



Northeast
Utilities System

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January 31, 1997

Docket Nos. 50-245
50-336
50-423

B16197

F. J. Miraglia, Deputy Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3
Proposed Third Party Oversight of Comprehensive Plan for
Reviewing and Dispositioning Safety Concerns Raised by Employees - Supplement

Our letter dated December 20, 1996 proposed the independent, third party organization to oversee the implementation of Northeast Nuclear Energy Company's (NNECO's) comprehensive plan for: (a) reviewing and dispositioning safety concerns raised by its employees and (b) ensuring that employees who raise safety concerns are not subject to discrimination. The letter provided our proposal that this oversight responsibility be fulfilled by a team under the direction of Mr. John W. Beck of Little Harbor Consultants, Inc. (LHC).

In our letter dated January 14, 1997 we submitted a copy of LHC's technical proposal, which included certifications of organizational, experience, and financial independence for each of the team members. At the time of the submittal, two of the certifications were in transit (Donald R. Ferguson and Donald M. Ehat), and copies signed by Mr. Beck were submitted in their place. We have since received both certifications, and this letter forwards them to you to further facilitate the NRC's review of the proposed LHC team.

We would also like to note that subsequent to January 10, 1997, Dr. Donald R. Ferguson recalled that he performed approximately three days of work pertaining to Millstone Unit 3. This work does not have relevance to any anticipated oversight efforts the team will be conducting. In addition, for the three individuals that have identified previous work with NU (Donald R. Ferguson, Donald P. Irwin, and Paul Wood), LHC

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has annotated the independence certifications with a brief description of the work they performed. These annotated certifications are provided in Attachment 1.

If you have any questions, please contact me.

Very truly yours

NORTHEAST NUCLEAR ENERGY COMPANY



David M. Goebel

Vice President - Nuclear Oversight

Attachment 1: Supplemental Independence Certification Statements, Independent Oversight Team for Employee Concerns, LHC, Inc.

cc: W. D. Travers, Director, Special Projects Office
H. J. Miller, Region I Administrator
P. F. McKee, Deputy Director of Licensing, Special Projects Office
W. D. Lanning, Deputy Director of Inspections, Special Projects Office
S. Dembek, NRC Project Manager, Millstone Unit No. 1
D. G. McDonald, Jr., NRC Project Manager, Millstone Unit No. 2
J. W. Andersen, NRC Project Manager, Millstone Unit No. 3
T. A. Easlick, Senior Resident Inspector, Millstone Unit No. 1
Senior Resident Inspector, Millstone Unit No. 2
A. C. Cerne, Senior Resident Inspector, Millstone Unit No. 3

Mr. H. J. Thompson, Executive Director for Operations
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Washington, D.C. 20555

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Attachment 1

Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3

Supplemental Independence Certification Statements
Independent Oversight Team for Employee Concerns
Little Harbor Consultants, Inc.

January 1997

Little Harbor Consultants, Inc.

Organizational, Experience and Financial Independence Certification

I hereby certify that I do not have any conflicts with Northeast Utilities System, Northeast Utilities Service Company, or Northeast Nuclear Energy Company as related to my participation on the Independent Oversight Team for Employee Concerns (IOTEC), in independently assessing their Employee Concerns Program (ECP), corrective actions, or investigation of specific safety issues or allegations. Specifically:

1. ☒ I am not and have never been an employee or director of Northeast Utilities System, Northeast Utilities Service Company, or Northeast Nuclear Energy Company;
2. ☒ I am not currently employed as a contractor or consultant to Northeast Utilities System, Northeast Utilities Service Company, or Northeast Nuclear Energy Company;
3. Either:
☒ (a) I have never worked as a contractor or consultant to Northeast Utilities System, Northeast Utilities Service Company, or Northeast Nuclear Energy Company;

Or

- ☐ (b) It has been approximately ____ years since I have supported a consulting project to Northeast Utilities System, Northeast Utilities Service Company, or Northeast Nuclear Energy Company, but my prior work never involved the employee concerns program, investigating a concern raised by an employee, or performance of their corrective action program.
4. ☒ I do not currently own or directly control any equity position or bonds in Northeast Utilities System, Northeast Utilities Service Company, or Northeast Nuclear Energy Company, or receive any compensation or remuneration from these companies. I will not obtain any such direct financial position in these companies for the duration of this independent oversight project.

Certified by: Donald M. Elert (Print/type Name) Donald M. Elert

Date: 1/4/97

Little Harbor Consultants, Inc.

Organizational, Experience and Financial Independence Certification

I hereby certify that I do not have any conflicts with Northeast Utilities System, Northeast Utilities Service Company, or Northeast Nuclear Energy Company as related to my participation on the Independent Oversight Team for Employee Concerns (IOTEC), in independently assessing their Employee Concerns Program (ECP), corrective actions, or investigations of specific safety issues or allegations. Specifically:

1. ☒ I am not and have never been an employee or director of Northeast Utilities System, Northeast Utilities Service Company, or Northeast Nuclear Energy Company;
2. ☒ I am not currently employed as a contractor or consultant to Northeast Utilities System, Northeast Utilities Service Company, or Northeast Nuclear Energy Company;
3. Either:
☐ (a) I have never worked as a contractor or consultant to Northeast Utilities System, Northeast Utilities Service Company, or Northeast Nuclear Energy Company;

Or

- ☒ * (b) It has been approximately 13 years since I have supported a consulting project to Northeast Utilities System, Northeast Utilities Service Company, or Northeast Nuclear Energy Company, but my prior work never involved the employee concerns program, investigating a concern raised by an employee, or performance of their corrective action program.
4. ☒ I do not currently own or directly control any equity position or bonds in Northeast Utilities System, Northeast Utilities Service Company, or Northeast Nuclear Energy Company, or receive any compensation or remuneration from these companies. I will not obtain any such direct financial position in these companies for the duration of this independent project.

Certified by: Donald R. Ferguson, (Print/type Name) Donald R. Ferguson

Date: 1/22/97

* Subsequent to the 10th of January, it was recalled that Dr. Ferguson did an estimated three day completeness review of design basis documentation provided NEU by Westinghouse on Millstone Unit 3. This prior work has no relevance to any anticipated ECP oversight efforts.

Little Harbor Consultants, Inc.

Organizational, Experience and Financial Independence Certification

I hereby certify that I do not have any conflicts with Northeast Utilities System, Northeast Utilities Service Company, or Northeast Nuclear Energy Company as related to my participation on the Independent Oversight Team for Employee Concerns (IOTEC), in independently assessing their Employee Concerns Program (ECP), corrective actions, or investigation of specific safety issues or allegations. Specifically:

1. ☒ I am not and have never been an employee or director of Northeast Utilities System, Northeast Utilities Service Company, or Northeast Nuclear Energy Company;
2. ☒ I am not currently employed as a contractor or consultant to Northeast Utilities System, Northeast Utilities Service Company, or Northeast Nuclear Energy Company;

3. Either:

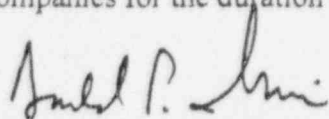
☐ (a) I have never worked as a contractor or consultant to Northeast Utilities System, Northeast Utilities Service Company, or Northeast Nuclear Energy Company;

Or

☒ (b) It has been approximately 15 years since I have supported a consulting project to Northeast Utilities System, Northeast Utilities Service Company, or Northeast Nuclear Energy Company, but my prior work never involved the employee concerns program, investigating a concern raised by an employee, or performance of their corrective action program.

4. ☒ I do not currently own or directly control any equity position or bonds in Northeast Utilities System, Northeast Utilities Service Company, or Northeast Nuclear Energy Company, or receive any compensation or remuneration from these companies. I will not obtain any such direct financial position in these companies for the duration of this independent oversight project.

Certified by:



(Print/type Name)

DONALD P. IRWIN

Date:

27 Dec 96

* While Mr. Irwin has never been involved in work directly supporting the Millstone site, he did some work years ago in support of Northeast Utilities participation in NRC rule-making on ECCS, GESMO and the uranium fuel cycle.

Little Harbor Consultants, Inc.

Organizational, Experience and Financial Independence Certification

I hereby certify that I do not have any conflicts with Northeast Utilities System, Northeast Utilities Service Company, or Northeast Nuclear Energy Company as related to my participation on the Independent Oversight Team for Employee Concerns (IOTEC), in independently assessing their Employee Concerns Program (ECP), corrective actions, or investigation of specific safety issues or allegations. Specifically:

1. ☒ I am not and have never been an employee or director of Northeast Utilities System, Northeast Utilities Service Company, or Northeast Nuclear Energy Company;
2. ☒ I am not currently employed as a contractor or consultant to Northeast Utilities System, Northeast Utilities Service Company, or Northeast Nuclear Energy Company;

3. Either:

- ☐ (a) I have never worked as a contractor or consultant to Northeast Utilities System, Northeast Utilities Service Company, or Northeast Nuclear Energy Company;

Or

- ☒ (b) It has been approximately 10 years since I have supported a consulting project to Northeast Utilities System, Northeast Utilities Service Company, or Northeast Nuclear Energy Company, but my prior work never involved the employee concerns program, investigating a concern raised by an employee, or performance of their corrective action program.

4. ☒ I do not currently own or directly control any equity position or bonds in Northeast Utilities System, Northeast Utilities Service Company, or Northeast Nuclear Energy Company, or receive any compensation or remuneration from these companies. I will not obtain any such direct financial position in these companies for the duration of this independent oversight project.

Certified by: Paul Wood, (Print/type Name) PAUL WOOD

Date: 12/27/96

*Dr. Wood provided PRA consulting services to Northeast Utilities Service company in 1985. Dr. Wood will not be involved with any oversight activities that pertain to this previous engagement.