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May 25, 1995

Docket No. 50-336
B15238

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

Millstone Nuclear Power Station, Unit No. 2
Request for Readiness Assessment Team Inspection

In our letter to the NRC dated April 4, 1995,⁽¹⁾ Northeast Nuclear Energy Company (NNECO) committed to provide the NRC with the following:

- Date by which NNECO will be ready for the Millstone Unit No. 2 Readiness Assessment Team Inspection (RATI),
- Detailed information regarding the startup criteria used by NNECO management to assure that corrective actions have resulted in sufficient improvement to justify restart of Millstone Unit No. 2, and
- Our disposition of recommendations resulting from the Startup Assessment Team (SAT), which I commissioned on January 12, 1995.⁽²⁾

The purpose of this letter is to provide this information.

NNECO requests that the NRC's RATI begin on Tuesday, May 30, 1995. To assist the RATI in reviewing the status of work remaining to be

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- (1) J. F. Opeka letter to U.S. Nuclear Regulatory Commission, "Millstone Unit No. 2 Startup Plan," dated April 4, 1995.
- (2) J. F. Opeka letter to U.S. Nuclear Regulatory Commission, "Formation of Startup Assessment Team," dated January 12, 1995.

ADD1

accomplished, Attachment 1 provides a list of the major activities that have yet to be completed.

Attachment 2 lists the startup criteria established by NNECO to determine the readiness of Millstone Unit No. 2 for restart. These criteria provide evidence of (1) the improved materiel condition of the plant's systems, structures, and components; (2) the improvement in procedural adherence; and (3) the management controls in place to proactively identify and correct existing and future deficiencies. In support of Millstone Unit No. 2 startup, we have developed and are tracking specific key performance indicators related to issue significance, discovery method, and equipment deficiencies. These indicators support the evaluation of various startup criteria and will help us monitor performance in the future. Trend graphs of these indicators are included in Attachment 2. When evaluated in the aggregate, the criteria listed in Attachment 2 affirm our readiness to restart Millstone Unit No. 2. Although not tied to startup, two additional performance indicators have been established to help us assess the effectiveness of our corrective actions (repeat findings) and our efforts at improving housekeeping and materiel condition.

Attachment 3 provides the SAT's final report. The SAT has identified a number of issues that it believes should be corrected prior to startup. With these exceptions, the SAT has identified no issue which would prevent the plant from proceeding with startup (Mode 4). The SAT's final report was presented to the Nuclear Safety Assessment Board (NSAB) during a meeting on May 19, 1995.

The NSAB concurred with the SAT's conclusion and considers that Millstone Unit No. 2 can be safely restarted and operated. The NSAB conclusion is dependent upon completing the activities in the Millstone Unit No. 2 Startup Plan, satisfying the prerequisites in the SAT's final report, and resolving additional items discussed during the NSAB meeting.


I have authorized entry into Modes 4 and 3 contingent upon the completion of the SAT recommendations, NSAB recommendations, and certain other items identified by the Senior Vice President - Millstone Station including such items as: Operations being "in charge," acceptable resolution of SPDS issues, identifying the reason for an increase in tagging errors, and resolution of issues dealing with configuration control, corrective action effectiveness, and preventive maintenance as surveillances. This authorization was based on my review of the SAT final report, my attendance at portions of both the NSAB special meeting and a System Readiness Review Meeting, and my assessment of the progress made in improving Millstone Unit No. 2 performance.

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We look forward to the opportunity to demonstrate to the RATI our readiness to proceed with the safe startup of Millstone Unit No. 2. Should you have any questions regarding the information provided, please call Mr. Michael J. Wilson of my staff at (203) 440-2081, or me.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



J. F. Opeka
Executive Vice President

cc: T. T. Martin, Region I Administrator
G. S. Vissing, NRC Project Manager, Millstone Unit No. 2
P. D. Swetland, Senior Resident Inspector, Millstone Unit
Nos. 1, 2, and 3
R. W. Cooper, II, Director, Division of Reactor Projects,
Region I
J. P. Durr, Chief, Projects Branch 4, Region I
J. B. Jacobson, Team Leader, Special Inspection Branch, NRR

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Attachment 1

Millstone Nuclear Power Station, Unit No. 2
Major Activities That Have Yet to be Completed

May 1995

MAJOR ACTIVITIES THAT HAVE YET TO BE COMPLETED

Emergency Operating Procedure (EOP) Revisions

EOP revisions to resolve safety significant deviations from CEN-152 Revision 3 and the current writers guide (Mode 4)

EOP Training

Training on the revised EOPs (Mode 4)

Verification of Operator Performance Level

The Operations Manager and Unit Director determination of the adequacy of operator performance (Mode 4)

Operator Burden Reduction

Work to reduce the present number of operator burdens. As an indication of our progress in this area, we expect to start up with 10 or fewer control panel deficiency and bypass jumper operator burdens.

Technical Specification Surveillance Tracking

Work to resolve deficiencies resulting from the review of surveillance procedures and tracking methods (Mode 4)

Plant Design Change Request (PDCR) Closeout and Turnover to Operations

Closeout, turnover, and release for operations of the remaining PDCRs.

Completion of Startup Punchlist Details

Plant Operations Review Committee review of punchlist items prior to mode changes

System Readiness Review Followup

System Readiness Reviews review and approval (Mode 4)

Material Equipment Parts List

Evaluation of items reclassified during the MEPL project (Mode 4)

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Engineered Safety Actuation System (ESAS) Design and Performance
Review

Implementation of ESAS modifications (Mode 4)

Station Battery Replacement

Replacement of the Station Battery (Mode 4)

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Attachment 2
Millstone Nuclear Power Station, Unit No. 2
Startup Criteria

May 1995

**Attachment 2
Millstone Unit No. 2
Startup Criteria**

I. Adverse Condition Report (ACR) Significance

The ACR significance reported in the Accomplishments and Issues report shows most adverse conditions are of low significance. (The enclosed trend shows a recent increase in the number of significance level C issues. This is due in part to the identification of past problems and is not representative of recent performance.)

II. ACR Discovery Method

The discovery method distribution shows that most errors are self-identified and do not result in events. (The relatively large percentage of third party identification the week of May 20 is due, in part to the lower number of total ACRs, and the review of Unit 2 susceptibility to Millstone Unit No. 3 issues.)

III. Materiel Condition

Corrective maintenance, Trouble Report, and Automated Work Order (AWO) backlogs are acceptable. The overall impact on operations will be evaluated by assessing the quantity and significance of the backlog.

IV. Major Items Aging

The top ten list is in place and posted.

V. Operator Burdens

The quantity of operator burdens has been significantly reduced. The significance of the remaining burdens is acceptable. The management review process is in place. (Our expectations are to start up with 10 or fewer of the currently identified control panel deficiency and bypass jumper operator burdens.)

VI. Personnel Error Rate

The number and significance of personnel errors is low. Significant events do not routinely occur.

VII. Surveillance Program

Process review of surveillance databases complete and any related changes completed.

VIII. Startup Assessment Team

All Mode 4 issues are dispositioned.

IX. Operator Performance

The Operations Manager and the Unit Director observe day-to-day in-plant performance and simulator performance of operators and determine it to be adequate.

X. Emergency Operating Procedures (EOPs)

EOPs are revised and necessary Verification and Validation activities are complete. Operator performance on the simulator is satisfactory.

XI. Work Order Quality

Quality and Assessment Services and Work Observation input indicate that AWO quality is adequate.

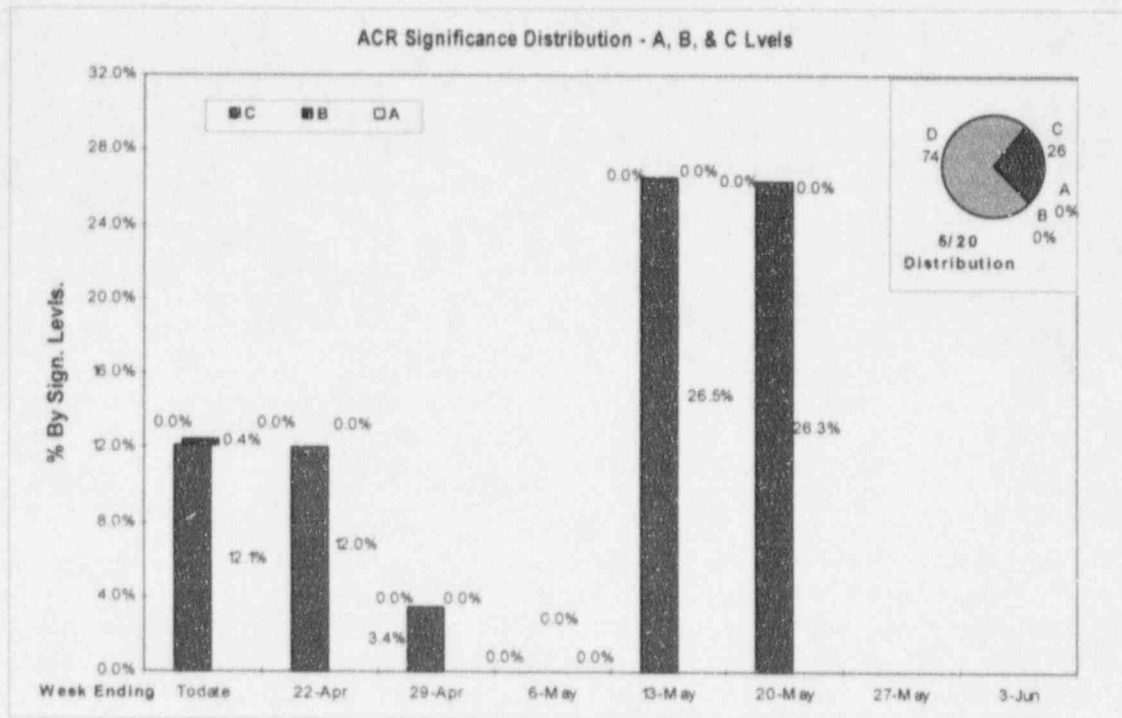
XII. Equipment Performance

Readiness reviews for designated systems are complete and accepted by the Plant Operations Review Committee. Major deficiencies are resolved.

XIII. Improving Station Performance (ISP)

The designated "Improving Station Performance" ISP activities for Millstone Unit No. 2 startup have been verified complete.

Millstone Point Unit 2 - Key Performance Indicators ACR Significance



Every ACR is assigned a significance level, ranging from A (the highest significance level) to D (the issue is not significant). High significance level events should rarely occur.

Level A - High Consequences, High Complexity.

Level B - High Consequences, Low Complexity.

Level C - Low Consequences, High Complexity.

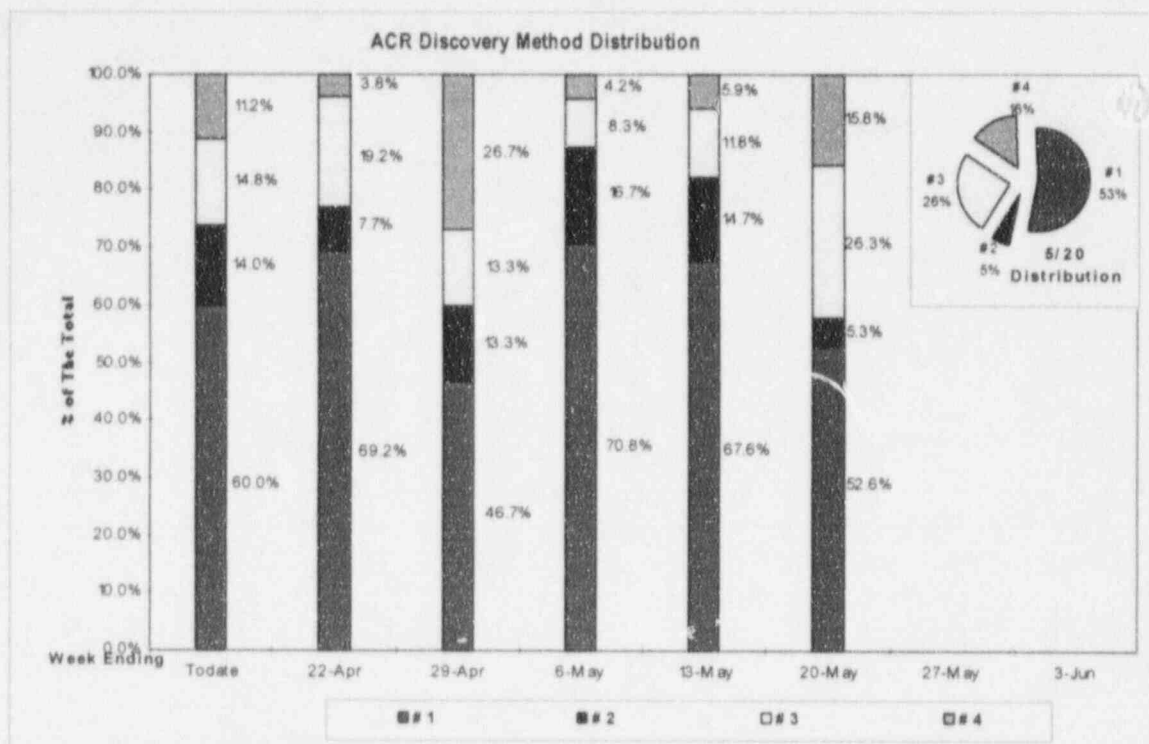
Level D - Low Consequences, Low Complexity.

This KPI shows the weekly and cumulative distribution of significance levels for ACRs assigned to Unit 2. The graph does not include ACRs documenting site-wide issues. The graph shows the percentage of ACRs that were significance level A, B and C.

	Today	Today	4/22	4/22	4/29	4/29	5/6	5/6	5/13	5/13	5/20	5/20
	# of ACRs	Percent	# of ACRs	Percent	# of ACRs	Percent	# of ACRs	Percent	# of ACRs	Percent	# of ACRs	Percent
Sign. A	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Sign. B	1	0.4	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Sign. C	31	12.1	3	12.0	1	3.4	0	0.0	9	26.5	5	26.3
Sign. D	225	87.6	22	88.0	28	96.6	23	100.0	25	73.5	14	73.7
Cum Total	256	100	25	100	29	100	34	100	34	100	19	100

Millstone Point Unit 2 - Key Performance Indicators

ACR Discovery Method Distribution



Discovery methods are categorized as follows:

#1 Self Identified - workers and performers themselves find it through the self-checking, attention to detail, and good work practices.

#2 Line Identified - The reviews, observations, and other activities performed by the management team finds it.

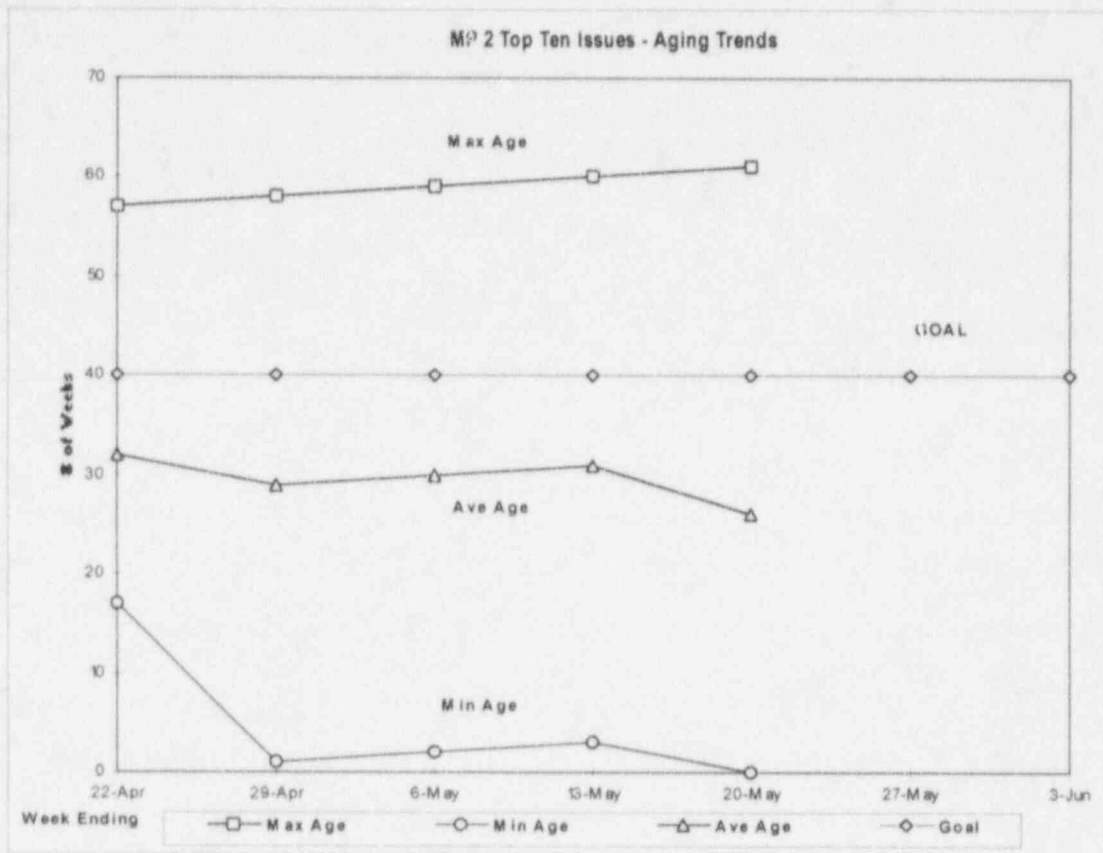
#3 Independent Entities Identified - Third party organizations, including QAS, NRC, INPO, combined utility audits, insurance inspectors and OSHA etc find it.

#4 Condition/Event Identified - The conditions that are self-revealing, with or without consequences (for example, equipment problems found because of alarms, failed retests, mispositioned valves) find it.

This KPI shows the weekly and cumulative distribution of ACR discovery methods for ACRs assigned to Unit 2. The graph does not include ACRs documenting site-wide issues.

	Todate # of ACRs	Todate Percent	4/22 # of ACRs	4/22 Percent	4/29 # of ACRs	4/29 Percent	5/06 # of ACRs	5/06 Percent	5/13 # of ACRs	5/13 Percent	5/20 # of ACRs	5/20 Percent
#1 Self Ident.	150	60.0	18	69.2	14	46.7	17	70.8	23	67.6	10	52.6
#2 Line Ident.	35	14.0	2	7.7	4	13.3	4	16.7	5	14.7	1	5.3
#3 Indep. Ident.	37	14.8	5	19.2	4	13.3	2	8.3	4	11.8	5	26.3
#4 Condi Ident.	28	11.2	1	3.8	8	26.7	1	4.2	2	5.9	3	15.8
Total	250	100.0	26	100.0	30	100.0	24	100.0	34	100.0	19	100.0

Millstone Point Unit 2 - Key Performance Indicators Major Issues Aging



The major items aging indicator shows how quickly unit personnel correct significant equipment deficiencies. The item's age is counted from the date the issue is added to the Major Items List. The Major Items list is published in the Daily Status Report.

The graph illustrates: 1) the number of issues on the major items list 2) the average age, in weeks 3) age of the oldest issue, in weeks 4) age of the newest issue, in weeks.

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Attachment 3

Millstone Nuclear Power Station, Unit No. 2

Startup Assessment Team
Final Report

May 1995