

**Northeast
Nuclear Energy**

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The Northeast Utilities System

March 4, 1997

Docket No. 50-245
B15686

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

Millstone Nuclear Power Station, Unit No. 1
Revised Reply to Request for Information
NRC Combined Inspection 50-245/95-34; 50-336/95-34; and 50-423/95-34

The purpose of this letter is to request the removal of a portion of Northeast Nuclear Energy Company's (NNECO) letter of March 1, 1996,⁽¹⁾ from the public document room and to replace it with the attached version. In our March 1, 1996 letter, NNECO included material in the attachment without providing proper credit to the authors. In addition, this letter updates and clarifies information contained in our March 1, 1996 letter.

NRC Combined Inspection Report 50-245/95-34; 50-336/95-34; and 50-423/95-34 dated October 20, 1995,⁽²⁾ discussed an inadvertent reactor vessel drain down event at Millstone Unit No. 1 and requested that NNECO respond as to what measures have been taken to address effectiveness of Plant Operations Review Committee (PORC) review and approval of procedure changes. NNECO responded to the NRC's request via letter dated March 1, 1996.

The letter and attachment provided herein supersede our letter and Attachment 1 of March 1, 1996. This letter includes citations on the appropriate portions of Attachment 1, and provides clarification to the description of the Millstone Unit No. 1 PORC

(1) F. R. Dacimo letter to U.S. Nuclear Regulatory Commission, "Reply to Request for Information, NRC Combined Inspection 50-245/95-34; 50-336/95-34; and 50-423/95-34," dated March 1, 1996.

(2) J. P. Durr letter to J. F. Opeka, "NRC Combined Inspection 50-423/95-34; 50-336/95-34; 50-423/95-34," dated October 20, 1995.

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effectiveness assessment performed by the Nuclear Safety Assessment Board (NSAB) currently through the Operations and Maintenance Sub-Committee (O&MSC). The changes from the March 1, 1996, letter consist of:

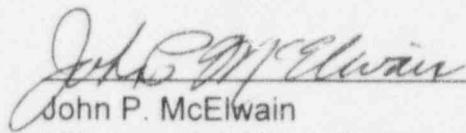
1. A clarification is being made to indicate that the NSAB O&MSC charter provides for assessing the effectiveness of the PORC process. Originally the letter indicated that each member of the NSAB O&MSC had been tasked with evaluating the effectiveness of the PORC process. However, it is not practical to have each subcommittee member tasked with PORC effectiveness reviews at all times. In addition, the letter has been clarified to indicate that the O&MSC does not plan to review all PORC meeting minutes, but instead plans to review PORC minutes selectively.
2. The discussion of NSAB evaluations of PORC effectiveness is being clarified to emphasize the use of the PORC Effectiveness Evaluation Forms as a structured means of assessing PORC effectiveness.
3. NNECO implied that the Station Qualified Reviewer (SQR) program would be functional by March 15, 1996, and would significantly reduce the volume of material being reviewed by PORC. This program was implemented at the Millstone Station on March 3, 1997, and therefore it has not yet produced the desired results.

Finally as noted above, Attachment 1 is being revised to add a citation to the authors. Therefore, NNECO requests that Attachment 1 of the March 1, 1996 letter be withdrawn from the Public Document Room. The only differences between Attachment 1 of the March 1, 1996, letter and Attachment 1 contained herein is the citation to the authors. Therefore, withdrawal of Attachment 1 of the March 1, 1996 letter would not change the availability of information to the public. We apologize for any inconvenience this request may cause.

There are no commitments contained with this letter. If you have any questions regarding the information contained in this letter, please contact Mr. Robert W. Walpole at (860) 440-2191.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY


John P. McElwain
Millstone Unit No. 1 Recovery Officer

Attachment

cc: H.J. Miller, Region I Administrator
S. Dembek, NRC Project Manager, Millstone Unit No. 1
T.A. Easlick, Senior Resident Inspector, Millstone Unit No. 1
W.D. Travers, Dr., Director, Special Projects

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Attachment 1

Millstone Nuclear Power Station, Unit No. 1

Reply to Request for Information
NRC Combined Inspection 50-245/95-34, 50-336/95-34; and
50-423/95-34

PORC Effectiveness Evaluation

March 1997

PORC

Effectiveness

Evaluation

Document prepared by:

W.G. Noll Jr. (6/1/95) with input received
from Dr. W.R. Corcoran, President Nuclear
Safety Review Concepts Corporation

Evaluator: _____

Date: _____

PORC No.: _____

PORC Chairman: _____

PORC Effectiveness Evaluation Process

The attached pages in this booklet provide the NSAB member a tool to evaluate the effectiveness of the PORC process. The process is broken down into three specific areas:

PORC Meeting Observation

PORC Minute Review Observation

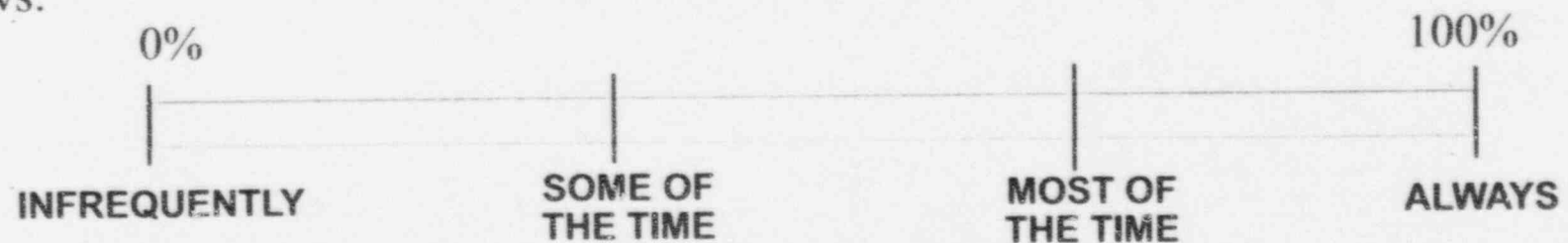
PORC Self Assessment Review

The most important and effective way to monitor PORC effectiveness is by actual observation. The PORC Meeting Observation process contains the majority of the PORC competencies and represents the main focus of the overall evaluation.

The PORC Minute Review Observation provides an evaluation of the PORC documentation and a means to evaluate the thought process from an historical perspective.

The PORC Self Assessment Review is an means to evaluate the how well the PORC looks at itself and how effective PORC is in identifying and correcting problems and issues.

The evaluation assessments listed on each page of this document are intended to provide a "qualitative" view of each PORC competency. The 0% to 100% scale should be viewed as follows:



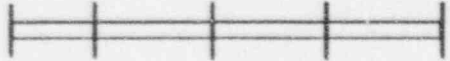
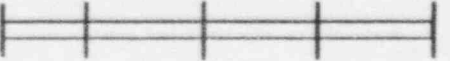
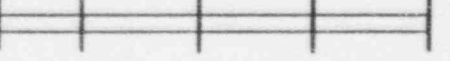
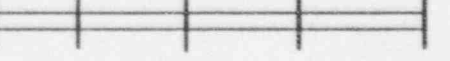
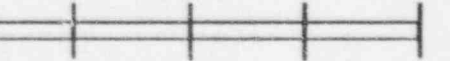
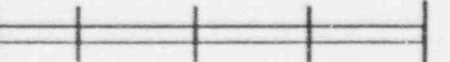
PORC Meeting Observation

PORC OBSERVATION FORM

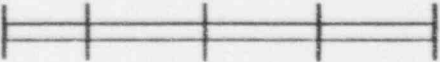
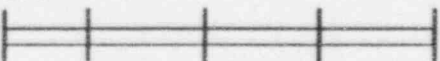
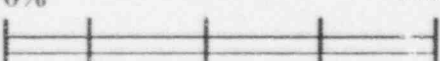
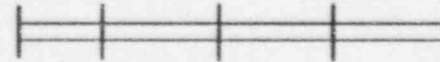
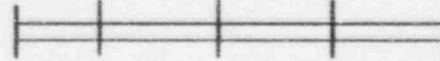

The following PORC competency attributes are to be observed and evaluated by NSAB members during routine PORC visits. Each item listed below should be graded on the sliding scale or marked as not observed. The results of the observation should be reviewed with the PORC Chairman immediately following the PORC meeting if at all possible.

PORC Competency	Evaluation	Comments
PORC advises the Unit Director and does not perform line management functions.	<div style="display: flex; justify-content: space-between;"> 0% 100 % </div>	
PORC has adequate support for agenda preparation, distribution of review items, etc.	<div style="display: flex; justify-content: space-between;"> 0% 100 % </div>	
Most review items are distributed in advance of the PORC meeting to allow adequate review.	<div style="display: flex; justify-content: space-between;"> 0% 100 % </div>	
PORC members review the PORC agenda items prior to the PORC meeting.	<div style="display: flex; justify-content: space-between;"> 0% 100 % </div>	
All attending members participate in the PORC meeting and no one member dominates the meeting.	<div style="display: flex; justify-content: space-between;"> 0% 100 % </div>	
PORC membership is appropriately represented.	<div style="display: flex; justify-content: space-between;"> 0% 100 % </div>	

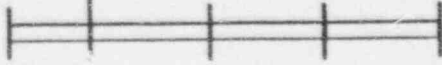
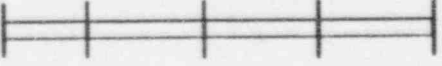
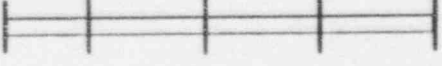

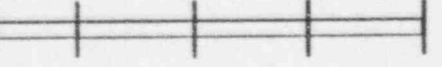
PORC OBSERVATION FORM

PORC Competency	Evaluation	Comments
<p>PORC upholds high standards for safety evaluations, ACR's, Licensee Events Reports, and responses to notice of violations(NOV's).</p>	<p>0% 100 %</p> 	
<p>PORC sees that discovered conditions at variance with license requirements receive safety evaluations or justification for continued operation.</p>	<p>0% 100 %</p> 	
<p>PORC performs assessments of the integrated impact of all Operability Determinations and justification for continued operation (JCO's).</p>	<p>0% 100 %</p> 	
<p>"Walk-in's" are only a small fraction of PORC business.</p>	<p>0% 100 %</p> 	
<p>PORC does not engage in problem solving to the extent that its independence is compromised.</p>	<p>0% 100 %</p> 	
<p>When items are presented for PORC approval, and are technically deficient or contain quality problems, the responsible line manager is informed and PORC requires resolution of the underlying casual factors.</p>	<p>0% 100 %</p> 	



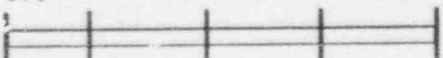
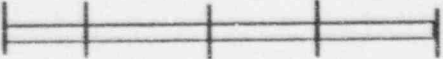
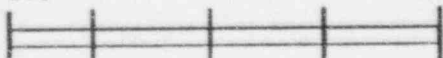
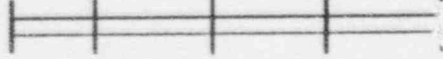
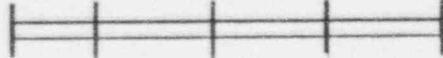
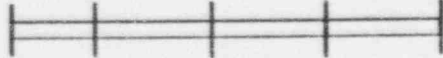
PORC OBSERVATION FORM

PORC Competency	Evaluation	Comments
<p>PORC reviews Technical Specification clarifications and verifies that they do not involve an unreviewed technical specification and it's basis.</p>	<p>0% 100 %</p> 	
<p>PORC is alert to casual factors, generic implications, and adverse trends.</p>	<p>0% 100 %</p> 	
<p>PORC does not compromise its independence by routinely suggesting improvements or changes to documents presented. Quality problems are reported to the appropriate line management.</p>	<p>0% 100 %</p> 	
<p>PORC is regularly briefed on lessons learned from in-house and industry events and experience.</p>	<p>0% 100 %</p> 	
<p>PORC Chairman has regular contact with NSAB.</p>	<p>0% 100 %</p> 	
<p>PORC is sensitive to precursors, i.e. problems that are in the event sequences for more serious problems such deaths, radiation releases, and major equipment damage.</p>	<p>0% 100 %</p> 	

PORC OBSERVATION FORM

PORC Competency	Evaluation	Comments
<p>PORC can recognize an Unreviewed Safety Question (USQ) and can assess the basis for conclusion of no USQ.</p>	<p>0% 100 %</p> 	
<p>PORC is supportive of measures to enhance nuclear safety, industrial safety, fire prevention, and ALARA.</p>	<p>0% 100 %</p> 	
<p>PORC takes specific cognizance of adverse trends by discussions by members and briefings by assessment personnel representing the ISEG group, technical monitoring (surveillance requirements, quality control, and auditing groups.</p>	<p>0% 100 %</p> 	
<p>Items requiring further action are identified as PORC commitments and a person is designated as responsible for resolving and reporting the resolution to PORC.</p>	<p>0% 100 %</p> 	
<p>The Unit Director is briefed on matters related to:</p> <ul style="list-style-type: none"> Nuclear Safety Enviromental Impact Safe Operation of the Unit Continued reliability of the Unit 	<p>0% 100 %</p> 	

PORC OBSERVATION FORM

PORC Competency	Evaluation	Comments
<p>PORC reviews proposed procedure revisions and changes that affect nuclear safety or environmental matters.</p>	<div style="display: flex; justify-content: space-between;"> 0%100 % </div> 	
<p>PORC documents actions to be taken to prevent recurrence of Technical Specification violations in the PORC meeting minutes.</p>	<div style="display: flex; justify-content: space-between;"> 0%100 % </div> 	
<p>PORC review and approval of PDCR's include the following attributes:</p> <ul style="list-style-type: none"> Selection of QA Category and impact on safety related systems. Safety and Environmental evaluations. Determination if an Unreviewed Safety Question (USQ) exists. Impact on Technical Specifications or other license or amendment conditions. Test Plan to ensure affected plant systems will be adequately tested. Training Plan to ensure affected plant personnel will be adequately trained to safely operate the affected system(s). 	<div style="display: flex; flex-direction: column; align-items: center;"> <div style="display: flex; justify-content: space-between; width: 100%;"> 0%100 % </div>  <div style="display: flex; justify-content: space-between; width: 100%;"> 0%100 % </div>  <div style="display: flex; justify-content: space-between; width: 100%;"> 0%100 % </div>  <div style="display: flex; justify-content: space-between; width: 100%;"> 0%100 % </div>  <div style="display: flex; justify-content: space-between; width: 100%;"> 0%100 % </div>  <div style="display: flex; justify-content: space-between; width: 100%;"> 0%100 % </div>  </div>	