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The Northeast Utilities System

May 7, 1997

Docket No. 50-336
B16226

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

Millstone Nuclear Power Station, Unit No. 2
Emergency Operating Procedures Upgrade Program Update

The purpose of this letter is to advise the NRC of our current plans for Emergency Operating Procedures (EOPs) for Millstone Unit No. 2. In a letter dated August 10, 1995,⁽¹⁾ the NRC transmitted the results of a safety inspection of the Millstone Unit No. 2 revised EOPs and the ability of the control room operators to use them to safely operate the unit. In the inspection report, the NRC concluded that the revised EOPs and the administrative program that supports them, met current industry and NRC standards for safety. The NRC also documented that the revised EOPs were to undergo a second revision to further improve them. In the inspection report, the NRC requested that Northeast Nuclear Energy Company (NNECO) submit a listing of those items which Millstone Unit No. 2 planned to address in the EOP upgrade program, along with an estimated time table for completion. In a letter dated September 21, 1995,⁽²⁾ NNECO provided the information requested in the August 10, 1995, inspection report. In that response, NNECO stated that the upgraded EOPs were scheduled to be implemented by July 1, 1997.

Millstone Unit No. 2 began its upgrade of the EOPs in September 1995 and has made substantial progress to date. A staff dedicated to EOP development was put in place and has been receiving support from multiple disciplines including Human Factors, Training, Engineering, Operations, Safety Analysis, and Licensing. However, we have not made the progress to date that was anticipated when NNECO initially established the EOP implementation date of July 1, 1997. Millstone Unit No. 2 has been shut down

⁽¹⁾ G. W. Meyer letter to J. F. Opeka, "Millstone, Unit 2, EOP Inspection - Report No. 50-336/95-21," dated August 10, 1995.

⁽²⁾ J. F. Opeka letter to U.S. NRC, "Reply to a Request for Submittal of Plans and Schedule for Emergency Operating Procedures Upgrade Program Inspection Report 50-336/95-21," dated September 21, 1995.



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since February 20, 1996. Among the activities which have been ongoing during the shutdown is a design and licensing basis review. Resources that would have been dedicated to EOP development activities have been diverted to this design and licensing basis review, as well as other operational readiness activities. Additionally, since CEN-152, "Combustion Engineering Emergency Procedure Guidelines", was in the process of being revised to Revision 04, Millstone Unit No. 2 made the decision to develop its Upgraded EOPs to Revision 04. This required some additional schedule adjustments to coincide with the completion of Revision 04.

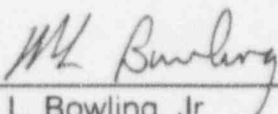
To ensure that the current EOPs continue to meet industry and NRC standards for safety, the EOPs will be revised prior to unit restart. A summary of the methodology used for the revision process is contained in Attachment 2.

The purpose of the Combustion Engineering Owners Group (CEOG) development of Revision 04 to CEN-152 was to incorporate the Revision 03 Maintenance Manual items, to correct typographical errors, and to incorporate information gained through the CEOG Instrument Uncertainties study. Millstone Unit No. 2 will not be performing a complete upgrade to revision 04 of CEN-152 as part of this revision to the EOPs. That will be accomplished through the EOP Upgrade Program. Millstone Unit No. 2 has, however, already incorporated all applicable CEN-152, Revision 03, Maintenance Manual items and typographical error corrections into the current EOPs as part of the EOP administrative maintenance program. Any safety significant items identified as part of the Millstone Unit No. 2 Instrument Uncertainties study will be incorporated into the EOPs prior to startup.

NNECO's commitments identified in this letter are contained in Attachment 1.

If there are any questions regarding our EOP upgrade program including its implementation date, please contact Mr. Ravi G. Joshi at (860) 440-2080.

Very Truly yours,
NORTHEAST NUCLEAR ENERGY COMPANY



Martin L. Bowling, Jr.
Millstone Unit No. 2 Recovery Officer

cc: W. D. Travers, PhD, Director, Special Projects Office
H. J. Miller, Region I Administrator
P. F. McKee, Deputy Director of Licensing, Special Projects Office
W. D. Lanning, Deputy Director for Inspections
D. G. McDonald, Jr., NRC Senior Project Manager, Millstone Unit No. 2
D. P. Beaulieu, Senior Resident Inspector, Millstone Unit No. 2

Attachment 1

Millstone Nuclear Power Station, Unit No. 2

Emergency Operating Procedures Upgrade Program Update

NNECO'S Commitments

May 1997

List of Regulatory Commitments

The following table identifies those actions committed to by NNECO in this document. Any other actions discussed in the submittal represent intended or planned actions by NNECO. They are described to the NRC for the NRC's information and are not regulatory commitments. Please notify the Manager - Nuclear Licensing at the Millstone Nuclear Power Station, Unit No. 2 of any questions regarding this document or any associated regulatory commitments.

| Commitment Number | Commitment | Committed Date or Outage |
|-------------------|---|---|
| B16226 - 1 | To ensure that the current EOPs continue to meet industry and NRC standards for safety, and that any safety significant items identified as part of the Millstone Unit No. 2 Instrument Uncertainties study will be incorporated into the EOPs, a revision of the EOPs will be performed. | Prior to restart from the current outage. |

Attachment 2

Millstone Nuclear Power Station, Unit No. 2

Emergency Operating Procedures Upgrade Program Update

EOP Revision Program Methodology

May 1997

Emergency Operating Procedures Upgrade Program

EOP Revision Program Methodology

The Millstone Unit No. 2 Emergency Operating Procedure (EOP) Revision Program, to be completed prior to restart, will consist of the following tasks:

1. Incorporation of comments from licensed operator review of the EOPs.
2. Incorporation of comments from licensed operator training concerning the EOPs.
3. Incorporation of modifications required by Configuration Management Program evaluations.
4. Incorporation, as applicable, of modifications resulting from Millstone Unit No. 2 responses to industry issues such as NRC Information Notices and Generic Letters, Institute of Nuclear Power Operations (INPO) Significant operating Experience Reports (SOER), and industry events.
5. Incorporation of modifications resulting from an evaluation of EOP support procedures conducted by a multi-discipline assessment team. The assessment team will consist of representatives from the EOP Development Team, the Safety Analysis Branch, the Operations Department, the Licensed Operator Training Department, and the Human Factors Group. This team will evaluate the applicable EOP support procedure steps, place the steps into one of the categories listed below, and ensure that the EOPs and the EOP training program are modified as required.

EOP Support Procedures: Categories of Individual Steps

- a. The Step is acceptable as written, no further action is required.
- b. The Step is acceptable as written but needs additional training for enhanced operator understanding.
- c. The Step needs to be re-written to account for accident conditions.
- d. The Step needs to be re-written and additional training is necessary.

6. Verification, validation, approval, training, and implementation of the revised EOPs in accordance with the Millstone Unit No. 2 EOP Program administrative procedures.