



INDEPENDENT CORRECTIVE ACTION VERIFICATION PROGRAM

MILLSTONE UNIT 2

COMMUNICATION PLAN

PLN-02

Revision 1

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## MILLSTONE UNIT 2 COMMUNICATION PLAN

### REVISION LOG

<u>Section</u>	<u>Revision No.</u>	<u>Description</u>	<u>Date</u>
All	0	Initial Issue	April 18, 1997
All	1	Incorporation of NRC Comments	June 5, 1997

This list delineates sections of this plan that are currently in effect. The latest changes are indicated by a vertical line in the right hand margin of the affected pages.

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## **1.0 INTRODUCTION**

Nuclear Regulatory Commission (NRC) Confirmatory Order issued on August 14, 1996 for Establishing Independent Corrective Action Verification Program (ICAVP) for Millstone Unit 2 requires that the ICAVP contractor (Parsons Power Group Inc.) concurrently provide its findings to both Northeast Nuclear Energy Company (NNECo) and the NRC. Further, Policy Statement SECY 97-003 requires that a communication protocol be followed that allows representatives of the NRC to monitor interactions between Parsons Power Group Inc. (Parsons) and NNECo whenever technical issues are discussed either by telephone or in person.

This document establishes the communication protocol that Parsons will use for written and verbal communications between NRC, NNECo, media and public that allows the NRC oversight staff to monitor interactions between Parsons and NNECo. Exhibit 1-1 shows the process that will be followed for the receipt, handling, response and disposition of all Parsons ICAVP communications. It is the responsibility of the project team personnel to assure that these guidelines are implemented in a manner which assures the independence of the review. Parsons internal communications are unaffected by the requirements of this protocol.

Correspondence that deals with Contractual and Financial matters between NNECo and Parsons are excluded from this plan.

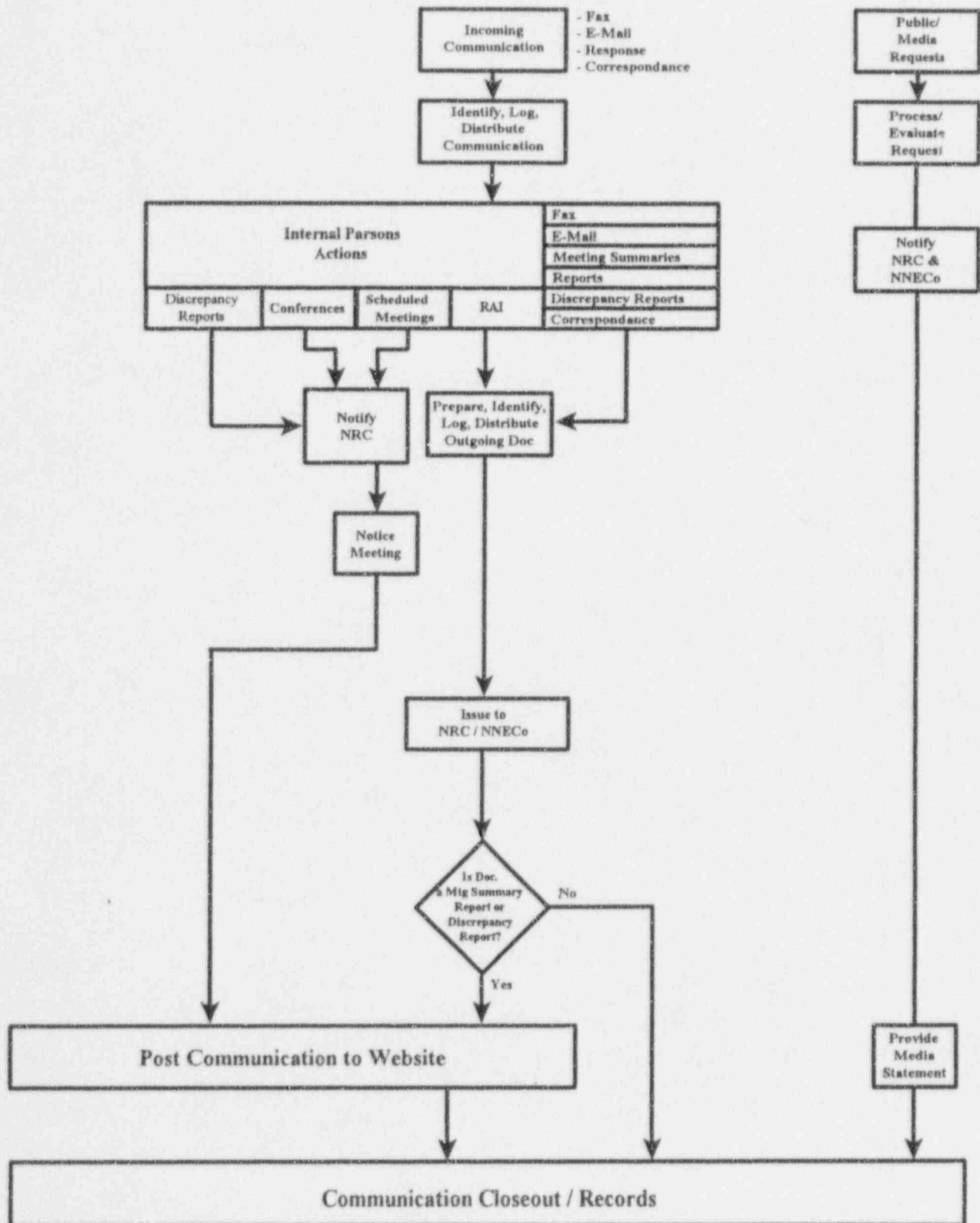
## **2.0 ORGANIZATIONAL INTERACTION**

### **2.1 NUCLEAR REGULATORY COMMISSION (NRC)**

Office facilities will be provided at Parsons' Reading, PA offices and at the local site office for the NRC ICAVP oversight personnel to facilitate communications. Parsons will notify the NRC when they plan to talk to, meet or have information conferences with NNECo. This requirement applies to all Parsons personnel associated with this program. Parsons will not conduct the meeting, telecon, or conferences until advised by the NRC of their intention to participate.

All Parsons correspondence addressed or copied to the NRC will be sent to the NRC ICAVP Deputy Director and the NRC Document Control Desk in accordance with the Distribution Matrix in Exhibit 2-1.

# EXHIBIT 1-1 ICAVP COMMUNICATION PLAN PROCESS



# **EXHIBIT 2-1** **ICAVP COMMUNICATION PLAN DISTRIBUTION MATRIX**

ORGANIZATION/ LOCATION	CORRESPONDENCE	REPORTS	MEETING SUMMARIES (4)	DISCREPANCY REPORTS
PLAN SECTION	4.1	4.3	5.2	9.0
NRC (1)	X	X	X	X
NNECo	X	X	X	X
WWW		X(3)	X(2)	X

**NRC**      Nuclear Regulatory Commission  
**NNECo**    Northeast Nuclear Energy Company  
**NEAC**     Connecticut Nuclear Energy Advisory Council  
**WWW**     World Wide Website

**Notes:**

- (1)    NRC distribution includes ICAVP Deputy Director, Document Control Desk and NEAC
- (2)    Except for non electronic information (materials exchanged at meeting)
- (3)    Report summaries only
- (4)    Meeting summaries not available from NRC



## **2.2 NORTHEAST NUCLEAR ENERGY COMPANY (NNECO)**

Interaction with NNECo will be conducted primarily through formal written correspondence and electronic mail (E-Mail).

Periodic meetings will be conducted to appraise NNECo of the project status and to promote discussion with the ICAVP reviewers to assist in conducting their work in an efficient manner.

Parsons direct verbal contact with NNECo personnel either by phone, meeting, or conferences requires prior notification to the NRC in order to allow time for observation by the NRC ICAVP oversight team.

## **2.3 CONNECTICUT NUCLEAR ENERGY ADVISORY COUNCIL (NEAC)**

NEAC and the NRC have established a memorandum of understanding that permits NEAC to participate and/or observe the NRC's oversight activities for the ICAVP. NRC is responsible for interface and communication with NEAC. Communication that is issued to the NRC will be copied to NEAC in accordance with Exhibit 2-1.

Office facilities will be provided at Parsons' Reading, PA offices and at the local site office for NEAC observers or their alternates to allow direct observation of the review process and Parsons' interactions with the NRC and NNECo.

The invitation for NEAC to observe meetings or conferences between Parsons and NNECo will be extended by the NRC. It is assumed that NEAC is responsible to interface, appraise, and advise other interested State of Connecticut entities.

## **2.4 OTHER INTERESTED PARTIES**

Notification of meetings, meeting summaries not posted by the NRC, and discrepancy reports will be posted on the World Wide Web (WWW) to facilitate public access to ICAVP information.

Formal correspondence, meeting summaries, reports, and discrepancy reports will be available in the Public Document Room (PDR) in accordance with the Distribution Matrix in Exhibit 2-1.



## **2.5 PRIME CONTACTS**

Exhibit 2-2 provides the addresses and telephone numbers for the primary and backup contact(s) of the Parsons ICAVP review team personnel authorized to receive written and verbal communication and to interface with the media, public and other interested parties. No other Parsons' personnel are authorized to receive formal documents or to have direct contact with the media or public unless an alternate is designated in writing.

Other non-Parsons contacts are included in Exhibit 2-2. Control and distribution of information within the respective organization is the responsibility of the identified contact individual.

## **3.0 MEDIA INTERACTION**

All public or media request of Parsons personnel for an interview, information and/or comment concerning the ICAVP will be handled through the Project Director. The Project Director will consider the request and determine the appropriate response. NRC and NNECo will be notified prior to news releases.

## **4.0 PROCESSING INCOMING OR OUTGOING DOCUMENTS**

### **4.1 DOCUMENT CONTROL**

All documents received or issued by Parsons will have a document identification number. Incoming documents will be given a Parsons' unique identification number regardless of any other identification number on the document and entered into the project log. Document distribution will be in accordance with the ICAVP Communication Plan Distribution Matrix shown in Exhibit 2-1. Project correspondence will be available in the Reading, PA office for review by the NRC Oversight Team.

### **4.2 REQUESTS FOR ADDITIONAL INFORMATION (RAI)**

Requests for additional information (RAI) are those requests that require a response to a particular question or clarification. All requests for additional information will be documented in writing to NNECo using a form similar to Exhibit 4-1. RAI's can include those requests that require a specific copy of a document. Whenever Parsons

requests a document that is controlled, NNECo will add Parsons to the NNECo controlled document distribution. RAI's and their NNECo response will be available in the Reading, PA office for review by the NRC Oversight Team.

#### **4.3 REPORTS**

Parsons will issue the ICAVP reports noted below to the NRC and NNECo. All reports will be issued as final, draft reports will not be issued. Report summaries will be posted to the Parsons Website 48 (2 business days) hours after they have been distributed to NNECo and the NRC.

##### ICAVP Project Reports

- System Vertical Slice Review
- Accident Mitigation System Review
- Process Review
- ICAVP Final Report

#### **5.0 FORMAL MEETINGS OR BRIEFINGS**

##### **5.1 MEETING ANNOUNCEMENTS**

Formal meetings to discuss the results of the ICAVP and periodic briefings for the public will normally be scheduled in advance or initiated by the NRC. The NRC will notify NNECo and Parsons' primary contacts at least one week in advance of the meeting. For meetings open to the public the NRC normally provides a two week notification. Parsons will also post meeting notification on the Website for meetings open to the public after the NRC has issued notification.

##### **5.2 MEETING SUMMARIES**

All planned formal meetings will have a summary of the items discussed, including all material that is exchanged. The meeting summary will be prepared by the organization/individual who has called the meeting. If the NRC has the meeting transcribed, no other summaries of the meeting are required. Meeting summaries will include information requests and written material exchanged at the meeting. Summaries will be distributed to the meeting participants. For summaries that have material exchanged during the meeting, a list of the material exchanged will be noted but copies of the exchanged material will not be posted to the Website. Summaries will be made within two weeks after the meeting.

**EXHIBIT 2-2 (page 1 of 2)**  
**PRIMARY CONTACT LISTING**

ORGANIZATION	INDIVIDUAL	TITLE	MAILING ADDRESS	OVERNIGHT MAIL ADDRESS	PHONE/ FAX	E-MAIL ADDRESS
PARSONS	Daniel L. Curry (1)	Project Director	Parsons Power Group Inc 2675 Morgantown Road Reading, PA 19607	Parsons Power Group Inc 2675 Morgantown Road Reading, PA 19607	(610) 855 - 2366 (610) 855 - 2509 FAX	dancurry@talon.net
NRC	E.V. Ambro	Deputy Director for ICAVP Special Project Office	USNRC Washington, D.C. 20555	USNRC 11555 Rockville Pike Rockville, Md 20852-2738	(301) 415-1490 (301) 415-1222 FAX	exi@NRC.GOV
NNECo	Richard Laudert	ICAVP Program Director	Millstone Nuclear Power Station Unit 2 P.O. Box 128 Waterford, CT 06385	Millstone Nuclear Power Station Unit 2 156 Rope Ferry Road Waterford, CT 06385	(860) 444-5248 (860) 440-2091 FAX	laudert@GWSMTP.NU.COM
NEAC	Rep. Terry Concannon	Co-Chair	NEAC 34th Assembly District 76 Timms Hill Road Haddam, CT 06438	NEAC 34th Assembly District 76 Timms Hill Road Haddam, CT 06438	(860) 240-8585 (Capitol) (860) 345-4141 (home) (860) 345-2888-FAX	Later
NEAC	Evan Woollacott	Co-Chair	NEAC 128 Terrys Plain Road Simsbury, CT 06070	NEAC 128 Terrys Plain Road Simsbury, CT 06070	(860) 658-9591 (860) 658-9591-FAX	Later

(1) Parsons' contact for all Public, Media or Interested Parties

# **EXHIBIT 2-2 (page 2 of 2)** **BACKUP CONTACT LISTING**

ORGANIZATION	INDIVIDUAL	TITLE	MAILING ADDRESS	OVERNIGHT MAIL ADDRESS	PHONE/ FAX	E-MAIL ADDRESS
PARSONS	Eric Blocher	Project Deputy Director	Parsons Power Group Inc 2675 Morgantown Road Reading, PA 19607	Parsons Power Group Inc 2675 Morgantown Road Reading, PA 19607	(610) 855 - 2071 (610) 855 - 2509 FAX	Eric_A_Blocher@PARSONS.COM
NRC	Loren Plisko	Branch Chief ICAVP Oversight	USNRC Washington, D.C. 20555	USNRC 11555 Rockville Pike Rockville, Md 20852-2738	(301) 415-1230 (301) 415-1232 FAX	lrp@NRC.GOV
NNECo	Joe Fougere	Project Manager	Millstone Nuclear Power Station Unit 2 P.O. Box 128 Waterford, CT 06385	Millstone Nuclear Power Station Unit 2 156 Rope Ferry Road Waterford, CT 06385	(860) 444-5526 (860) 440-0403 - FAX	Fougejg@GWSMTP.NU.COM
NEAC	Rep. John C. Markowicz	Co-Chair	9 Susan Terrace Waterford, CT 06385-3515	9 Susan Terrace Waterford, CT 06385-3515	(860) 437-4654 (Capitol) (860) 437-9355 (Home) (860) 437-4645- FAX	Later

**EXHIBIT 4-1**  
**REQUEST FOR ADDITIONAL INFORMATION (RAI)**

PARSONS POWER GROUP INC.

2675 Morgantown Road, Reading, PA 19607  
(610) 855-2000 • FAX: (610) 855-2509

**ICAVP MILLSTONE UNIT 2**  
**REQUEST FOR ADDITIONAL**  
**INFORMATION**

TO: NNECo				ISSUE DATE:		ACTION DATE:	
DOCUMENT/TRACKING NO.: RAI-0001							
REV 00	REV 01	REV 02	REV 03				
	//	//	//				

Issuing Engineer \_\_\_\_\_

**LIST OF REQUESTED INFORMATION**

Please respond to the following information as required by Section 4.2 of the ICAVP Communication Plan (PLN-02), refer to the RAI number and provide next revision date for all responses to this document.

QUESTIONS AND CLARIFICATIONS	NNECo RESPONSE

## **6.0 CONFERENCES**

Parsons may request a conference with NNECo to obtain clarification or further understanding of particular items. NNECo may also request a conference to discuss or clarify discrepancy reports issued by Parsons. Conferences can be by telephone, video conference, or in person.

In order to allow the NRC to monitor the interaction between Parsons and NNECo, Parsons will notify the NRC's designated ICAVP oversight team member(s) whenever direct contact with NNECo is required. Notification can be by phone, fax, or E-mail. It is anticipated that for most requests, prompt NRC response will be provided to allow the interaction to take place. A twenty-four hour (one business day) notification period will be followed to allow the NRC a reasonable time period to participate. Notes of the conference will be written and distributed to the primary contacts of the participating organization.

## **7.0 PARSONS POWER GROUP INC. WORLD WIDE WEBSITE**

### **7.1 FUNCTION**

The Parsons Website for this project will function as the repository for the communications identified in Exhibit 2-1. The Website will provide the public with the ability to view:

- a. Meeting announcements
- b. Meeting summaries not available from the NRC
- c. Discrepancy Reports
- d. Prime Contact Information
- e. Final reports summaries

The Parsons WWW site will be updated periodically and can be addressed at <http://www.parsonsicavp.net>

### **7.2 POSTING OF DOCUMENTS/ANNOUNCEMENTS**

Parsons meeting announcements will be updated in accordance with the frequency described in the Meeting Summaries Section of this plan. The NRC or NNECo will announce any meetings with respect to the ICAVP that they initiate or plan to chair.



## 8.0 CONDUCT OF AUDIT

The intent of this plan is to provide a communication protocol that Parsons will use in interfacing with the NRC, NNECo, NEAC, media and public. This plan indicates and addresses how various communications will be handled. Certain day to day and administrative communications are required for efficient project execution and are not part of this plan. The following are examples of administrative activities that Parsons considers not part of the communication plan:

- Badging
- Radiation Work Permits (RWP)
- Requests for inspection support activities (e.g. scaffolding, insulation removal, equipment tagouts, safety (OSHA) activities etc.)

In order to ascertain the availability of information or to identify the appropriate documents containing required information, the Parsons Deputy Director or one of the group leads may contact the NNECo primary contact or a designated Document Control personnel via phone. This type of interface shall only be made in the process of preparing and submitting a request for information.

## 9.0 DISCREPANCY REPORTS

Discrepancy Reports will be formally documented and issued concurrently to the NRC and NNECo. In addition, Parsons will post the discrepancy reports on the Parsons Website 48 hours (2 business days) after they have been distributed to NNECo and the NRC. NNECo's response will be posted on the WWW by Parsons and reviewed by the project team before determining the final disposition of the discrepancy report. PP-07 "Discrepancy Reports" provides the instructions for processing ICAVP discrepancy reports.