

**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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October 16, 1985

Docket No. 50-245  
B11819

Director of Nuclear Reactor Regulation  
Attn: Mr. Christopher I. Grimes, Chief  
Systematic Evaluation Program Branch  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

References: (1) J. F. Opeka letter to C. I. Grimes, dated May 17, 1985.  
(2) H. L. Thompson letter to J. F. Opeka, dated July 31, 1985.

Gentlemen:

Millstone Nuclear Power Station, Unit No. 1  
Integrated Safety Assessment Program

In Reference (1), Northeast Nuclear Energy Company (NNECO) provided a proposed scope for the Integrated Safety Assessment Program (ISAP) review of Millstone Unit No. 1. In Reference (2), the Staff formally issued the results of the ISAP screening review process, establishing the scope of ISAP for Millstone Unit No. 1 and initiating issue-specific evaluations. Reference (1) also indicated that for each issue or topic included in ISAP, NNECO would provide a discussion of the safety objective and an evaluation of the plant design with respect to the issue being addressed to identify specific items to be considered in the integrated assessment. In accordance with this commitment, the review for the following ISAP topic is attached.

- o ISAP Topic 1.38 - "Expand QA List"

If you have any questions concerning the attached review, please contact us.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

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J. F. Opeka  
Senior Vice President

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

cc: J. A. Zwolinski

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ISAP TOPIC NO. 1,38

EXPAND QA LIST

October, 1985

## ISAP Topic No. 1.38

### Expand QA List

#### I. Introduction

The TMI Action Plan (Reference 1) identified that:

"Several systems important to the safety of TMI Unit 2 were not designed, fabricated, and maintained at a level equivalent to their safety importance. They were not on the Quality Assurance List (the QA list) for the plant. This condition exists at other plants and results primarily from the lack of clarity in NRC guidance for graded protection."

The NRC also proposed to:

"Develop guidance for licensees to expand their QA lists to cover equipment important to safety and rank the equipment in order of its importance to safety. The results of the interim reliability evaluation program (IREP) and the systems interaction tasks will be used to establish the importance of equipment as it relates to safety. Experience in use of the revised NRR review procedure for developing QA lists for individual operating license applicants will also be factored into the generic guidance to be developed and when determining backfit requirements."

#### II. Review Criteria

1) NUREG-0660

#### III. Related Topics/Interfaces

None

#### IV. Evaluation

Until recently, the regulatory terms "important to safety" and "safety related" have been used synonymously by both industry and the NRC. Recent NRC Staff actions have, however, signalled a departure from this long-standing practice by broadening the term "important to safety" to cover a more extensive set of plant structures, systems and components than is covered by the term "safety related". We believe that the terms "important to safety" and "safety related" are synonymous. Systems, structures and components at Millstone Unit No. 1 are categorized in essentially two basic groups: safety related equipment and non-safety related equipment. Accordingly, our QA program is a two-tier program, except for fire protection, radwaste transportation and radwaste handling systems. These exceptions are in response to NRC requirements. We strongly oppose the proliferation of additional QA programs and we do not believe that a three-tier QA program is appropriate for the following reasons.

We believe that the effects of non-safety related structures, systems and components on the safe and reliable operation of Millstone Unit No. 1 have already been adequately considered without the need to establish additional QA requirements for a so-called "important to safety" category of equipment. The need to expand QA requirements beyond existing criteria implies that non-safety related means unsafe or uncontrolled. This is simply not the case. At the outset, it is important to recognize that non-safety related equipment is not essential to maintain the plant in a safe condition or to adequately protect the public health and safety. Rather, this equipment can enhance the safety of an already safe plant and should be treated accordingly. Non-safety related structures, systems and components are continuously and routinely evaluated for their impact upon safety related equipment. Several recent licensing issues (e.g., environmental qualification of electrical equipment, block walls, and NUREG-0612) substantiate this statement. In addition, seismic criteria for non-safety related equipment addresses the need to seismically support such equipment if it is shown that failure of non-safety related equipment during a seismic event could impact the proper functioning of safety related equipment. In those cases where General Design Criteria in 10CFR50, Appendix A, are applicable, we have always interpreted the regulations to require that any non-safety related structure, system or components that could impact safety related structures systems and components from performing the function necessary to comply with the particular General Design Criterion would need to be designed such that that could not occur. Based upon our interpretation of the regulations, we are confident that from a safety standpoint the impact of non-safety related equipment at Millstone Unit No. 1 has been, and continues to be, adequately addressed. Additional consideration of non-safety related equipment such as an expansion of the QA requirements beyond the traditional safety related set of systems, structures, and components is unnecessary in our opinion.

Northeast Nuclear Energy Company routinely applies management measures to non-safety related equipment as a matter of good engineering, construction and operations practices. We normally apply accepted codes and standards to various backfit projects. Design installation and maintenance activities are subject to measures which help ensure the quality of that equipment. A good example of our efforts in the area of improving plant reliability and safety is our plant maintenance program. This program addresses all equipment in Millstone Unit No. 1, not just safety related equipment. It establishes all necessary maintenance activities related to each individual piece of equipment. We note that, as of August 13, 1985, Millstone Unit No. 1 was on-line for 374 continuous days, which is a U. S. record for BWRs. We believe this record is indicative of proper attention to maintenance of both safety related and non-safety related equipment.

Other examples of our management measures to assure proper functioning and control over both non-safety related equipment and safety related equipment follows. First, we use the same plant design change request process, except for the independent design verification step, for both non-safety related and safety related equipment. We also utilize identical maintenance procedures and personnel to perform maintenance for both

non-safety related and safety related equipment. In addition, the same drawing control system and welding procedures are used. All items get receipt inspected, but to slightly different degrees, and we utilize the same calibration equipment for safety related and non-safety related equipment. In addition, only nuclear grade cabling is used for replacement at the plant. We believe that the above is very indicative of a well managed nuclear power plant with proper attention given to all equipment, regardless of whether or not it is safety related.

Based on the degree of attention given non-safety related equipment at Millstone Unit No. 1, we do not believe that a measureable increase in safety would be obtained by the expansion of the QA safety related list to include any additional non-safety related equipment. We believe we already adequately address this equipment in our ongoing programs even though these programs may not necessarily be part of the formal QA program. We would like to stress that the difference between the way we do business and the intent of this item is that we stress line responsibility and accountability for non-safety related equipment, whereas an expansion of the QA program would put the burden of responsibility in the independent QA management chain. We strongly emphasize that we do not believe that a independent QA verification of the actions that we now take for non-safety related equipment is necessary nor will it significantly increase the safety of Millstone Unit No. 1.

#### V. Conclusion

In conclusion, we believe that we adequately meet the intent of this item at the present time. We strongly emphasize that we do not agree with the NRC's interpretation of the term "important to safety." The terms "important to safety" and "safety related" are in fact synonymous. Notwithstanding the definitional problem that currently exists between the NRC Staff and the industry in general, we believe that more than adequate management controls and measures are in place for equipment beyond the traditional safety related set of systems, structures, and components to adequately maintain this equipment and to adequately protect the public health and safety. As such, we do not believe any additional effort is necessary on our part for this item.

#### VI. References

- I. NUREG-0660