



**Northeast
Nuclear Energy**

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The Northeast Utilities System

APR - 3 1997

Docket Nos. 50-245

50-336

50-423

B16296

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Millstone Nuclear Power Station, Unit Nos. 1, 2 and 3
Clarification of Previous Information on Procedure Basis Information

The purpose of this letter is for Northeast Nuclear Company (NNECO) to clarify what is expected to be contained within the basis sections of procedures at Millstone Station.

In two replies to previously issued Notices of Violation, NNECO provided information to the NRC which stated that all nuclear plant procedures would be upgraded and a basis section would be generated for each procedure. In a letter to the NRC, ⁽¹⁾ NNECO initially identified a plan for improving procedures as part of the Performance Enhancement Program (PEP). The PEP included an action plan for a general upgrade of all procedures over a two year period. The letter stated that the plan included an effort to develop a basis section for all procedures. A subsequent letter to the NRC ⁽²⁾ quoted the previous statement. However, neither letter included a discussion on what was expected to be contained in the basis sections of procedures.

Procedure basis information is inserted into procedures in the form of comment fields using a procedure publishing software program. A version of the document, called the procedure basis document, may be printed with the additional information in the basis comment fields visible for use during the review process. The final version of the procedure approved for use in the facility does not display the comment fields with the basis information. The comment fields do not contain information which would be used during performance of the procedure.

⁽¹⁾ J. F. Opeka letter to the U. S. Nuclear Regulatory Commission, "Millstone Nuclear Power Station, Unit No. 3 Reply to a Notice of Violation (EA-92-166)", dated January 26, 1993

⁽²⁾ J. F. Opeka letter to the U. S. Nuclear Regulatory Commission, "Millstone Nuclear Power Station, Unit No. 3 Reply to a Notice of Violation Inspection 50-245/94-28; 50-336/94-27; 50-423/94-24", dated December 2, 1994



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The procedure basis sections serve as an informational tool to aid when reviewing, changing or revising a procedure. They function as an elaboration of the procedure's References Section by providing the means to record the dates, revisions, sections, etc. of reference material. They also allow specific references, explanations, commitments and background information to be placed in basis information boxes directly at the locations within the procedure (step, precaution, setpoint, etc.) where they apply. Writers and reviewers are encouraged to enter historical information relevant to the procedure in the basis sections. When judgment, experience or preference is used to establish limits, acceptance criteria, or a unique work practice, an explanation should be provided as basis information in the procedure.

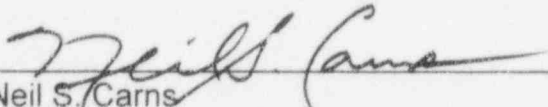
The insertion of such basis information into procedures in this manner is intended to make subsequent reviews of a procedure easier to perform. It allows a reviewer to quickly determine what may need to be modified in a procedure due to changes in reference material. It provides a method to imbed information at specific locations in the procedure that describes why a step, precaution, prerequisite, and so forth is written the way it is. This can help prevent the inadvertent removal or alteration of material specified during a previous revision, and facilitate corrections when necessary.

The basis sections in procedures are not intended or required to function as repositories for text from design or licensing basis documents that support the content of each procedure. Procedure writers and reviewers are not expected to duplicate material from these design and licensing basis documents in the basis sections. These documents must be listed in the References Section, and the reviewer is expected to access those design or licensing basis documents as necessary for this information.

NNECO has no commitments contained within this letter. Please contact Mr. R. Walpole at (860) 440-2191 if you have any further questions.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

 4/3/97
Neil S. Carns
Senior Vice President and
Chief Nuclear Officer - Millstone

cc: See page 3

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