

50-245



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

November 6, 1996

Mr. Ted C. Feigenbaum  
Executive Vice President and  
Chief Nuclear Officer  
Northeast Utilities Service Company  
c/o Mr. Terry L. Harpster  
Director - Nuclear Licensing Services  
P.O. Box 128  
Waterford, CT 06385

SUBJECT: NRC OVERSIGHT OF THE INDEPENDENT CORRECTIVE ACTION VERIFICATION PROGRAM

Dear Mr. Feigenbaum:

You submitted a letter on August 13, 1996, in which you committed to have an independent team perform an Independent Corrective Action Verification Program (ICAVP) at Millstone Units 1, 2, and 3. NRC's confirmatory order of August 14, 1996, required completion of an ICAVP before the restart of each Millstone unit.

To help us in defining resource requirements for our oversight activities, we request that you send us a schedule of major program milestones for the ICAVP. Specifically, we request projected dates for the following program milestones:

- Submittal of recommendation for ICAVP contractor to NRC for review and approval
- Completion of one-half of System Specific Assessments (SSAs) for Group 1 Systems
- Completion of SSAs for Group 1 Systems
- Completion of SSAs for Group 2 Systems
- Completion of contractor's ICAVP Audit Plan

We understand that the unique nature of this program may require changes to the projected dates, but your current best estimates are necessary for our resource planning.

I also wanted to take this opportunity to emphasize two points regarding this verification program. First, as we discussed during the ICAVP meeting on September 24, 1996, it is imperative that your system reviews and subsequent corrective actions are rigorous and comprehensive, because we expect the ICAVP to verify that your problem identification process has been effective. You should not view the ICAVP as another layer of problem identification. Second, the primary focus of the ICAVP should be the verification of the current plant configuration against the design and licensing bases requirements. This

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verification should not be limited to a review of modifications since issuance of the facility operating license. The verification must also encompass a review of the original design to assess whether those aspects of the facility that remain as originally constructed meet their current licensing bases. Our previous inspection findings regarding informal design processes and inadequate corrective action processes show that formal design changes are not the sole source of changes to the system; therefore, the review must consider the processes that can result in changes to the system licensing or design bases.

Sincerely,

Original signed by:

Eugene V. Imbro  
Deputy Director for ICAVP Oversight  
Special Projects Office  
Office of Nuclear Reactor Regulation

Docket No. 50-245, 50-336,  
and 50-423

cc: See next page

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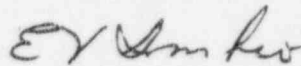
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Ted C. Feigenbaum

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Sincerely,



Eugene V. Imbro  
Deputy Director for ICAVP Oversight  
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cc: See next page

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Millstone Power Station,  
Unit Nos. 1, 2 & 3

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