

PROJECT
INSTRUCTION

Sargent & Lundy

INSTRUCTION PI-MP3-01
REV. 1

Client: Northeast Utilities

Station: Millstone Unit 3

Title: INDEPENDENT CORRECTIVE ACTION VERIFICATION PROGRAM
COMMUNICATIONS PROTOCOL

☒ Safety-Related

☐ Non-Safety-Related

Reviewed By:

Approved By:

System Lead

Programmatic
Lead

O&M Lead

Accident
Mitigation
Lead

QA Engineer

Internal Review
Committee
Chairman


Verification Team
Manager

Date: 4-28-97

Description

Rev. 1

- Added NEAC to protocol
- Revised NU contacts
- Revised meeting advanced notification time
- Revised some external distribution
- Added allowance for administrative discussions
- Deleted IOT

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1.0 PURPOSE

The purpose of employing an independent reviewer for the Independent Corrective Action Program (ICAVP) is to obtain an unbiased assessment of the Millstone Unit 3 configuration management and corrective action programs. Therefore, every reasonable effort will be made to assure that the observations and conclusions made are the result of the Project Team's own independent assessment and not influenced or biased by representations of other parties such as the Northeast Utilities (NU) line organization or their contractors responsible for subjects under review. To maintain this assurance of independence, this formal protocol has been established and will be implemented to control the communications between S&L, NU, and the NRC. This protocol has been written so that the Project Team reviewers remain objective and unbiased, yet will permit the legitimate need for the Project Team to communicate with the NU organization to obtain information including any necessary verbal clarification to maintain an efficient process. It is, however, the responsibility of the independent reviewers to assure that these guidelines are implemented in a manner which assures the objectivity and independence of the review.

Sargent & Lundy Project Team internal communications are unaffected by the requirements of this protocol, including those between or among the Verification Team, the Internal Review Committee and the Quality Assurance Division.

2.0 ORGANIZATIONAL-POINTS OF CONTACT

The Nuclear Energy Advisory Council (NEAC) is an organization created by the Connecticut State Legislature to monitor activities related to Millstone. The NEAC and the NRC have established a memorandum of understanding that permits the NEAC to participate and/or observe the NRC's oversight activities for the ICAVP. As such, the NEAC will be included in the communications protocol and will be provided with documents, notifications, and opportunities to participate in the oversight of S&L activities.

Each of the organizations involved in the ICAVP (NRC, NU, and S&L) has provided a primary and backup point of contact. These points of contact are the personnel through which inter-organizational communications will occur or be arranged. This includes both verbal and written communications, including electronic mail.

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2.1 Northeast Utilities

Primary Contact: Richard Laudenat, ICAVP Program Manager
 Phone - 860-444-5248
 Fax - 860-440-2091
 e-mail - laudert@gwsmt.pu.com
 Overnight mail - Northeast Utilities
 Millstone Nuclear Power Station
 Rope Ferry Road
 Waterford, Connecticut 06385

Backup Contact: George Pitman, Unit 3 ICAVP Coordinator
 Phone - 860-447-1791 X0454
 Fax - 860-440-2140
 e-mail - pitmagr@gwsmt.pu.com
 Overnight mail - Northeast Utilities
 Millstone Nuclear Power Station
 Rope Ferry Road
 Waterford, Connecticut 06385

2.2 Nuclear Regulatory Commission

Primary Contact: Gene Imbro, Deputy Director, ICAVP Oversight
 Phone - 301-415-1490
 Fax - 301-415-2260
 e-mail - exi@nrc.gov
 Overnight mail - Nuclear Regulatory Commission
 11555 Rockville Pike
 Rockville, Maryland 20852-2738

Backup Contact: Loren Plisko, Branch Chief ICAVP Oversight
 Phone - 301-415-1231
 Fax - 301-415-2260
 e-mail - lrp@nrc.gov
 Overnight mail - Nuclear Regulatory Commission
 11555 Rockville Pike
 Rockville, Maryland 20852-2738

2.3 Nuclear Energy Advisory Council


Primary Contact: State Representative, Terry Concannon
Co-Chairman, NEAC
Phone: 860 240-8585 Capitol
860 345-4141 Home
Fax: 860 345-2888
Overnight Mail:
Legislative Office Building, Room 4035
Capitol Avenue,
Hartford, Connecticut 06106
or
34th Assembly District
76 Timms Hill Road
Haddam, Connecticut 06438

Backup Contact: Mr. Evan Woolacott
Co-Chairman, NEAC
Phone: (860) 658-9591
Fax:
Overnight Mail:
128 Terry's Plain Road
Simsbury, Connecticut 06070

2.4 Sargent & Lundy

Primary Contact: Don Schopfer, Verification Team Manager
Phone - 312-269-6078
Fax - 312-269-2049
e-mail - don.k.schopfer@slchicago.infonet.com
Overnight mail - Sargent & Lundy
55 E. Monroe Street
Chicago, Illinois 60603

Backup Contact: Bryan Erler, ICAVP Project Director
Phone - 312-269-7132
Fax - 312-269-2049
e-mail - bryan.a.erler@slchicago.infonet.com
Overnight mail - Sargent & Lundy
55 E. Monroe Street
Chicago, Illinois 60603

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3.0 RULES FOR VARIOUS TYPES OF COMMUNICATIONS

There are a variety of types of communications necessary to effectively implement the ICAVP. The following identifies the various types of inter-organizational communications required and defines the rules governing those types of communications. These rules address aspects such as who initiates the communication, whether notification of other parties is given, who may participate in the communication, whether public access is to be given, and the documentation requirements for the communication and to whom it is provided. Other communication between personnel in these project organizations or their contractors should be avoided during the performance of the ICAVP.

3.1 Request for information - S&L will need significant amounts of documents and drawings from NU to commence and proceed with the review. The information request process from S&L to the NU organization will be a frequent occurrence during the ICAVP.

- * The S&L Verification Team Manager, or one of the Review Leads, will submit all requests for information to the NU primary contact in writing. This may be via fax, e-mail or overnight mail. Each request shall be on a standard form developed for this purpose and shall be provided with a sequential number for tracking (See Attachment 5.1). A copy of each request for information shall be provided to the NRC's primary contact. NU's response to the requests shall be submitted in duplicate to the S&L primary contact, one copy to Chicago and one copy to the office space provided by NU to S&L near the Millstone station. NU shall provide an index of all documents submitted, including a revision number or identifying date.
- * In order to ascertain the availability of information or to identify the appropriate documents containing required information, the S&L Verification Team Manager or one of the Review Leads may contact the NU primary contact or a designated Document Control personnel via phone. This type of informal contact shall only be made in the process of preparing and submitting a request for information.
- * There may occasionally be a need for S&L to discuss administrative issues with NU, such as arrangements for access training and badging of personnel, arrangements for access to NU computer databases, and issues related to the local office facility. This type of

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communication is permitted directly between S&L and NU primary contacts or their designees without NRC or NEAC involvement.

3.2 Request for conference - S&L may on occasion request a conference with NU line organization personnel to obtain clarification or further understanding of particular issues. Alternately, NU may request a conference to discuss or clarify findings issued by S&L. This conference can be by telephone, by videoconference, or in person.

- * The primary contact for the organization initiating the informal conference shall contact the primary contact of the other organization (via phone, fax, or e-mail) and identify the reason for the conference and the participants needed. The NRC and NEAC primary contacts will be notified of the conference and given the opportunity to participate. A minimum of a 24 hour advanced notice shall be provided to the participating organization and to the NRC and NEAC. Notes of the conference shall be written by S&L and distributed to the primary contacts of the participating organizations.

3.3 Issuance of findings - The findings identified by S&L will be distributed to NU, the NRC, and the NEAC, including their posting on an Internet Web Site.

- * The S&L primary contact, or designee, will distribute the findings (discrepancy reports) from the ICAVP to NU, the NRC, and the NEAC primary contacts by fax and overnight mail. In addition, S&L will post the findings on the S&L Internet page 48 hours after they have been distributed to NU, the NRC, and the NEAC. This will allow public access to this information. More information about accessing the ICAVP information on the Internet is included in Section 4.0 of this protocol. The S&L instructions for the processing of the discrepancy reports and their proposed resolutions is provided in project instruction PI-MP3-11.

3.4 Submittal of proposed resolutions - NU will evaluate the findings submitted by the S&L Project Team and develop proposed resolutions and submit these proposed resolutions to S&L for review.

- * The NU primary contact will submit the proposed resolutions to the ICAVP findings to both the S&L and the NRC primary contacts. Following acceptance of the resolution in accordance with PI-MP3-11 S&L will post the NU resolution on the ICAVP Web Site.

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3.5 Formal Meetings or Briefings - It is expected that there will be formal meetings with the various participants and the public to discuss the results of the program.

- * 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 the NU and S&L primary contacts at least one week in advance of the meetings. For meetings open to the public, the NRC normally provides a two week notification. S&L will also post meeting notification on the Web Site for meetings open to the public after the NRC has issued notification. S&L participation at this type of meeting will normally be the Project Director, the Verification Team Manager, and others as may be determined by S&L. Participation other than S&L will be determined by the NRC. If the NRC has the meeting transcribed, no other notes of meeting are required. Otherwise, S&L will publish notes from the meeting and distribute them to the participants. Copies of all presentation material will be available at the public meetings and will be posted to the Web Site.

3.6 Press and/or Media Communications - Based on the current level of public interest in the ICAVP and Millstone in general, there is expected to be press and media interest in the work of the ICAVP Contractor. Communications with the press and media and notification of the NRC and NU of such interest are included in this protocol.

- * Requests for interviews with the press or media shall be referred to the Project Director or the Verification Team Manager. One of them shall notify the NU and the NRC primary contact of the request. The Director or Manager shall respond appropriately to the press or media requests.

3.7 Communications related to NRC oversight of S&L - S&L's activities in the ICAVP are considered an extension of the NRC. As such, communication between S&L and the NRC will be required, both related to the execution of the review and to the NRC's oversight of S&L's performance.

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- * From time to time S&L may have specific questions or need direction from the NRC. When necessary the S&L primary contact may call or meet with the NRC primary contact, or his designee, to discuss these issues. No other participants are required for a conference of this type between S&L and the NRC, unless the NRC wishes to include NEAC.

3.8 Financial / Contractual Issues between S&L and NU - As with any contractual relationship between two organizations, periodic discussions and / or written communications will be required between S&L and NU. This type of communication will be primarily between the S&L Verification Team Manager and the NU Director - Contracts & Purchasing and/or the NU ICAVP Program Manager, and will be limited to purchasing and contract related issues. However, NRC and NEAC will be invited to attend any meetings that are required between NU and S&L regarding contractual issues.

4.0 PUBLIC ACCESS TO ICAVP INFORMATION ON THE INTERNET

As discussed in earlier sections of this protocol, discrepancy reports identified during the course of the ICAVP and their accepted resolution will be posted on the S&L Internet Web Site to allow public access. In addition, certain other documents will be posted on the Web Site, including portions of the Project Manual, periodic status report information, and the final report. The S&L home page may be accessed on the Internet World Wide Web at <http://www.slchicago.com>.

5.0 ATTACHMENTS

5.1 ICAVP Request for Information (1 page)

Northeast Utilities
Millstone Unit 3

RFI No _____

**REQUEST FOR INFORMATION
INDEPENDENT CORRECTIVE ACTION VERIFICATION PROGRAM**

To: Mr. George Pitman, Unit 3 ICAVP Coordinator

From: _____

Date of Request: _____ / Date Needed by: _____

Document Title or Description

Document Title or Description

cc: D. K. Schopfer/File