

**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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February 19, 1985

Docket No. 50-423  
B11455

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

- References: (1) D. G. Eisenhower to W. G. Council, Design Verification Activities - Millstone Unit No. 3, dated August 13, 1984.
- (2) W. G. Council to D. G. Eisenhower, Design Verification Activities - Millstone Unit No. 3, dated October 26, 1984.

Gentlemen:

Millstone Nuclear Power Station, Unit No. 3  
Design Verification Activities

In Reference (1), the NRC requested that Northeast Nuclear Energy Company (NNECO) provide any plans that we have for assuring Millstone Unit No. 3 has been designed and constructed in accordance with FSAR commitments. In Reference (2), NNECO provided documentation of our assurance that Millstone Unit No. 3 has been designed and constructed in accordance with applicable requirements based on a number of special audits and other NNECO initiatives.

A meeting was held with the NRC on January 11, 1985 in Bethesda, Maryland to discuss several of NNECO's initiatives in the area of design verification. The NRC Staff was most interested in the Stone & Webster Engineering Corporation (SWEC) Engineering Assurance (EA) program. NNECO gave a brief overview of the EA program including the scope of technical audits completed on Millstone Unit No. 3. Three of four audits scheduled for Millstone Unit No. 3 have been completed. The fourth audit will be conducted during the period from April to July 1985. SWEC personnel at the meeting discussed the EA program in comparison with the NRC Integrated Design Inspection (IDI) program. An outline of typical EA audit chronology was presented showing activities associated with planning and preparation, performance, reporting and follow-up action. The NRC Staff noted that an ongoing management supported technical review program within the utility company, such as the EA program at Millstone Unit No. 3, may be an acceptable alternative to a third party review performed at the end of the design and construction efforts. In concluding the meeting the Staff stated their interest in meeting with NNECO representatives in the near future to discuss NNECO's plan for the fourth EA audit at Millstone Unit No. 3.

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A meeting was held with the NRC on February 11, 1985 in Bethesda, Maryland to discuss NNECO's plan for the fourth EA audit at Millstone Unit No. 3. A detailed plan for completion of both phases of the program was presented at the meeting. Completion of the program involves the performance of the 4th audit (Phase I) and the evaluation and assessment of the results of the 4 audits in order to form a conclusion as to the adequacy of the design process as implemented for Millstone Unit No. 3 (Phase II). Attachment I contains the description of the program for completion of the EA Technical Audit Program as discussed with the NRC on February 11, 1985. It also provides a schedule of activities for both the phases of the program and areas of NRC involvement in the process as discussed at the February 11, 1985 meeting.

We anticipate that this Program Plan is responsive to the NRC initiatives in this area and will meet the NRC Staff needs. We remain available to meet with the Staff to resolve any questions which may arise and provide any information necessary.

If there are any questions, please contact our licensing representative directly.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY  
et. al.

BY NORTHEAST NUCLEAR ENERGY COMPANY  
Their Agent

W. G. Council  
W. G. Council  
Senior Vice President

C. F. Sears  
By: C. F. Sears  
Vice President

STATE OF CONNECTICUT    )  
                                  ) ss. Berlin  
COUNTY OF HARTFORD    )

Then personally appeared before me C. F. Sears, who being duly sworn, did state that he is 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 Applicants herein and that the statements contained in said information are true and correct to the best of his knowledge and belief.

Jennifer J. Powers  
Notary Public  
My Commission Expires March 31, 1989