



PARSONS

PP-07

MILLSTONE UNIT 2 ICAVP  
PROJECT PROCEDURES

Title:

Evaluation of Findings

REVISION 0

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4/3/97

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4/3/97

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4/3/97

REVISION HISTORY

REVISION	DATE	REVISION DESCRIPTION
0	04/03/97	Procedure Initiation



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### 1.0 PURPOSE

The purpose of this Project Procedure is to provide the guidance necessary to evaluate project findings developed during the conduct of the Millstone Unit 2 Independent Corrective Action Verification Program (ICAVP). Findings developed by the Millstone Unit 2 ICAVP will be reported in parallel to both the NRC and the licensee in accordance with the Communications Plan (PLN-02). Potential Findings are evaluated as shown in Exhibit 1.

### 2.0 DEFINITIONS

- 2.1 Findings - A finding is a defect, deficiency or an unresolved item identified during the Millstone Unit 2 Independent Corrective Action Verification Program. Licensee corrective action and response is required for Findings.
- 2.2 Defect - A defect is any condition that results in the plant being outside its current licensing bases. This would include a condition that would be considered an unreviewed safety question in accordance with 10 CFR 50.59. It would also include a condition that would prevent a structure, system, or component (SSC) from meeting a specific docketed regulatory requirement applicable to Millstone Unit 2.
- 2.3 Deficiency - A deficiency is an error or omission in the Millstone Unit 2 licensing or design basis which is not identified as a defect.
- 2.4 Unresolved Item - An unresolved item requires more information to reach a conclusion. Licensee response and further evaluation are required for resolution.



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### 3.0 RESPONSIBILITIES

- 3.1 Project Director - The Project Director is responsible for approval of Findings prior to concurrent reporting to NNECo and the NRC in accordance with the Communications Plan (PLN-02).
- 3.2 Deputy Project Director - The Deputy Project Director is responsible for review of Findings prior to concurrent reporting to NNECo and the NRC in accordance with the Communications Plan (PLN-02) and for tracking and monitoring of Potential Findings. The Deputy Project Director is responsible for approval of comments concerning proposed corrective action on Findings by the Licensee.
- 3.3 Originator - The Originator is responsible to identify potential findings during the conduct of the Millstone Unit 2 ICAVP. The Originator additionally has input on the comment resolution phase based upon resolution proposed by the Licensee.

### 4.0 PROCEDURE

#### 4.1 IDENTIFICATION OF POTENTIAL FINDINGS

- 4.1.1 During the course of the Millstone Unit 2 ICAVP, any Project Team member may identify and originate Potential Findings. Further Parsons evaluation is required to determine the bases of the Potential Finding.
- 4.1.2 Once a Potential Finding has been identified, it is logged in on Form PP-07-1 (Attachment 1) for tracking and monitoring purposes.



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### 4.2 IDENTIFICATION OF FINDINGS

4.2.1 Once the identified Potential Finding has been evaluated and the basis validated by the responsible Group Lead, it will be determined to be either a Finding or the Potential Finding may be closed if the basis is determined not to be valid. The initiation and evaluation of a potential finding is documented on the Resolution of Findings form (Attachment 2).

4.2.2 A Potential Finding is determined to be a Finding if it is determined to be a defect, deficiency or an unresolved item, as described below.

4.2.3 A Potential Finding is determined to be a defect if during the evaluation, it is determined that the potential finding meets any of the following criteria:

4.2.3.1 The probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the safety analysis report has increased; or

4.2.3.2 The probability of an accident or malfunction of a different type than any evaluated previously in the safety analysis report has been created; or

4.2.3.3 The margin of safety as defined in the basis for any Technical Specification is reduced, or

4.2.3.4 The regulatory bases of the system, structure or component are not met.

4.2.4 A Potential Finding is determined to be a deficiency if it meets an error or omission is found in the licensing and design basis of Millstone Unit 2 and the criteria for a defect are not met. This includes identification of Potential Findings that have been found to already have been identified and documented by NNECo.



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4.2.5 A Potential Finding is determined to be an unresolved item if additional information required from the licensee to complete the evaluation. Action is required by the licensee and follow-up action is required to complete evaluation of the unresolved item.

4.2.6 A Potential Finding is determined to be a closed item if through further evaluation, it is determined that the issue is not a finding.

### 4.3 REPORTING OF FINDINGS

4.3.1 Once a potential Finding has been determined to be a finding, it will be reviewed by the Deputy Project Director and approved by the Project Director and reported concurrently to the NRC and NNECo in accordance with the Communications Plan (PLN-02)

### 4.4 REVIEW OF PROPOSED CORRECTIVE ACTION

4.4.1 PPGI is responsible to comment on the proposed corrective action prepared by NNECo in response to Findings.

4.4.2 The ICAVP Group Leader responsible for generating the Finding is responsible for commenting on the resolution. A copy of the proposed corrective action will be sent to the originator. Comments should cover the adequacy of the response to bring the issue back within the licensing and design basis. The Resolution of Findings Form (Attachment 2) is used to document the Parsons responses and close out of the NNECo response.

4.4.3 The Deputy Director is responsible for approving resolution comments prior to releasing the comments per the Communications Plan (PLN-02).





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**Attachment 2  
Resolution of Findings**

**Potential Finding Tracking Number** \_\_\_\_\_

**Initiation of Potential Finding**

*Description: (Attach additional documentation as necessary)*

\_\_\_\_\_ (Initiator) \_\_\_\_\_ (Date)

**Evaluation of Potential Finding**

*Resolution (Finding or Closed): (Attach additional documentation as necessary)*

\_\_\_\_\_ (Group Lead) \_\_\_\_\_ (Date)

**Evaluation of Finding**

*Resolution (Defect, Deficiency, Unresolved Item): (Attach additional documentation providing basis, as necessary)*

**Reviewed:** \_\_\_\_\_ (Dep. Proj. Dir.) \_\_\_\_\_ (Date)

**Approved:** \_\_\_\_\_ (Proj. Dir.) \_\_\_\_\_ (Date)





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Attachment 2  
Resolution of Findings (Continued)

NNECo Response:

*Summary:*

Comment on NNECo Response:

Reviewed: \_\_\_\_\_ (Dep. Proj. Dir.) \_\_\_\_\_ (Date)

Approved: \_\_\_\_\_ (Group Lead) \_\_\_\_\_ (Date)

Closed

\_\_\_\_\_ (Dep. Proj. Dir.) \_\_\_\_\_ (Date)



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Exhibit 1  
EVALUATION OF FINDINGS

