

**NORTHEAST UTILITIES**

THE CONNECTICUT LIGHT AND POWER COMPANY  
WESTERN MASSACHUSETTS ELECTRIC COMPANY  
HOLYOKE WATER POWER COMPANY  
NORTHEAST UTILITIES SERVICE COMPANY  
NORTHEAST NUCLEAR ENERGY COMPANY

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June 29, 1984

Docket No. 50-423  
B11244

Director of Nuclear Reactor Regulation  
Mr. B. J. Youngblood, Chief  
Licensing Branch No. 1  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Reference: (1) W. G. Counsil letter to B. J. Youngblood, NRC Radiological  
Assessment Branch Review Meeting, dated March 23, 1984.

Dear Mr. Youngblood:

Millstone Nuclear Power Station, Unit 3  
Revised Response to DSER Open Item RAB-8

Attached is Northeast Nuclear Energy Company's revised response to the NRC's Radiological Assessment Branch (RAB) DSER Open Item RAB-8, concerning the Radiation Protection Manager (RPM).

Our original response, which was transmitted via Reference (1), has been revised as a result of conversations between your Mr. J. Minns and our Mr. J. L. Majewski in which Mr. Minns indicated that our original response to RAB-8 was insufficient to close the open item. He also indicated that the NRC-RAB would require that the Millstone RPM or one of his subordinates be made a regular member of the Millstone Unit 3 Plant Operations Review Committee (PORC) to close this open item.

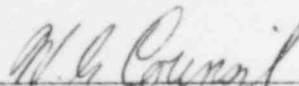
As outlined in the attached response, it is our position that the Millstone RPM need not be a regular member of the Millstone Unit 3 PORC.

We remain available to discuss the matter further with the Staff as necessary.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY  
et. al.

BY NORTHEAST NUCLEAR ENERGY COMPANY  
Their Agent

  
\_\_\_\_\_  
W. G. Counsil  
Senior Vice President

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STATE OF CONNECTICUT )

COUNTY OF HARTFORD )

) ss. Berlin

*June 29, 1984*

Then personally appeared before me W. G. Counsil, who being duly sworn, did state that he is Senior Vice President of Northeast Nuclear Energy Company, an Applicant herein, that he is authorized to execute and file the foregoing information in the name and on behalf of the Applicant herein and that the statements contained in said information are true and correct to the best of his knowledge and belief.

*S. M. Cates*  
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Notary Public

My Commission Expires March 31, 1986

## Open Items

### Radiological Assessment Branch (RAB)

#### RAB-8 Radiation Protection Manager (Draft SER Section 12.5.1)

The Millstone Unit 3 plant organization shows the Radiation Protection Manager reporting to the Radiological Service Supervisor. It is the staff's position that, in matters relating to radiological health and safety, the individual responsible for the activities of the radiation protection support group has a direct responsibility to both employees and management. This responsibility can best be fulfilled if the Radiation Protection Manager not only has access to the Station Superintendent, but is independent of plant operations management, whose prime responsibility is continuity or improvement of station operability. This apparent lack of independence is an open item.

#### Response (3/84)

Refer to response to Question 471.23.

#### Summary of Discussion (3/84)

The NRC-RAB reviewers identified two concerns. They were:

- a. Provide an updated resume for the Millstone Radiation Protection Manager (John P. Kangley) which shows compliance with Regulatory Guide 1.8.
- b. It is the NRC-RAB's position that the RPM should be a regular member of the PORC to ensure that matters of radiological safety are adequately addressed by the PORC. Appoint the Millstone RPM to the PORC or provide justification for not having the RPM as a PORC member.

The NNECO responses are as follows:

- a. An updated resume for John P. Kangley is attached. Mr. Kangley is the Radiological Services Supervisor for the Station. He is the designated Radiation Protection Manager and reports to the Station Services Superintendent.
- b. Appointing the RPM as a member of the PORC would dilute his effectiveness as a manager and weaken the administration of the radiation protection program due to the numerous number of PORC meetings and procedure reviews required of PORC members.

It is understood by the PORC membership that radiological safety is not the responsibility of just one individual but that it is the responsibility of each and every one of them in their review process. When matters of radiological safety are to be reviewed or are identified in the review process the RPM and/or his designee is required to participate in the meeting. Radiological safety is strictly administered and controlled by the Unit/Station radiation protection procedures. These procedures are the responsibility of the RPM and/or his designee. Any changes or revisions to these procedures require approval and will be presented to the PORC by one of these individuals. Additionally, the entire radiation protection staff has the authority to stop work when in their opinion radiological safety is being compromised.

## Open Items

### Radiological Assessment Branch (RAB)

#### RAB-8 Cont.

Both the Radiation Protection Manager and PORC are part of the present station organization whose duties and responsibilities are defined in our administrative control procedures. Both the organization and the use of administrative control procedures have been approved by the NRC and have been found by them to adequately address matters of radiological safety. Appointing the Radiation Protection Manager as a member of the Millstone Unit No. 3 PORC would be inconsistent with our present organization and would create a separate organization for Unit No. 3. This would have the effect of weakening the radiation protection program for the whole station.

#### Status (3/84)

Open.

#### Additional Response (6/84)

The individual responsible for radiation protection at Millstone 3 and the Millstone Station is the Station Services Superintendent. Refer to FSAR Section 13.1.2.2.14(3). The Station Services Superintendent serves as a member of the Millstone Unit 1, Unit 2 and Unit 3 Plant Operations Review Committee (PORC). He also serves as a member of the Millstone Site Operations Review Committee (SORC). The Station Services Superintendent meets the requirements of ANSI N18.1-1971, Section 4.2.1, as referenced by Regulatory Guide 1.8, 1977. Refer to FSAR Section 13.1.3.1.1.(3).

Additionally the PORC and SORC Charters allow the Chairman to obtain additional technical expertise when such is required by appointing subcommittees or by utilizing consultants from either within or from outside the Northeast Utilities organization. It is our position that adequate experience exists in both the PORC and the SORC memberships to judge when consultants are necessary to aid them in their review process. The PORC has operated in this manner for many years at Millstone Units 1 and 2 with NRC concurrence and with outstanding results. We expect this to continue with Millstone Unit 3. Therefore, we feel that it is unnecessary to appoint the Millstone RPM or one of his subordinates as a member of the PORC.

In summary, the provision for obtaining assistance from subcommittees or consultants whenever necessary, and the experience of the PORC members themselves, provides adequate technical diversity to review any matter which may have the potential to affect the safe operation of the plant.