

PROJECT  
INSTRUCTION

Sargent & Lundy

INSTRUCTION PI-MP3-10  
REV. 1

Client: Northeast Utilities

Station: Millstone Unit 3

Title: **DIFFERING PROFESSIONAL OPINIONS**

☒ **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
<i>[Signature]</i>	<i>[Signature]</i>	<i>[Signature]</i>	<i>[Signature]</i>	<i>[Signature]</i>	<i>[Signature]</i>	<i>[Signature]</i>
Description						Date: <u>4-28-97</u>

Rev. 1

- Added notification and copy to NRC of DPO's at initiation.
- Added requirement to redact the name of the Initiator from DPO's submitted to the NRC.

PROJECT INSTRUCTION		INSTRUCTION PI-MP3-10 REV. 1
------------------------	--	---------------------------------

## 1.0 PURPOSE

This instruction establishes the requirements for the handling and resolution of differing professional opinions (DPO) related to technical safety significant concerns raised during the implementation of the Independent Corrective Action Program (ICAVP) for Millstone Unit 3.

## 2.0 REFERENCE

- 2.1 NRC Confirmatory Order Establishing Independent Correction Action Verification Program - Millstone Nuclear Power Station, Units 1,2 and 3
- 2.2 PI-MP3-01, Communications Protocol
- 2.3 PI-MP3-12, Project File Index
- 2.4 10CFR50.7, Employee Protection

## 3.0 DEFINITIONS

- 3.1 **Differing Professional Opinion** - a written statement expressing an individual's professional judgment on a technical issue that is different than a decision made or a position taken by the management of the project.
- 3.2 **DPO Resolution** - a written statement providing the technical basis for the disposition of the DPO.
- 3.3 **Initiator** - The individual Project Team member that initiates a DPO.

## 4.0 RESPONSIBILITIES

- 4.1 The Initiator shall be responsible for preparing the DPO when he believes it necessary to raise a technical safety concern.
- 4.2 The ICAVP Management Team (Project Director, Verification Team Manager, or Internal Review Committee Chairman, as appropriate) shall be responsible for providing the technical basis in writing for a decision made or a position taken on a technical issue for which a DPO has been generated.

PROJECT INSTRUCTION	 Sargent & Lundy	INSTRUCTION PI-MP3-10 REV. 1
------------------------	--	---------------------------------


- 4.3 The Quality Assurance Manager shall be responsible for establishing a board to provide a disposition for the DPO using the resources of the firm as required.
- 4.4 The Verification Team Manager is responsible for maintaining a log of all DPOs initiated during the project and for submitting a copy of the DPOs and their resolution to the NRC.

## 5.0 PROCEDURE

### 5.1 General

Differences of opinion on technical issues occur from time to time during the conduct of professional activities. These differences are normally resolved by the individuals within the chain of command of a project. In the case of the ICAVP, it is expected that the Verification Team Manager will facilitate the resolution of issues within the Verification Team, and that the Project Director will facilitate the resolution of issues between the Verification Team and the Internal Review Committee, when required. However, if any member of the ICAVP Project Team disagrees with a decision or position taken on a technical issue that he believes has potential safety significance, he may initiate a formal Differing Professional Opinion in accordance with the following procedural steps.

- 5.2 The Initiator shall prepare the DPO on Attachment 6.1. The DPO shall contain the following information related to the technical issue, along with any supporting information:
  - a summary of the Management decision or position on the technical issue,
  - a description of the Initiator's view and how they differ from the management position,
  - the rationale for the Initiator's opinion on the issue, including an assessment of the potential consequences, based on risk and safety, if the Initiator's position is not adopted.
- 5.3 The Initiator shall sign and date the DPO form and forward the original of the form along with any attachments to the S&L Quality Assurance Manager. A copy of the DPO form shall be submitted to the Verification Team Manager and he shall maintain a log of all DPOs on the project.

PROJECT INSTRUCTION	 Sargent & Lundy	INSTRUCTION PI-MP3-10 REV. 1
------------------------	---	---------------------------------

- 5.4 The Verification Team Manager shall submit a copy of the DPO to the NRC with the name of the Initiator redacted.
- 5.5 The QA Manager shall, within three working days of receipt of the DPO, acknowledge its receipt to the Initiator. The QA Manager shall notify the S&L Power Services Business Group Executive Vice President of the receipt of the DPO and shall convene a board consisting of himself, the PSBG Lead Nuclear Project Director and a mutually acceptable subject matter expert to disposition the DPO.
- 5.6 The DPO Board shall provide a disposition to the DPO based on the technical merits of the issue within 10 working days from receipt of the DPO. They may request to interview the Initiator and /or the management of the project or others as required to arrive at their decision. The QA Manager shall submit the DPO Resolution to the Initiator, the Verification Team Manager, the Project Director, and the PSBG Executive VP.
- 5.7 The Verification Team Manager shall log the resolution and submit a copy of the complete DPO and DPO Resolution along with all supporting documentation to the NRC primary contact listed in the Communications Protocol PI-MP3-01 (Reference 2.2). The name of the Initiator shall be redacted on the copy submitted to the NRC.
- 5.8 The Verification Team Manager shall review the disposition and take any corrective action required by the disposition, including any "re-work" of the ICAVP review process, if required.
- 5.9 The Verification Team Manager shall file the DPO and the resolution in accordance with PI-MP3-12.
- 5.10 The Initiator and any other employee also has the right to contact the NRC directly with a safety concern without fear of reprisal in accordance with S&L policy and 10CFR50.7 (Reference 2.4).

## 6.0 ATTACHMENTS

- 6.1 Differing Professional Opinion Form (1 page)
- 6.2 Flow Chart, DPO Process (1 page)

DPO-MP3-\_\_\_\_\_

**Independent Corrective Action Verification Program  
Millstone Nuclear Power Station - Unit 3**

**Differing Professional Opinion**

---

Description of Technical Issue and S&L Management Position:

(Add pages as required)

---

Description of Initiator's View, Rationale, and Assessment of Consequences, if not adopted:

Initiator \_\_\_\_\_

Date \_\_\_\_\_

(Add pages as required)

---

Disposition:

QA Manager \_\_\_\_\_

Date \_\_\_\_\_

(Add pages as required)

# DIFFERING PROFESSIONAL OPINION PROCESS FLOW CHART

