improvement who together with several other Process Owners (e.g., Oversight, Regulatory Affairs and Emergency Planning) reports to the Master Process Owner (MPO) - Assessment. The MPO - Assessment reports to "a high level technically oriented management position," the Vice President - Nuclear Technical Services, who reports directly to the SVP & CNO. The Vice President - Nuclear Technical Services (officer) is not in the direct chain of command for power production. Therefore, this reporting relationship provides the ISEG with access (organizationally - via the chain of command) to the Vice President - Nuclear Technical Services.

Also, the ISEG submits reports directly to the SVP & CNO on a quarterly basis, thereby meeting the intent of NUREG-0737.

The proposed changes will continue to meet the requirements of NUREG-0737, Item I.B.1.2, by providing organizational freedom for the assessing organization from the pressures of power production. The Master Process Owner - Assessment, is not responsible for power production, but for processes relating to managing programs implemented by the line organization. The ISEG group reports directly to the Process Owner - Process Improvement, who is responsible only for those processes that improve performance of operations and the line organization.

In accordance with 10 CFR 50.54(a)(4), these changes from the previous reporting relationship may reflect a reduction in commitment for ISEG, and therefore require NRC approval prior to implementation.

3. Utilization of Other Oversight Processes in Lieu of Audits

It is proposed to modify NUQAP Section 18.2.1, "Implementation – Program," in order to allow "other documented oversight processes" to be utilized in lieu of audits when any of the following conditions listed in the plan occur, i.e., when "significant changes are made in functional areas of the quality assurance program, such as significant reorganization or procedure revisions; when it is suspected that the quality of the item is in jeopardy due to deficiencies in the quality assurance program; when a systematic, independent assessment of program effectiveness is considered necessary; (or) when necessary to verify implementation of required corrective action."

ANSI N45.2.12-1977⁽¹⁾ Section 3.5.3 states in part, that "Regularly scheduled audits should be supplemented by audits of one or more of the following conditions" (listed in paragraphs 3.5.3.1 through 3.5.3.6), but does not indicate that "other documented oversight processes" may be utilized in lieu of audits when these conditions occur. The conditions listed in ANSI Standard N45.2.12-1977 encompass those listed within the NUQAP. Therefore, this proposed change requires an exception to the standard via an addition to Appendix E, "Program Exceptions."

Although this change is a reduction in commitment to ANSI N45.2.12-1977, this change meets the requirements of 10 CFR 50 Appendix B, based on the fact that Section 1.4 of the ANSI standard (definition of audits) and Section C.6 of Regulatory Guide (RG) 1.144, Rev. 1, "Auditing Of Quality Assurance Programs For Nuclear Power Plants," recognize other methods of oversight (e.g. surveillances and inspections). The proposed change would not eliminate the need for Oversight to assess these conditions if present, but would allow Oversight to determine which method to use to meet the intent of this requirement to perform oversight.

NNECO believes the proposed changes meet or exceed the requirements of 10 CFR 50 Appendix B. However, as the proposed changes involve a reduction of commitment to NNECO's current quality assurance program, NNECO requests NRC review and approval of the proposed changes.

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Enclosure 1

Millstone Nuclear Power Station, Unit Nos. 2 and 3

Proposed Changes to Revision 22 of the Northeast Utilities Quality Assurance
Program Topical Report Sections 1.0 and 18.0, and Appendices E and F

1.0 ORGANIZATION

1.1 INTRODUCTION

This section describes the organizations involved in the operation and technical support of Units 2 and 3 at Millstone Nuclear Power Station (MNPS). In addition, this section describes the responsibilities governed by the Northeast Utilities (NU) Quality Assurance Program (NUQAP). Qualifications for key personnel are found in the unit Technical Specifications and Appendix B, "Qualification and Experience Requirements."

NOTE

In the remainder of QAP 1.0, the text describes station - wide functions that support Millstone Units 2 and 3. Units 2 and 3 organizations may supply services to, or use services from, the Unit 1 organization, with appropriate controls. Unit 1 is defueled and in a decommissioning mode.

Additional information on organizations supporting Unit 1, and on the quality assurance program for Millstone Unit 1, is provided in the Millstone Unit 1 Northeast Utilities Quality Assurance (NUQAP) Topical Report.

1.2 ORGANIZATION

The Chairman, President and Chief Executive Officer (CEO) of NU has ultimate responsibility and overall authority for the NU nuclear program, and has delegated the necessary responsibility and authority for all nuclear operations to the President and CEO-NNECO. In addition, Northeast Utilities Service Company (NUSCO) provides certain support services to NNECO. The President and CEO-NNECO is also the President-Generation Group of NUSCO.

1.3 KEY MANAGEMENT RESPONSIBILITIES AND AUTHORITY

1.3.1 Senior Vice President and CNO-Millstone (SVP & CNO).

The SVP & CNO has been delegated by the President and CEO-NNECO the necessary responsibility and authority for the management and direction of all activities related to the operation of MNPS. The SVP & CNO has overall responsibility for engineering, construction, operation, maintenance, modification and quality assurance including this NUQAP, at MNPS. The following licensing basis positions report directly to the SVP & CNO:

- Vice President (VP)-Generation
- VP-Nuclear Technical Services
- VP-Nuclear Work Services

The Process Owner - Oversight has direct access to the SVP & CNO for quality and safety related issues.

1.3.2 VP-Generation

VP-Generation is responsible for establishing common policies and standards pertaining to the operating units, the safe operation and maintenance of the units, for services in support of the station, and implementation of this NUQAP. The VP-Generation is responsible for maintaining compliance with requirements of the Operating License and Technical Specifications as well as applicable federal, state and local laws, regulations and codes. The following master processes report directly to the VP-Generation:

- Operate the Asset
- Maintain the Asset
- Support Services
- Training

1.3.3 VP-Nuclear Technical Services

VP-Nuclear Technical Services is responsible for providing engineering services and implementation of this NUQAP. The following master processes report directly to the VP-Nuclear Technical Services:

- Manage the Asset
- Assessment
- Procure the Asset

1.3.4 VP-Nuclear Work Services

VP-Nuclear Work Services is responsible for overseeing decommissioning services and implementation of this NUQAP and the Unit 1 Quality Assurance Program. The following report directly to VP-Nuclear Work Services:

- Unit 1 General Manager

1.3.5 Process Owner - Oversight

Process Owner - Oversight is responsible for the effective performance of Oversight. The Process Owner - Oversight acts as advisor to the SVP & CNO and President and CEO-NNECO on items related to nuclear quality and safety at the station. Overall responsibility for the NUQAP has been delegated to the Process Owner - Oversight by the SVP & CNO. The Process Owner - Oversight has the necessary authority and responsibility for the following:

- Direction of the quality assurance program
- Development and implementation of policies, plans, requirements, procedures, and audits
- Verification to assure compliance with 10CFR50 Appendix B and other regulatory requirements
- Verification of the implementation of the NUQAP Topical Report requirements
- Preparation and issuance of the NUQAP Topical Report

- Identification of quality problems
- Recommendations for solutions to quality problems and verification of the implementation of the solutions

Verification is performed through a planned program of audits, surveillances and inspections by Oversight. The Process Owner - Oversight provides objective evidence to management of the performance of quality activities independent of the individual or group directly responsible for performing the specific activity.

The Process Owner - Oversight has the authority and organizational freedom to verify activities affecting quality. This is performed independent of undue influences and responsibilities for schedules and costs.

In order to implement these responsibilities, the Process Owner - Oversight is provided "Stop Work" authority whereby he/she can suspend unsatisfactory work and control further processing or installation of non-conforming materials. The authority to stop work is assigned to Oversight personnel and delineated in an approved procedure.

1.3.6 Maintain the Asset

Maintain the Asset is responsible for on-line maintenance, cost and scheduling, outage activities, installation, maintenance, alterations, adjustment and calibration, replacement and repair of plant electrical and mechanical equipment, and instruments and controls. Responsibilities include scheduling of surveillances required by Technical Specifications, establishing standards and frequency of calibration for instrumentation and ensuring instrumentation and related testing equipment are properly used, inspected and maintained.

The Deputy Master Process Owner - Maintain the Asset meets all qualification requirements of the Master Process Owner - Maintain the Asset to ensure responsibilities can be met during the Master Process Owner's absence.

1.3.7 Operate the Asset

Operate the Asset is responsible for operations, nuclear safety, chemistry activities and shift technical advisors. The Master Process Owner - Operate the Asset is responsible for the safe and efficient operation of the units. During accident situations, if currently holding an active SRO license on the unit, the Master Process Owner - Operate the Asset may relieve the Shift Manager of the responsibility of directing the licensed Control Room operators. The following master processes report to the Master Process Owner - Operate the Asset

- Unit Operations
- Chemistry

- Operations Support

1.3.8 Unit Operations

The Unit Operations groups report to the Master Process Owner - Operate the Asset. Each group includes the following key supervisory positions:

- Process Owner -Operations
- Assistant Manager-Operations
- Shift Manager(s)
- Unit Supervisor(s)

1.3.8.1 Process Owner -Operations and Assistant Manager-Operations

The Process Owner - Operations provides general supervision for the operation of the respective unit, and coordinates unit operations with maintenance, work management, and other groups. As stipulated in Technical Specifications or in Appendix B, the Process Owner - Operations or the Assistant Manager - Operations holds an appropriate license on the Unit (SRO on Units 2 and 3). The Process Owner - Operations assures the safe and efficient operation of the assigned unit in accordance with applicable licenses, operating instructions and procedures, emergency procedures and safety rules and regulations. During accident situations, if currently holding an active SRO license on the unit, the Process Owner - Operations may relieve the Shift Manager of the responsibility of directing the licensed Control Room operators. The Process Owner - Operations delegates the necessary authority and responsibility for various duties to the Assistant Manager-Operations.

1.3.8.2 Shift Manager

The Shift Managers report to the Assistant Manager-Operations and are responsible for the Control Room command function. The Shift Manager holds an appropriate license on the unit (SRO on Units 2 and 3). The Shift Manager directs and supervises the operation of the unit. Administrative functions that detract from or are subordinate to the management responsibility for assuring the safe operation of the plant are delegated to other operational personnel not on duty in the Control Room.

During accident situations, unless properly relieved, the Shift Manager remains in the Control Room and directs the activities of the licensed operators. The Shift Manager has direct authority to shut down the respective unit if, in the Shift Manager's opinion, serious abnormal conditions exist. A Unit 3 Shift Manager fulfills the facility staff requirements of the Shift Supervisor for the Unit 3 Technical Specifications.

1.3.8.3 Unit Supervisor

The Unit Supervisor holds an appropriate license on the unit (SRO on Units 2 and 3) and supervises the operators in the Control Room. The Unit Supervisor directs activities of the licensed Control Room operators, and may operate the controls of equipment and piping systems from the Control Room or alternate station control location.

1.3.8.4 Control Operators

Control Operators hold a Reactor Operator or Senior Reactor Operator license on the unit. The Control Operators are responsible to perform the following duties:

- Start up, operate, and shut down nuclear plant equipment including, but not limited to, reactor, reactor auxiliaries, turbine generator unit and its auxiliaries as necessary to satisfy system requirements or station conditions
- Test, as scheduled, control room instruments and controls
- Maintain required logs and calculations, observe these logs for indications of faulty operation, and notify the on-duty Unit Supervisor or the Shift Manager of abnormal plant conditions

1.3.8.5 Plant Equipment Operators

Plant Equipment Operators are responsible to perform the following duties:

- Start up, operate, inspect, adjust, and shut down all auxiliary and other various plant equipment
- Perform or assist with scheduled operational tests
- Make minor repairs

1.3.9 Support Services

Support Services is responsible for services in support of the station, including security, radiological protection, radiological waste services, fire protection, nuclear records management and procedures.

1.3.10 Radiological Protection

Radiological Protection carries out health physics functions and reports to Support Services to provide sufficient organizational freedom and independence from operating pressures as required by the unit Technical Specifications. The Process Owner - Radiological Protection fulfills the "Health Physics Manager" position qualifications required by the unit Technical Specifications. Radiological protection services include the following:

- scheduling and conducting radiological surveys including contamination sample collection
- determining contamination levels and assigning work restrictions through radiation work permits
- maintaining records and reports on radioactive contamination levels
- administering the personnel monitoring program and maintaining required records in accordance with federal and state codes
- radiological waste services.

1.3.11 Training

Training is responsible for operator and technical training. The operator training group reports directly to the Master Process Owner - Training to provide sufficient organizational freedom and independence from operating pressures as required by the unit Technical Specifications.

1.3.12 Manage the Asset

Manage the Asset is responsible for design engineering functions, supporting activities, engineering programs, configuration management including design and configuration control and engineering assurance, engineering technical support and systems engineering, including material engineering. The group is responsible for engineering activities in safety analysis and nuclear fuel, including probabilistic risk assessment, reactor, and radiological engineering. The Unit 1 organization will share responsibility for certain systems shared between Unit 1 and Units 2 or 3.

The Deputy Master Process Owner - Manage the Asset meets all qualification requirements of the Master Process Owner - Manage the Asset to ensure responsibilities can be met during the Master Process Owner's absence.

1.3.13 Procure the Asset

Procure the Asset is responsible for procurement. Responsibilities include approval and oversight of vendors that provide quality-related material and services including source and receipt inspection.

1.3.14 Assessment

Assessment includes Emergency Planning, Performance Improvement, **and Oversight.**

1.3.14.1 Emergency Planning is responsible for development and maintenance of the on-site radiological emergency plan and the development and coordination of required off-site radiological emergency response plans.

1.3.14.2 Performance Improvement is responsible for the Corrective Actions program, **and Independent Safety Engineering Group and Operating Experience Program.**

1.3.14.3 **Oversight is responsible for the Quality Assurance Program. (See 1.3.5.)**

1.4 QUALITY-RELATED RESPONSIBILITIES COMMON TO ALL DEPARTMENT HEADS

The head of each department performing quality activities is responsible for:

- Administering those activities within their organization which are required by this NUQAP;
- Ensuring implementation of the Quality Assurance Program;
- Establishing and clearly defining the duties and responsibilities of personnel within their organization who perform quality activities;
- Planning, selecting, and training personnel to meet the requirements of the NUQAP Topical Report; and
- Performing and coordinating quality activities within their department and interfacing with the Oversight department.

Each individual performing or verifying activities affecting quality is responsible to conduct those activities in accordance with the requirements of this NUQAP and implementing procedures. These individuals shall have direct access to such levels of management as may be necessary to perform this function.

The responsibility, authority, and organizational relationship for performing quality activities within each organization is established and delineated in the NUSCO/NNECO organizational charts, policy statements, and written job or functional descriptions.

Vendors may be delegated the execution of quality assurance functions; however, NU shall retain responsibility for this Quality Assurance Program.

Master Process Owners and Process Owners carry out responsibilities assigned to Managers and Directors referenced in the unit Technical Specifications.

1.5 ANNUAL MANAGEMENT QUALITY ASSURANCE REVIEW

The SVP & CNO is responsible for the assessment of the scope, status, implementation, and effectiveness of the NUQAP. To meet this responsibility, a team of qualified individuals is appointed to perform an annual Management Quality Assurance Review. The team is made up of individuals knowledgeable in quality assurance, quality activities, auditing, management responsibilities, and the NUQAP Topical Report. This review is:

- A systematic evaluation;
- pre-planned toward the objective of determining the adequacy of the NUQAP and its compliance with Appendix B to 10 CFR 50 and other regulatory requirements; and
- capable of identifying, communicating, and tracking any required corrective action.

The SVP & CNO has delegated the responsibility for the Management Quality Assurance Review to the Process Owner -Oversight.

1.6 SPECIFIC NUQAP RESPONSIBILITIES

The SVP & CNO resolves all disputes related to the implementation of the NUQAP for which resolution is not achieved at lower levels within the organization.

1.7 SUCCESSION OF RESPONSIBILITY FOR OVERALL PLANT OPERATION

The succession to responsibility for overall plant instructions or special orders, in the event of absences, incapacitation of personnel or other emergencies, is as follows:

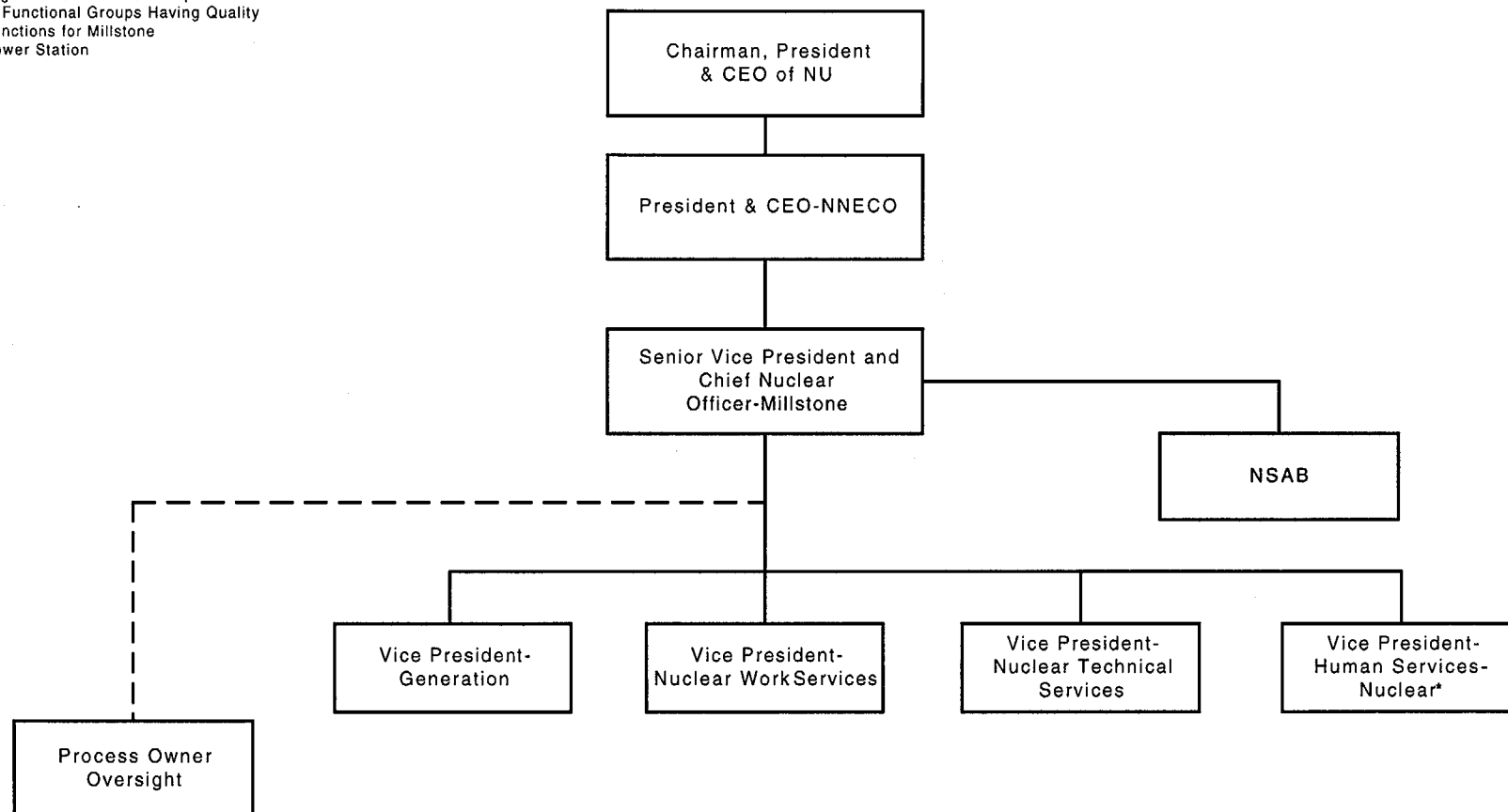
- Vice President-Generation
- Master Process Owner - Operate the Asset
- Licensed Process Owner - Operations or Licensed Assistant Manager-Operations designated by Vice President-Generation
- Shift Manager (SRO)
- Licensed Unit Supervisor (SRO)

1.8 ORGANIZATION CHARTS

NOTE

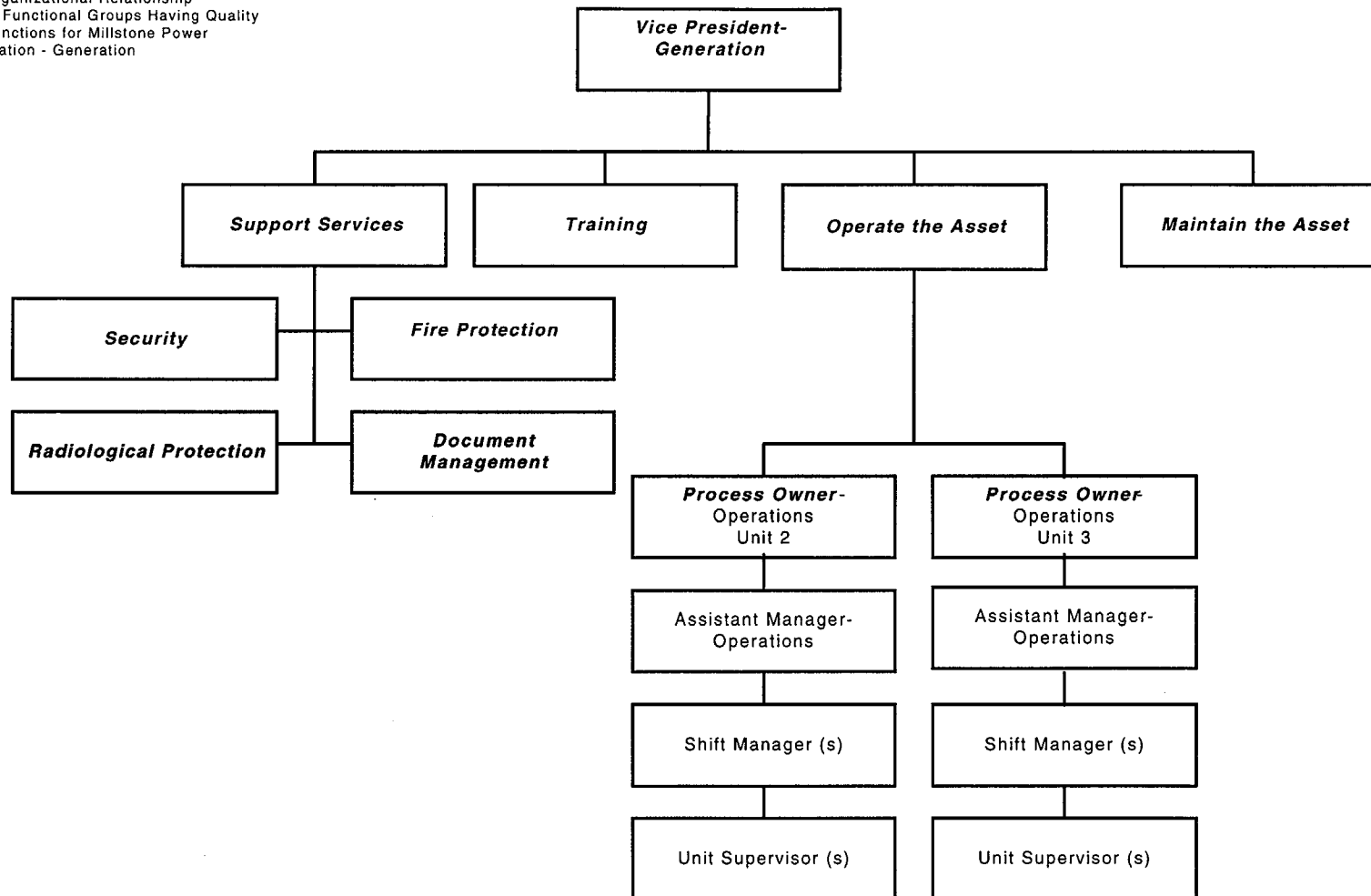
The following organization charts are incorporated by reference in the Millstone Station Emergency Plan. Changes to these organization charts require an effectiveness review in accordance with 10 CFR 50.54 (q).

Organizational Relationship
of Functional Groups Having Quality
Functions for Millstone
Power Station

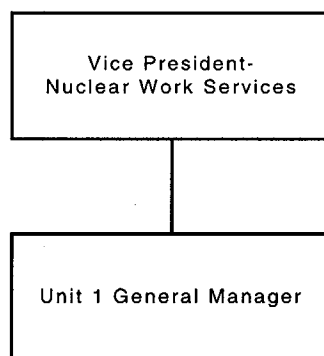


* No Licensing Basis function within these organizations. Included for information only.

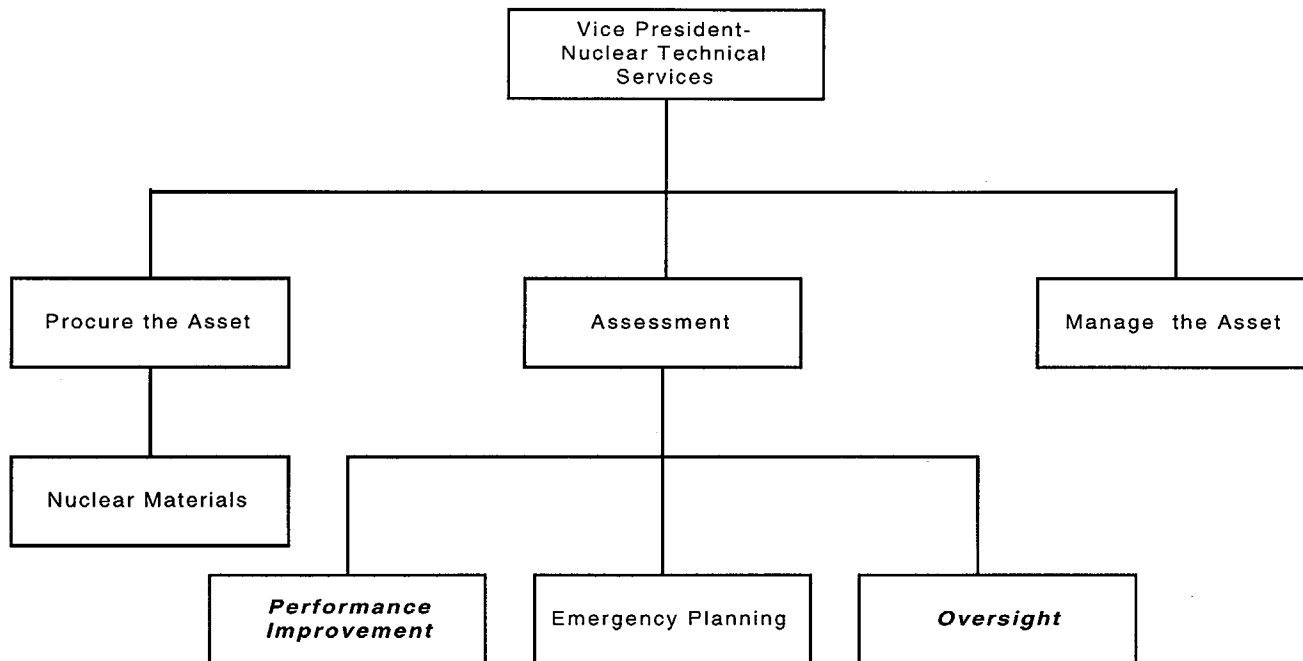
Organizational Relationship
of Functional Groups Having Quality
Functions for Millstone Power
Station - Generation



Organizational Relationship of
Functional Groups Having Quality Functions
for Millstone Power Station-Nuclear Work Services



Organizational Relationship of Functional Groups Having
Quality Functions for Millstone Power Station -
Nuclear Technical Services



18.0 AUDITS

18.1 GENERAL REQUIREMENTS

This NUQAP requires that a comprehensive system of planned and periodic audits shall be carried out to verify that quality activities for Millstone Station nuclear power plants are performed in compliance with this NUQAP and to determine the effectiveness of the program.

Audits are conducted in accordance with written procedures or checklists by appropriately trained personnel not having direct responsibilities in the areas being audited.

Audit results are documented and reviewed by management having responsibility in the area audited and the responsible management takes the necessary action to address any audit findings revealed by the audit.

18.2 IMPLEMENTATION

18.2.1 PROGRAM

The audit program requires audits of Corporate and Station nuclear power plant quality activities under the oversight of the Nuclear Safety Assessment Board. Audits are performed on activities where the requirements of 10 CFR 50, Appendix B and respective nuclear unit Technical Specifications are being implemented. In addition to those activities, audits are performed on areas associated with indoctrination and training programs, interface control among NNECO and vendors, vendor quality programs and the Procure the Asset procurement function. Audits are regularly scheduled on the basis of the status and safety importance of the activities being performed. Regularly scheduled audits are supplemented by audits ***or other documented oversight processes*** for one or more of the following conditions:

- a. When significant changes are made in functional areas of the quality assurance program, such as significant reorganization or procedure revisions;
- b. When it is suspected that the quality of the item is in jeopardy due to deficiencies in the quality assurance program;
- c. When a systematic, independent assessment of program effectiveness is considered necessary;
- d. When necessary to verify implementation of required corrective action.

Schedules for the audit of Corporate, and Station, quality activities are originated and maintained by Oversight. Schedules for vendor quality assurance activities are maintained by the Procure the Asset and Oversight, as appropriate.

Audits are performed as specified in procedures by qualified personnel, using an audit plan prepared by the auditing organization. Audits may include evaluation of the work areas, activities, processes, items, and review of documents and records to determine the effectiveness of implementation and conformance to this NUQAP.

Approved vendors utilized to perform quality activities for the Station nuclear power plants are responsible for developing and implementing a system of planned and periodic audits to verify compliance with and to determine the effectiveness of all aspects of their quality assurance program. Procure the Asset is responsible for verifying the acceptability of vendor audit programs. Audits, are performed as appropriate, to verify that these vendors are effectively complying with their quality assurance requirements.

In addition to the audits, other methods, such as surveillances and inspections are used to assure that quality activities are in compliance with this NUQAP.

18.2.2 REPORTING OF AUDIT RESULTS

Audit results are reviewed, approved, and reported in accordance with Oversight and Procure the Asset procedures, as applicable. The audit reports are issued to the appropriate management of the area audited to assure appropriate and/or timely corrective action is taken to address conditions adverse to quality identified by the audit findings. In addition, audit data and reports are accumulated as part of the review for quality trends and assessed to assure the effectiveness of this NUQAP.

18.2.3 REVIEW, ACTION, AND FOLLOW-UP OF AUDIT FINDINGS

Audit findings that involve conditions adverse to quality are reviewed and investigated by the management having the responsibility for the area audited. The responsible management is required to take the necessary action to address any conditions adverse to quality identified by the audit and: report the results of such reviews and investigations, take the necessary actions to correct problems reported, and report the completion of corrective action within specified time frames.

Follow-up of audit findings involving conditions adverse to quality is performed by the auditing organization as necessary to verify appropriate actions have been taken to resolve audit findings. Items which cannot be resolved by affected management are submitted for resolution to the Senior Vice President and Chief Nuclear Officer - Millstone.

18.2.4 RECORDS/REPORTS OF AUDITS

Audit records, reports, and associated documentation are retained in the Station Nuclear Document Services Facility, as specified in applicable procedures.

APPENDIX E

NORTHEAST UTILITIES QUALITY ASSURANCE PROGRAM (NUQAP) TOPICAL REPORT - MILLSTONE POWER STATION

PROGRAM EXCEPTIONS

1. ANSI N45.2.9, states in part, "structure, doors, frames, and hardware should be Class A fire-related with a recommended four-hour minimum rating." The three record storage vaults at NNECO have a two-hour rating.

NNECO's vaults are used for storage of documentation that is unsuitable for filming or awaiting filming.

A records organization exists along with written procedures addressing the control of quality assurance records.

2. Deleted

3. ANSI N45.2.9-1974, paragraph 1.4, definition of "Quality Assurance Records" states in part: "For the purposes of this standard, a document is considered a quality assurance record when the document has been completed."

Northeast Utilities has developed the following alternative definition to provide guidance during the interim period from the time a document is completed until it is transmitted to the Nuclear Document Services Facility:

"A record is considered a working document until it is transmitted to the Nuclear Document Services Facility (NDSF) at which time it is designated as a Quality Assurance Record. The following maximum time limits are established for the transmittal of working documents to the NDSF:

Operations Documents - Documentation generated during plant operations may be maintained, as needed, by operating plant departments, for up to one year.

New Construction or Betterment Documents - Documents which evolve during new construction or betterment projects shall be transmitted to NDSF within 90 days of completion of a new construction project or turnover of a betterment project or plant operations.

Procurement Documents - Inspection/Surveillance/Audit Reports generated during vendor oversight activities which are used to maintain vendor status for current and future procurements may be maintained, as needed, by Nuclear Materials and Document Management for up to three years.

All Other Working Documents - All other working documents shall be transmitted to NDSF within 6 months of their receipt or completion."

The requirements of ANSI N45.2.9-1974 do not apply to these "working documents" based on paragraph 1.1 of the ANSI standard which states:

"It (ANSI N45.2.9) is not intended to cover the preparation of the records nor to include working documents not yet designated as Quality Assurance Records."

4. Regulatory Guide 1.64 - 6/76, the Regulatory position states, in part, "It should not be construed that such verification constitutes the required independent design verification." Northeast Utilities has developed the following alternative to allow for adequate independent design verification:

This review may be performed by the originator's Supervisor, only if the Supervisor:

Did not specify a singular design approach;

Did not establish the design inputs or did not rule out certain Design considerations;

Is the only individual in the organization competent to perform the review.

Where the Supervisor performs the design review, the next level of management shall fulfill the Supervisor's responsibilities.

5. ANSI N45.2.13 - 1976, paragraph 10.3.4, states in part, "Post-Installation Test requirements and acceptance documentation (should) shall be mutually established by the purchaser and supplier." Involvement by the supplier in establishing Post-Installation Test requirements and acceptance documentation is requested only when it is deemed necessary and proper by the responsible engineering organization.

Northeast Utilities no longer has any nuclear plants under construction. As a result, most procurements are made for spare parts from suppliers who are not the original equipment manufacturer. In these cases, the supplier may have little or no understanding or knowledge of either the operation of the system the component is to be installed in, or applicable Post-Installation Test requirements and acceptance documentation. As such, Northeast Utilities assumes responsibility for establishing Post Installation Test requirements and acceptance documentation.

6. ANSI N45.2.2-1972, paragraph 1.2, states in part that, "The requirements of this standard apply to the work of any individual or organization that participates in the packaging, shipping, receiving, storage, and handling of items to be incorporated into nuclear power plants."

Since a portion of Northeast Utilities procurement activities involve commercial suppliers which do not fully comply with the requirements of ANSI N45.2.2, the Northeast Nuclear Energy Company Nuclear Materials and Document Management organization verifies through source inspections, receipt inspection, and/or survey activities that the quality of the materials, items, components or equipment is preserved by those suppliers to the

extent that packaging, shipping, storage and handling methods are employed which are commensurate with the nature of the product.

7. ANSI N18.1-1971, paragraph 4.2.2, states in part "The Operations Manager shall hold a Senior Reactor Operator's license". NU has developed an alternative to this requirement which has been accepted by the NRC via amendment 132 for the Millstone Power Station Unit No. 3 license which allows that:

If the Operations Manager does not hold a Senior Reactor Operator license for Millstone Unit No. 3, then the Operations Manager shall have held a Senior Reactor Operator license at a pressurized water reactor, and the Assistant Operations Manager shall hold a Senior Reactor Operator license for Millstone Unit No. 3.

8. ANSI N18.1-1971, paragraph 4.2.2, states in part "The Operations Manager shall hold a Senior Reactor Operator's license". NU has developed an alternative to this requirement which has been accepted by the NRC via amendment 190 for the Millstone Power Station Unit No. 2 license which allows that:

If the Operations Manager does not hold a Senior Reactor Operator license for Millstone Unit No. 2, then the Operations Manager shall have held a Senior Reactor Operator license at a pressurized water reactor, and an individual serving in the capacity of the Assistant Operations Manager shall hold a Senior Reactor Operator license for Millstone Unit No. 2.

9. Regulatory Guide 1.33 - 2/78, regarding audits, states in part:

- (a) "The results of actions taken to correct deficiencies...at least once per 6 months."
- (b) "...technical specifications and applicable license conditions - at least once per 12 months."
- (c) "The performance, training, and qualifications of the facility staff - at least once per 12 months."

NU has developed an alternative which modifies these Audit frequencies to at least once per 24 months. This alternative has previously been accepted by the NRC via license amendments 79, 184, and 104 for MP1, MP2, and MP3, respectively.

10. Deleted.

11. ANSI N45.2.13-1976, paragraph 10.3.5., states in part, "in certain cases involving procurement of services only, such as third party inspection; engineering and consulting services, and installation, repair, overhaul or maintenance work; the Purchaser may accept the service by any or all of the following methods:

- (a) Technical verification of the data produced
- (b) Surveillance and/or audit of the activity
- (c) Review of the objective evidence for conformance to the procurement document requirements such as certifications, stress reports, etc."

In order to maintain the independence requirement of the NRC's August 14, 1996 Order, NNECO will not perform an acceptance review of the work produced by the vendors contracted to conduct the Independent Corrective Action Verification Program. This work will be performed in accordance with the vendor's own approved, 10 CFR 50 Appendix B Quality Assurance Program.

12. Deleted.

13. Regulatory Guide 1.70 Revision 3, November 1978 Section 17.1.2.4 states in part: "The PSAR should include a listing of QA program procedures or instructions that will be used to implement the QA program for each major activity such as design, procurement, construction, etc. The procedure list should identify which criteria of Appendix B to 10 CFR 50 are implemented by each procedure".

NU has developed an alternative to this requirement where procedure indices are maintained which identify the procedures that implement the Quality Assurance Program for Millstone Power Station and which, by title and originating organization, indicate the Appendix B to 10 CFR 50 criterion being implemented.

14. ANSI N18.7-1976, Paragraph 5.2.15, "Review, Approval, and Control of Procedures," states in part: "Plant procedures shall be reviewed by an individual knowledgeable in the area affected by the procedure no less frequently than every two years to determine if changes are necessary or desirable."

NU implements administrative and programmatic controls that ensure procedures are maintained current in accordance with 10CFR50, Appendix B, thus meeting the intent of the biennial review.

NU implements administrative controls to perform biennial reviews of non-routine procedures such as EOP's, AOP's, E-Plan, Security and other procedures that may be dictated by an event.

Programmatic controls specify conditions when the mandatory review of plant procedures apply, and include a requirement to review applicable procedures following an accident or transient and following any modification to a system.

NU utilizes a pre-job briefing practice to ensure that personnel are aware of what is to be accomplished and what procedures will be used prior to beginning a job. In addition, the Procedure Compliance Policy requires that the job be stopped and the procedure be revised or the situation resolved prior to work continuing if procedures cannot be implemented as written.

Additionally, NU Quality Assurance Program requires the review of a representative sample of plant procedures as part of routine audits and surveillances to ensure that existing administrative controls for procedure verification, review and revision are effective in maintaining the quality of plant procedures. Significant procedural deficiencies are identified and corrected through the Station Corrective Action Program. The Station Self-

Assessment Program also periodically reviews selected procedures and identifies deficiencies and improvements through the Corrective Action Program.

15. ***ANSI N45.2.12 - 1977, paragraph 3.5.3, states, "Regularly scheduled audits should be supplemented by audits for one or more of the following conditions:..." NU has developed an alternative to performing supplemental audits for the conditions that includes using other documented oversight processes to assess these conditions.***

APPENDIX F
NORTHEAST UTILITIES QUALITY ASSURANCE PROGRAM (NUQAP)
TOPICAL REPORT - MILLSTONE POWER STATION

ADMINISTRATIVE CONTROLS¹

NOTE:

1. "Technical Specification" numbers refer to the unit specific Unit 2/3 Technical Specifications only.

INDEPENDENT SAFETY ENGINEERING GROUP (ISEG)

Function

The ISEG shall function to advise the Senior Vice President and CNO-Millstone on matters related to nuclear safety. The ISEG shall include, as part of its function, examination of unit operating characteristics, NRC issuances, industry advisories, Licensee Event Reports, and other sources of unit design and operating experience information, including units of similar design, which may indicate areas for improving unit safety. The ISEG shall make detailed recommendations for revised procedures, equipment modifications, maintenance activities, operations activities, or other means of improving unit safety to appropriate station/corporation management.

The ISEG reports to management who is not in the direct chain of command for power production. This relationship provides for access to a high level technically oriented management position such that the required authority and organizational freedom to perform assessment is not influenced by cost and schedule when opposed to nuclear safety considerations. The ISEG is directly involved in meeting the requirements of NUREG-0737 for item I.B.1.2 for Millstone Units 2 and 3. The ISEG is independent of the PORC and the NSAB. ISEG independence is similar to that of the Oversight function.

Composition

The ISEG shall be composed of at least five full-time personnel located on site to perform the functions described above for Millstone Units 2 and 3. Each person shall have either:

- (1) A bachelor's degree in engineering or related science and at least 2 years of professional level experience in his field, at least 1 year of which experience shall be in the nuclear field, or,
- (2) At least 10 years of professional level experience in his field, at least 5 years of which experience shall be in the nuclear field.

A minimum of 50% of these personnel shall have the qualifications specified in (1) above.

Responsibilities

The ISEG shall be responsible for maintaining surveillance of unit activities to provide independent verification* that these activities are performed correctly and that human errors are reduced as much as practical.

Records

Records of activities performed by the ISEG shall be prepared and maintained, and quarterly reports of completed evaluations will be made to the **SVP & CNO**.

*Not responsible for sign-off function

REVIEW AND AUDIT

Unit 2/3 Plant Operations Review Committee (Unit 2/3 PORC)

Function

The Unit 2/3 PORC shall function to advise the Master Process Owner (MPO) - Operate the Asset on all matters related to nuclear safety.

Composition

The Unit 2/3 PORC shall be composed of a minimum of eleven members. Members shall collectively have experience and expertise in the following areas:

- Plant Operations
- Engineering
- Reactor Engineering
- Maintenance
- Instrumentation and Controls
- Health Physics
- Chemistry
- Work Planning
- Quality Assurance

Each Unit 2/3 PORC member shall meet the following minimum qualifications:

- 1) Have an academic degree in an engineering or physical science field, and have a minimum of five years technical experience in their respective field of expertise,
or
- 2) Hold a management position, and have a minimum of five years technical experience in their respective field of expertise.

The members of Unit 2/3 PORC shall be appointed in writing by the Master Process Owner (MPO) - Operate the Asset. The Unit 2/3 PORC Chairperson and two Vice Chairpersons of the Unit 2/3 PORC shall be drawn from the selected Unit 2/3 PORC members and be appointed in writing by the Master Process Owner - Operate the Asset.

Alternates

The Unit 2/3 PORC Chairperson shall appoint designated alternates for each member in writing to serve on a temporary basis. Each alternate shall meet the minimum qualifications described above for Unit 2/3 PORC members, and shall have the same area of expertise as the member he/she is replacing.

Meeting Frequency

The Unit 2/3 PORC shall meet at least once per calendar month and as convened by the Chairperson.

Quorum

A quorum of the Unit 2/3 PORC shall consist of the Chairperson, or a Vice Chairperson, and four members or designated alternates. However, no more than two alternates may vote at any one time.

Responsibilities

The Unit 2/3 PORC shall be responsible for:

- a. Review of: (1) all procedures, except common site procedures, required by Technical Specification 6.8 and changes thereto, 2) all programs, except common site programs required by Technical Specification 6.8 and changes thereto, and (3) any other proposed procedures, programs or changes thereto as determined by the Master Process Owner - Operate the Asset to affect nuclear safety. Procedures and programs required by Technical Specification 6.8 that are designated for review and approval by the Station Qualified Reviewer Program do not require Unit 2/3 PORC review.
- b. Review of all proposed tests and experiments that affect nuclear safety;
- c. Review of all proposed changes to Sections 1.0-5.0 of the Technical Specifications;
- d. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety;
- e. Investigation of all violations of the Technical Specifications, including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence, to the Senior Vice President and CNO - Millstone and to the Chairperson of the Nuclear Safety Assessment Board;
- f. Review of all REPORTABLE EVENTS;
- g. Review of facility operations to detect potential safety hazards;

- h. Performance of special reviews, investigations, or analyses and reports thereon as requested by the Chairperson of the Nuclear Safety Assessment Board.
- i. Render determinations in writing if any item considered under (a) through (d) above, as appropriate and as provided by 10CFR50.59 or 10CFR50.92, constitutes an unreviewed safety question, or requires a significant hazards consideration determination.
- j. Review of Unit Turbine Overspeed Protection Maintenance and Testing Program and revision thereto.
- k. Review of the Fire Protection Program and implementing procedures.

Authority

The Unit 2/3 PORC shall:

- a. Recommend to the Master Process Owner - Operate the Asset written approval or disapproval of items considered under Responsibilities (a) through (d) above.
- b. Provide immediate written notification to the Senior Vice President and CNO - Millstone and the Chairperson of the Nuclear Safety Assessment Board of disagreement between the Unit 2/3 PORC and the Master Process Owner - Operate the Asset; however, the Master Process Owner - Operate the Asset shall have responsibility for resolution of such disagreements pursuant to Technical Specification 6.1.1.

Records

The Unit 2/3 PORC shall maintain written minutes of each meeting and copies shall be provided to the Senior Vice President and CNO - Millstone and Chairperson of the Nuclear Safety Assessment Board.

Site Operations Review Committee (SORC)

Function

The SORC shall function to advise the Senior Vice President and CNO - Millstone on all matters related to nuclear safety of the entire Millstone Station Site.

Composition

The SORC shall be composed of the:

| | |
|---------|---|
| Member: | Director - Unit 1 Operations |
| Member: | Master Process Owner- Operate the Asset |
| Member: | Process Owner - Operations Millstone 2 |
| Member: | Process Owner - Operations Millstone 3 |
| Member: | Process Owner - Radiological Protection |
| Member: | Master Process Owner - Support Services |
| Member: | Designated Member of Unit 1 PORC |
| Member: | Designated Member of Unit 2/3 PORC |
| Member: | Designated Member of Unit 2/3 PORC |
| Member: | Designated Member of Unit 2/3 PORC |
| Member: | Designated Member of Oversight |

The SORC Chairperson and two Vice Chairpersons of the SORC shall be drawn from the selected SORC members and be appointed in writing by the Senior Vice President and CNO Millstone.

Alternates:

Alternate members shall be appointed in writing by the SORC Chairperson to serve on a temporary basis; however, no more than two alternates shall participate in SORC activities at one time.

Meeting Frequency

The SORC shall meet at least once per six months and as convened by the SORC Chairperson.

Quorum

A quorum of the SORC shall consist of the Chairperson or Vice Chairperson and five members including alternates.

Responsibilities

The SORC shall be responsible for:

- a. Review of 1) all common site procedures required by Unit 2/3 Technical Specification 6.8 and changes thereto, 2) all common site programs, required by Unit 2/3 Technical Specification 6.8 and changes thereto, 3) any other proposed procedures, programs, or changes thereto as determined by the designated officer [Senior Vice President and CNO - Millstone] to affect site nuclear safety. Common site programs and procedures required by Unit 2/3 Technical Specification 6.8 that are designated for review and approval by the Station Qualified Reviewer Program do not require SORC review.
- b. Review of all proposed changes to "Section 6.0 "Administrative Controls" of the Technical Specifications.
- c. Performance of special reviews and investigations and reports as requested by the Chairperson of the Nuclear Safety Assessment Board.

- d. Not used.
- e. Not used.
- f. Review of all common site proposed tests and experiments that affect nuclear safety.
- g. Review of all common site proposed changes or modifications to systems or equipment that affect nuclear safety.
- h. Render determinations in writing or meeting minutes if any item considered under (a) through (g) above, as appropriate and as provided by 10CFR50.59 or 10CFR50.92, constitutes an unreviewed safety question or requires a significant hazards consideration determination.
- i. Review of the common site fire protection program and implementing procedures.

Authority

The SORC shall:

- a. Recommend to the Senior Vice President and CNO - Millstone written approval or disapproval in meeting minutes of items considered under Responsibilities (a) through (i) above.
- b. Provide immediate written notification or meeting minutes to the President and Chief Executive Officer (CEO) and the Chairperson of the Nuclear Safety Assessment Board of disagreement between the SORC and the Senior Vice President and CNO - Millstone; however, the Senior Vice President and CNO - Millstone shall have responsibility for resolution of such disagreements pursuant to Technical Specification 6.1.1.

Records

The SORC shall maintain written minutes of each meeting and copies shall be provided to the Senior Vice President and CNO - Millstone and Chairperson of the Nuclear Safety Assessment Board.

Nuclear Safety Assessment Board (NSAB)

Function

The minimum qualifications of NSAB members are as follows:

- a. The Chairperson and NSAB members shall have:
 - 1. An academic degree in an engineering or physical science field, or hold a senior management position, and
 - 2. A minimum of five years technical experience in their respective field of expertise.
- b. The NSAB shall have experience in and shall function to provide independent oversight review and audit of designated activities in the areas of:
 - 1. Nuclear power plant operations;
 - 2. Nuclear engineering;

3. Chemistry and radiochemistry;
4. Metallurgy;
5. Instrumentation and control;
6. Radiological safety;
7. Mechanical and electrical engineering; and
8. Quality assurance practices.

The NSAB serves to advise the Senior Vice President and CNO - Millstone on matters related to nuclear safety and notify the Senior Vice President and CNO - Millstone within 24 hours of a safety significant disagreement between the NSAB and the organization or function being reviewed.

Composition

The Senior Vice President and CNO - Millstone shall appoint, in writing, a minimum of seven members to the NSAB and shall designate from this membership, in writing, a Chairperson and a Vice Chairperson. The membership shall function to provide independent review and audit in the areas listed in Function (b) above.

Alternates

All alternate members shall be appointed, in writing, by Senior Vice President and CNO - Millstone; however, no more than two alternates shall participate as members in NSAB activities at any one time.

Meeting Frequency

The NSAB shall meet at least once per calendar quarter.

Quorum

The quorum of the NSAB shall consist of a majority of NSAB members including the Chairperson or Vice Chairperson. No more than a minority of the quorum shall have line responsibility for operation of the same Northeast Utilities' nuclear unit. No more than two alternates shall be appointed as members at any meeting in fulfillment of the quorum requirements.

Review Responsibilities

The NSAB shall be responsible for the review of:

- a. The safety evaluations for changes to procedures, equipment, or systems, and tests or experiments completed under the provisions of 10 CFR 50.59, to verify that such actions did not constitute an unreviewed safety question as defined in 10 CFR 50.59;
- b. Proposed changes to procedures, equipment, or systems that involve an unreviewed safety question as defined in 10 CFR 50.59;

- c. Proposed tests or experiments that involve an unreviewed safety question as defined in 10 CFR 50.59;
- d. Proposed changes to Technical Specifications and the Operating License;
- e. Violations of applicable codes, regulations, orders, license requirements, or internal procedures having nuclear safety significance;
- f. All Licensee Event Reports required by 10 CFR 50.73;
- g. Indications of significant unanticipated deficiencies in any aspect of design or operation of structures, systems, or components that could affect nuclear safety;
- h. Significant accidental, unplanned, or uncontrolled radioactive releases, including corrective actions to prevent recurrence;
- i. Significant operating abnormalities or deviations from normal and expected performance of equipment that could affect nuclear safety;
- j. The performance of the corrective action program; and
- k. Audits and audit plans.

Reports or records of these reviews shall be forwarded to the Senior Vice President and CNO - Millstone within 30 days following completion of the review.

Audit Program Responsibilities

The NSAB audit program shall be the responsibility of Oversight. NSAB audits shall be performed at least once per 24 months in accordance with administrative procedures and shall encompass:

- a. The conformance of unit operation to provisions contained within the Technical Specifications and applicable license conditions;
- b. The training and qualifications of the unit staff;
- c. The implementation of all programs required by Technical Specification 6.8;
- d. The Fire Protection Program and implementing procedures.
- e. The fire protection equipment and program implementation utilizing either a qualified offsite license fire protection engineer or an outside independent fire protection consultant.
- f. Actions taken to correct deficiencies occurring in equipment, structures, systems, components, or method of operation that affect nuclear safety; and
- g. Other activities and documents as requested by the Senior Vice President and CNO - Millstone.

Records

Written records of reviews and audits shall be maintained. As a minimum these records shall include:

- a. Results of the activities conducted under the provisions of this NSAB Section;
- b. Deleted
- c. Deleted

Station Qualified Reviewer Program

Function

The designated Master Process Owner, designated Process Owner, designated officer, or Senior Vice President and CNO - Millstone may establish a Station Qualified Reviewer Program whereby required reviews of designated procedures or classes of procedures required by Unit 2/3 PORC, Responsibilities item (a), and SORC, Responsibilities item (a) are performed by Station Qualified Reviewers and approved by designated managers [Responsible Individual(s) for the procedure(s)]. These reviews are in lieu of reviews by the Unit 2/3 PORC or SORC. However, procedures which require a 10CFR50.59 evaluation must be reviewed by the Unit 2/3 PORC or SORC.

Responsibilities

The Station Qualified Reviewer Program shall:

- a. Provide for the review of designated procedures, programs, and changes thereto by a Qualified Reviewer(s) other than the individual who prepared the procedure, program, or change.
- b. Provide for cross-disciplinary review of procedures, programs, and changes thereto when organizations other than the preparing organization are affected by the procedure, program, or change.
- c. Ensure cross-disciplinary reviews are performed by a Qualified Reviewer(s) in affected disciplines, or by other persons designated by cognizant Process Owner or Master Process Owner as having specific expertise required to assess a particular procedure, program, or change. Cross-disciplinary reviewers may function as a committee.
- d. Provide for a screening of designated procedures, programs and changes thereto to determine if an evaluation should be performed in accordance with the provisions of 10CFR50.59 to verify that an unreviewed safety question does not exist. This screening will be performed by personnel trained and qualified in performing 10CFR50.59 evaluations.
- e. Provide for written recommendation by the Qualified Reviewer(s) to the responsible Process Owner for approval or disapproval of procedures and programs considered under Unit 2/3 PORC, Responsibilities item (a) and SORC, Responsibilities item (a), and that the procedure or program was screened by a qualified individual and found not to require a 10 CFR 50.59 evaluation.

If the responsible manager determines that a new program, procedure, or change thereto requires a 10 CFR 50.59 evaluation, that Process Owner will ensure the required evaluation is performed to determine if the new procedure, program, or change involves an unreviewed safety question. The new procedure, program, or change will then be forwarded with the 10 CFR 50.59 evaluation to Unit 2/3 PORC or SORC for review.

Personnel recommended to be Station Qualified Reviewers shall be designated in writing by the designated Master Process Owner, Process Owner or Senior Vice President and CNO - Millstone or- Vice President - Generation for each procedure, program, or class of procedure or program within the scope of the Station Qualified Reviewer Program.

Temporary procedure changes shall be made in accordance with Technical Specification 6.8.3 with the exception that changes to procedures for which reviews are assigned to Qualified Reviewers will be reviewed and approved as described in Responsibilities (a) through (e) above.

Records

The review of procedures and programs performed under the Station Qualified Reviewer Program shall be documented in accordance with administrative procedures.

Training and Qualification

The training and qualification requirements of personnel designated as a Qualified Reviewer in accordance with the Station Qualified Reviewer Program shall be in accordance with administrative procedures. Qualified reviewers shall have:

- a. A Bachelors degree in engineering, related science, or technical discipline, and two years of nuclear power plant experience;

OR

- b. Six years of nuclear power plant experience;

OR

- c. An equivalent combination of education and experience as approved by a Process Owner or Master Process Owner.

SAFETY LIMIT VIOLATION - Units 2 and 3

The Senior Vice President and CNO - Millstone and the Chairperson of the NSAB shall be notified within 24 hours in the event a Safety Limit is violated.

The Safety Limit Violation Report shall be submitted to the Commission, the Chairperson of the NSAB, and the Senior Vice President and CNO - Millstone, within 14 days of the violations.

RECORD RETENTION - Unit 2

(1) The following records shall be retained for at least five years:

- a. Records and logs of facility operation covering time interval at each power level.
- b. Records and logs of principal maintenance activities, inspections, repair and replacement of principal items of equipment related to nuclear safety.
- c. All REPORTABLE EVENTS.
- d. Records of surveillance activities, inspections, and calibrations required by these technical specifications.

- e. Records of reactor tests and experiments.
 - f. Records of changes made to operating procedures.
 - g. Records of radioactive shipments.
 - h. Records of sealed source leak tests and results.
 - i. Records of annual physical inventory of all sealed source material of record.
- (2) The following records shall be retained for the duration of the facility operating license:
- a. Records and drawing changes reflecting facility design modifications made to systems and equipment described in the Final Safety Analysis Report.
 - b. Records of new and irradiated fuel inventory, fuel transfers, and assembly burnup histories.
 - c. Records of facility radiation and contamination surveys.
 - d. Records of radiation exposure for all individuals entering radiation control areas.
 - e. Records of gaseous and liquid radioactive material released to the environs.
 - f. Records of transients or operational cycles for those facility components designed for a limited number of transients or cycles.
 - g. Records of training and qualification for current members of the plant staff.
 - h. Records of inservice inspections performed pursuant to the Technical Specifications.
 - i. Records of quality assurance activities required by the QA Manual.
 - j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR Part 50.59.
 - k. Records of meetings of the Unit 2/3 PORC, the NSAB, and the SORC.
 - l. Records of Environmental Qualification which are covered under the provisions of Technical Specification 6.13.
 - m. Records of reviews performed for changes made to the Radiological Effluent Monitoring and Offsite Dose Calculation Manual (REMDCM) and the Process Control Program.

RECORD RETENTION - Unit 3 Only

- (1) In addition to the applicable record retention requirements of Title 10, Code of Federal Regulations, the following records shall be retained for at least the minimum period indicated.
- (2) The following records shall be retained for at least five years:

- a. Records and logs of unit operation covering time interval at each power level;
- b. Records and logs of principal maintenance activities, inspections, repair and replacement of principal items of equipment related to nuclear safety;
- c. All REPORTABLE EVENTS;
- d. Records of surveillance activities, inspections, and calibrations required by Technical Specifications;
- e. Records of changes made to the procedures required by Technical Specification 6.8.1;
- f. Records of radioactive shipments;
- g. Records of sealed source and fission detector leak tests and results; and
- h. Records of annual physical inventory of all sealed source material of record.

(3) The following records shall be retained for the duration of the unit Operating License:

- a. Records and drawing changes reflecting unit design modifications made to systems and equipment described in the Final Safety Analysis Report;
- b. Records of new and irradiated fuel inventory, fuel transfers, and assembly burnup histories;
- c. Records of radiation exposure for all individuals entering radiation control areas;
- d. Records of gaseous and liquid radioactive material released to the environs;
- e. Records of transient or operational cycles for those unit components identified in Technical Specification Table 5.7-1.
- f. Records of reactor tests and experiments;
- g. Records of training and qualification for current members of the unit staff;
- h. Records of inservice inspections performed pursuant to the Technical Specifications;
- i. Records of quality assurance activities required by the Quality Assurance Topical Report not listed in (2) a. through (2) h. above;
- j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR Part 50.59;
- k. Records of meetings of the Unit 2/3 PORC, the NSAB, and the SORC;
- l. Records of the service lives of all hydraulic and mechanical snubbers required by Technical Specification 3.7.10 including the date at which the service life commences and associated installation and maintenance records;
- m. Records of secondary water sampling and water quality; and

- n. Records of analyses required by the Radiological Environmental Monitoring Program that would permit evaluation of the accuracy of the analysis at a later date. This should include procedures effective at specified times and QA records showing that these procedures were followed.
- o. Records of reviews performed for changes made to the Radiological Effluent Monitoring and Offsite Dose Calculation Manual (REMOCM) and the Process Control Program.

¹ Relocation of Technical Specification Administrative Controls Related to Quality Assurance in Response to AL 95-06.