

North Atlantic

North Atlantic Energy Service Corporation
P.O. Box 300
Seabrook, NH 03874
(603) 474-9521, Fax (603) 474-2987

The Northeast Utilities System

Ted C. Feigenbaum
Senior Vice President &
Chief Nuclear Officer

NYN-94127

November 10, 1994

United States Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Document Control Desk

References: (a) Facility Operating License No. NPF-86, Docket No. 50-443
(b) North Atlantic letter NYN-94002, dated January 14, 1994, "Proposed Change to the North Atlantic Operational Quality Assurance Program (TAC No. M86712)"

Subject: Supplemental Information Regarding Proposed Change to the North Atlantic Operational Quality Assurance Program (TAC No. M86712)

Gentlemen:

The following supplemental information is provided to assist in your review of North Atlantic Energy Service Corporation's (North Atlantic) proposed change to the Operational Quality Assurance Program [Reference (b)]. The proposed change reduced an existing commitment by deleting the requirement to perform a biennial review of plant procedures. This supplemental information specifically addresses the December 21, 1992 internal guidance provided by the Director of the Division of Reactor Inspection and Licensee Performance to the Regional Directors of Reactor Safety. The North Atlantic implementation methodology for each of the four considerations in the NRC guidance is discussed below.

Consideration: Programmatic controls should specify that all applicable plant procedures will be reviewed following an unusual incident, such as an accident, an unexpected transient, significant operator error, or equipment malfunction and following any modification to a system, as specified by Section 5.2 of ANSI N18.7/ANS 3.2 which is endorsed by RG 1.33.

Response: Unusual incidents such as an accident, unexpected transient, significant operator error, or significant equipment malfunction are evaluated as part of the North Atlantic Corrective Action Program. The Operating Experience Manual, which contains the implementing procedures for the Corrective Action Program, will be revised to include a requirement for a review of the applicable procedures following any unusual incident. The Design Control Program, which controls the modification of structures, systems and components, contains the requirement for the review of the affected plant procedures and the development of revisions concurrent with the development of a system modification.

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Consideration: Non-routine procedures (procedures such as emergency operating procedures, off-normal procedures, procedures which implement the emergency plan, and other procedures whose usage may be dictated by an event) should be reviewed at least every two years and revised as appropriate.

Response: North Atlantic does not intend to include non-routine procedures in the population of procedures that will be excluded from a biennial review. The Emergency Operating Procedures, Abnormal Operating Procedures and the Emergency Plan Procedures will continue to be reviewed on a biennial basis. This biennial review requirement will be included in the administrative controls for these procedures.

Consideration: At least every two years, the Quality Assurance (or other "independent") organization should audit a representative sample of the routine plant procedures that are used more frequently than every two years. The audit is to ensure the acceptability of the procedures and verify that the procedure review and revision program is being implemented effectively. The root cause of significant deficiencies is to be determined and corrected.

Response: North Atlantic Quality Programs will review plant procedures that are used more frequently than a normal plant fuel cycle (i.e. power operation, shutdown, refueling outage and subsequent startup), on a sampling basis, as part of routine audits and surveillances. These audits and surveillances will be used to ensure that existing programmatic controls, such as those specified in the the Design Control Program, Operating Experience Review Program, Corrective Action Program and the Procedure Compliance Policy are effective in maintaining the quality of plant procedures. If concerns are noted the Quality Programs organization has the ability to address the issue and ensure the root cause is determined and corrected either through the audit and surveillance response process or the Corrective Action Program.

Consideration: Routine plant procedures that have not been used for two years should be reviewed before use to determine if changes are necessary or desirable.

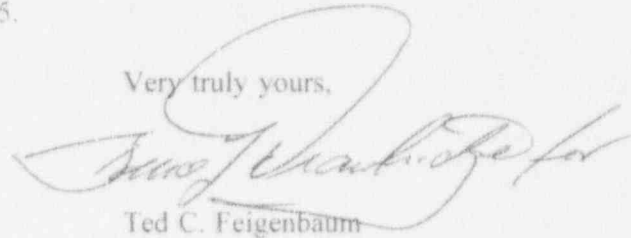
Response: North Atlantic utilizes a pre-job briefing practice to ensure that personnel are aware of what is to be accomplished and what procedures will be used, prior to beginning a job. In addition, a rigorous Procedure Compliance Policy ensures that personnel know what actions are required if the procedures cannot be implemented as written. The Procedure Compliance Policy requires that the job be stopped and the procedure be revised or the situation be resolved prior to work continuing. The pre-job briefing will address most procedures that are not used during a normal plant fuel cycle. The administrative controls for the procedure system will be revised to require that procedures that are scheduled to be used at intervals longer than a normal fuel cycle, which have not been revised or reviewed since they were last used, to be discussed during the pre-job briefing.

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North Atlantic believes that this supplemental information should facilitate the review of the proposed change to the Operational Quality Assurance Program. Should you have any questions regarding this supplemental information or the proposed change please contact Mr. Terry L. Harpster, Director of Licensing Services, at (603) 474-9521, extension 2765.

Very truly yours,



Ted C. Feigenbaum

TCF:JMP/act

cc: Mr. Thomas T. Martin
Regional Administrator
U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

Mr. Albert W. De Agazio, Sr. Project Manager
Project Directorate 1-4
Division of Reactor Projects
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Mr. Richard Laura
NRC Senior Resident Inspector
P.O. Box 1149
Seabrook, NH 03874

Mr. George L. Iverson, Director
New Hampshire Office of Emergency Management
107 Pleasant Street
Concord, NH 03301