



50245

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

June 19, 1997

Lois E. Bailey
51 Hanover-Versailles Rd.
Baltic, CT 06330

Dear Ms. Bailey:

I am responding to your letters of April 23 and 30, 1997, to the Chairman of the U.S. Nuclear Regulatory Commission (NRC). In your letters, you expressed concern over statements made by senior Northeast Utilities (the licensee) management, the selection criteria for the contractor of the Independent Corrective Action Verification Program (ICAVP), the conduct of the ICAVP, and the NRC's policy regarding public participation. In addition, you provided the Citizens' Regulatory Commission's 15-point agenda, which you felt must be accepted by the licensee and made part of the NRC's agenda for evaluating Millstone in order to demonstrate readiness for restart. I have forwarded your concerns about NRC performance to the NRC Inspector General for disposition.

On August 14, 1996, the NRC issued a confirmatory order to the licensee requiring completion of an ICAVP before the restart of any Millstone unit. The purpose of the ICAVP, as stated in the order, is to confirm that the plant's physical and functional characteristics are in conformance with its licensing and design bases. The ICAVP audit required by the NRC is expected to independently verify, beyond the licensee's quality assurance and management oversight, that the licensee has identified and satisfactorily resolved existing nonconformances with the design and licensing bases; documented and utilized the licensing and design bases to resolve nonconformances; and established programs, processes, and procedures for effective configuration management in the future.

On April 7, 1997, the NRC conditionally approved Sargent & Lundy for the conduct of the Millstone Units 1 and 3 ICAVPs (Enclosure 1). In the conditional approval, the staff stated that the NRC decided to adopt a practical standard of independence between the ICAVP contractor and the licensee. In making the determination, the staff balanced the need to ensure adequate financial independence with the need to ensure that the contractor had the necessary skills and experience to effectively conduct the ICAVP. The staff found that Sargent & Lundy was sufficiently independent from the design and operation of Millstone Units 1 and 3 because, with some minor exceptions, it has not been involved in design activities that would affect its ability to perform the ICAVP. In areas where minor exceptions exist, controls have been

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established to incorporate a party other than Sargent & Lundy in the review. Although Sargent & Lundy does not meet the strict definition of independence, as you and other members of the public have pointed out, the NRC has determined that Sargent & Lundy has sufficient technical and financial independence, and the nuclear design experience necessary to conduct an objective review.

On January 3, 1997, the staff sent a memorandum to the Commission outlining the process and approaches it would use to oversee the corrective action programs at Millstone (Enclosure 2, with an updated NRC Restart Assessment Plan). As part of this memorandum, the staff outlined the scope of the ICAVP and submitted its ICAVP oversight inspection plan. The ICAVP contractor will conduct a detailed review of at least four safety-related or risk-related systems at Millstone Unit 3 (tier 1 review). In addition, the ICAVP will review portions of many other systems (tier 2 review). The objective of these system reviews is to identify and review some critical design characteristics that are important to ensure that these systems can perform their specified functions. The ICAVP contractor will also review examples of the implementation of various processes used by the licensee to change or modify the facility (tier 3 review). As such, tier 3 reviews are likely to result in the examination of portions of additional safety-related or risk-significant systems. The tier 3 review will gain insights into the effectiveness of the licensee's processes that control the plant's configuration. By using this approach, the conduct of the ICAVP will support the NRC's restart assessment process by providing important insights regarding (1) the effectiveness of the licensee's root-cause analysis process, (2) the effectiveness of the licensee's corrective actions, (3) the licensee's compliance with the licensing basis, (4) the effectiveness of the licensee's design and configuration control processes, and (5) the licensee's process for deferring completion of certain corrective actions until after restart.

The ICAVP and, as appropriate, all of the NRC activities relating to Millstone oversight will be open processes. The Nuclear Energy Advisory Council (NEAC) and the State of Connecticut have been invited to observe ICAVP implementation at the Millstone site. The NRC plans to continue to meet periodically with the public on the status of the ICAVP and other NRC activities, thereby providing a forum for public comment.

With regard to the Citizens' Regulatory Commission's 15-point agenda, we have reviewed the agenda and find that some of the 15 recommendations cover topics which are related to those included in the NRC's Restart Assessment Plan (see Enclosure 2). We believe the Restart Assessment Plan consists of the major elements that require resolution before plant restart. We also note that several of the agenda recommendations are outside of the NRC's purview, such as item 7 (concerning outage costs), item 9 (concerning the licensee taking an oath to abide by State and Federal ethical standards), and item 15 (concerning the State performing a study on its dependence upon nuclear energy). Please be assured that the NRC's main focus is protecting public health and safety and that restart will not be recommended until the NRC determines that the licensee can operate and maintain a Millstone unit safely.

June 19, 1997

The NRC appreciates the comments and concerns expressed in your letters. The staff believes that the current ICAVP and Restart Assessment Plan processes, as detailed in the enclosures, provide an open and comprehensive review of the licensee's corrective actions. I trust that you will find this information responsive to your concerns.

Sincerely,

~~Original signed by~~

Frank J. Miraglia

for Samuel J. Collins, Director
Office of Nuclear Reactor Regulation

Docket Nos. 50-245, 50-336, and 50-423

Enclosures:

1. NRC Letter dated April 7, 1997
2. SECY-97-003

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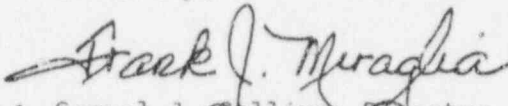
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Lois E. Bailey

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Sincerely,


for Samuel J. Collins, Director
Office of Nuclear Reactor Regulation

Docket Nos. 50-245, 50-336, and 50-423

Enclosures:

1. NRC Letter dated April 7, 1997
2. SECY-97-003



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0901

April 7, 1997

Mr. Bruce D. Kenyon
President and Chief Executive Officer
Northeast Nuclear Energy Company
P.O. Box 128
Waterford, CT 06385-0128

Dear Mr. Kenyon:

This letter provides conditional approval of your proposed contractor, Sargent & Lundy (S&L), for the conduct of the Millstone Units 1 and 3 Independent Corrective Action Verification Program (ICAVP), pending completion and submittal of the enclosed certifications of financial independence by S&L and the Licensee's corporate officials. On the basis of the information provided in your submittals of December 18, 1996, January 15, February 21, and March 26, 1997, and the discussions at the meetings of February 5 and March 18, 1997, we have concluded that S&L has the technical expertise and nuclear design experience necessary to conduct the ICAVP review at Millstone Units 1 and 3. We have also concluded that S&L is sufficiently independent of the Licensee and its design contractors for the conduct of the ICAVP.

Concerns were raised by the Nuclear Energy Advisory Council (NEAC) for the State of Connecticut and by members of the public on the independence of the contractor. The NRC has chosen to adopt a practical standard of independence between the ICAVP contractor and the Licensee. In making our determination, we balanced the need to ensure adequate financial independence with the need to ensure that the contractor had the necessary skills and experience to effectively conduct the ICAVP. We found that S&L was sufficiently independent from the design and operation of Millstone Units 1 and 3 in that it has not been involved in design activities that would affect its ability to perform the ICAVP, with the following exceptions: (1) seismic qualifications, specifications, standards, and procedures for Millstone Unit 1 and (2) interactions between nonseismic Category 2 systems and seismic Category 1 safety systems at Millstone Unit 3. On the basis of our review of the information submitted, we find that these two areas represent a conflict of interest and shall not be reviewed by S&L during the ICAVP. If review of these areas is necessary during performance of the ICAVP, it shall be handled by a party other than S&L.

Regarding S&L's financial independence from the Licensee, we found sufficient independence in that, organizationally, S&L, its subsidiaries, its Retirement Plan, and its Savings Investment Plan do not directly own any Licensee stock, bonds, or other financial instruments issued by Northeast Utilities (NU), Northeast Nuclear Energy Company (NNECO), or other entities named on the Millstone Units 1 and 3 operating licenses. In addition, each of the proposed ICAVP team members will be required to provide a written statement regarding conflict of interests that includes financial interests.

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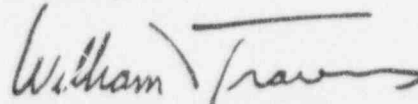
As previously described, we have concluded that S&L has sufficient technical and financial independence to conduct an objective review. However, this approval is conditioned upon the submittal of the enclosed certifications of financial independence by the corporate officials of the NNECO and S&L (Enclosure 1). A detailed discussion of the basis for our approval is provided in Enclosure 2.

To ensure the continued independence of the ICAVP team, a communication protocol will be established as part of the contractor's audit plan. This protocol shall include the reporting procedures discussed in the Confirmatory Order of August 14, 1996. The staff will approve the protocol after discussions with the contractor during the staff's review of the audit plan.

As we discussed in our letter of January 13, 1997, and subsequent meeting on February 5, 1997, we will withhold final approval of individual team members until completion of our interviews in conjunction with our review of the proposed audit plan. The staff will conduct interviews with each team member to verify that he or she is technically and financially independent and to determine whether the member's technical qualifications and experience are consistent with his or her assigned role as defined in the audit plan. In addition, we request that all team members complete the enclosed Conflict-of-Interest Statement to document their financial and technical independence (Enclosure 3). These statements will be collected from S&L when the NRC staff conducts the interviews.

Please contact Eugene Imbro at (301) 415-1490 if you need any additional information or clarification of the enclosures.

Sincerely,



William D. Travers, Director
Special Projects Office
Office of Nuclear Reactor Regulation

Enclosures:

1. Certification of Financial Independence
2. Results of the Staff's Review of the Proposed ICAVP Contractor for Millstone Units 1 and 3
3. Conflict-of-Interest Statement

Certification of Financial Independence

I, _____, being first duly sworn, depose and state:

That I am President, Sargent & Lundy (the Contractor).

That I am authorized to provide the following certification on behalf of the Contractor to the U. S. Nuclear Regulatory Commission.

That the Contractor does not own stock, bonds, or other financial instruments issued by Northeast Utilities or its subsidiaries, the organizations that performed the original design for Millstone Units 1 and 3, the suppliers of the nuclear steam supply systems for the Units 1 and 3 and other entities named on the operating licenses for Units 1 and 3.

Date

Certification of Financial Independence

I, Bruce D. Kenyon, being first duly sworn, depose and state:

That I am President and Chief Executive Officer, Northeast Nuclear Energy Company (the Licensee).

That I am authorized to provide the following certification on behalf of the Licensee to the U. S. Nuclear Regulatory Commission.

That the Northeast Nuclear Energy Company and the other co-license holders for Millstone Units 1 and 3 do not own stock, bonds, or other financial instruments issued by Sargent & Lundy or its subsidiaries.

Bruce D. Kenyon
President and Chief Executive Officer

Date

RESULTS OF THE STAFF'S REVIEW OF THE PROPOSED ICAVP CONTRACTOR FOR MILLSTONE UNITS 1 AND 3

INTRODUCTION

On August 14, 1996, the U. S. Nuclear Regulatory Commission (NRC) issued a Confirmatory Order to Northeast Nuclear Energy Company (NNECO, or Licensee) requiring completion of an Independent Corrective Action Verification Program (ICAVP) before the restart of any Millstone unit. The order directs the Licensee to obtain the services of an organization independent of the Licensee and its design contractors to conduct a multidisciplinary review of Millstone Units 1, 2, and 3.

The purpose of the ICAVP, as stated in the Confirmatory Order, is to confirm that the plant's physical and functional characteristics are in conformance with its licensing and design bases. The ICAVP audit required by the NRC is expected to provide independent verification, beyond the Licensee's quality assurance and management oversight, that the Licensee has identified and satisfactorily resolved existing nonconformances with the design and licensing bases; documented and utilized the licensing and design bases to resolve nonconformances; and established programs, processes, and procedures for effective configuration management in the future.

BACKGROUND

The Licensee submitted information regarding the proposed selection of Sargent & Lundy (S&L) as the contractor for the Unit 3 ICAVP on December 18, 1996. The submittal included the principal criteria used in evaluating the contractor bids, a discussion of the methodology used in the bid selection process, program elements to be covered by the ICAVP scope, and guidelines for the communication protocol. The submittal also included resumes of the proposed ICAVP team members. In its submittal, the Licensee stated that S&L is financially and organizationally independent of Northeast Utilities (NU) and its co-license holders, and its subsidiaries, and the design contractors for the Millstone units. Additions and corrections to the proposal were submitted on January 8, February 21, and March 26, 1997.

The Licensee submitted the proposed selection of S&L as the contractor for the Unit 1 ICAVP on January 15, 1997. This submittal included additional resumes for proposed team member substitutes.

On February 5, 1997, the staff held a public meeting with the Licensee to discuss the contractor selection process and to respond to staff questions that were provided to the Licensee by letter on January 13, 1997. The staff also held an evening meeting with the public on February 5, 1997, to obtain comments regarding the proposed contractor.

On February 21, 1997, the Licensee submitted additional information regarding the proposed selection to respond to questions and comments from the meeting on February 5, 1997. The submittal included responses to NRC questions regarding the financial independence of S&L, previous work performed by S&L for the Licensee, restrictions on future work for the Licensee,

ICAVP team member substitution, S&L's differing professional opinion process, quality assurance program requirements, the ICAVP organization, and ICAVP staffing and experience levels.

During the staff's evaluation of the submitted information, the staff raised additional questions regarding the financial independence of S&L. On March 12, 1997, the NRC requested that the Licensee provide additional information regarding the financial holdings of S&L's retirement plan and restrictions on S&L from performing future work for the Licensee. On March 26, 1997, the Licensee submitted additional information regarding these issues.

STAFF EVALUATION

The staff conducted a review of the information submitted by the Licensee regarding the proposed contractor, S&L, to ensure that the contractor selected to perform the ICAVP is technically and financially independent of the Licensee and its design contractors, and technically capable of effectively performing the ICAVP.

To complete this task, the NRC's ICAVP oversight staff performed the following activities:

1. Evaluated whether the proposed contractor has any financial interest or had any technical involvement with the design or construction of the subject Millstone units.
2. Evaluated whether the proposed contractor has adequate technical and managerial qualifications to conduct the ICAVP.
3. Evaluated whether the proposed specialists have the appropriate technical background to participate in the ICAVP. The evaluation included a preliminary review of individual team member resumes.

The staff will conduct interviews with each team member during review of the audit plan. This effort will also confirm that the individual specialists have no financial interests in NU or other entities named on the operating license, the nuclear steam supply system (NSSS) vendor, or the architect-engineer (AE) for the subject Millstone unit by means of a Conflict-of-Interest Statement. In addition, the statement will require the team members to confirm that they have had no prior technical involvement with the subject Millstone unit.

DISCUSSION

1. Company's Technical Experience

As stated in the Confirmatory Order of August 14, 1996, the Licensee was directed to obtain the services of an organization, independent of the Licensee and its design contractors, to conduct a multidisciplinary review of the Millstone units. The purpose of the ICAVP is to verify the adequacy of the Licensee's efforts to establish adequate design bases and design controls, including translation of the design bases into operating procedures, maintenance procedures and testing practices; verification of system performance; and implementation of modifications since issuance of the initial facility operating licenses. The review must be comprehensive and

incorporate appropriate engineering disciplines so that the NRC can be confident that the Licensee has been thorough in identifying and resolving problems. Therefore, the contractor must have sufficient breadth and depth of technical experience in nuclear power plant design requirements to perform an adequate review.

The Licensee's submittal states that proposed contractor S&L has corporate experience that includes the design of 13 boiling-water reactors (BWR) and 14 pressurized-water reactors (PWR). For example, S&L was the A.E. for Braidwood (PWR), Byron (PWR), Clinton (BWR), Dresden (BWR), Fermi (BWR), LaSalle (BWR), Quad Cities (BWR), and Zion (PWR).

On the basis of the staff's review of the resumes in the proposal, it appears that, in general, the engineering disciplines needed for the review are being provided by the contractor. Some of the proposed team members have expertise in several areas. The 37 proposed team members possess adequate expertise in the areas of mechanical engineering, electrical engineering, civil/structural engineering, nuclear engineering, instrumentation and control engineering or design, reactor plant operations, and probabilistic risk assessment. The NRC will give its final approval of the S&L proposed team members following interviews conducted in conjunction with NRC review of the ICAVP audit plan.

The staff has previously reviewed a similar independent design review conducted by S&L. A S&L vertical slice review (VSR) was performed in 1988 and 1989 at Watts Bar Nuclear Plant. The VSR provided an independent, systematic, structured, and comprehensive evaluation of the adequacy of the design and construction of Watts Bar structures, systems, and components. The VSR reviewed the component cooling and emergency auxiliary power systems. The VSR also compared licensing requirements and design-basis documents with design output documents (e.g., drawings and construction specifications) and with installed hardware and associated quality records. The VSR was conducted in accordance with a formal plan that the NRC had reviewed. The VSR identified approximately 500 discrepancies. An NRC team inspected the VSR effort and the results were documented in Inspection Reports 50-390/88-09 (February 27, 1989) and 50-390/89-02 (May 2, 1989). The team inspections found that the VSR review performed by S&L was thorough and adequate. A summary of the NRC inspection of the VSR is provided in NUREG-0847, Supplement No. 17, "Safety Evaluation Report related to the operation of Watts Bar Nuclear Plant, Units 1 and 2," dated October 1995.

In addition, S&L performed a review similar to the proposed ICAVP on the Hope Creek facility as part of the Independent Design Verification Program (IDVP) requested by the NRC prior to the issuance of the facility's initial operating license. A summary of this effort, which was performed with direct NRC inspection oversight, is contained in NUREG-1048, Supplement 5, "Safety Evaluation Report related to the Operation of Hope Creek Generating Station," dated April 1986.

S&L has recently been selected as an NRC contractor to conduct similar design-related inspections at nuclear power facilities. This competitive selection provides additional justification to conclude that this organization has the technical experience to conduct the ICAVP. (Details of the contract between NRC and S&L are provided in Section 6 below.)

On the basis of the information in the Licensee's submittals and the staff's previous experience with S&L, the staff concluded that the proposed contractor has the technical expertise and experience to conduct this complex, multidisciplinary review.

2. Company's Technical Independence

During the selection process, the Licensee established an essential criterion that the supplier must be independent of NU and its design contractors. The Licensee's submittal states that S&L was not involved in the original design of any of the Millstone units. The staff's review of NRC records indicates that S&L was not the AE for any Millstone unit. The AEs for the Millstone units were as follows:

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| Millstone Unit 1 | Ebasco |
| Millstone Unit 2 | Bechtel |
| Millstone Unit 3 | Stone & Webster |

The Licensee's submittal also states that S&L has received approximately \$707,000 in revenues from the Licensee in the past 10 years. The staff requested additional details regarding the work performed by S&L to determine whether a potential conflict exists.

The Licensee provided additional details at the meeting of February 5, 1997, regarding the contractor's work activities at Millstone as a primary contractor or as a subcontractor. The staff reviewed the summary of the work performed by S&L and found several areas of potential conflict. In 1986, S&L assisted the Licensee in developing seismic qualifications, specifications, standards, and procedures for Millstone Unit 1. In addition, in 1985, S&L conducted an analytical study regarding interaction between nonseismic Category 2 systems and seismic Category 1 safety systems at Millstone Unit 3. S&L has also performed work pertaining to a standardized fuse control process and life cycle management. To address these potential areas of conflict, the staff requested that the Licensee provide the specific actions that would be taken if ICAVP audit plan activities resulted in the need to review the adequacy of previous S&L work. In the Licensee's submittal of February 21, 1997, the Licensee stated that prior involvement of S&L would be handled on a case-by-case basis, and that the NRC's ICAVP oversight team would be notified of the circumstances of the involvement and how each case would be handled before proceeding with the work.

The staff concluded that, in general, the case-by-case approach would be acceptable. The staff found that S&L's work pertaining to the standardized fuse control process and life cycle management does not affect its ability to perform the ICAVP. However, because of the involvement of S&L in the development of the seismic qualifications, specifications, standards, and procedures for Millstone Unit 1, and its involvement in an analytical study regarding interaction between nonseismic Category 2 systems and seismic Category 1 safety systems at Millstone Unit 3, S&L shall be excluded from conducting reviews of these two areas during its performance of the ICAVP at the respective Millstone units.

3. Company's Financial Independence

To effectively balance the need to have an organization that has the required technical capabilities to perform the ICAVP with the need for that organization to have adequate financial and technical independence, the NRC has chosen to adopt a practical standard of independence between the ICAVP contractor and the Licensee. This standard recognized that relatively few organizations have the necessary technical capabilities to perform the ICAVP, and allowed NNECO sufficient latitude to propose for NRC approval, a contractor that has the requisite experience and capabilities to conduct a credible technical review as set forth in the Confirmatory Order issued by the NRC on August 14, 1996. The financial independence criteria discussed by the NRC staff with NNECO at a publicly held meeting on September 24, 1996, stated that (1) the proposed contractor should have no ownership interest in NU, and (2) the proposed contractor should have no current involvement with the unit being reviewed.

The Confirmatory Order of August 14, 1996, directs the Licensee to obtain the services of an organization independent of the Licensee and design contractors. The Licensee stated in its submittal that S&L did not own or control Licensee stock and had no financial interest in the Licensee, any of its subsidiaries, or its design contractors. The Licensee's submittal on February 21, 1997, included a "Certification of Ownership Interests" in which S&L affirmed that it and its subsidiaries did not hold, directly or indirectly, stock or other ownership interests in any of the entities listed on the Units 1 and 3 operating licenses, the respective NSSS vendors (General Electric and Westinghouse) or the respective original AE organizations (Ebasco, now owned by Raytheon, and Stone & Webster). The "Certification of Ownership Interests" also stated that although S&L had no ownership interest as indicated above, its Retirement Plan and Savings Investment Plan (including its 401(k) plan) may have direct or indirect ownership interests in one or more of the entities previously discussed. However, the investments made by the Retirement Plan were made through a Trust Fund and S&L did not participate directly in the selection of individual securities in which the Trust Fund invests. The staff requested further information on both the Retirement Plan and the Savings Investment Plan. A summary of holdings of the Retirement Plan dated February 28, 1997, indicated no ownership interest in any of the above-mentioned entities. The investment options from which employees participating in the Savings Investment Plan can select were provided, along with prospectuses. The staff reviewed these items and concluded that the investment options are managed independent of S&L and each individual investment option is widely diversified. Therefore, the staff finds S&L to be sufficiently financially independent of the Licensee and design contractors to conduct the ICAVP required by the Confirmatory Order.

The other criterion for independence discussed by the staff at the meeting of September 24, 1996, was that the proposed ICAVP contractor should have no current involvement with the Licensee at the unit being reviewed. S&L had no current involvement with either Units 1 or 3 before it was proposed by NNECO as the ICAVP contractor. In addition to the NRC criterion, the Licensee further restricted the selection of a contractor to one that had limited past involvement with NNECO. The Licensee's submittal stated that while S&L has annual revenues of more than \$200 million, it had only received approximately \$700,000 in revenues from the Licensee over the past 10 years. The Licensee concluded that these small revenues in comparison to the annual revenues of S&L did not comprise a sufficient financial interest on which to question the objectivity of the contractor. The staff agrees with this conclusion.

The Licensee's submittal stated that S&L did not provide for any restrictions on future work at Millstone. To ensure an objective review, the staff requested that the Licensee further discuss restrictions on future work. At the meeting of February 5, 1997, the Licensee stated that the contract will preclude any future S&L work within 6 months of completion of the ICAVP to resolve discrepancies identified in the ICAVP review. Although this course of action would impose some restrictions, the staff requested that the Licensee review the proposal. The staff was concerned that followup work, even 6 months after completion of the ICAVP, could call into question the objectivity of the ICAVP review. During subsequent discussions, the Licensee agreed to a 12-month restriction on future work for S&L at all NU facilities. These discussions were the subject of a followup letter dated March 12, 1997. The Licensee's response dated March 26, 1997, stated that S&L will be restricted from performing or seeking new work at any NU facility for the duration of the ICAVP contract and that S&L will not seek work at any NU facility for 12 months following the completion of the ICAVP project for Millstone Units 1 and 3. This restriction is similar to that imposed by the NRC on its contractors. Therefore, the staff finds this restriction acceptable.

4. Technical Experience of Team Members

As previously stated, the staff's review found that the appropriate technical disciplines are being provided by the contractor. However, the staff intends to review each resume in detail and to conduct interviews of each proposed member at a later date. The resume review and interviews will be conducted concurrent with the staff's review of the proposed audit plan and team structure. This separate review and approval is necessary so that the NRC staff can evaluate the adequacy of each team member's expertise and experience, with an understanding of the specific tasks that the ICAVP team members will perform during the review.

The Licensee's submittal states that S&L's proposal did not discuss a plan for possible substitution of team members. The submittal also states that the need for a stated position regarding substitution of project team members will be factored into the contract award so that new members and substitutions will be made using an approved process. The staff requested that this issue be discussed further at the meeting of February 5, 1997. At that meeting, the Licensee stated that the S&L procedure for substituting personnel would be provided to the NRC for approval. The procedure for substitution of personnel will be reviewed and approved during NRC's review and approval of the audit plan.

5. Technical and Financial Independence of Team Members

The Confirmatory Order of August 14, 1996, states that in evaluating the independence of each team member, the factors the NRC staff will consider include, but are not limited to, whether the individual has had prior involvement in design reviews for the Licensee and whether the individual has any financial interest in the Licensee. The Licensee's submittal stated that all proposed team members had been screened to ensure that they have no prior involvement with design reviews for the Licensee.

The staff reviewed the resumes provided by the Licensee to verify that the proposed team members have not had prior involvement in design reviews at Millstone. On the basis of a preliminary review of the resumes, the staff determined that none of the proposed team members had prior involvement in the design, design reviews, operation, testing, or maintenance of Millstone Units 1 and 3.

As discussed at the meeting on February 5, 1997, and in an earlier letter of January 13, 1997, the staff will withhold final approval of the individual team members until completion of individual interviews and review of the proposed audit plan. The staff will conduct interviews of all team members to verify that they are technically and financially independent, and to determine whether the members' technical qualifications and experience are compatible with their assigned roles as defined in the audit plan. In addition, the staff will request that all team members complete a Conflict-of-Interest Statement to document their financial and technical independence. These statements will be collected from S&L when the staff conducts the interviews.

6. Public Comments

The Nuclear Energy Advisory Council (NEAC) and the public have expressed concerns, regarding the independence and objectivity of S&L, at meetings held by the NRC with the public and at meetings of the NEAC at which the NRC has been asked to participate. These comments can be grouped into several categories: (1) S&L derives a substantial portion of its income from the nuclear industry, (2) the ICAVP contractor will be selected and paid by the Licensee, (3) S&L has been proposed by the Licensee to conduct the ICAVP at more than one unit, (4) S&L is currently under contract to the NRC to provide technical expertise in the conduct of design-related inspections, and (5) S&L has previously performed work at Millstone. The staff has considered and weighed these comments in its evaluation of S&L as the possible ICAVP contractor.

The NRC staff has responded to these comments in the public forums previously noted and its responses are summarized as follows:

a. S&L Involvement in the Nuclear Industry

The review of the design of a commercial nuclear power plant and its operating procedures requires specialized knowledge of NRC regulatory guidance, design standards, and facility operation. This knowledge is held by those individuals and organizations that work in the commercial nuclear power generation industry. A review performed by individuals and organizations without this specialized knowledge would not give the NRC and the public a sufficient level of confidence that NNECO programs have been effective in identifying and correcting problems.

b. S&L Payment by NNECO

It is the responsibility of the Licensee to operate its facility in a safe manner, maintain the facility in compliance with its licensing bases, and identify and resolve any problems. Therefore, it is appropriate that the Licensee assume any cost associated with the

ICAVP. Further, the ICAVP process will impose rigid communication protocols to control the NNECO/S&L interaction, and it will be closely overseen by the NRC, with NEAC observing the NRC oversight function. These actions provide substantial assurance of an independent objective review by the contractor.

c. Conduct of an ICAVP at Units 1 and 3

The conduct of an ICAVP by a single contractor at more than one unit does, in the view of some members of the public, create the perception of a biased outcome. However, as previously described, the staff is confident that the ICAVP process, including NRC oversight, will provide substantial assurance that the review of each unit will be thorough and of sufficient scope and depth to provide insights into the effectiveness of the Licensee's corrective action process.

d. Current S&L Work for the NRC

The NRC awarded contract NRC-03-96-028 to S&L on October 1, 1996. The total estimated cost for full performance of the contract is \$1,845,431. The contract is for nuclear AE technical assistance for design inspections. Under this contract, S&L will provide a PWR team of five design specialists. These specialists will perform design inspections to assist the NRC in determining whether operating nuclear power plants meet their original design bases. The period of the contract is 2 years, beginning from October 1, 1996, with two 1-year renewal options. The fact that S&L was selected by NRC to perform design reviews indicates that, in the staff's judgment, it is a technically capable organization.

The NRC contract restricts S&L, during the term of the contract, from entering into consulting or other contractual arrangements with a nuclear power plant to perform any work that results from the inspections. Since S&L has been selected by the Licensee to perform the ICAVP at Millstone Units 1 and 3, S&L will be restricted from participating in the NRC's design inspections of these units under NRC's contract NRC-03-96-028.

The ICAVP process was modeled after the IDVP required by the NRC of Licensees in the 1980s before the NRC would grant an initial operating license. The IDVP was not independent of the NRC but relied upon a design review conducted by a contractor independent of the original design organization and overseen by the NRC. Similarly, the ICAVP was not intended to establish independence from the NRC.

e. Prior Work by S&L at Millstone

Proportional to its total annual revenue of \$200 million, S&L has had minimal involvement with NNECO (\$0.7 million over the preceding 10 years). This represents 0.035 percent of S&L's gross revenue during that 10-year period. Further, the NRC has restricted S&L from directly reviewing prior work or work performed under programs developed by S&L for the Licensee, for example, Unit 1 seismic qualification.

7. Other Issues

Differing Professional Opinions

Because of the history of employee concerns issues at Millstone, the staff requested that the proposed contractor provide a description of the process used to handle differing professional opinions (DPO) that may arise among the staff performing the ICAVP. In its submittal of February 21, 1997, the Licensee stated that the DPO process would include a step to notify the NRC of the initiation of a DPO and its resolution. In addition, the S&L process instruction covering the DPO process was included in the audit plan submitted for NRC's approval on March 19, 1997. The NRC staff's review of the audit plan will include a review of the S&L process instruction covering the DPO process.

CONCLUSION

On the basis of the information provided in the Licensee's submittals of December 18, 1996, January 15, February 21, and March 26, 1997, and the discussions at the meetings of February 5, 1997, and March 18, 1997, the staff has concluded that S&L has the technical expertise and nuclear design experience necessary to conduct the ICAVP review at Millstone Units 1 and 3. In addition, the staff concluded that S&L has sufficient technical and financial independence to conduct an objective review but restricted S&L from performing reviews of (1) seismic qualifications, specifications, standards, and procedures for Millstone Unit 1, and (2) interactions between nonseismic Category 2 systems and seismic Category 1 safety systems at Millstone Unit 3. However, this approval is conditioned upon submittal of the certification of financial independence by both a corporate official of the Licensee and S&L.

As discussed in a letter of January 13, 1997, and subsequent meeting on February 5, 1997, the staff will withhold final approval of the individual ICAVP team members until it completes individual interviews and reviews the proposed audit plan.

CONFLICT-OF-INTEREST STATEMENT

MILLSTONE - Independent Corrective Action Verification Program (ICAVP)

Proposed Consultant

Consultant's Employer

My participation in the Millstone Unit ____ ICAVP [() does () does not] involve situations or relationships in which I had direct previous involvement with activities at the plant that I will be reviewing and I [() have () do not have] conflicting roles that might bias my judgment in relation to my work on the ICAVP. In addition

1. () I have not been previously employed by Northeast Nuclear Energy Company (NNECO) or any of its predecessors.

() I have been previously employed by NNECO or some of its predecessors. (State the nature of the employment.)
2. () I have not previously provided design or engineering services to NNECO for the subject Millstone unit as a contractor or a subcontractor.

() I have previously provided design or engineering services to NNECO for the subject Millstone unit as a contractor or a subcontractor.
3. () I have no other business relations (member of NNECO's Board of Directors, member of an Offsite Review Committee, etc.) with NNECO for the subject Millstone unit that may create the appearance of a conflict of interest.

() I have other business relations with NNECO for the subject Millstone unit that may create the appearance of a conflict of interest.
4. () I have not been previously employed by the subject Millstone unit's architect-engineer (AE) (_____), the nuclear steam supply system (NSSS) vendor (_____), or any of their predecessors associated with design or construction of the subject Millstone unit.

() I have been previously employed by the subject Millstone unit's AE (_____), the NSSS vendor (_____), or one or more of their predecessors associated with design or construction of the subject Millstone unit. (State the nature of the employment.)
5. () I, and my immediate family, do not own or control financial interests (stocks, bonds, mutual funds, etc.) in NNECO, the subject Millstone unit's AE (_____), or the NSSS vendor (_____).

() I, or a member of my immediate family, own or control financial interests (stocks, bonds, mutual funds, etc.) in NNECO, the subject Millstone unit's AE (_____), or the NSSS vendor (_____).

Proposed Consultant

Consultant's Employer

6. ☐ Members of my immediate family are not employed by NNECO, the subject Millstone unit's AE (_____), or the NSSS vendor (_____) associated with design or construction of the subject Millstone unit.
- ☐ Members of my immediate family are employed by NNECO, the subject Millstone unit's AE (_____), or the NSSS vendor (_____) associated with design or construction of the subject Millstone unit. (State the nature of the employment.)
7. ☐ My close relatives (aunts, uncles, first cousins) are not employed by NNECO, the subject Millstone unit's AE (_____), or the NSSS vendor (_____) in a management capacity.
- ☐ My close relatives (aunts, uncles, first cousins) are employed by NNECO, the subject Millstone unit's AE (_____), or the NSSS vendor (_____) in a management capacity. (State the nature of the employment.)
8. Have you been promised any additional compensation, reward or anything of value, contingent upon the position you take on any issue being considered by you in connection with the subject Millstone unit ICAVP? If yes, provide a detailed description of the circumstances.
- ☐ NO ☐ YES. Explain.
9. Do you know of any reason, whether or not inquired about in this questionnaire, that would affect your ability to be completely objective in performing any of the tasks assigned to you in connection with the subject Millstone unit's ICAVP? If yes, provide a detailed description of the circumstances.
- ☐ NO ☐ YES. Explain.
10. Are you aware of anything that might create a perception that you would not act with objectivity in performing any of the tasks assigned to you in connection with the subject Millstone unit's ICAVP? If yes, provide a detailed description of the circumstances.
- ☐ NO ☐ Yes. Explain.

I certify that the statements I have made on this form are true, complete, and correct to the best of my knowledge and if the circumstances surrounding the responses change during performance of the ICAVP for the subject Millstone unit, I will inform the NRC of those changes.

Signature

Date

In the above statements, the term "employed" is construed to mean any form of employment, either direct, as a contractor, or as a subcontractor. The term "immediate family" includes the interviewee's children, stepchildren, spouse, parents, stepparents, mother-in-law, father-in-law, brothers-in-law, sisters-in-law, or any person living with the interviewee.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

March 24, 1997

Mr. Bruce Kenyon
President and Chief Executive Officer
Northeast Nuclear Energy Company
P.O. Box 128
Waterford, CT 06385-0128

LATEST REVISION

SUBJECT: RESTART ASSESSMENT PLAN

Dear Mr. Kenyon:

This letter is to inform you of a recent revision to the NRC's Millstone Restart Assessment Plan. This will be the second revision to the plan since it was initially issued. The Restart Assessment Plan was initially issued in September 1996, and subsequently revised in December 1996, to reflect an NRC reorganization which had established a Special Projects Office for Millstone oversight. The Restart Assessment Plan was revised to make the plan applicable to all three Millstone units rather than just Unit 3 and was based on your decision to allow all three units to focus on restart in parallel, rather than the previous circumstances in which most resources were applied to a Unit 3 restart. The revised Restart Assessment Plan is enclosed to this letter.

The NRC Manual Chapter (MC)—0350, "Restart Approval" checklist, will be the same for all three Millstone units. However, in addition to the Unit 3, the Significant Items List (SIL) for Unit 3, which was already in the Restart Assessment Plan, SIL have been added for Units 1 and 2. Also, the Unit 3 SIL has been revised by the addition of more items to the list, and to show what items have already been addressed and closed by the NRC through our inspection process. Editorial changes were made to each SIL to allow for cross referencing between the SIL and the MC—0350 "Restart Approval" checklist. The SILs for each unit are living documents and will be periodically revised. We will inform you by letter when there are significant revisions to each SIL.

Inspection of items listed in the Restart Assessment Plan will require significant NRC resources. So that we may efficiently schedule the use of our resources to verify that items listed on the plan have been completed, we request that your staff carefully review the enclosed plan and provide to our staff scheduled completion dates for each item. In addition, you should give us sufficient advance notice of your readiness for restart of each unit so that we may plan the use of our resources for other planned NRC inspections, as noted in the Restart Assessment Plan.

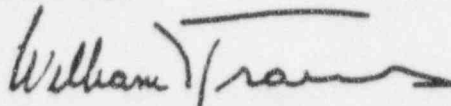
4704010044 2PP

Mr. Bruce Kenyon

2

If you have any, questions please contact Mr. Wayne D. Lanning at 610-337-5126 or Mr. Jacque P. Durr at 610-337-5224.

Sincerely,



William D. Travers, Director
Special Projects Office
Office of Nuclear Reactor Regulation

Enclosure:

Restart Assessment Plan, dtd March 1997

Docket Nos. 50-245, 50-336, and 50-423

cc w/enclosure

N. S. Carns, Senior Vice President and Chief Officer
R. T. Laudenat, Acting Director - Regulatory Affairs for Millstone Station
M. H. Brothers, Vice President - Millstone, Unit 3
J. McElwain, Unit 1 Recovery Officer
M. Bowling, Jr., Unit 2 Recovery Officer
D. M. Goebel, Vice President, Nuclear Oversight
J. K. Thayer, Recovery Officer, Nuclear Engineering and Support
P. D. Hinnenkamp, Director, Unit Operations
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L. M. Cuoco, Esquire
J. R. Egan, Esquire
V. Juliano, Waterford Library
Department of Public Utility Control
S. B. Comley, We The People
State of Connecticut SLO Designee
Citizens Awareness Network
T. Concannon, NEAC
E. Woollacott, NEAC

MILLSTONE
RESTART ASSESSMENT PLAN



Approved: _____

William D. Travers
William D. Travers, Director
Special Program Office

Date: 3/24/97

Revision 03/24/97

9704010053 58pp

MILLSTONE RESTART ASSESSMENT PLAN

1.0 BACKGROUND

The three Millstone units are shut down to formulate responses to a series of 10 CFR 50.54 (f) letters requiring them to affirm their compliance with the conditions of each unit's license and the regulations. The NRC performed a series of inspections at Units 2 and 3 with a 20—person Special Inspection Team (SIT) to ascertain the extent of their compliance. Currently, the results of those inspections are under assessment by the team and NRC management. The licensee initially focussed on Unit 3 as the lead plant for restart. However, as a result of a licensee reorganization which occurred on October 1, 1996, each Millstone unit was assigned a recovery manager who was an executive on temporary loan from another nuclear utility. Resources originally assigned to Unit 3 from the other units were returned to their respective units. Each unit has been tasked with establishing their own restart plan and whichever unit is ready will apply to restart first. Hence this restart assessment plan has been expanded to include Manual Chapter (MC)—0350 evaluations (see paragraph 3.0) for all three units.

On June 28, 1996, the Executive Director for Operations (EDO) issued a letter to the licensee that stated the Commission had decided to make the three Millstone units a Category 3 on the Watch List and would vote on the restart of the Millstone units. It is the intent to implement the appropriate aspects of NRC Manual Chapter 0350, "Staff Guidelines for Restart Approval" for the restart of all three units. The NRC will schedule and implement its inspection program after the licensee has indicated that the individual activities necessary for restart are complete and ready for inspection.

The NRC has been dealing with Northeast Utilities on broader performance issues which go beyond the 10 CFR 50.54(f) concerns. These broader concerns are considered contributory causes for the current poor performance, which the 10 CFR 50.54(f) issues are a subset. These issues have been formalized by the licensee in a program titled "Improving Station Performance" (ISP) and are topics that will be addressed by the licensee and reviewed by the NRC Millstone Restart Assessment Panel. A meeting was conducted on April 30, 1996, and disclosed that the licensee was not adequately managing the program or tracking progress.

The salient concerns embodied in the ISP include leadership, communications (employee concerns), the corrective action program, procedural adherence and procedure upgrades, work planning and control, and operational enhancements. The NRC Restart Assessment Plan will focus on the broader issues of the ISP and

REVISION — MARCH 24, 1997

licensee self—assessments and management oversight, recognizing the necessity to ensure adequate closure of the 10 CFR 50.54(f) process. The NRC plan for inspection of the Improving Station Performance issues is discussed in more detail in Section 3 of this plan.

On November 3, 1996, the agency established the Special Projects Office (SPO) to consolidate NRC efforts under a single Senior Executive Service (SES) manager, who reports to the Director of the Office of Nuclear Reactor Regulation (NRR). The Director, SPO assumed the authority and responsibilities of the Regional Administrator and the Associate Director of Projects.

2.0 10 CFR 50.54(f) Activities

Each Millstone unit has been requested to submit information describing actions taken to ensure that future operations will be conducted in accordance with the terms and conditions of the operating license, the Commission's regulations, and the Final Safety Analysis Report. In a May 21, 1996, letter, the NRC requested Northeast Utilities (NU) to provide for each unit its plan for completing the licensing bases reviews.

To aid in NRC understanding of how deficiencies were identified and dispositioned, the NRC's May 21, 1996, letter also requested that NU provide for each Millstone unit a comprehensive list of design and configuration deficiencies and information related to how each deficiency was identified and will be dispositioned.

On August 14, 1996, the NRC issued a Confirmatory Order establishing an Independent Corrective Action Verification Program (ICAVP). The independent effort will verify the adequacy of NU's efforts to establish adequate design bases and design controls, including translation of the design bases into operating procedures and maintenance and testing practices, verification of system performance, and implementation of modifications since issuance of the initial facility operating licenses. The NRC oversight of the ICAVP and activities will be in addition to the activities described in this Restart Assessment Plan. The results from this program will be incorporated into this restart plan and considered a significant part of the decision regarding recommended restart. The deficiencies found by the licensee as a result of the 50.54(f) letters will be evaluated by the Millstone Restart Assessment Panel to identify restart issues.

3.0 MC 0350 Process

Millstone Unit 1 entered a routine refueling outage on November 3, 1995. On December 13, 1995, the NRC sent a 10 CFR 50.54(f) letter requiring the licensee to certify compliance with the regulatory requirements before restarting the unit. At the January 1996 Senior Management Meeting, the site was placed on the "Watch List" for various reasons, including a concern for regulatory compliance. Subsequently, Millstone Units 2 and 3 were sent similar letters which required responses before restart.

The NRC Inspection Manual, Manual Chapter (MC) —0350, "Staff Guidelines For Restart Approval", provides guidelines and a list of tasks and activities that must be considered before a plant that has been shutdown for cause can restart. Because of NRC concerns relating to the licensee's management effectiveness, the appropriate aspects of MC 0350 will be applied to the restart of Units 1, 2, and 3 to ensure applicable requirements have been met (Enclosure (4)).

The Director, SPO, in coordination with the Deputy Executive Director for Regulatory Programs, and the Director of NRR, will make a recommendation regarding restart. NRR and the SPO will inform the Commission of the staff's and licensee's restart activities through Commission papers, or communications to the EDO. The Commission will then vote on whether to approve the restart of each Millstone unit.

3.1 SPECIAL PROJECTS OFFICE

The SPO was created on November 3, 1996, to oversee the restart of the Millstone units. The plan was to consolidate the NRC resources devoted to the restart efforts under one SES manager. The office is organized into three primary elements, licensing, inspection, and independent corrective action oversight. The Licensing Branch will administer the typical licensing actions performed in NRR; the Inspection Branch will implement the inspection programs, normally managed from the region, and the Independent Corrective Action Verification Program Oversight Branch will oversee the licensee's licensing and design bases review process.

Within the SPO, the Restart Assessment Panel (RAP) will meet to assess the licensee's performance and their progress in completing the designated restart activities. The RAP is composed of the Director, SPO (chairman); the Deputy Directors of Licensing, Inspections, and Independent Corrective Actions Verification Program Oversight; the Project Managers for the three Millstone units; the Inspection Branch Chief, the Senior Resident Inspectors for the three Millstone units, and the appointed Division of Reactor Safety representative. The function of the Millstone RAP is described in MC—0350.

3.2 MILLSTONE OPERATIONAL READINESS PLAN

On July 2, 1996, NU submitted the Unit 3 Operational Readiness Plan, which was discussed at the July 24, 1996, meeting and updated at the August 19, 1996, meeting. However, the licensee has replaced all of the line managers (President, Vice Presidents, and two of the three unit directors) in the recent past. With this replacement, the submitted plans for Unit 3 and the proposed plans for Units 1 and 2 are being changed substantially. The RAP will review these plans and hold periodic meetings with NU, open to the public, to discuss the schedule for implementation and coordination of NRC restart activities.

The deficiency lists associated with the restart plans for each unit, which will be updated periodically by the licensee, includes restart and deferred items, and will be

audited by the NRC to verify the acceptability of the criteria used to defer items from the restart list.

3.3 CORRECTIVE ACTION PROGRAM

The NU corrective action program has been weak in ensuring comprehensive and effective corrective actions. There are many instances of narrowly focused corrective actions that failed to embrace all aspects of the underlying problem. Additionally, the licensee has failed to follow up on corrective actions to ensure they were effective. Consequently, the RAP has determined that any restart effort should examine the current state of the licensee's corrective action program. Because of the large number of Adverse Condition Reports (ACR) being identified by the licensee's staff, the resident and regional inspection staff will concentrate on issues for each unit identified by the ACR process and audit the licensee's corrective actions for completeness. The staff is periodically selecting ACRs for review, based on the licensee's assigned level of importance, or their risk significance, as perceived by the resident staff. Additionally, other ACR's will be examined to provide a spectrum of safety significant and lesser risk issues. These selected ACRs will be added to the SIL for each unit, which are Enclosures 1, 2, and 3 to this plan.

The intent is to primarily assess the corrective action program while dealing with the safety significant technical issues. Examination of the corrective action program needs to review the Action Requests (AR) from the Action Item Tracking and Trending System (AITTS) program, which is an extension of the ACR process, and commitments regarding violations and inspection items. Further, a significant input to assessing the licensee's corrective action program is derived from the normal inspection program where valuable insights regarding the effectiveness of corrective actions are routinely collected from the technical safety inspections.

Additionally, the NRC Independent Corrective Action Verification Oversight Branch will assess the licensee's corrective actions for degraded and non-conforming conditions. Finally, the Operational Safety Team Inspection (OSTI) will audit portions of the corrective action process during the course of its activities.

Demonstration of improvements in the process will be judged by the completeness of the licensee's corrective actions for each of the inspected ACR's. There must be a high ratio of successfully completed ACR's to the total population inspected. There should only be minor comments regarding the processing, evaluation, directed corrective actions and closure of an issue.

3.4 WORK PLANNING AND CONTROLS (C.4.)¹

Work planning and controls are other areas that the licensee has shown a weakness. The ability to plan, control, and complete work is fundamental to

¹ Reference to applicable MC-0350 section

achieving adequate corrective actions. Effective work planning and controls are prerequisites for reducing and managing backlogs. Weak work planning and control was demonstrated during the Unit 2 outage, wherein, tagging boundary violations resulted in an extensive effort by the licensee to correct. Work control and planning were also issues at Unit 1, which resulted in a management meeting.

There will be a complete review of the Automated Work Order (AWO) process by the resident or regional staffs. The automated work order process is an integral part of the work planning and control system and is instrumental in establishing the scope of the work, providing the appropriate procedures, and establishing the tagging boundaries. Consequently, the Unit 1 resident staff has been directed to use the available initiative inspection hours to do a comprehensive inspection of the AWO process, which is a site—wide process.

The OSTI will assess the engineering and maintenance backlogs during its operational readiness inspection. The OSTI will determine if there are safety significant issues that must be resolved before restart.

3.5 PROCEDURE UPGRADE PROGRAM (C.3.3.e)

The quality and adherence to procedures has been a chronic problem at the Millstone site. The issue was an element in "Improving Station Performance" and was one of the subjects of discussion at the periodic meetings between NU and the NRC. In response to NRC concerns, the licensee developed the Procedure Upgrade Program in the early 1990's to improve station procedures.

The resident inspectors will relate procedural inspection findings back to the procedural upgrade program (PUP), identifying whether the procedures reviewed during the course of an inspection have been upgraded and characterize the quality of the document. This will establish a basis for assessing the effectiveness of the licensee's PUP. The NRC staff will develop an inspection plan for examining selected portions of each unit's individual efforts.

3.6 OVERSIGHT (C.1.4)

The licensee has identified its oversight function as deficient through self—assessments and external and internal audits and as a contributing factor in the licensee's declining performance. The report of Assessment of Past Ineffectiveness of Independent Oversight by the Yankee Atomic Electric Company (YAEC), examined the failure of Quality Assessment Services, the Independent Safety Evaluation Group, and the Nuclear Review Board (NRB) to identify the deficient FSAR control process and the radioactive waste conditions. They found that management did not support these functions adequately.

In addition, the Joint Utilities Management Association (JUMA) issued its report on July 17, 1996. One conclusion was that the quality assurance (QA) program audits, surveillances, and inspections were not effective in the implementation of their

mission and resolution of identified problems. In addition, the JUMA audit found that recommendations for improving QA effectiveness identified in previous QA internal and external assessments have not been addressed.

The NRC assessment of the nuclear oversight function is addressed as part of the RAP's review of the ISP program and through insights gained from the normal inspection program. In addition, the NRC will perform a special inspection of the oversight function using the services of its Human Factors Assessment group. Late in the restart process for each unit, there will be an inspection to evaluate the effectiveness of the oversight groups and management's utilization of the oversight process. There should be positive indications that the oversight function has been made an integral part of the licensee's management team assessment process. The oversight function should result in meaningful findings, have access to line management, and provide assessments of process and program effectiveness through periodic reports. There should be evidence that the reports are forwarded to the responsible manager and that they have dealt with the contents appropriately. Oversight should be adequately staffed with qualified and experienced personnel. The audit and surveillance programs need to be clearly defined, proceduralized, and implemented with established schedules.

3.7 ENFORCEMENT

Outstanding enforcement items will be reviewed by the resident inspectors to determine if any issues require closure before plant restart. The agency is currently accumulating escalated enforcement items concerning the spent fuel pool and design bases issues which may require licensee response before recommending restart of each unit. There are also potential enforcement items that will result from the efforts of the Office of Investigations, the allegation process review group, the Office of the Inspector General, the Special Inspection Team, routine resident and regional inspection efforts, and the 10 CFR 2.026 petition process.

A Pre-decisional Enforcement Conference was held with the licensee on December 5, 1996, to discuss 64 individual apparent violations. The licensee did not contest any of the violations at the conference, and the staff is in the process of finalizing the enforcement package. Once enforcement actions have been taken, the NRC will evaluate the licensee's corrective action to those enforcement actions which are determined to impact restart of each unit.

3.8 EMPLOYEE CONCERNS

The Millstone site has had a chronic problem in dealing effectively with employee concerns. The NRC continues to receive an inordinate quantity of allegations from the staff at the Millstone site. The current series of 10 CFR 50.54(f) letters were initiated due to NRC concerns regarding design basis issues at Millstone, as well as an allegation, and a subsequent Millstone 10 CFR 2.206 petition, dealing with the

Unit 1 spent fuel pool. The NRC has issued two enforcement actions for harassment and intimidation to NU in the past three years and has a current escalated enforcement action pending.

The NRC initiated two task groups to examine the Northeast Utilities handling of employee concerns, and the recent layoffs that affected several previous allegers. The task group examined NU's handling of employee concerns and identified a number of root causes for the licensee's problems in this area. The task group also concluded that past problems and their root causes still remain. Subsequently, the NRC issued an order, dated October 24, 1996, requiring NU to establish a comprehensive program to address employee concerns, and hire an independent party to oversee the implementation of the program. The output from these two task groups and the licensee's response to the order will be reviewed for restart issues.

3.9 SIGNIFICANT ISSUES LIST

The technique to be used for the restart will be to reach agreement with the licensee on its restart issues list, have it impose controls on adding or deferring items from the list, have the resident inspectors review the list to ensure it includes issues of interest to the NRC, and have the residents review the deferred list to ensure appropriate rationales for deferral have been documented (see item B.4.3. of MC 0350). As a result of the 10 CFR 50.54(f) activities, the licensee initially determined that, for all three Millstone units, hundreds of items did not meet criteria for inclusion as a restart item. The resident inspectors, augmented by headquarters staff, are reviewing these lists periodically and confirming that the licensee is performing an adequate assessment of the discrepancies. This process will be used in the restart assessment of each unit. The RAP will determine that licensee's restart issues list includes appropriate restart items from the licensee's programs such as ACR, AR (AITTS), engineering work requests, and commitments.

The enclosed NRC Significant Issues Lists for all Millstone units (Enclosure 1, 2 and 3) contain some of the items that are being used to audit and evaluate licensee programs such as the corrective action process and significant safety/regulatory technical issues.

Restart issues will meet at least one of the following criteria:

1. Resolution of the issue is required to ensure safe operation of the facility to include satisfaction of the technical specifications or licensing basis.
2. Inspection of the issue will provide an insight to an identified programmatic deficiency such as the corrective action system.
3. Inspection of the issue will provide assessment of management effectiveness or personnel performance.

3.10 RESTART INSPECTION

Selected portions of NRC MC—93802, "Operational Safety Team Inspection," will provide the framework for a team inspection of each unit during the restart process. The procedure scope will be modified to address the pertinent issues at Millstone. The inspection will cover self-assessments by the licensee, the licensee's implementation of its startup plan, control room observations during the approach to criticality and power ascension, selected systems readiness inspection and observation of management oversight.

The resident inspectors will provide close monitoring of each unit during mode changes to ensure compliance with each unit's technical specifications and FSAR design bases.

3.11 PLANT PERFORMANCE REVIEW

On March 19, 1997, the Millstone Oversight Team conducted a Plant Performance Review (PPR). The PPR was used to identify the issues that needed to be inspected for the Millstone station. The review identified several issues that warrant NRC inspection before plant restart of the unit. The unit specific issues, as well as station wide issues identified by the PPR, are contained in the SIL for each unit as inspection items.

3.12 LICENSING ISSUES

Each Millstone unit plans to submit or has submitted licensing issues (amendments, unresolved safety questions, relief requests, etc.) which will impact the restart process. The SPO Licensing Branch will disposition each applicable issue prior to restart. The status of NRR actions concerning each issue is documented in Enclosure (5) of this plan.

Enclosures:

- (1) Significant Items List - Millstone Unit 1
- (2) Significant Items List - Millstone Unit 2
- (3) Significant Items List - Millstone Unit 3
- (4) MC-0350 - Restart Approval Checklist - All Millstone Units
- (5) Licensing Issues Required for Restart

ENCLOSURE 1

MILLSTONE RESTART ASSESSMENT PLAN

Millstone Unit 1 Significant Items List

| | REFERENCE | MILLSTONE UNIT 1 INSPECTION ITEM | RESP | STATUS |
|----|--|---|--------------------|--------|
| 1 | ACR 01148 | Determine FSAR status before restart | SPO (L) | |
| 2 | ACR 01535 | While de-watering spent resin, the waste temperature in the liner raised from 90 to 310°F | DRS | |
| 3 | ORDER Hannon Report ACR M1-96-0921 EA 96-59 MC 0350 C.1.4.e, C.5.d, C.2.2.b | Review expectations and standards for employee concerns •Senior management has created difficult working environment | SPO (L) | |
| 4 | MC 0350 C.5.e | Review enforcement and unresolved items for restart issues | SPO (I) | |
| 5 | MC 0350 C.5.f | Review allegations for restart issues | SPO (I) SPO (L) | |
| 6 | | Review all operability determinations and by-pass jumpers before restart | SPO (I) | |
| 7 | LER 96-22 JRI 92-30-2 | Fatigue cycle open items | DRS | |
| 8 | | New fuel security (IP 81064) | DRS | |
| 9 | | Review licensee event reports for restart issues | SPO (I) | |
| 10 | ACR 05373 M1-97-0358 | Material, equipment and parts list (MEPL) program evaluation | SPO (L) | |
| 11 | ACR 96-1068 | RPS System •Scram solenoid pilot valve replacement | SPO (I) | |
| 12 | LER 96-48 GL 96-01 ACR M1-97-045 | Overlap testing of RPS/ESF | DRS | |

| | REFERENCE | MILLSTONE UNIT 1 INSPECTION ITEM | RESP | STATUS |
|----|--|--|---------|--------|
| 13 | TI 2515/109 URI94-005-02 URI94-005-04 URI95-001-01 URI96-005-05 LER96-52 ACR 03689 M1-97-0397, 0384 | Motor operated valve program GL89-10 closure | DRS | |
| 14 | ACR M1-96-0992 LER 96-18 VIO95-007-02 LER 96-42 | Surveillances Program Review | SPO (I) | |
| 15 | ACR 10790 (U-3) | Control and use of vendor information | DRS | |
| 16 | ACR M1-96-0915 M1-97-0240, 0241 EEI 96-003-01 LER 97-001 MC 0350 C.2.2.c | Radwaste recovery/configuration. ●Insufficient management support for maintenance of radwaste ●RW effluent isolation valve QA classification | DRS | |
| 17 | EEI 96-09-05 IR 96-04 URI95-81-01 ACR M1-96- 0922 ACR 7007 ACR 13318 M1-96-0823, M1-96-1035, M1-97-0342, 0343 MC 0350 C.1.1, C.1.3, C.1.4.d, C.2.1.h, C.3.1.d | Corrective Actions ●Review licensee corrective action programs for effectiveness to include ACR's. ●Corrective actions have been ineffective in resolving problems | SPO (I) | |
| 18 | | Review 0737 action items for completion and adequacy | SPO (I) | |
| 19 | | Review engineering backlogs for restart issues | SPO (I) | |

| | REFERENCE | MILLSTONE UNIT 1 INSPECTION ITEM | RESP | STATUS |
|----|--|--|-----------------------|--------|
| 20 | ORDER MC 0350 C.5.d | Phase II of the ICAVP | SPO (L) | |
| 21 | ACR 03117 VI095-31-03/ EA95-177-01 ACR M1-97- 0323, 0417 | <ul style="list-style-type: none"> • Single failure can disable both trains of emergency power source-LNP lockout relay • Review LNP integrated procedure and results • LNP post testing does not meet RG 1.41 Requirements | DRS | |
| 22 | ACR 04167 URI94-014-01 URI96-004-07 ACR M1-96- 0622, 1120 | SRV's <ul style="list-style-type: none"> • setpoint drift resolution • accelerated testing • electric lift modification adequacy • electric lift setpoints not fully evaluated | DRS | |
| 23 | ACR 6264 ACR 05239 ACR M1-96- 0928 ACR M1- 96-0936 ACR M1- 96-0345 IFI/VIO 94-201-03 EEI96-04-03 ACR M1-96- 1009 MC 0350 C.2.1.g.f C.3.2.f C.5.d | Configuration Management <ul style="list-style-type: none"> • Review 50.54 issues for restart issues • Unit 1 design deficiencies and issues trends • Review open DBDP items for startup issues • Review station blackout self-assessment items for startup issues • Significant differences between design bases and as-built • Field changes to plant modifications not reviewed for cause | SPO (I)/SPO (O) | |
| 24 | ACR 03428, M1-96-0280, M1-96-0728, M1-96-0913, M1-97-0221 | Review FME <ul style="list-style-type: none"> • FME deficiencies trend for SFP and RX cavity • Debris identified in spent fuel pool • Adverse trend identified in Unit 1 FME program • Fuel Pool foreign material and storage controls • LP-24D stuck open due to foreign material | SPO (I) | |
| 25 | ACR 07478, 05482 LER 95-24 | Inadequate design modifications <ul style="list-style-type: none"> • installed wrong material (pressure rating) for LLRT connections | DRS | |

| | REFERENCE | MILLSTONE UNIT 1 INSPECTION ITEM | RESP | STATUS |
|----|--|--|-------------|--------|
| 26 | ACR 03822 | Current CWDs do not show modifications to equipment | SPO (I) | |
| 27 | ACR 06483 LER96-31 LER96-17 URI96-004-06 | Fuse control program inadequate | DRS | |
| 28 | ACR 12663 | LOCA analysis does not account for instrument uncertainty during surveillance testing | DRS | |
| 29 | PPR E.1 MC 0350 C.3.3.d | Operator acceptance of degraded conditions, lack of ownership, O.D.'s accept degraded conditions, temporary mods, etc. | SPO (I) | |
| 30 | ACR M1-96-0343 ACR M1-96-0923 PPR E.2 EEI96-08-01 ACR M1-96-1057 MC 0350 C.2.1 | Work Control Process Review <ul style="list-style-type: none"> • Audit the AWO process • Significant long standing work management weaknesses • Failure to completely implement and document recommendations of AWO task force report of 1/1995 • Troubleshooting | SPO (I) | |
| 31 | PPR E.2 VIO96-001-02 VIO94-031-01 MC 0350 C.4.h | Post maintenance testing/maintenance F/U inspection | SPO (I)/DRS | |
| 32 | URI 96-005-04 | Rework | SPO (I) | |
| 33 | ACR 07454 LER 96-40 LER 96-49 LER 96-51 IFI96-005-06 ACRM1-96-0843 EEI96-08-03 URI96-08-04 URI96-08-05 ACR M1-96-0696, M1-97-0345, 0412 | Seismic Issues <ul style="list-style-type: none"> • Seismic review seismic modifications (FWCI, A-46, 79-02/79-14, NUSOER) • Seismic II/I • Verify resolution of A-46 outliers • CRD operability • SEP Topic III-6 Close out | DRS | |

| | REFERENCE | MILLSTONE UNIT 1 INSPECTION ITEM | RESP | STATUS |
|----|--|--|---------|--------|
| 34 | IR 95-82 IFI96-004-02 LER 96-013 ACR's M1-96-646 M1-97-0040 0016,0053, 0057,0058, 0082,0035, M1-97-0355, 0356, 0456, 0392 | Spent Fuel Pool <ul style="list-style-type: none"> •SFP Cleanup •Review resolution of Spent Fuel Pool issues •Assess and disposition numerous open items in IR95-82 •Unanalyzed condition due to indeterminate boraflex degradation •Load drop analysis (Fuel) | DRS | |
| 35 | | Review Reg Guide 1.97 modifications | DRS | |
| 36 | ACR M1-96-0106 | NRC Information Notices IENS have incomplete or inaccurate responses | SPO (I) | |
| 37 | ACR M1-96-0247 UR96-006-02 | Control rod blades in spent fuel pool lifted inadvertently with tri-nuc filter | SPO (I) | |
| 38 | ACR M1-96-0545 LER 96-27 EEI96-04-05 | Ineffective program to monitor and control fasteners | DRS | |
| 39 | ACR M1-96-0564 | Adverse trend identified in the control of contracted services | DRS | |
| 40 | ACR M1-96-0614 | M&TE program is ineffective | SPO (I) | |
| 41 | ACR M1-96-0716 M1-97-0188 | Process for controlling distribution and use of documents (procedures) is ineffective | SPO (I) | |
| 42 | ACR M1-96-0810 | Potential deviation from tech specs when changes made to Unit 1 organizational structure | SPO (I) | |
| 43 | ACR M1-96-0848 M1-97-0071 IFI95-036-01 NU letter B16195, 2/10/97 MC 0350 C.3.1.m C.2.2.g C.2.2.h | Multiple weaknesses identified during recent E-plan <ul style="list-style-type: none"> •E-Plan key position staffing •Performance of dose assessments | DRS | |

| | REFERENCE | MILLSTONE UNIT 1 INSPECTION ITEM | RESP | STATUS |
|----|--|---|-------------|--------|
| 44 | ACR M1-96-0876 | Potential weaknesses in EEQ program | DRS | |
| 45 | ACR M1-96-0638 | Components in control rod drive system (suction filters and associated piping, valves and fittings) may not meet the original design requirements | DRS | |
| 46 | ACR M1-96-0924 | Insufficient personnel for key leadership programs | SPO (I) | |
| 47 | ACR M1-96-0925 MC 0350 C.4.I | PM tasks on plant equipment not performed | SPO (I) | |
| 48 | ACR M1-96-0926 MC 0350 C.2.1.a | Management direction insufficient for system engineering | DRS | |
| 49 | ACR M1-06-0927 MC 0350 C.2.1 | System and design engineering work management weaknesses | SPO (OS) | |
| 50 | ACR M1-96-0929 MC 0350 C.3.1.e | Training for engineering personnel not effectively implemented | SPO | |
| 51 | ACR M1-96-0933 | Improvements needed in TLD process and program | DRS | |
| 52 | ACR M1-96-0934 ACR M1-96-0936 IFI96-004-16 | Chemistry Issues <ul style="list-style-type: none"> • Adverse chemistry conditions increase potential for corrosion • Weaknesses in chemistry monitoring, trending and evaluation | DRS | |
| 53 | URI 96-12-01 ACR M1-96-0909, M1-96-0910 MC 0350 C.3.1.k C.3.3.e C.3.3.f C.2.2.d C.2.1.b | Procedure adequacy/quality of V&V process & implementation <ul style="list-style-type: none"> • Operating procedure deficiencies hinder operators • Deviation from operations procedures during simulator transients • Verify off-normal and general operating procedures revisions/adequacy • EOP's | SPO (I) | |
| 54 | ACR M1-96-0911 | Component and system degradation during plant shutdown | SPO (I) | |

| | REFERENCE | MILLSTONE UNIT 1 INSPECTION ITEM | RESP | STATUS |
|----|---|---|-----------------|--------|
| 55 | ACR M1-96-0912 | Degraded instrument air system quality | SPO (I) | |
| 56 | VIO95-007-04 ACR M1-96-0155 LER 96-46 M1-97-0367 M1-97-0349 | Appendix J resolution <ul style="list-style-type: none"> •Inadequate testing •Implementation of Appendix J modifications •Verify the basis for not Appendix "J" testing the ECCS suction valves •Adequacy of the basis for the shutdown cooling system classification as a closed loop system | DRS | |
| 57 | LER 96-026 LER 96-012 LER 95-024 M1-96-1104 | LLRT Program Review <ul style="list-style-type: none"> •Feedwater system configuration not allow complete drain, accept LLRT •Containment isolation check valve fails inform LLRT •Historical LLRT results/repeat failures of MSIVs, MSIV drains, FWIVs | DRS | |
| 58 | | •Review ILRT (required due to the replacement of inboard containment isolation valves LP-14A & LP-14B) | DRS | |
| 59 | ACR M1-96-0995, 97-0177 DEV94-023-05 VIO95-31-04- 177-02 VIO95-44- 02/EA95 LER96-11 EEI96-08-02 LER 96-62 | SBGT issues resolution <ul style="list-style-type: none"> •Implementation of a low flow isolation modification •Resolution of all outstanding issues that could affect operability (ACR 03735, 08248, 03403, 03402) •Technical Specification restriction to prevent the use of both standby gas trains when venting the drywell •Use of a dedicated operator while venting the drywell via SGTS •Draw down time criteria/testing during a LNP | DRS | |
| 60 | URI95-31-01 | Verify resolution of ATWS issues,lack of LCO and turning off the ATWS system to perform battery voltage adjustments | SPO (I) | |
| 61 | LER 95-58 | Verify resolution of IPEEE walkdown issues <ul style="list-style-type: none"> •Determine the need for the licensee to complete the IPEEE | DRS/S PO (L) | |

| | REFERENCE | MILLSTONE UNIT 1 INSPECTION ITEM | RESP | STATUS |
|----|------------------------------|---|---------|--------|
| 62 | ACR M1-97-0219 M1-97-0330 | Verify implementation of setpoint changes identified by the setpoint verification program ●Incorrect RPS setpoints ●Yarways - 7" Error Low Low Water Level Calculation | DRS | |
| 63 | | Verify HELB program completion | DRS | |
| 64 | | Verify drywell temperature profile, PDCR completion and closeout necessary to update the plant design basis | DRS | |
| 65 | URI93-24-04 IFI96-001-03 | Fire Protection/Appendix R Program Review ●Review fire detection and suppression system code compliance issues resolution ●Appendix R equipment, test, maintenance program, and surveillance program | DRS | |
| 66 | | Review commitment modification program for startup issues | SPO (I) | |
| 67 | ACR M1-96-0938 | Core reload ●Error in LOCA model input data for GE11 fuel ●SIL 581 ●The LOCA results are expected to reduce the operating margin for MAPLHGR below the normal value (10%) ●3D monicore heat balance error correction ●Review reload 15/core design for cycle 16 including the PDCR, safety evaluation and reload report. | DRS | |
| 68 | | Core spray suction valves receives a seal-in accident signal and can not be shut for leak isolation during an accident | SPO (I) | |
| 69 | | SD valves (1, 2A, 2B) may not close under HELB conditions if open with greater than 300 degrees Rx water temperature | SPO (I) | |
| 70 | | Review relief valve reliability ACR trend | DRS | |
| 71 | | Modifications installed prior to NRC approval and sometimes before the TSAR submitted. (shutdown cooling, SRVs) | SPO (L) | |

| | REFERENCE | MILLSTONE UNIT 1 INSPECTION ITEM | RESP | STATUS |
|----|---|--|-----------------|--------|
| 72 | ACR 8254 | Isolation condenser thermal shock operability/service life issue | DRS | |
| 73 | | Leaker fuel bundle root cause | SPO (I) | |
| 74 | | CRD scram solenoid pilot valve elastomer degradation | SPO (I) | |
| 75 | EEI 96-09-08 EEI 96-04-04 ACR M1-96-0981 ACR 02372 ACR M1-96-1058 | Service water inspection (GL89-13) ●Arcor issue resolution ●SW and ESW system operability | DRS | |
| 76 | M1-97-0331 ACR 8250 URI91-14-02 LER 96-25 PIR95-048 ACR M1-96-08 9 M1-97-0144 LER 96-30 | Electrical separation ●Rx high level trip powered from the same source ●Cable Separation in Switchgear | DRS/S PO (L) | |
| 77 | ACR M1-96-0845 LER 96-57 | Seismic concern with 4KV breaker racked out | SPO (I) | |
| 78 | ACR 07454 LER 96-14 EEI 96-09-06 LER 95-29 LER 96-35 URI96-005-03 URI96-005-02 | IGSCC Program weaknesses | DRS | |
| 79 | ACR 7304 ACR 7402 LER 95-31 Numerous LERs | Review failure to meet technical specifications root cause and corrective actions | SPO (I) | |
| 80 | ACR M1-96-1011 | Review TRM for technical specification interpretations ●Method to track conditional LCO's | SPO (I) | |
| 81 | URI90-001-02 | Seismic qualification of FWCI valve air supply | SPO (I) | |
| 82 | URI90-001-03 | FWCI test results | SPO (I) | |
| 83 | URI 91-081-04 | Availability of short circuit/voltage drop calcs | DRS | |

| | REFERENCE | MILLSTONE UNIT 1 INSPECTION ITEM | RESP | STATUS |
|----|---|--|-----------------------|--------|
| 84 | VIO 95-007-01 LER 96-003 | Control room habitability •Use of SCBAs | SPO (I)/SPO (L) | |
| 85 | URI95-028-02 | Refueling evolutions contrary to design basis | SPO (I) | |
| 86 | VIO95-031-02 | Cross connecting 480V safety related buses | SPO (I) | |
| 87 | URI 96-006-01 LER 96-041 LER 96-043 | Drywell fire/Technical Specifications violation | SPO (I) | |
| 88 | LER 96-008 | Nonconservative ATWS low low water level setpoint | SPO (I) | |
| 89 | LER 96-015 | Recirc pump flow mismatch surv not perf in accordance with TS | SPO (I) | |
| 90 | LER 96-024 | Temporary Modification to the scram air header pressure switch instrument not removed | SPO (I) | |
| 91 | LER 96-032 | Unqualified components in drywell preclude long term operability | SPO (I) | |
| 92 | LER 96-036 | Potential to bypass turbine stop valve when required to be operable | SPO (I) | |
| 93 | LER 96-037 | Automatic depressurization system may not be single failure proof | SPO (I) | |
| 94 | LER 96-029 LER 96-039 ACR M1-97- 0276, 0400 | IST/ISI Program Review | DRS | |
| 95 | LER 96-045 | LPCI sys inop due to stuck open injection check valve | SPO (I) | |
| 96 | LER 96-061 LER 96-050 LER 97-04 ACR M1-96- 0941 ACR M1-96- 0550 | LOCA concurrent with LNP loss DC power prevents closure of LPCI torus cooling valve •RWCU Valves | SPO (I) | |
| 97 | URI95-81-01 EEI96-006-04 ACR M1-96- 0454 | NCR Program Ineffective | SPO (I) | |

| | REFERENCE | MILLSTONE UNIT 1 INSPECTION ITEM | RESP | STATUS |
|-----|---|--|---------|--------|
| 98 | IR 96-12 URI 96-05-01 ACR M1-96-1024,1025 M1-97-0117,0148, 0168,0223, 0259, 0398, 0437 MC 0350 C.3.1.e C.3.3.c | Licensed Operator Training Program •LOIT/LOUT program requirement discrepancies | DRS | |
| 99 | EEI96-01-01 LER 96-10 | Inoperable Gas Turbine Fuel Pump | SPO (I) | |
| 100 | IFI96-08-21 MC 0350 C.4.f | Material Condition Program | SPO (I) | |
| 101 | LER 96-53 LER 96-54 LER 96-65 LER 97-05 ACR M1-96-1042,1060, 1059,M1-97-0242, 0424 | Radiation Effluents Monitoring Program Review | DRS | |
| 102 | ACR M1-97-0424 EEI 96-09-07 LER 96-55 LER 96-56 LER 96-60 | EDG Air Start System Review | SPO (I) | |
| 103 | ACR M1-97-0292, 0207, 0026, ACR M1-96-1097 | Use of "Non-Q" parts in "Q" applications | SPO (I) | |
| 104 | ACR M1-97-0260 | GT Air Start System Review | SPO (I) | |
| 105 | ACR M1-97-0277 | Single failure vulnerability of FWCI/APR historical failure to meet ECCS acceptance criteria | SPO (I) | |
| 106 | ACR M1-97-0200 | Containment isolation valves exceed allowable stroke time | SPO (I) | |
| 107 | | Review deferred restart items list | SPO (I) | |

| | REFERENCE | MILLSTONE UNIT 1 INSPECTION ITEM | RESP | STATUS |
|-----|---|------------------------------------|------|--------|
| 108 | MC 350 C.3.1.1 EEI 96- 05-15 EEI 97- 01-XX VIO 96-09-20 | Security Issues Corrective Actions | DRS | |

ENCLOSURE 2

MILLSTONE RESTART ASSESSMENT PLAN

Millstone Unit 2 Significant Items List

The following is a list of the Millstone issues that, as a minimum, require an NRC inspection and evaluation prior to restart.

| | REFERENCE | MILLSTONE UNIT 2 INSPECTION ITEM | RESP | STATUS |
|---|--|--|------------------|--------|
| 1 | MC 0350 SECTION C.1.3, C.2.1, C.2.2.a,d,e, C.3.1,a,b,c,d | MANAGEMENT OVERSIGHT AND EFFECTIVENESS; LICENSEE STAFF SAFETY CULTURE | SPO(II) | |
| 2 | MC 0350 SECTION C.1.1, C.1.3, C.1.4.g, C.3.2, C.4.f; CONFIRMATORY ORDER DATED 08/14/96 | 10 CFR 50.54(f) | SPO(O) | |
| 3 | MC 0350 SECTION C.1.1 AND C.1.3; C.2.2.d; UNIT 1 ACR 7007; UNIT 2 ACR 8761 | DESIGN CONTROL PROCESS CHANGES TO ADDRESS UNIT 1 ACR 7007 NUMEROUS EXAMPLES OF DRAWINGS NOT REFLECTING ACTUAL PLANT CONFIGURATION | SPO(O) | |
| 4 | MC 0350 ITEM C.1.4.e, C.2.2.b,e; CONFIRMATORY ORDER DATED OCTOBER 24, 1996 | EMPLOYEE CONCERNS PROGRAM | SPO(L) | |
| 5 | MC 0350 SECTION C.1.1, C.1.3, C.1.4.d-l, C.2.1, C.2.2.c,e, C.3.1.d,m; C.4.f; IR 96-04 & 08 EEI 336/96-201-30 | CORRECTIVE ACTION PROGRAM TIMELINESS AND EFFECTIVENESS; SELF-ASSESSMENT PROGRAM IMPLEMENTATION AND EFFECTIVENESS; COMMITMENT TRACKING | SPO(II) | |
| 6 | MC 0350 ITEMS C.2.2.d, C.4.e,f,h,i,j | WORK PLANNING AND CONTROL: PLANT MAINTENANCE PROGRAM EFFECTIVENESS; SIGNIFICANT HARDWARE ISSUES RESOLVED; MAINTENANCE BACKLOG MANAGED AND IMPACT ON OPERATION ASSESSED; SURVEILLANCE TESTING; PLANT HOUSEKEEPING | DRS (OL) | |
| 7 | MC 0350 ITEMS C.1.3.f, C.2.1.e, C.3.2.e, C.4.f,i; | BYPASS JUMPERS, OPERATOR WORK-AROUNDS & CONTROL BOARD DEFICIENCIES | SPO(II), OSTI | |

| | REFERENCE | MILLSTONE UNIT 2 INSPECTION ITEM | RESP | STATUS |
|----|--|---|---------------------------|--------|
| 8 | MC 0350 ITEMS C.2.1.b, C.2.2.d, C.3.1.k, C.3.3.e,f; URI 336/96-01-04; IFI 336/95-201-03; URI 336/96-06-08 | <p>PROCEDURE QUALITY AND ADHERENCE</p> <p>SURVEILLANCE QUALITY - <u>NUMEROUS</u> EXAMPLES OF INADEQUATE PROCEDURES REFLECTED IN LERs AND NRC INSPECTION REPORTS</p> <p>ESTABLISHMENT OF ALL PROCEDURES REQUIRED BY TECHNICAL SPECIFICATION 6.8.1</p> <p>REVIEW OPERATING PROCEDURES TO PRECLUDE WATER HAMMER EVENTS</p> | SPO(O) SPO(II) OSTI | |
| 9 | MC 0350 ITEMS C.1.4.g, C.2.2.g, C.3.3.e,f; EEI 336/96-08-13, EEI 336/96-06-05, EEI 336/96-08-06; LER 336/97-02, ACR 11104, | <p>OPERATING PROCEDURES CONSISTENT WITH FSAR DESCRIPTION OF SYSTEM OPERATION</p> <p>ADEQUACY OF PROCEDURE CHANGE PROCESS TO ENSURE OPERATION IN ACCORDANCE WITH LICENSE</p> | SPO(O) | |
| 10 | MC 0350 ITEMS C.2.1.g, C.3.3.e,f; IR 336/95-21 | <p>PROGRESS OF EMERGENCY OPERATING PROCEDURE UPGRADES;</p> <p>ACCEPTABILITY OF DEFERRING ABNORMAL OPERATING PROCEDURE UPGRADES</p> | DRS (OL) | |
| 11 | MC 0350 ITEMS C.1.4.a,b,c, C.2.1.c | QUALITY ASSURANCE AND OVERSIGHT | SPO(II) NRR | |
| 12 | MC 0350 SECTION C.1.1 C.1.3, C.1.4.e, C.2.1.f-g, C.4.f,i | LICENSEE RESTART PUNCH LIST - REVIEW OF ITEMS DEFERRED UNTIL AFTER RESTART | SPO(II) | |
| 13 | MC 0350 ITEMS C.3.1.g,h,i,j,l, C.3.3.a,b,d,g | LICENSED OPERATOR STAFFING; CONTROL ROOM FORMALITY; ATTENTIVENESS TO DUTY; ATTENTION TO DETAIL; OFF-HOUR PLANT STAFFING; OVERTIME USAGE; AWARENESS TO PLANT SECURITY; AWARENESS OF EQUIPMENT STATUS; LOG KEEPING PRACTICES; | SPO(II) OSTI | |
| 14 | MC 0350 ITEMS C.3.1.e, C.3.3.c; CONFIRMATORY ACTION LETTER DATED MARCH 7, 1997 | <p>INACCURATE LICENSE APPLICATION FORMS SUBMITTED TO THE NRC FOR 12 OPERATOR LICENSES;</p> <p>ADEQUACY OF LICENSED OPERATOR TRAINING PROGRAM;</p> | DRS (OL) | |

| | REFERENCE | MILLSTONE UNIT 2 INSPECTION ITEM | RESP | STATUS |
|----|---|--|---|--------|
| 15 | MC 0350 ITEMS C.4.a,b,c,d,e,g | AUGMENTED INSPECTION COVERAGE DURING RESTART INSPECTION: OPERABILITY OF TECHNICAL SPECIFICATION SYSTEMS; OPERABILITY OF SECONDARY AND SUPPORT SYSTEMS; SYSTEM LINEUPS; RESULTS OF PRE-STARTUP TESTING; POWER ASCENSION TESTING | SPO(II) OSTI | NOTE 1 |
| 16 | MC 0350 ITEMS C.2.2.g-h, C.3.1.m, C.3.2.h; NU LETTER (B16195) DATED FEBRUARY 10, 1997 | EFFECTIVENESS OF EMERGENCY RESPONSE ORGANIZATION; COORDINATION WITH OFFSITE EMERGENCY PLANNING OFFICIALS; ON-SHIFT DOSE ASSESSMENT CAPABILITY | DRS(EP) | |
| 17 | MC 0350 SECTION C.5 AND C.6 | DISPOSITION OF REGULATORY ISSUES: LICENSE AMENDMENTS; EXEMPTIONS; RELIEFS; ORDERS; SIGNIFICANT ENFORCEMENT ISSUES; ALLEGATIONS; AND 10 CFR 2.206 PETITIONS. COORDINATION WITH INTERESTED AGENCIES AND PARTIES. | NRR, SPO(L), OE, OI, DRS, OPA | |
| 18 | ACRs 02621, M2-96-0239 EEI 336/96-201-42 & 43 | MATERIAL, EQUIP. AND PARTS LIST (MEPL) PROGRAM | NRR, DRS (SEB) | |
| 19 | ACRs M2-96-0515 & 07958 EEI 336/96-201-20; URI 336/93- 19-02 | ELECTRICAL EQUIPMENT QUALIFICATION PROGRAM HIGH ENERGY LINE BREAK PROGRAM | DRS (EEB) | |
| 20 | IFI 336/95-01-01 EEI 336/96-05-09 EEI 336/95-08-01, 02, 03 & 04 | GENERIC LETTER 89-10 MOTOR OPERATED VALVE PROGRAM; DYNAMIC TESTING OF AFW TERRY TURBINE STEAM ADMISSION MOV; PRESSURE LOCKING OF CONTAINMENT SUMP RECIRCULATION VALVES | DRS (SEB) | |
| 21 | MC 0350 ITEM C.3.3.e; IR 336/96-08; LICENSEE SELF-ASSESSMENTS AND QA AUDITS; ACR M2-96-0460 | FIRE PROTECTION PROGRAM; APPENDIX R RELATED ABNORMAL OPERATING PROCEDURES; APPENDIX R COMPLIANCE ASSOCIATED WITH THERMO-LAG | DRS (EEB) | |

| | REFERENCE | MILLSTONE UNIT 2 INSPECTION ITEM | RESP | STATUS |
|----|--|---|------------------|--------|
| 22 | ACRs M2-96-0513; EEI 336/96-06-11 | CONTAINMENT SUMP SCREEN MESH SIZE & ECCS PUMP THROTTLE VALVE CLOGGING | DRS (SEB) | |
| 23 | ACRs 01991, M2-96-0449, 0467, 0654, 0655, & 0656 EEI 336/96-08-13, 14 & 15; EEI 336/96-201-03 & 41; URI 336/96-01-05 | HYDROGEN MONITORS AND POST-ACCIDENT SAMPLING SYSTEM INOPERABLE AND FAILURE TO MEET DESIGN BASIS AND LICENSING BASIS | SPO(I) | |
| 24 | ACRs 08174, 04047, 06372 & 09739 URI 336/95-42-03 | EXCESSIVE REACTOR COOLANT SYSTEM HEATUP AND COOLDOWN RATES; EVALUATION OF SIMULTANEOUS REACTOR COOLANT PUMP AND SHUTDOWN COOLING SYSTEM OPERATION | SPO(I) | |
| 25 | NUMEROUS ACRs; URI 336/96-06-08 | ECCS PUMPS SUCTION LINE FROM RWST HAS NUMEROUS DEGRADED OR INOPERABLE PIPE SUPPORTS, MANY CAUSED BY WATER HAMMER | DRS (CMME) | |
| 26 | ACR 11252 EEI 336/96-09-10 | "B" EMERGENCY DIESEL GENERATOR FAILURE - INADEQUATE CORRECTIVE ACTIONS | SPO(I) | |
| 27 | EEI 336/96-201-09 | INADEQUATE DESIGN CONTROL MEASURES FOR VERIFYING ACCURACY OF INFORMATION CONTAINED IN DESIGN BASIS DOCUMENT PACKAGES | SPO(O) | |
| 28 | EEI 336/96-201-11, EEI 336/96-201-31 | FAILURE TO ADEQUATELY CONTROL INSTALLATION OF TEMPORARY MODIFICATION TO THE RBCCW SURGE TANK | SPO(I) SPO(O) | |
| 29 | EEI 336/96-201-12 | SEPARATION AND SINGLE FAILURE CONCERNS FOR WIDE RANGE NUCLEAR INSTRUMENTS | SPO(I) SPO(O) | |
| 30 | EEI 336/96-201-25 | FAILURE TO IMPLEMENT CORRECTIVE ACTIONS CONCERNING "DUAL-FUNCTION" ISOLATION VALVES | SPO(I) SPO(O) | |
| 31 | EEI 336/96-201-28 | FAILURE TO ADDRESS STATION BLACKOUT DIESEL ISSUES IDENTIFIED IN THE VECTRA ASSESSMENT | SPO(I) SPO(O) | |
| 32 | EEI 336/96-201-29 | FAILURE TO IMPLEMENT CORRECTIVE ACTIONS FOR AUDIT ISSUES INVOLVING TRENDING AND PRIORITIZATION OF NON-CONFORMANCE REPORTS | SPO(I) SPO(O) | |

| | REFERENCE | MILLSTONE UNIT 2 INSPECTION ITEM | RESP | STATUS |
|----|--|---|------------|--------|
| 33 | EEI 336/96-201-36 | INADEQUATE CORRECTIVE ACTION CONCERNING A SEISMIC DESIGN DEFICIENCY OF A VITAL SWITCHGEAR ROOM COOLER | DRS (CMME) | |
| 34 | EEI 336/96-08-06 | IMPLEMENTATION OF CORRECTIVE ACTION OF CHANGING OPERATING PROCEDURE TO LOCK OPEN REFUELING POOL DRAIN VALVES, AS SPECIFIED IN THE FSAR, WAS INADEQUATE | SPO(I) | |
| 35 | EEI 336/96-08-08 | INADEQUATE CORRECTIVE ACTION IN LER 336/96-24 | SPO(I) | |
| 36 | EEI 336/96-08-10 | INADEQUATE CORRECTIVE ACTIONS TO ADDRESS UNIT 1 HEAVY LOADS LIFTED OVER THE UNIT 2 VITAL SWITCHGEAR ROOM | SPO(I) | |
| 37 | EEI 336/95-44-05 | ICE BLOCKAGE OF SERVICE WATER STRAINER BACKWASH LINE | SPO(I) | |
| 38 | EEI 336/96-05-11; ENFORCEMENT LETTER DATED 11/13/96 | SPENT FUEL POOL FSAR UPDATES | SPO(O) | |
| 39 | EEI 336/96-04-10 URI 336/96-201-38 | ERRONEOUS RBCCW FLOW VALUES IN CONTAINMENT TEMPERATURE PROFILE ANALYSIS AND FAILURE TO CONSIDER POST-ACCIDENT FLUID TEMPERATURE IN HPSI FLOW EVALUATION | DRS (SEB) | |
| 40 | LER 336/96-31 | POTENTIAL STEAM GENERATOR OVERPRESSURE DUE TO RESTRICTIVE MAIN STEAM SAFETY PIPING | DRS (SEB) | |
| 41 | ACR M2-97-0023 | SEIMANS COMPUTER MODEL OF REACTOR CORE LARGE AND SMALL BREAK LOSS OF COOLANT ACCIDENTS | NRR | |
| 42 | IR 336/94-201 | EMERGENCY DIESEL GENERATOR FUEL DAY TANK DOES NOT SATISFY 7-DAY DESIGN BASIS CAPACITY | SPO(L) | |
| 43 | IR 336/96-08; LER 336/96-24 | INAPPROPRIATE REMOVAL OF STARTUP RATE TRIP | SPO(I) | |

| | REFERENCE | MILLSTONE UNIT 2 INSPECTION ITEM | RESP | STATUS |
|----|--|--|------------------|--------|
| 44 | ACR 02797, ACR 09563, ACR M2-96-0153 | AFW REGULATING VALVE LEAKAGE FOLLOWING A MAIN STEAM LINE BREAK COULD RESULT IN EXCEEDING CONTAINMENT DESIGN PRESSURE AFW REGULATING VALVES FAILING OPEN FOLLOWING SINGLE FAILURE IN CONTROL CIRCUIT COULD PREVENT ISOLATING A RUPTURED STEAM GENERATOR AFFECTING CONTAINMENT PEAK PRESSURE | SPO(I) | |
| 45 | ACR M2-96-0296 | FAILURE OF MAIN STEAM CHECK VALVE FOLLOWING A MAIN STEAM LINE BREAK (MSLB) COULD CAUSE BOTH STEAM GENERATORS TO BLOW DOWN RESULTING IN EXCEEDING CONTAINMENT DESIGN PRESSURE. THE CONTAINMENT HAS LESS THAN ONE PSI DESIGN MARGIN FOR MSLB. THE LICENSEE'S MEPL PROGRAM DESIGNATES THE MS CHECK VALVES AS NON-QA WHICH THE LICENSEE HAS EVALUATED AS ACCEPTABLE. FSAR DESCRIBES THAT THE IMPACT DURING CHECK VALVE CLOSURE WOULD CAUSE PORTIONS OF THE DISK AND BODY CASTING TO "GO PLASTIC." | SPO(I) SPO(O) | |
| 46 | LER 336/97-02 | CONTROL ROOM AIR CONDITIONING COMMON INLET DAMPER COULD BECOME STUCK CLOSED, DISABLING BOTH FACILITIES. DAMPER HAS NO MANUAL OPERATOR AS STATED IN FSAR. | SPO(I) | |
| 47 | URI 336/96-08-09 | REACTOR PROTECTION SYSTEM AND ENGINEERED SAFETY FEATURE RESPONSE TIME TESTING | SPO(I) | |
| 48 | ACRs M2-96-0252 & 0542 URI 336/96-08-16 | TECHNICAL SPECIFICATION LIMITS FOR INOPERABLE MAIN STEAM ISOLATION VALVES NON-CONSERVATIVE | SPO(I) | |

Note 1: Since this inspection will occur following restart approval, the closure of this item will not be reflected on this list.

ENCLOSURE 3

MILLSTONE RESTART ASSESSMENT PLAN

Millstone Unit 3 Significant Items List

| | REFERENCE | MILLSTONE UNIT 3 INSPECTION ITEM | RESP | STATUS |
|----|--|--|------------|-------------------|
| 1 | ACR 10773 EEI 96-06-13 LER 96-007-01 & 02 | RSS AND QSS PIPING TEMPERATURE MAYBE HIGHER THAN ANALYZED (NRR REVIEW ENG. ANALYSIS, DRS INSPECT INSTALLATION) | NRR DRS | Update IR96-06 |
| 2 | EEI 96-201-01 | DETERMINE FSAR STATUS BEFORE RESTART | SPO(L) | |
| 3 | ACR 05715 | REACTOR POWER INCREASE WHEN UNBORATED CATION DEMIN PLACED INTO SERVICE 3CHS-DEMIN2 | DRP | CLOSED IR96-08 |
| 4 | ACR 01895 | EDG SEQUENCER CDA SIGNAL OUTPUT "A" TRAIN COMPONENTS STARTED | DRS | CLOSED IR96-09 |
| 5 | ACR 01844 VIO 94-24-01 | FAILURE TO ENTER AN ACTION STATEMENT WHEN MSIVS WERE CLOSED | SPO(I) | |
| 6 | ACR 04199 | RCP SEAL INJECTION FILTER "B" GASKET FAILED RESULTING IN SPILL OF COOLANT TO FLOOR DRAINS | DRP | CLOSED IR96-08 |
| 7 | ACR 06092 | RCS CHECK VALVE BODY TO BONNET LEAK; 3 RCS*V146 | DRP | CLOSED IR96-06 |
| 8 | ACR 01535 | WHILE DEWATERING SPENT RESIN, THE WASTE TEMPERATURE IN THE LINER RAISED FROM 90 TO 310°F | DRP | CLOSED IR96-06 |
| 9 | ACR 10543 | NEED FOR ADDITIONAL REVIEW OF RESPONSE TIME TESTING FOR PROCEDURES | SPO(I) | |
| 10 | ACR 11322 | CLOSURE OF PIR WITHOUT ADDRESSING DESIGN FEATURE OF AFFECTED COMPONENTS | DRP | CLOSED IR96-09 |
| 11 | NU LTR (B15397) 11/1/95, ACR 10774 & 10780 EEI 96-201-04, 05 URI 96-201-40 | TURBINE DRIVEN AUX FEEDWATER DESIGN CONCERNS | SPO(I) | |
| 12 | ACR 97-0317 ACR 6323 URI 96-04-13 URI 96-04-14 URI 96-04-15 IFI 94-11-09 | CONTAINMENT FOUNDATION EROSION | NRR | |

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| | REFERENCE | MILLSTONE UNIT 3 INSPECTION ITEM | RESP | STATUS |
|----|---|---|------------|--------------------|
| 13 | ACR 96-326 & 13427 URI 96-08-20 IR 96-201 LER 96-28 & 96-40 | CCP SYSTEM OPERATION ABOVE DESIGN TEMPERATURE; 3 RHS*HCV 606/607 FAILING OPEN; AND OTHER FAILURE MODES | SPO(I) | Update IR96-08 |
| 14 | ACR 7745 URI 96-01-C7 | SGCS OPERATIONAL CONFIGURATION CONTROL | SPO(I) | |
| 15 | ACR 96-0159 EEI 96-06-15 | LETDOWN HEAT EXCHANGER LEAKAGE AND DESIGN DISCREPANCIES | SPO(I) | Update IR96-06 |
| 16 | Unit 2 ACR 01935 | DUAL FUNCTION VALVE CONTROL AND TESTING | SPO NRR | |
| 17 | ACR 7266 | RCP SEAL HOUSING LEAKAGE AND BOLT CORROSION | DRS | |
| 18 | ACR 10562, PPR G.2 EEI 96-201- 15 EEI 96-201- 18 EEI 96-201- 19 URI 96-201- 17 | CONTROL AND USE OF VENDOR INFORMATION | DRS | |
| 19 | URI 96-201- 16 | RESOLUTION OF AFW VALVES HELB CONCERN | SPO(I) | |
| 20 | VIO 96-59-13 MC 0350 ITEMS C.1.4.e & C.2.2.b | REVIEW OUTPUT FROM J. HANNON EMPLOYEE CONCERNS | SPO(L) | |
| 21 | | FATIGUE CYCLE OPEN ITEMS IP 37750 (UNIT 2 ISSUE) | DRS | CLOSED IR96-01 |
| 22 | | PART 70 STORAGE AND INVENTORY IP 84750 (UNIT 1 ISSUE) | DRS | CLOSED IR96-05 |
| 23 | | FORMALITY OF NON-ROUTINE SECURITY ACTIVITIES AND NEW FUEL SECURITY IP 81064 | DRS | CLOSED IR96-05 |
| 24 | URI 96-01-08 LER 97-17 | OVERLAP TESTING OF RPS/ESF | SPO(I) | Update IR97-01 |
| 25 | ACR 912 URI 95-07-10 EEI 96-201- 43 | MATERIAL, EQUIP. AND PARTS LIST (MEPL) PROGRAM EVALUATION | DRS NRR | Update IR96-201 |

| | REFERENCE | MILLSTONE UNIT 3 INSPECTION ITEM | RESP | STATUS |
|----|---|---|--------|-------------------|
| 26 | ACR 96-277, 0278, 627, 12862 LER 96-19,20 LER 96-35 URI 95-17-09 IFI 95-01-01 IFI 95-17-01, 02, 03, 04, 05 | MOTOR OPERATED VALVE PROGRAM GL89-10 | DRS | |
| 27 | PPR G.1.C, G.2 MC 0350 ITEMS C.4.e | MISSSED SURVEILLANCES/TEST CONTROL | SPO(I) | CLOSED IR96-08 |
| 28 | PPR G.1.C | DILUTION EVENTS | SPO(I) | CLOSED IR96-08 |
| 29 | PPR G.1.C | FEEDWATER HAMMER | DRS | CLOSED IR96-01 |
| 30 | IR 95-31, NU LTR (B15397) 11/1/95 PPR G.1.C, ACR 96-0855 | AFW CHECK VALVE LEAKAGE | DRS | |
| 31 | PPR G.1.C, G.2 MC 0350 ITEMS C.1.3.f, C.2.1.e C.3.2.e, C.4.f.& i | WORK-AROUNDS AND ABUSE OF USE-AS-IS DEFICIENCIES | SPO(I) | |
| 32 | NCV 94-16- 05 PPR G.2 MC 0350 ITEMS C.2.2.e C.4.f,h,i | RESIDENT EMPHASIS: AWO QUALITY AND BACKLOG CONTROL | DRS | |
| 33 | IR 96-201 PPR G.2 | SEISMIC II/I | DRS | |
| 34 | | EFFLUENT/ENVIRONMENTAL SAMPLING AND ANALYTICAL PROFICIENCY | DRS | Update IR96-09 |
| 35 | | RADWASTE SYSTEMS/CONTROLS | DRS | Update IR96-08 |

| | REFERENCE | MILLSTONE UNIT 3 INSPECTION ITEM | RESP | STATUS |
|----|--|--|--------|-------------------|
| 36 | | HEAT EXCHANGER PERFORMANCE (GL 89-13) | DRS | |
| 37 | IR 96-04 EEI 96-201- 13, 21, 22, 23, 24, 26, 27, 28, 29 MC 0350 ITEMS C.1.1, C.1.3, C.1.4.d,e,g, C.2.1, C.2.2.c,e, C.3.1.d, C.4.f | REVIEW LICENSEE CORRECTIVE ACTION PROGRAMS FOR EFFECTIVENESS TO INCLUDE ACR's AND NCR's | SPO(I) | |
| 38 | | REVIEW 0737 ACTION ITEMS FOR COMPLETION | SPO(I) | |
| 39 | MC 0350 ITEMS C.3.2.a,c | REVIEW ENGINEERING BACKLOGS | DRS | |
| 40 | MC 0350 ITEMS C.1.1, C.1.3, C.1.f,& g, C.4.f,i | REVIEW 50.54F ISSUES FOR RESTART/REVIEW DEFERRED RESTART ITEMS LIST | SPO | Update IR96-06 |
| 41 | ACR 7007 URI 95-81-01 VIO 96-09-04 MC 0350 C.1.4.i | REVIEW SELF ASSESSMENT ROOT CAUSES AND VERIFY CORRECTIVE ACTIONS (IP40500) | SPO(I) | |
| 42 | | FIRE PROTECTION PROGRAM | DRS | |
| 43 | ORDER | PHASE II OF THE ICAVP | SPO(O) | |
| 44 | ACR 12116, 96-0325 LER 96-26 | CYCLE 6 BORON DILUTION ANALYSIS POTENTIALLY NON-CONSERVATIVE AND PGS FLOW RATE TO CHARGING PUMPS MAY BE IN ERROR | DRS | |
| 45 | ACR 96- 0524,08897 URI 96-06-14 LER 96-29 & 96-39 | INITIAL SETTINGS FOR ECCS THROTTLE VALVES INADEQUATE AND POTENTIAL CLOGGING | SPO(I) | Update IR96-06 |
| 46 | ACR 96-0183 | LOW PRESSURE SAFETY INJECTION PENETRATIONS | SPO(I) | |
| 47 | ACR 96-0391 | RHR HEAT EXCHANGER BOLTING SUSCEPTIBLE TO BORIC ACID | DRS | |
| 48 | ACR 10397 | LLRT "AS FOUND" TOTAL LEAKAGE EXCEEDED MAX ALLOWABLE | DRP | CLOSED IR96-08 |

| | REFERENCE | MILLSTONE UNIT 3 INSPECTION ITEM | RESP | STATUS |
|----|--|--|------------|-------------------|
| 49 | ACR 96-0324 | FUEL TRANSFER TUBE BELLOWS SEAL CONNECTION NOT TESTED | DRP | CLOSED IR96-08 |
| 50 | ACR 96-0446 | DOCUMENTATION OF CONTAINMENT SYSTEMS DISCREPANCIES | DRS | |
| 51 | ACR 96-0339, 96-0389 | WALWORTH VALVE YOKE GENERIC ISSUE | DRS | |
| 52 | ACR 10795 EEI 96-201-02,23 LER 96-005-01 | SWP TEMPERATURE SWITCHES DEFEATED BY BYPASS JUMPER FOR SWP*P3A1B (BOOSTER PUMPS) | SPO(I) | |
| 53 | ACR 96-0449 URI 96-09-XX LER 96-25 | PIECES OF ARCOR FOUND IN 3RSS*E1A AND 3RCC*E1C | SPO NRR | Update IR96-09 |
| 54 | ACR 96-0181 | NUMEROUS BOLTS ON BACK DOOR ON 4160V SWITCHGEAR MISSING | DRP | CLOSED IR96-06 |
| 55 | ACR 96-0467 | FAST TRANSFER TEST FAILURES | DRS | CLOSED IR96-09 |
| 56 | ACR 12495 | SHUTDOWN MARGIN MONITOR ALARM SETPOINT | DRS | CLOSED IR96-05 |
| 57 | ACR 96-0080, 96-0081 LER 96-15, 45, 49 LER 96-015-02 | POTENTIAL ELECTRICAL SEPARATION VIOLATIONS | DRS | |
| 58 | ACR 96-0557, 96-0685 EEI 96-201-33 | THERMAL RELIEF VALVE SETPOINTS | SPO(I) | |
| 59 | ACR 96-0775, 9124, 0846 LER 96-33 | USE OF BORAFLEX IN SFP RACKS | SPO(L) | |
| 60 | ACR 96-0718, 0821 EEI 96-09-XX | ANALYSIS OF SOV FAILURE MODES DUE TO MOPD | SPO(I) | Update IR96-09 |
| 61 | UNIT 2 ACR 7923 | EEQ PROCESS | DRS | |

| | REFERENCE | MILLSTONE UNIT 3 INSPECTION ITEM | RESP | STATUS |
|----|---|--|------------|-------------------|
| 62 | ACR 13788 | TSP BASKET SAFETY EVALUATION POSSIBLY NOT VALID | SPO(I) | |
| 63 | ACR 96-0396 | 3MSS*MOV17D MISSED IST SURVEILLANCE REQUIREMENT | DRP | CLOSED IR96-08 |
| 64 | ACR 08614 | REACTOR PROTECTION LEAD LAG CIRCUITS MAY BE SET NONCONSERVATIVELY | DRS | CLOSED IR96-05 |
| 65 | ACR 96-0745, CR 97-742 LER 96-36 | SIL/SH VALVES POWERED FROM NONSAFETY TRAIN | SPO NRR | |
| 66 | ACR 96-0483 | CCP AND CCE NON-Q COMPONENTS CAUSE Q-COMPONENTS NOT TO FAIL SAFE | SPO(I) | |
| 67 | ACR 96-0621 TAC No. M96054 URI 96-201-14 | SBO POSSIBLE OVERLOAD IN EVENT OF AN SIS ACTUATION & DESIGN ISSUES | SPO | |
| 68 | | REVIEW ALLEGATIONS FOR RESTART ISSUES | SPO | |
| 69 | | REVIEW ALL OPERABILITY DETERMINATIONS AND BY-PASS JUMPERS BEFORE RESTART | SPO | |
| 70 | URI 96-08-16 LERs 96-002-01, 96-37, 96-38, 96-42, 96-43, 96-48, CAL 1-97-010 | REVIEW TRM FOR TECH. SPEC. INTERPRETATIONS; EVALUATE TS AND OPER. LICENSE ISSUES | DRS | |
| 71 | MC 0350 C.1.4.i | REVIEW LICENSEE EVENT REPORTS FOR RESTART ISSUES | SPO(I) | |
| 72 | | REVIEW ENFORCEMENT AND UNRESOLVED ITEMS FOR ITEMS FOR RESTART ISSUES | SPO(I) | |
| 73 | NOV 96-05-12, IFI 96-06-17 MC 0350 C.1.4.a,b,c, C.2.1.c | REVIEW QA PROGRAM FOR ADEQUACY AND IMPROVEMENT | NRR OSTI | |
| 74 | URI 96-08-18 LER 96-21 | ISI/IST PROGRAM CONTROL | DRS | |
| 75 | IFI 96-08-15 IFI 96-09-17 | TIA ISSUES (EDG EXHAUST & REQUIRED # OF SW PUMPS) | NRR | |

| | REFERENCE | MILLSTONE UNIT 3 INSPECTION ITEM | RESP | STATUS |
|----|---|---|----------------|-------------------|
| 76 | IFI 96-08-17 | CRACKING OF FUSE FERRULES | DRS | |
| 77 | IFI 95-44-06 | POTENTIAL FREEZING OF SW BACKWASH LINES | SPO(I) | |
| 78 | URI 93-07-07, EEI 96-201-02, 04, 05, 06, 07, 08 | SAFETY ANALYSIS (50.59) PROCESS | SPO(L) | |
| 79 | EEI 96-201-09, 15, 35, 37, 39 MC 0350 C.3.2.f | DESIGN CONTROL PROCESS REVIEW (PART OF PHASE I OF THE ICAVP) | SPO(O) | |
| 80 | ACR 97-348 EEI 96-201-18, 19 MC 0350 C.2.1.b, C.2.2.d, C.3.1.k, C.3.3.e,f | PROCEDURE ADEQUACY AND ADHERENCE/ PUP PROCESS | SPO(I) OSTI | Update IR97-01 |
| 81 | EEI 96-201-32, 33, 34 | TESTING OF SAFETY SYSTEMS | DRS | |
| 82 | EEI 96-201-10 | QUALITY ASSURANCE RECORDS | SPO(I) | |
| 83 | NU LETTER (B16195), 2/10/97 MC 0350 ITEMS C.2.2.g, h, C.3.1.m, C.3.2.h & IFI 95-36-01 | EFFECTIVENESS OF EMERGENCY RESPONSE ORG; COORDINATION WITH OFFSITE EP OFFICIALS; DOSE ASSESSMENT CAPABILITY | DRS | |
| 84 | MC 0350 ITEM C.3.1.i EEI 96-05-15, EEI 97-01-XX, U1 VIO 96-09-20 | SECURITY ISSUES - CORRECTIVE ACTION AND REVIEW | DRS | |
| 85 | ACR 96-496, 497, 620, 1078, 97-039, 128, 409 LER 97-03, 97-15 | OTHER RSS AND RELATED DESIGN BASIS CONCERNS | DRS NRR | |

ENCLOSURE 4

MILLSTONE RESTART ASSESSMENT PLAN

MILLSTONE UNIT ALL UNITS

RESTART APPROVAL (MC0350)

The following items are considered applicable to the restart of all Millstone Units:

RESPONSIBILITIES AND AUTHORITIES

| | | NEED | STATUS | RESP |
|----------|---|------|--------|------|
| 4.0 1 | <u>Director, Special Projects Office (SPO)</u> . Notifies the Executive Director for Operations (EDO) and the Commission, as appropriate, of the NRC actions taken concerning shutdown plants and the proposed followup plan. | X | C | NRR |
| 4.0 2 | <u>Director, Special Projects Office</u> a. Discusses with the Deputy Executive Director for Nuclear Reactor Regulation, Regional Operations and Research, the Office of Enforcement (OE), and NRR, as appropriate, the need for an order or confirmatory action letter (CAL) specifying the actions required of the licensee to receive NRC approval to restart the plant and the proposed followup plan. | X | C | DSPO |
| | b. Decides, in consultation with the NRR Associate Director for Projects, whether this manual chapter applies to a specific reactor restart. | X | C | DSPO |
| | c. In coordination with the NRR Associate Director for Projects, decides whether to establish a Restart Panel. | X | C | DSPO |
| | d. Develops a written Restart Assessment Plan, including a case-specific checklist, to assign responsibilities and schedules for restart actions and interactions with the licensee and outside organizations. | X | C | RAP |

| | | NEED | STATUS | RESP |
|--|--|------|--------|------|
| | e. Coordinates and implements those actions prescribed in the Restart Assessment Plan that have been determined to be the Office of Special Project's responsibility. These include, when appropriate, interactions with State and local agencies and with regional offices of Federal agencies. | X | | RAP |

| | | | | |
|--|--|---|--|---------------------------|
| | f. In conjunction with NRR, reviews and determines the acceptability of licensee's corrective action program. | X | | RAP SRI OSTI NRR |
| | g. Approves restart of the shutdown plant, following consultation with the EDO and the Director of NRR, and approval/vote by the Commission. | X | | DSPO |

| | | | | |
|------|--|---|--|-------|
| 4.03 | Director SPO | | | |
| | a. Acts as the focal point for discussions within NRR to establish the appropriate followup actions for a plant that has been shut down. | X | | DSPO |
| 4.04 | Deputy Director, Licensing | | | |
| | a. Coordinates participation in followup conference calls and management discussions to ensure that the Director SPO are directly involved, when appropriate, in followup action. | X | | DSPOL |
| | b. Coordinates and implements actions prescribed in the Restart Assessment Plan that have been determined to be Licensing's responsibility. These include, where applicable, appropriate NRC Office or NRR Division interaction with other Federal agencies (e.g., Federal Emergency Management Agency (FEMA), Department of Justice (DOJ)) pursuant to any applicable Memoranda of Understanding. | x | | DSPOL |

| | | NEED | STATUS | RESP. |
|-----|---|------|--------|-------|
| B.1 | <p>INITIAL NRC RESPONSE</p> <p>The facts, the causes, and their apparent impacts should be established early in the process. This information will assist the NRC in characterizing the problems, the safety significance, and the regulatory issues. Early management appraisal of the situation is also important to ensure the proper immediate actions are taken. The following items should have been completed or should be incorporated into the CSC as appropriate. Refer to Section 5.02 of this manual chapter for additional information.</p> | NA | | |
| | a. Initial notification and NRC management discussion of known facts and issues | NA | | |
| | b. Identify/implement additional inspections (i.e. AIT, IIT, or Special) (Region). | NA | | |
| | c. Determine need for formal regulatory response (i.e. order or CAL). | NA | | |
| | d. Identify other parties involved (i.e., NRC Organizations, other Federal agencies, industry organizations). | NA | | |

| | | NEED | STATUS | RESP. |
|------------|--|------|--------|-------|
| B.2 | NOTIFICATIONS Initial notification of the event quickly communicates NRC's understanding of the event and its immediate response to the parties having an interest in the event. Notification to regional and headquarters offices of cognizant Federal agencies may be appropriate. As the review process continues, additional and continuing notifications may be required. | NA | | |
| | a. Issue Daily and Directors Highlight (NRR). | NA | | |
| | b. Issue preliminary notification (Region). | NA | | |
| | c. Conduct Commissioner assistants' briefing. | NA | | |
| | d. Issue Commission paper (NRR). | NA | | |
| | e. Cognizant Federal agencies notified (i.e., FEMA, EPA, DOJ). | NA | | |
| | f. State and local officials notified (Region). | NA | | |
| | g. Congressional notification (NRR) | NA | | |

PROCESS B.3

| | | NEED | STATUS | RESP. |
|-----|--|------|--------|-------|
| B.3 | <u>ESTABLISH AND ORGANIZE THE NRC REVIEW PROCESS</u> | | | |
| | a. Establish the Restart Panel. | X | C | RAP |
| | b. Assess available information (i.e. inspection results, licensee self-assessments, industry reviews). | X | | RAP |
| | c. Obtain input from involved parties both within NRC and other Federal agencies such as FEMA, EPA, DOJ. | X | | RAP |
| | d. Conduct Director SPO briefing. | X | | RAP |
| | e. Conduct NRR Executive Team briefing (NRR). | X | C | RAP |
| | f. Develop the case-specific checklist (CSC). | X | C | RAP |
| | g. Develop the Restart Assessment Plan. | X | C | RAP |
| | h. Director SPO approves Restart Assessment Plan. | X | C | DSPO |
| | i. NRR Director approves Restart Assessment Plan. | X | C | DNRR |
| | j. Implement Restart Assessment Plan. | X | | RAP |
| | k. Modify order as necessary | X | | NRR |

| | | NEED | STATUS | RESP. |
|-------|---|------|--------|-------------|
| B.4 | <u>REVIEW IMPLEMENTATION</u> | | | |
| B.4.1 | <u>Root Causes and Corrective Actions</u> | | | |
| | a. Evaluate findings of the special team inspection. | X | | OSTI RAP |
| | b. Licensee performs root cause analysis and develops corrective action plan for root causes. | X | | NU OSTI |

| | | | | |
|--|--|---|--|-------------|
| | c. NRC evaluates licensee's root cause determination and corrective action plan. | X | | RAP OSTI |
|--|--|---|--|-------------|

| | | NEED | STATUS | RESP |
|-------|--|------|--------|------|
| B.4.2 | <p>B.4.2 <u>Assessment of Equipment Damage</u></p> <p>For events where equipment damage occurs, a thorough assessment of the extent of damage is necessary. A root cause determination will be necessary if the damage was the result of an internal event. The need for independent NRC assessment should be considered. The licensee will need to determine corrective actions to repair, test, inspect, and/or analyze affected systems and equipment. These actions are required to restore or verify that the equipment will perform to design requirements. Equipment modifications may also be required to ensure performance to design requirements.</p> <p>Potential offsite emergency response impact for external events such as natural disasters, explosions, or riots should be considered. NRR should obtain information from FEMA headquarters reaffirming the adequacy of State and local offsite emergency plans and preparedness if an event raises reasonable doubts about emergency response capability.</p> | NA | | |
| | a. Licensee assesses damage to systems and components. | NA | | |
| | b. NRC evaluates licensee damage assessment. | NA | | |
| | c. Licensee determines corrective actions. | NA | | |
| | d. NRC evaluates corrective actions. | NA | | |

| | | NEED | STATUS | RESP. |
|-------|---|------|--------|-------|
| B.4.3 | <u>Determine Restart Issues and Resolution</u> The establishment of the restart issues that require resolution before restart demands a clear understanding of the issues and the actions required to address those issues by both the NRC and the licensee. This section outlines steps to determine the restart issues and NRC's evaluation of their resolution. | X | | RAP |
| | a. Review/evaluate licensee generated restart issues. | X | | RAP |
| | b. Independent NRC identification of restart issues | X | | RAP |
| | c. NRC/licensee agreement on restart issues. | X | | RAP |
| | d. Evaluate licensee's restart issues implementation process. | X | | RAP |
| | e. Evaluate licensee's implementation verification process. | X | | SRI |

| | | NEED | STATUS | RESP. |
|-------|--|------|--------|--------------------|
| B.4.4 | <u>Obtain Comments</u> Since some shutdowns involve a broad number of issues, solicitation of comments from diverse sources may be appropriate. The decision to solicit comments from a group and the level of participation should be made on a case-by-case basis. Input from these groups should be factored into the restart process when they contribute positively to the review. Note: If needed, comments concerning the adequacy of state and local emergency planning and preparedness must be obtained from FEMA headquarters through NRR. | X | | RAP |
| | a. Obtain public comments. | | | |
| | b. Obtain comments from State and Local Officials (Region). | X | | SLO |
| | c. Obtain comments from applicable Federal agencies. | X | | RAP |
| B.4.5 | <u>Closeout Actions</u> When the actions to resolve the restart issues and significant concerns are substantially complete, closeout actions are needed to verify that planned inspections and verifications are complete. The licensee should certify that corrective actions required before restart are complete and that the plant is physically ready for restart. This section provides actions associated with completion of significant NRC reviews and preparations for restart. | | | RAP OSTI |
| | a. Evaluate licensee's restart readiness self-assessment. | X | | |
| | b. NRC evaluation of applicable items from Section C "ISSUES" complete. | X | | RAP |
| | c. Restart issues closed. | X | | RAP SRI OSTI |
| | d. Conduct NRC restart readiness team inspection. | X | | OSTI |

| | | | | |
|--|--|---|--|------|
| | e. Issue augmented restart coverage inspection plan. | X | | OSTI |
|--|--|---|--|------|

| | | NEED | STATUS | RESP. |
|-----|---|------|--------|------------|
| | f. Comments from other parties considered. | X | | RAP |
| | g. Determine that all conditions of the Order/CAL are satisfied. | X | | RAP |
| | h. Re-review of Generic Restart Checklist complete. | X | | RAP SRI |
| B.5 | <u>RESTART AUTHORIZATION (B.5)</u> When the restart review process has reached the point that the issues have been identified, corrected, and reviewed, a restart authorization process is begun. At this point the Restart Panel should think broadly and ask: "Are all actions substantially complete? Have we overlooked any items?" a. Prepare restart recommendation document and basis for restart. | X | | RAP |
| | b. NRC Restart Panel recommends restart | X | | RAP |
| | c. No restart objections from other applicable HQ offices. | X | | MCKee |
| | d. No restart objections from applicable Federal agencies. | X | | RAP |
| | e. DSPO concurs in restart recommendation | X | | DSPO |
| | f. NRR Director concurs in restart recommendation. | X | | DSPOL |
| | g. EDO concurs in restart recommendation when required. | X | | EDO |
| | h. Conduct ACRS briefing when requested (NRR). | X | | SPO |

| | | | | |
|--|--|---|--|------|
| | i. Conduct Commission briefing when requested. | X | | DSPO |
| | j. Commission approves in restart authorization. | X | | COMM |
| | k. DSPO authorizes restart. | X | | EDO |

| | | | |
|------------|---|-----------|------------|
| B.6 | <u>RESTART AUTHORIZATION NOTIFICATION (B.6)</u> | NA | RAP |
| | <p>Notify the applicable parties of the restart authorization. Notifications should generally be made using a memorandum or other format consistent with the level of formality required. Communication of planned actions is important at this stage to ensure that NRC intentions are clearly understood.</p> <p>a. Commission (if the Commission did not concur in the Restart Authorization or as requested) (NRR).</p> | | |
| | <p>b. EDO (if the EDO did not concur in the restart recommendation or as requested) (NRR).</p> | NA | EDO |
| | <p>c. Congressional Affairs (RAP).</p> | X | OCA |
| | <p>d. ACRS (a briefing may be substituted for the written notification if the ACRS requests a briefing) (NRR).</p> | X | SPO |
| | <p>e. Applicable Federal agencies.</p> | X | RAP |
| | <p>f. Public Affairs.</p> | X | OPA |
| | <p>g. State and local officials.</p> | X | SLO |
| | <p>h. Citizens or groups that expressed interest during the restart approval process.</p> | X | RAP |

ISSUES

| | | NEED | STATUS | RESP. |
|-------|--|------|--------|-------------|
| C.1.1 | <u>Root Cause Assessment</u> | | | |
| | a. Conditions requiring the shutdown are clearly understood. | X | | RAP |
| | b. Root causes of the conditions requiring the shutdown are clearly understood. | X | | RAP |
| | c. Root causes of other significant problems are clearly understood. | X | | RAP |
| | d. Effectiveness of the root cause analysis program. | X | | RAP |
| C.1.2 | <u>Damage Assessment</u> | | | |
| | a. Damage assessment was thorough and comprehensive. | NA | | |
| | b. Corrective actions clearly restored systems and equipment or verified they can perform as designed. | NA | | |
| C.1.3 | <u>Corrective Actions</u> | | | |
| | a. Thoroughness of the corrective action plan | X | | RAP |
| | b. Completeness of corrective action programs for specific root causes. | X | | SRI |
| | c. Control of corrective action item tracking. | X | | SRI OSTI |
| | d. Effective corrective actions for the conditions requiring the shutdown have been implemented. | X | | SRI OSTI |
| | e. Effective corrective actions for other significant problems have been implemented. | X | | SRI OSTI |
| | f. Control of long-term corrective actions. | X | | SRI OSTI |
| | g. Effectiveness of the corrective action verification process. | X | | SRI OSTI |

| | | NEED | STATUS | RESP. |
|-------|---|------|--------|-------------|
| C.1.4 | <u>Self-Assessment Capability</u> The occurrence of an event may be indicative of potential weaknesses in the licensee's self-assessment capability. A strong self-assessment capability creates an environment where problems are readily identified, prioritized, and tracked. Effective corrective actions require problem root cause identification, solutions to correct the cause, and verification methods that ensure the issue is resolved. Senior licensee management effectiveness in ensuring effective self-assessment is treated separately. | | | |
| | a. Effectiveness of Quality Assurance Program. | X | | RAP |
| | b. Effectiveness of Industry Experience Review Program. | X | | OSTI |
| | c. Effectiveness of licensee's Independent Review Groups. | X | | SRI OSTI |
| | d. Effectiveness of deficiency reporting system. | X | | SRI OSTI |
| | e. Staff willingness to raise concerns. | X | | OE RAP |
| | f. Effectiveness of PRA usage. | X | | OSTI |
| | g. Effectiveness of commitment tracking program. | X | | SRI RAP |
| | h. Review applicable external audits | X | | OSTI |
| | i. Quality of 10 CFR 50.72 and 50.73 reports. | X | | SRI |
| | | NEED | STATUS | RESP. |
| C.2.1 | <u>Management Oversight and Effectiveness</u> a. Goals/expectations communicated to the staff. | X | | OSTI |
| | b. Demonstrated expectation of adherence to procedures. | X | | SRI OSTI |
| | c. Management involvement in self-assessment and independent self-assessment capability | X | | RAP |

| | | | | |
|--|--|---|--|-------------|
| | d. Effectiveness of management review committees. | X | | SRI OSTI |
| | e. Management's demonstrated awareness of day-to-day operational concerns. | X | | SRI OSTI |
| | f. Management's ability to identify and prioritize significant issues. | X | | SRI OSTI |
| | g. Management's ability to coordinate resolution of significant issues. | X | | SRI OSTI |
| | h. Management's ability to implement effective corrective actions. | X | | SRI OSTI |

| | | | | |
|-------|---|----|--|-------------|
| C.2.2 | <u>Management Support</u> | | | |
| | a. Impact of any management reorganization. | X | | RAP |
| | b. Effective and timely resolution of employee concerns. | X | | RAP |
| | c. Adequate engineering support as demonstrated by timely resolution of issues. | X | | DRS OSTI |
| | d. Adequate plant administrative procedures. | X | | SRI PE |
| | e. Effective information exchange with other utilities. | X | | SRI OSTI |
| | f. Participation in industry groups. | NA | | |
| | g. Effectiveness of Emergency Response Organization. | X | | DRS |
| | h. Coordination with offsite emergency planning officials. | X | | DRS |

| | | | | |
|-------|---|------|--------|--------------------|
| | | NEED | STATUS | RESP. |
| C.3.1 | <u>Assessment of Staff</u> | | | |
| | a. Demonstrated commitment to achieving improved performance. | X | | RAP SRI OSTI |
| | b. Demonstrated safety consciousness. | X | | OSTI SRI |
| | c. Understanding of management's expectations and goals. | X | | OSTI |

| | | | | |
|-------|--|------|--------|-------------|
| | d. Understanding of plant issues and corrective actions. | X | | OSTI SRI |
| | e. Qualifications and training of the staff. | X | | OSTI |
| | f. Staff's fitness for duty. | NA | | |
| | g. Attentiveness to duty. | X | | OSTI |
| | h. Level of attention to detail. | X | | OSTI |
| | i. Off-hour plant staffing. | X | | SRI |
| | j. Staff overtime usage. | X | | SRI SRI |
| | k. Procedure usage/adherence. | X | | SRI PE |
| | l. Awareness of plant security. | X | | DRS |
| | m. Understanding of offsite emergency planning issues. | X | | DRS |
| C.3.2 | <u>Assessment of Corporate Support and Site Engineering Support</u> | X | | OSTI |
| | a. Corporate staff understanding of plant issues. | X | | OSTI |
| | b. Corporate staff site specific knowledge. | X | | OSTI |
| | c. Effectiveness of the corporate/plant interface meetings. | X | | OSTI |
| | d. Corporate involvement with plant activities. | X | | OSTI |
| | e. Effectiveness of site engineering support. | X | | DRS |
| | f. Effectiveness of the site design modification process. | X | | DRS |
| | g. Effectiveness of licensing support. | X | | RAP |
| | | NEED | STATUS | RESP. |
| | h. Coordination with offsite emergency planning officials. | X | | RAP |
| C.3.3 | <u>Operator Issues</u> | | | |
| | a. Licensed operator staffing meets requirements and licensee goals. | X | | OSTI |
| | b. Level of formality in the control room. | X | | OSTI SRI |

| | | | | |
|-----|--|------|--------|-------------|
| | c. Effectiveness of control room simulator training. | X | | DRS |
| | d. Control room/plant operator awareness of equipment status. | X | | OSTI SRI |
| | e. Adequacy of plant operating procedures. | X | | SRI PE |
| | f. Procedure usage/adherence. | X | | SRI OSTI |
| | g. Log keeping practices. | X | | OSTI |
| C.4 | <u>ASSESSMENT OF PHYSICAL READINESS OF THE PLANT</u> | | | |
| | a. Operability of technical specification systems. | X | | OSTI |
| | b. Operability of required secondary and support systems. | X | | OSTI |
| | c. Results of pre-startup testing. | X | | SPO OSTI |
| | d. Adequacy of system lineups. | X | | OSTI |
| | e. Adequacy of surveillance tests/test program. | X | | OSTI |
| | f. Significant hardware issues resolved (i.e. damaged equipment, equipment ageing, modifications). | X | | OSTI |
| | g. Adequacy of the power ascension testing program. | X | | OSTI SRI |
| | h. Effectiveness of the plant maintenance program. | X | | OSTI DRS |
| | i. Maintenance backlog managed and impact on operation assessed. | X | | OSTI |
| | j. Adequacy of plant housekeeping and equipment storage. | X | | OSTI |
| | | NEED | STATUS | RESP. |
| C.5 | <u>ASSESSMENT OF COMPLIANCE WITH REGULATORY REQUIREMENTS</u> | | | |
| | a. Applicable license amendments have been issued. | X | | RAP |
| | b. Applicable exemptions have been granted. | X | | RAP |
| | c. Applicable reliefs have been granted. | X | | RAP |

| | | | | | |
|--|----|---|----|--|------------------|
| | d. | Imposed Orders have been modified or rescinded. | X | | RAP |
| | e. | Significant enforcement issues have been resolved. | X | | RAP OE |
| | f. | Allegations have been appropriately addressed. | X | | RAP SRI PE |
| | g. | 10 CFR 2.206 Petitions have been appropriately addressed. | X | | NRR |
| | h. | Atomic Safety and Licensing Board hearings have been completed. | NA | | |

| | | | | | |
|-----|--|---------------------------------------|---|--|----------|
| C.6 | <u>COORDINATION WITH INTERESTED AGENCIES AND PARTIES</u> | | | | |
| | a. | Federal Emergency Management Agency | X | | ORS |
| | b. | Environmental Protection Agency | X | | RAP |
| | c. | Department of Justice | X | | OE OI |
| | d. | Department of Labor | X | | OE |
| | e. | Appropriate State and local officials | X | | SLO |
| | f. | Appropriate public interest groups | X | | RAP |
| | g. | Local news media | X | | 3OPA |

ENCLOSURE 5

**LICENSING ISSUES REQUIRED FOR RESTART
MILLSTONE UNIT 1**

| No. | TAC No. | Issue | Status |
|------------|----------------|---|----------------------------|
| 1 | M96062 | Safety/Relief Valve Electrical Design Modification | Under staff review. |
| 2 | M97934 | Response Time Testing Clarification/Modification | Under staff review. |
| 3 | M98123 | Allowable Outage Times Revisions | Under staff review. |
| | | | |

Note: The licensee indicated they plan to submit two additional licensing issues which will be needed prior to restart.

**LICENSING ISSUES REQUIRED FOR RESTART
MILLSTONE UNIT 2**

| No. | TAC No. | Issue | Status |
|-----|---------|---------------------------------------|-----------------|
| 1 | M92879 | Cont. Rm. Emer. Vent Sys.- TSs | Under Review |
| 2 | M94105 | Steam Gen Blowdown. Mont.- TSs | Under Review |
| 3 | M94623 | Cont. Iso. Valves- TSs | Need Add. Info. |
| 4 | M97741 | Org Structure & Titles- TSs | Under Review |
| 5 | M97746 | Met. Tower Inst.- TSs | Need Add. Info. |
| 6 | M97680 | Siemens LOCA Anal. Evaluation | Under Review |
| 7 | | Ultimate Heat Sink- TSs | Submit 03/31/97 |
| 8 | | Enclosure Bldg.- TSs | Submit 03/31/97 |
| 9 | | ESFAS Time Delay- TSs | Submit 04/14/97 |
| 10 | | EDG Fuel Oil- TS Basis Change | Submit 04/21/97 |
| 11 | | Spent Fuel Vent Sys.- TSs | Submit 04/30/97 |
| 12 | | Shut Down. Cooling- TSs | Submit 04/30/97 |
| 13 | | Press. PORV- TSs | Submit 04/30/97 |
| 14 | | DNB Parameters- TSs | Submit 04/30/97 |
| 15 | | Rx Trip Setpoints SG Safety Valv.-TSs | Submit 04/30/97 |
| 16 | | RCS P-T Curves- TSs | Submit 04/30/97 |

**LICENSING ISSUES REQUIRED FOR RESTART
MILLSTONE UNIT 3**

| No. | TAC No. | Issue | Status |
|------------|----------------|--|--|
| 1 | M92798 | Modifies MSIV surveillance and action statements. | Under staff review. |
| 2 | M95469 | Modifies the description of the time constants associated with the Overtemperature and Overpressure Delta-T calculations. | Amendment No. 134, issued March 11, 1997. |

Note: The licensee has indicated that it plans to submit approximately 23 licensing issues which will be needed prior to restart.



POLICY ISSUE

(NEGATIVE CONSENT)

January 3, 1997

SECY-97-003

FOR: The Commissioners
FROM: James M. Taylor
Executive Director for Operations
SUBJECT: MILLSTONE RESTART REVIEW PROCESS

PURPOSE:

To inform the Commission of the processes and approaches that the Nuclear Regulatory Commission (NRC) staff will use to oversee the corrective action programs at Millstone Nuclear Power Station, Units 1, 2, and 3.

SUMMARY:

This paper presents the staff's plans that will be used to direct the review of Northeast Nuclear Energy Company's (NNECO's, licensee's) corrective action activities at Millstone Nuclear Power Station. The staff plans to apply the guidelines provided in NRC Inspection Manual Chapter 0350, "Staff Guidelines for Restart Approval," to the restart approvals of Millstone Units 1, 2, and 3. A restart panel has been established to oversee and coordinate NRC's restart review activities.

Until the staff was informed by the licensee at a public meeting on December 17, 1996, that it intended to pursue restart of all three units in parallel, Unit 3 was considered to be the lead plant for restart. Therefore, much of the NRC's activities to date have been focused on Unit 3 and are discussed in this paper. As noted throughout the paper, the staff will develop its plans for assessing restart readiness of Units 1 and 2 similar to that which has already been accomplished for Unit 3.

NOTE: TO BE MADE PUBLICLY AVAILABLE AT
COMMISSION BRIEFING ON 1/30/97.

Contact: William D. Travers, NRR/SPO
415-1200

9701100059NA 21pp.

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RETURN TO REGULATORY CENTRAL FILES
97-06

The restart panel has issued a restart assessment plan for Unit 3 to track and monitor all expected NRC actions required to be taken before the staff will forward a recommendation for restart. The staff has also developed preliminary plans for oversight of the Independent Corrective Action Verification Program (ICAVP) required by the NRC.

BACKGROUND:

On November 4, 1995, the licensee shut down Millstone Unit 1 for a planned refueling outage. During an NRC investigation of licensed activities at Millstone Unit 1, in the fall of 1995, the NRC staff identified potential violations regarding refueling practices and operation of the spent fuel pool cooling systems that were inconsistent with the Updated Final Safety Analysis Report (UFSAR). The NRC issued a letter to the licensee on December 13, 1995, requiring that, before the restart of Millstone Unit 1, it inform the NRC, pursuant to Section 182a of the Atomic Energy Act of 1954, as amended, and Section 50.54(f) of Title 10 of the Code of Federal Regulations (10 CFR), of the actions taken to ensure that in the future it would operate that facility according to the terms and conditions of the plant's operating license, the Commission's regulations, and the plant's UFSAR.

In January 1996, the NRC designated the units at Millstone as Category 2 plants on the NRC's watch list. Plants in this category have weaknesses that warrant increased NRC attention until the licensee demonstrates a period of improved performance. On February 20, 1996, the licensee shut down Millstone Unit 2 when it declared both trains of the high pressure safety injection (HPSI) system inoperable because of a design issue (there was a potential that the HPSI throttle valves could become plugged from debris when in the sump recirculation mode). On March 30, 1996, the licensee shut down Millstone Unit 3 after it found that containment isolation valves for the auxiliary feedwater turbine-driven pump were inoperable because the valves did not meet NRC requirements. In response to (1) a licensee root cause analysis of Millstone Unit 1 UFSAR inaccuracies that identified the potential for similar configuration-management conditions at Millstone Units 2 and 3, and (2) design configuration issues identified at these units, the NRC issued 10 CFR 50.54(f) letters to the licensee on March 7 and April 4, 1996. These letters required that the licensee inform the NRC of the corrective actions taken regarding design configuration issues at Millstone Units 2 and 3 before the restart of each unit.

In June 1996, the NRC designated the units at Millstone as Category 3 plants on the NRC's watch list. Plants in this category have significant weaknesses that warrant maintaining them in a shutdown condition until the licensee can demonstrate to the NRC that it has both established and implemented adequate programs to ensure substantial improvement. Plants in this category require Commission authorization to resume operations.

On August 14, 1996, the NRC issued a confirmatory order directing the licensee to contract with a third party to implement an ICAVP to verify the adequacy of its efforts to establish adequate design bases and design controls. The ICAVP is intended to provide additional assurance, before unit restart, that the licensee has identified and corrected existing problems in the design and configuration control processes.

On October 24, 1996, the NRC issued an order directing that, before the restart of any Millstone unit, the licensee develop and submit to the NRC a comprehensive plan for reviewing and dispositioning safety issues raised by its employees and ensuring that employees who raise safety concerns can do so without fear of retaliation. The order also directs the licensee to retain an independent third party to oversee implementation of its comprehensive plan.

On November 3, 1996, the NRC created a new organization, the Special Projects Office (SPO), within the Office of Nuclear Reactor Regulation (NRR), to provide a specific management focus on future NRC activities associated with the Millstone units. The SPO's responsibility for future activities at Millstone includes all licensing and inspection activities required to support an NRC decision on restart of the Millstone units.

DISCUSSION:

The significance and number of issues identified at Millstone have resulted in the continued shutdown of all three units pending the licensee's completion of its corrective actions and NRC's verification and formal authorization to restart. NRC regulatory oversight of the licensee's corrective actions will require extensive planning and program integration by the staff. Specific elements of the staff's approach for oversight of Millstone are described in this paper.

Staff planning for the conduct of NRC regulatory oversight programs at Millstone is based on the recognition that it is the licensee's primary responsibility to demonstrate that corrective actions have been effectively implemented. Before NRC can reach a decision to approve restart, the licensee must determine that the plants conform with applicable NRC regulations, license conditions, and the UFSARs and that applicable licensing commitments have been met. The licensee's compliance with NRC regulations, license conditions, and licensing commitments is fundamental to establish NRC's confidence in the safety of licensed activities.

The staff's approach for oversight at Millstone is designed to ensure that the licensee will carry out a comprehensive, broad-scope program to identify and correct its weaknesses. Recently, in a December 17, 1996, public meeting, the licensee provided its revised plans for recovery of Millstone Units 1, 2 and 3. The principle elements of their planning for restart includes: 1) system readiness; 2) organizational readiness; 3) operational readiness, and 4) regulatory readiness. The licensee has indicated that the Millstone Unit 3 Configuration Management Plan (CMP) continues to be its principal program to provide reasonable assurance that design-bases weaknesses have been effectively corrected. Similar plans exist for Millstone Units 1 and 2. The CMP includes both efforts to understand the licensing- and design-bases issues that led to NRC issuance of the 10 CFR 50.54(f) letters and actions to prevent recurrence of those issues. The licensee described its CMP objective to document and meet the units' licensing- and design-bases requirements, and its intention to ensure that adequate programs and processes exist to maintain control of these requirements.

To verify the adequacy of actions by the licensee, the NRC staff is planning a comprehensive and multi-faceted oversight program. The need for close evaluation of the licensee's programs and results is underscored by the breadth and significance of the problems identified at Millstone. Although, as a practical matter, NRC verification cannot include a 100-percent verification of licensee programs, NRC oversight is planned to provide confidence that the licensee has implemented its corrective actions. As described in this paper, independent third-party evaluations required by the NRC will be used to enhance NRC confidence that the licensee's corrective action programs have been effectively implemented.

Inspection Manual Chapter 0350

NRC Inspection Manual Chapter (MC) 0350, "Staff Guidelines for Restart Approval," establishes the guidelines for approving the restart of a nuclear power plant after a shutdown resulting from a significant event, a complex hardware problem, or a serious management deficiency. The staff originally issued this guidance in March 1990 in response to a May 1989 audit by the General Accounting Office (GAO) of NRC's restart actions for Peach Bottom. The GAO found that NRC's restart approval actions were reasonable, but that the NRC needed to establish criteria to ensure a consistent process is used to assess readiness for restart. The primary objective of the guidelines in MC 0350 is to ensure that NRC's restart review efforts are appropriate for the individual circumstances, are reviewed and approved by the appropriate NRC management levels, and provide objective measures of restart readiness. MC 0350 also states that the Advisory Committee for Reactor Safety (ACRS) may review the restart process to independently evaluate NRC's and the licensee's actions. The staff will include an opportunity for ACRS review in its Millstone oversight planning.

As a result of NRC concerns regarding the overall effectiveness of the licensee's management, the staff will apply the guidelines of MC 0350 to the restart approvals of Millstone Units 1, 2, and 3. MC 0350 states that the staff should develop a plant-specific restart action plan for NRC oversight of each plant startup. The restart action plan is to include those issues listed in MC 0350 that the NRC restart panel (discussed below) has deemed applicable to the reasons for the shutdown. The plan may also include additional issues determined to be applicable to the specific situation. The restart action plan is to include all expected NRC actions required to be taken before the NRC approves a plant for restart. Accordingly, the staff will use the restart action plan to track and monitor all significant NRC actions necessary to support a decision on restart approval.

With the recent formation of the SPO, the Acting Director of NRR and the Region I Regional Administrator have consolidated many of the functions and responsibilities of both the region and NRR, as described in MC 0350, within the SPO. The specific changes in the functions and responsibilities have been incorporated into the discussions below.

Millstone Restart Panel

For each plant restart subject to oversight in accordance with MC 0350, regional and headquarters management normally establishes a restart panel to oversee and coordinate NRC's restart activities. The function of the restart panel, as described in MC 0350, is to maintain and update the restart action plan, review the licensee's corrective actions, maintain an ongoing overview of licensee performance, and provide a written recommendation regarding restart based on the completion of the licensee's corrective actions. The restart panel will also modify, as necessary, the restart action plan to address emergent issues that require use of NRC resources.

The Millstone Restart Panel has been established to fulfill the functions described in MC 0350. The panel consists of the following members from the SPO:

- Director, SPO (Chairman)
- Deputy Director, Inspections
- Deputy Director, Licensing
- Deputy Director, ICAVP Oversight
- Chief, Inspections Branch
- Project Managers
- Senior Resident Inspectors
- Division of Reactor Safety Coordinator

Millstone Restart Assessment Plan

In accordance with MC 0350, the Millstone Restart Panel has issued the plant-specific restart action plan, titled the "Millstone Unit 3 Restart Assessment Plan" (RAP, Attachment 1). [Note: Unit 3 has been the primary focus of the licensee's recovery/restart activities. On December 17, 1996, the licensee announced a major redirection towards parallel corrective actions for all 3 units.] The RAP consists of several major elements that require resolution before plant restart and relate to the root causes for the decline in licensee performance. These elements include the corrective action programs, work planning and control improvements, procedure upgrade programs, employee concerns, and quality assurance and management oversight improvements. The plan also includes staff activities to evaluate the licensee's response to NRC's 10 CFR 50.54(f) letters regarding Millstone Units 1, 2, and 3, and completion of the ICAVP. The actions listed in the MC 0350 generic restart checklist that are applicable to Millstone, such as those regarding management effectiveness and self-assessment capability, are also included in the plan. The plan provides for the conduct of an operational safety team inspection (OSTI), which is normally carried out to assess the overall readiness of the plant for startup after a prolonged shutdown. Other issues in the Millstone Unit 3 RAP that require NRC review before restart are pending 10 CFR 2.206 petitions, enforcement actions, and allegations.

The RAP contains two enclosures: the Significant Issues List and the Process Check List. The Significant Issues List is a list of actions and issues that the staff intends to review before any restart recommendation for Millstone Unit 3. The Process Check List is a list of tasks based on the MC 0350

generic restart checklist that guides the general NRC restart review process.

The RAP is a "living" document that the Millstone Restart Panel will revise as it identifies emergent issues and inspection activities that are completed. The panel recently revised the RAP to reflect the formation of the SPO. It will be further revised to include activities needed to address the October 24, 1996, order regarding employee concerns. The RAPs for Units 1 and 2 are likely to contain the same programmatic issues as the Unit 3 RAP, supplemented with plant-specific technical issues.

Independent Corrective Action Verification Program

The ICAVP audit required by the NRC is expected to provide independent verification, beyond the licensee's quality assurance and management oversight programs, that the licensee's corrective action programs have identified and satisfactorily resolved existing nonconformances with the design and licensing bases; documented and utilized the licensing and design bases; and established programs, processes, and procedures for effective configuration management. The ICAVP, with oversight by NRC, is required to be completed before the restart of each of the Millstone units and is included as an element in the RAP. NRC's ICAVP oversight activities are discussed in more detail in Attachment 2.

The Director of NRR has established a branch, headed by a Senior Executive Service manager, that is responsible for overseeing the implementation of the ICAVP. This branch reports to the Director, SPO. The staff's oversight objectives are to ensure that the review by the ICAVP contractor is independent of the licensee and its design contractors, is performed by qualified individuals, and is comprehensive, incorporating appropriate engineering discipline and operational reviews. As part of the RAP, NRC oversight of the ICAVP will support the MC 0350 restart assessment process by providing important insights to the restart panel regarding (1) the effectiveness of the licensee's root cause analysis process, (2) the effectiveness of the licensee's corrective actions, (3) the licensee's compliance with the licensing basis, (4) the effectiveness of the licensee's design and configuration control processes, and (5) the licensee's process for deferring completion of certain corrective actions until after restart. These insights are necessary to ensure the licensee's readiness to restart. The ICAVP oversight staff will provide information to the restart panel on issues and observations identified during all phases of the ICAVP process. The restart panel will use this information to update, as necessary, the RAP. To facilitate the communication of information, the Deputy Director, ICAVP Oversight, will be a member of the restart panel. The results of the ICAVP review are expected to provide the NRC with critical insights for determining whether the licensee has been thorough in its identification and resolution of configuration control problems at the Millstone units.

As stated in the August 14, 1996, order, the NRC must approve the ICAVP contractor proposed by the licensee. Members of the public have expressed concern about the process used to select and approve this contractor. The principal concerns relate to the potential for bias by a contractor that derives a substantial portion of its income through work in the commercial

nuclear power industry and has been selected and paid by the licensee. The staff has built checks and balances into the ICAVP contractor selection and implementation processes to assist in ensuring independence. For example, the independent contractor organization will have no current involvement with the unit being reviewed, will have had limited prior involvement, and will not have ownership interest in the licensee. Further, the individual contractor reviewers will have had no prior involvement with the unit being reviewed and have no current financial interest in the licensee, such as ownership of stocks or bonds or participation in the pension plan. This approach recognizes the practical difficulty in identifying a technically competent organization that has no previous involvement with the licensee. On December 18, 1996, the licensee submitted information to the NRC on its proposed ICAVP contractor (Sargent and Lundy). The staff is currently reviewing the adequacy of this contractor's qualifications and independence.

The staff is developing a communications protocol to ensure that communication between the licensee and the ICAVP contractor occurs in an open forum. (Additional aspects of public openness and participation are presented later in this paper.) This protocol will require that representatives of the NRC monitor interactions during which technical issues are discussed either by telephone or in person between the contractor and the licensee. As stated in the order, the ICAVP contractor will provide its findings concurrently to both the licensee and the NRC. The staff will evaluate the contractor's reviews and findings throughout the ICAVP. The contractor will also periodically provide to the NRC its comments on the licensee's proposed resolution of the its findings and recommendations. These documents will be placed in the NRC Public Document Room. In addition, to maintain independence from the licensee, the contractor will conduct most of the ICAVP review activities at a location remote from the Millstone site to minimize interaction between the contractor and the licensee.

The licensee has indicated that its review scope for Unit 3 will include approximately 80 structures, systems, and components that it has categorized through the implementation of the maintenance rule as either Group 1 (safety-related and risk-significant) or Group 2 (safety-related or risk-significant). The ICAVP audit must provide insights into the effectiveness of the licensee's programs so that the results, either positive or negative, can be reasonably extrapolated to the systems that were not reviewed in the audit. Accordingly, the scope of the ICAVP must be broad enough to give the NRC confidence that the current configuration of each unit is in conformance with its licensing basis.

The NRC will review, and must approve, the ICAVP contractor's plan for implementing the ICAVP. As such, the NRC will determine the scope and depth of the ICAVP. The ICAVP contractor's audit plan for each unit will include a justification for its proposed scope and depth as a method for evaluating the effectiveness of the licensee's corrective action programs. The staff has determined that the ICAVP audit should be conducted using a multi-tiered approach. For Unit 3, in the first tier, four systems will be selected to provide a representative sample by which to test the thoroughness of the licensee's review in identifying potential nonconformances with the design and licensing bases. (Attachment 2 provides additional information on ICAVP

sample size.) The ICAVP contractor will review the design and operational aspects of these systems in depth, including maintenance, surveillance, training, and corrective actions for identified deficiencies. The number of systems selected for Tier 1 evaluations at Units 1 and 2 will be determined as additional information is obtained by the staff.

The second tier of the ICAVP contractor audit will address Group 1 and Group 2 systems that are not reviewed in Tier 1. These system reviews will be more limited in scope than those performed on the Tier 1 systems. The objective of these reviews is to identify and review some critical design characteristics of the systems that are important to ensure that these systems can perform their specified functions. The ICAVP contractor will propose a list of systems and characteristics to be reviewed to the NRC for approval. The scope (i.e., the systems and design characteristics) of the Tier 2 review will be determined by the staff following its evaluation of the ICAVP contractor's audit plan. Accident mitigation functions would be a specific focus of the Tier 2 reviews. This effort will not include a review of passive design considerations such as seismic design, piping and pipe hangers, and environmental qualification. The Tier 1 review will examine these aspects in sufficient depth to provide insights into the licensee's conformance with the licensing basis. The Tier 2 review will achieve additional assurance of the adequacy of the licensee's programs by broadening the scope of the review to other Group 1 and 2 systems.

The third tier of the ICAVP contractor audit will be a review of examples of the implementation of various processes used by the licensee to change or modify the facility. A sample of changes, randomly selected from among the licensee's design change processes, will be evaluated by the ICAVP contractor. The Tier 3 reviews will provide insights into the effectiveness of the licensee's processes that control the plant's configuration.

The staff plans to use the following process to select the specific systems to be evaluated in the Tier 1 reviews. Following the review of the contractor's proposed audit plan for Unit 3, the staff will select four systems to be reviewed using objective elements such as risk significance, system characteristics and complexity, previous opportunities for introducing inappropriate changes to the system or design bases, and previous problems with a system. Prior to finalizing its selection of four systems, the staff will offer to the Connecticut Nuclear Energy Advisory Council (NEAC), the opportunity to recommend one or two systems using any method that it deems appropriate. The NRC will consider including one or both of the systems recommended by the NEAC. This would address the public concern regarding the potential for the list of systems to be disclosed to the licensee before the start of the ICAVP. A similar two-part process is planned for system selections at Units 1 and 2.

In addition to overseeing the ICAVP contractor, the staff will perform an independent inspection, similar to the ICAVP three-tier audit discussed above. At Unit 3, the staff plans to conduct independent vertical-slice inspections of two systems, one within the scope of the ICAVP and one outside the scope, to provide additional assurance regarding the adequacy of the licensee's and the ICAVP contractor's reviews. Similar inspections will be used at Units 1

and 2. The staff will evaluate the final results of the ICAVP contractor's audit and assess the licensee's corrective actions. Additional details regarding the staff's inspection activities are included in the ICAVP Oversight Plan (Attachment 2).

Licensee Restart Items List

The licensee's ongoing problem identification activities in response to the 10 CFR 50.54(f) letters for Millstone Units 1, 2, and 3 have already resulted in the identification of several thousand design and configuration-management deficiencies. The licensee has developed a list of these deficiencies, which vary in scope and safety significance. This list contains deficiencies that must be corrected before restart and others that the licensee is planning to correct after restart. The NRC staff will review the list of deficiencies that the licensee proposes to correct after plant restart. The NRC staff conducted a preliminary review of the Millstone Unit 3 deficiency list in October 1996 and found the licensee's characterization of the deficiencies generally appropriate. In its continuing reviews of the deficiency list, the NRC staff will ascertain whether the licensee has appropriately scheduled safety-significant items for completion before restart, and whether those items that the licensee will defer until after restart are appropriate.

In addition to the deficiencies identified by the configuration-management corrective action activities, the licensee also maintains lists of work items identified in its routine work control and corrective action processes. These lists comprise such items as procedure upgrades, design changes, work orders, and administrative deficiencies. These lists will be reviewed as part of the routine inspection program and the OSTI. The NRC staff will assess the overall safety significance of the lists of open work items and evaluate whether they are being effectively managed.

Employee Concerns

The October 24, 1996, order requiring independent third-party oversight of the licensee's implementation of the resolution of employee concerns issues requires the licensee to submit, for NRC approval, a proposal for an independent, third-party organization that would oversee implementation of the licensee's employee concerns activities. NRC staff approval of the organization will be contingent on a finding that personnel proposed to accomplish the oversight function are independent and qualified to perform the tasks specified in the order. The order also requires that the licensee submit, for NRC review, a comprehensive plan for reviewing and dispositioning safety issues raised by its employees and ensuring that employees who raise safety concerns are not subject to discrimination. The order further requires that the third-party oversight organization submit, for NRC review and approval, an oversight plan for conduct of its activities. The staff is developing approaches for reviewing these licensee plans and their implementation and will keep the Commission informed of their status.

In a letter dated November 25, 1996, the licensee requested an extension of 30 days to submit a proposed third-party organization to review the employee concerns process. The staff granted the extension on December 12, 1996.

Public Participation

The staff will continue to ensure that the public has the opportunity to raise questions about the evaluation process or the substantive technical issues being addressed in the restart process. The staff has solicited public participation in the Millstone restart process during meetings near the Millstone site. These meetings have provided information about such topics as 10 CFR 2.206 petitions, the licensee's corrective action programs, licensee and NRC restart plans, employee concerns, and the ICAVP. As the restart assessment process continues, the staff will conduct public meetings near the Millstone site to discuss the restart plans and the results of NRC's oversight activities. To the extent practicable, the staff will also hold technical meetings with the licensee at the Millstone site, rather than at NRC regional or headquarters offices. These meetings will be open for public observation. However, there will be a need to conduct some meetings at NRC headquarters or Region I, such as periodic briefings of the Commission.

The NRC has invited representatives from both the State of Connecticut and the NEAC, constituted by the Connecticut State legislature, to observe activities associated with NRC's oversight of the ICAVP process. Representatives from the NEAC have agreed to observe the activities associated with NRC's oversight of the ICAVP and have signed a memorandum of understanding with the NRC. The NEAC has designated two observers and two alternates. The staff has also participated in several meetings with the NEAC regarding Millstone restart activities.

Restart Authorization Process

The process for NRC authorization to restart is described in detail in MC 0350. When the restart review process has reached a point where relevant issues have been identified, corrected, and reviewed, a restart authorization process is begun. Normally, the restart panel provides a recommendation for restart approval to the Regional Administrator. In Millstone's case, the SPO Director has been delegated the responsibilities and authority of both the Regional Administrator and the Associate Director for Projects, NRR. Since the attention of the SPO Director will be focused exclusively on Millstone activities, he will chair the restart panel. The SPO Director will forward the restart panel's recommendation for restart approval through the Director of NRR to the Executive Director for Operations (EDO). The EDO, after discussions with the SPO Director, the Regional Administrator, and the Director of NRR, will then forward the recommendation to the Commission regarding restart for each Millstone unit.

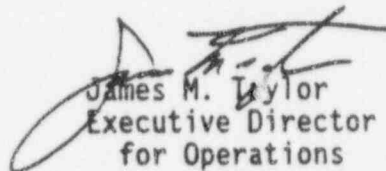
In addition, the staff normally briefs the Commission (1) after the staff has agreed to a corrective action plan and (2) about a month before the licensee anticipates a plant restart. Because of the scope and depth of the corrective actions for Millstone, the staff plans to hold periodic status briefings for the Commission.

RECOMMENDATION:

It is my intention to take the following actions unless, within the next 10 working days, the Commission directs otherwise.

1. Continue to implement the attached Restart Assessment Plan, and any subsequent revisions approved by the Millstone Restart Panel, for Millstone Unit 3.
2. Implement the attached ICAVP Oversight Plan, including plans for ICAVP scope and system selection processes, and any subsequent revisions approved by the Director, SPO, for Millstone Unit 3.

The staff will continue to keep the Commission informed of its planning and activities regarding NRC oversight at Millstone through periodic status briefings.


James M. Taylor
Executive Director
for Operations

Attachments: 1. Restart Assessment Plan
2. ICAVP Oversight Plan

SECY NOTE: In the absence of instructions to the contrary, SECY will notify the staff on Wednesday, January 22, 1997 that the Commission, by negative consent, assents to the action proposed in this paper.

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MILLSTONE
INDEPENDENT CORRECTIVE ACTION VERIFICATION PROGRAM
OVERSIGHT INSPECTION PLAN

Submitted by:

E. V. Imbro *Dec. 19, 1996*
Eugene V. Imbro
Deputy Director, ICAVP Oversight

Approved by:

William D. Travers *12/19/96*
William D. Travers, Director
Special Projects Office
Date

Attachment

MILLSTONE

INDEPENDENT CORRECTIVE ACTION VERIFICATION PROGRAM OVERSIGHT INSPECTION PLAN

I. BACKGROUND

On August 14, 1996, the Director of the Office of Nuclear Reactor Regulation (NRR) established a team to provide regulatory oversight of the Millstone Independent Corrective Action Verification Program (ICAVP). The charter directs that an inspection program be developed to oversee the ICAVP in a manner similar to that outlined in NRC Inspection Manual Chapter (MC) 2535, "Design Verification Programs," for Independent Design Verification Programs (IDVP). The team will be composed of inspectors from headquarters, regional offices (other than Region I), and contractors with specialized design expertise. The team's efforts are to be coordinated with the MC 0350, "Staff Guidelines for Restart Approval," process.

II. INSPECTION OBJECTIVE

The objective of NRC's oversight of the ICAVP for the Millstone units is to ensure that the review conducted by the ICAVP contractor is effective, performed in a manner independent of the licensee and its design contractors, and performed by qualified individuals. The oversight is to be comprehensive, incorporating appropriate engineering discipline and operational reviews, such that the NRC can be confident that Northeast Nuclear Energy Company (NNECO) has been thorough in identification and resolution of design deficiencies and configuration control problems for the Millstone units.

III. INSPECTION METHODOLOGY

The inspection of the ICAVP will be conducted in a manner similar to the IDVP, as outlined in NRC MC 2535. However, the MC 2535 inspection will be modified because the ICAVP will address the adequacy of the original design, design modifications, and control of the design and design bases since issuance of the initial operating license, where the IDVPs were conducted prior to the issuance of the initial operating license. The ICAVP, conducted by an independent contractor, will be similar to inspections described in Inspection Procedure (IP) 93801, "Safety System Functional Inspections," and MC 2530, "Integrated Design Inspection Program," in that the ICAVP will review the current configuration, including the aspects of the original design that have not been modified, and the modifications made since issuance of the initial operating license to determine that the systems conform to their licensing bases and will be capable of performing their intended function.

The NRC's oversight of the Millstone ICAVP for each unit will provide confidence that the licensee's configuration management corrective action programs have been effective. This inspection plan is based on the NRC's understanding of the licensees activities and will be modified, as necessary, to reflect new information. Millstone Unit 3 is currently scheduled to be the lead plant for the ICAVP. The scope and methodology for the inspection of the ICAVP for Units 1 and 2 may be adjusted based on insights gained from the Unit 3 inspection and the licensee's proposed programs for those units.

IV. INSPECTION CONDUCT

The NRC's ICAVP oversight staff will perform a number of tasks to ensure that the licensee's configuration management corrective action programs, and the ICAVP, have been effectively implemented. These tasks include the (1) review and approval of the contractor, and individual contractor specialists, selected by the licensee to perform the ICAVP; (2) review and approval of the contractor's audit plan for performing the ICAVP; (3) independently assessing the licensee's implementation of its configuration management corrective action programs; (4) assessing the performance of the ICAVP contractor's implementation of the ICAVP; (5) monitoring the contractor interactions with the licensee as specified in the approved communication protocol to ensure continued independence from the licensee; and (6) evaluating the adequacy of the licensee's corrective actions, and their implementation, including corrective actions developed in response to the ICAVP contractor's findings and recommendations, and the findings from the NRC's ICAVP oversight. In performing these tasks, a number of inspection and oversight activities will be performed as described below. Detailed inspection guidance for the NRC's ICAVP oversight staff will be prepared that incorporates the applicable aspects from MC 2530, MC 2535, and IP 93801.

1. Review and approve the selection of the contractor to perform the ICAVP.

PURPOSE: To ensure that the contractor selected to perform the ICAVP is technically and financially independent of the licensee, the NSSS vendor, and the architect-engineer (AE); and technically capable of effectively performing the ICAVP.

ACTIVITIES: To complete this task the NRC's ICAVP oversight staff will perform the following:

- a. Review the information provided by the licensee and the selected contractor to determine whether the contractor has any financial interest or had any technical involvement with the design or construction of the subject Millstone unit.
- b. Verify that the contractor has adequate technical and managerial qualifications to conduct the ICAVP.
- c. Verify that the individual specialists have the appropriate technical background to participate in the ICAVP. The evaluation will include interviews, as well as a review of individual resumes and certifications.
- d. Verify that the individual specialists have no financial interest in NNECO, the NSSS vendor, or the AE for the subject Millstone unit.
- e. Verify that the individual specialists have had no prior involvement with the subject Millstone unit.

2. Review and approve the ICAVP audit plan submitted by the ICAVP contractor.

PURPOSE: To ensure that the ICAVP contractor's audit plan accomplishes the objectives of the August 14, 1996, confirmatory order, includes a sufficient scope and depth, and provides sufficient guidance and instructions to its specialists to effectively implement an assessment of the capability and

effectiveness of the licensee's configuration management corrective action programs at identifying and addressing licensing-bases deficiencies.

ACTIVITIES: To complete this task, the NRC's ICAVP oversight staff will perform the following:

- a. Review the contractor's ICAVP audit plan to ensure it employs a three-tier approach for assessing the licensee's effectiveness at identifying and correcting licensing-bases deficiencies that includes:

Tier 1: A vertical-slice system review method for the approximately eight systems similar to the guidance provided in IP 93801 and MC 2530.

Tier 2: A review of accident mitigation systems that assesses critical design characteristics to ensure that the systems and components can perform their specified safety functions. This activity requires the NRC's ICAVP oversight staff to review and approve the critical design characteristics proposed by the ICAVP contractor.

Tier 3: A review of examples from the various processes used by the licensee to change the facility design or change the characteristics, procedures, or practices for maintaining, operating, testing, and training on safety or risk significant systems, structures, and components.

- b. Review the contractor's ICAVP audit plan to ensure it has sufficient depth to enable the contractor to:

- (1) Verify that the licensee's design engineers have sufficient technical guidance to perform assigned engineering functions.
- (2) Verify, for the selected systems, that the regulatory requirements, and licensing-bases are correctly implemented in specifications, drawings, calculations, and procedures and that systems can perform their specified functions.
- (3) Verify that the updated Final Safety Analysis Report (FSAR) accurately reflects the current licensing bases, current plant configuration and operational characteristics of the unit for the selected systems.
- (4) Verify that the analyzed facility configuration in the design bases is consistent with the current plant configuration and operational characteristics of the unit for the selected systems.
- (5) Verify that the correct licensing-bases information has been reflected in the responsible engineering, maintenance, and operations procedures.
- (6) Verify that system design changes have not invalidated preoperational and startup acceptance testing.

- (7) Verify that design controls, as applied to the original design, have also been applied to design changes, including permanent modifications, temporary modifications, procedure changes, and any other processes the licensee uses to change the configuration or operation of the facility.
 - (8) Verify the adequacy of the licensee's corrective actions and assess the effectiveness of the licensee's implementation of the corrective actions developed as part of the CMP and in response to the ICAVP findings.
 - (9) Define the contractor's review and inspection schedules for NRC planning.
- c. Verify that the procedures and review plans developed by the ICAVP contractor have sufficient administrative and technical instructions and guidance to its specialists to enable them to implement the ICAVP audit plan as approved by the NRC staff, including:
- (1) Instructions for documenting and reporting observations, findings, and recommendations in a manner consistent with the August 14, 1996, confirmatory order.
 - (2) Providing comments to the NRC on the licensee's recommended corrective actions in response to the ICAVP observations, findings and recommendations.
 - (3) Instructions for communicating with the licensee that are consistent with the communication protocol developed for the process.
- d. Review the ICAVP contractor's proposed system selection criteria. The August 14, 1996, order states that the ICAVP audit plan, which the licensee must provide to the NRC before implementation, must describe risk/safety based criteria for selection of systems for review.
- e. Select approximately three systems to include within the scope of the ICAVP contractor review. In selecting these systems, the staff will consider the ICAVP contractor's proposed criteria. Also considered by the NRC for system selection are the (1) system's risk significance; (2) system's design and operating characteristics; (3) number and complexity of changes to the system; and (4) number of previously identified deficiencies and operating problems. In addition, to address public concerns with system selection, the staff will offer to a third party, such as the Connecticut Nuclear Energy Advisory Council (NEAC), the opportunity to select one other system using any method that they deem appropriate.
3. Independently assess the effectiveness of the licensee's performance of its configuration management corrective action programs and performance of the ICAVP contractor in the implementation of its audit plan.

PURPOSE: To provide the NRC with an independent assessment of the licensee's ability to identify and resolve licensing-bases deficiencies; and assess the

effectiveness of the ICAVP contractor in verifying that the licensee has identified and addressed licensing-bases deficiencies as intended by the confirmatory order.

ACTIVITIES: To complete this task, the NRC's ICAVP oversight staff will perform the following activities to assess the ICAVP contractor's Tiers 1, 2, and 3 reviews, and provide the NRC with an independent assessment of the licensee's performance:

- a. The NRC ICAVP oversight staff will perform a vertical slice review of two systems. One of the reviews will be on a system within the scope of the Tier 1 (vertical-slice) system reviews of the ICAVP contractor. The second review will be of a system outside the scope of the ICAVP Tier 1 system reviews. The vertical slice reviews performed by the NRC's ICAVP oversight staff will include a review of design calculations and analyses for both the unmodified portions of the original system configuration and design modifications, system walkdowns, review of procedural controls for modifying or changing the facility operational characteristics. The vertical slice review will verify that:
 - (1) The current configuration accurately reflects the licensing-bases, including the updated FSAR.
 - (2) The calculations and analyses were performed using recognized and acceptable analytical methods.
 - (3) The assumptions made in any calculations or analysis supporting the change are technically sound.
 - (4) The results of calculations or analysis supporting the unmodified portions of the original configuration and design changes are reasonable (based on engineering judgement) for the scope of the change.
 - (5) The licensee considered the effect of a change on design margins and the design changes received the appropriate level of engineering and management review during the design phase and prior to implementation.
 - (6) The licensee considered the effect of a change on pre-operational, startup, or system baseline acceptance test results.
 - (7) Design changes were accomplished in accordance with the licensee's approved procedures.
 - (8) Design changes are accurately reflected in operating, maintenance, and test procedures, as well as in training materials.
 - (9) Proposed design changes, subsequently cancelled, were not replaced by procedural changes that imposed excessive burdens on plant operators.

b. In performing the vertical slice review, the NRC's ICAVP oversight staff will conduct in-plant system walkdowns for the two systems reviewed. The walkdowns will be performed in accordance with specific inspection guidance based on IP 93301 and MC 2535. The walkdowns will be multi-disciplinary reviews including, as a minimum, areas such as mechanical systems, mechanical components, electrical power, civil and structural design, and instrumentation and control. The walkdowns will be used to:

(1) Verify adequate control of operational procedures, maintenance procedures, test and surveillance procedures, operator training, and control of the plant simulator configuration.

(2) Verify that the current configuration is consistent with the licensing bases at the level of detail contained in piping and instrumentation diagrams (P&IDs) or system flow diagrams, piping isometric drawings, electrical single-line diagrams, and emergency, abnormal, and normal operating procedures. This includes:

(a) Verification of the licensing-bases information contained in the updated FSAR and docketed correspondence.

(b) Verification that the analyzed configuration is consistent with the current plant configuration.

(c) Verification that equipment location and identification numbers are as indicated on the P&ID or process flow diagram, and equipment name plate data is consistent with design specifications and analyses.

(d) Verification that the location of pipe supports, snubbers, and other pipe restraints is consistent with design specifications and piping stress analyses.

(e) Verification that divisional separation of safety-related systems, structures and components, seismic II/I, and other topics addressed by the licensee's hazards analyses are reflected in the current plant configuration.

(3) During the walkdowns, the team will also take note of modifications that appear to have been recently completed. These modifications will be screened to assure adequate documentation exists and will be included in further review.

c. The NRC's ICAVP oversight staff will select two postulated accidents analyzed in the accident analysis section of the FSAR and independently review the critical characteristics of the systems relied upon to mitigate the consequences of the selected accident scenarios to assess the ICAVP contractor's Tier 2 review. The oversight staff will ensure that the systems can perform their safety function(s) specified to mitigate the selected FSAR accident scenarios, and that the ICAVP contractor has thoroughly verified the critical characteristics for the systems associated with the selected accident scenarios.

d. The NRC's ICAVP oversight staff will select samples from each of the change processes within the scope of the ICAVP Tier 3 review, both reviewed by the ICAVP contractor and not reviewed by the contractor, to ensure that the contractor's review was effective in identifying specific and programmatic design process control deficiencies. For those samples reviewed by the ICAVP contractor include an evaluation of the validity of:

- (1) The ICAVP contractor's review methods for assessing the changes.
- (2) Any assumptions made by the ICAVP contractor in its review of the changes.
- (3) Any independent calculations or analysis performed by the ICAVP contractor during its review of the changes.

e. Verify that NRC comments and recommendations provided to the ICAVP contractor on the scope of the ICAVP were effectively implemented or otherwise satisfactorily resolved.

f. The NRC's ICAVP oversight staff will review the findings and observations made by the licensee during the implementation of the configuration management corrective action programs and the ICAVP contractor to determine whether the oversight staff's reviews have identified any licensing-bases deficiencies that were not identified by the licensee or the ICAVP contractor.

4. Assess the continued independence of the contractor and its specialists during implementation of the ICAVP.

PURPOSE: To ensure that the ICAVP contractor maintains an adequate level of independence from the licensee during conduct of the ICAVP.

ACTIVITIES: The NRC's ICAVP oversight staff will control and monitor the interactions between the ICAVP contractor and the licensee as specified in the communication protocol. To perform this task the NRC's ICAVP oversight staff shall perform the following activities:

- a. Control and monitor meetings and verbal communication between the ICAVP contractor and the licensee. Ensure that reasonable efforts are made to allow observation by the designated Connecticut NEAC observers or their alternates.
- b. Review the written questions posed by the ICAVP contractor to the licensee and the written replies by the licensee.

5. Assess the adequacy of the licensee's corrective actions, and their implementation, in response to the findings of licensee conducted programs (e.g., CMP), the ICAVP contractor's findings and recommendations, and the findings of the NRC's ICAVP oversight staff.

PURPOSE: To provide the principal input into the NRC's assessment of the ability of the licensee to maintain the licensing bases of the subject unit in the future.

ACTIVITIES: The NRC's ICAVP oversight staff will review the licensee's corrective actions resulting from its configuration management review, the ICAVP contractor's review, and the NRC's ICAVP oversight staff activities. This part of the inspection will be conducted after the ICAVP contractor has completed its review of the selected systems, including the corrective actions for issues previously identified by the licensee or its other contractors, and the corrective actions for issues identified by the ICAVP oversight staff. The staff will interface closely with the Millstone Restart Panel during this phase to ensure each deficiency has been appropriately resolved. To complete this task the NRC's ICAVP oversight staff will perform the following:

- a. Review the licensee's design-related corrective actions for the systems within the scope of the ICAVP Tier 1 review to assure that:
 - (1) The root cause(s) of and causal factors associated with the issue have been identified.
 - (2) The specific deficiency has been resolved.
 - (3) The applicability of the deficiency to other systems, and programmatic and operational aspects not reviewed by the ICAVP contractor has been addressed.
 - (4) The corrective actions have been adequately documented.
 - (5) Those corrective actions required to be implemented prior to restart have been completed, and that those not completed are adequately justified and acceptable to the ICAVP oversight staff.
- b. Ensure the results of the ICAVP, including all observations, findings, and recommendations made by the ICAVP contractor, and open items established by either the ICAVP contractor or the NRC staff, have appropriately been addressed by the licensee's corrective actions and that those corrective actions have been completed.
- c. Review the comments from the ICAVP contractor submitted to the NRC as required by the order regarding the corrective actions proposed by the licensee to resolve or address the ICAVP contractor's findings and recommendations. Verify that the licensee has considered the ICAVP findings and recommendations in the development of its corrective actions.
- d. Evaluate the overall results and conclusions of the ICAVP contractor to determine whether the licensee's configuration management corrective action programs were effective in:
 - (1) Providing the licensee with a clear understanding of the licensing and design bases of the subject unit.
 - (2) Providing confidence that the configuration of the unit under review is in accordance with the updated FSAR, NRC regulations, and other commitments.

- (3) Providing confidence that the licensee's configuration management programs, if properly implemented, will maintain the subject Millstone unit's compliance with its licensing basis.

V. ICAVP OVERSIGHT TEAM COMPOSITION

The NRC ICAVP Oversight Team will include the following:

| | |
|---|---|
| Deputy Director, ICAVP Oversight | E. Imbro, NRR/SPO |
| Branch Chief, ICAVP Oversight | L. Plisco, NRR/SPO |
| Operations Inspectors | J. Nakoski, NRR/SPO A. Gody, RIV/DRP |
| Mechanical Systems Inspectors | (2 minimum) |
| Electrical Power Systems Inspectors | (2 minimum) |
| Instrumentation & Control | (2 minimum) |
| Piping/Structural | (2 minimum) |

VI. DELEGATION OF RESPONSIBILITIES

The Director of the Office of Nuclear Reactor Regulation has delegated to the Senior Executive Service (SES) Manager responsible for the staff oversight of the Millstone ICAVP, the authority to approve changes to the initial ICAVP audit plan, within the scope of the August 14, 1996, confirmatory order, and to modify this inspection plan as necessary to ensure adequate oversight of the licensee's ICAVP audit plan. Changes to the ICAVP audit plan proposed by the licensee that are in conflict with the confirmatory order shall be approved by the Director of NRR.

EDO Principal Correspondence Control

FROM:

DUE: 5/19/97

EDO CONTROL: G970317

DOC DT: 04/23/97, 4/30/97

FINAL REPLY:

Lois E. Bailey
Baltic, Connecticut

TO:

Chairman Jackson

FOR SIGNATURE OF :

** GRN **

CRC NO: 97-0408

97-0431

Collins

DESC:

ROUTING:

OVERSIGHT OF THE MILLSTONE FACILITY

Callan
Jordan
Thompson
Norry
Blaha
Burns
Reyes, RII

DATE: 05/01/97

ASSIGNED TO:

CONTACT:

NRR

Collins

SPECIAL INSTRUCTIONS OR REMARKS:

~~For Appropriate Action.~~

Add EDO/Chairman on for concurrence.

ACB

EDO Principal Correspondence Control

FROM:

[REDACTED]

EDO CONTROL: G970317

DOC DT: 04/23/97, 4/30/97

FINAL REPLY:

Lois E. Bailey
Maltic, Connecticut

TO:

Chairman Jackson

[REDACTED]:

** GRN **

CRC NO: 97-0408

97-0431

ESC:

ROUTING:

OVERSIGHT OF THE MILLSTONE FACILITY

Callan
Jordan
Thompson
Norry
Blaha
Burns
Reyes, RII

DATE: 05/01/97

ASSIGNED TO:

CONTACT:

NRR

Collins

SPECIAL INSTRUCTIONS OR REMARKS:

~~For Appropriate Action.~~

[REDACTED]

ACB

OFFICE OF THE SECRETARY
CORRESPONDENCE CONTROL TICKET

PAPER NUMBER: CRC-97-0408 LOGGING DATE: Apr 30 97

ACTION OFFICE: EDO

AUTHOR: LOIS BAILEY
AFFILIATION: CONNECTICUT

ADDRESSEE: CHAIRMAN JACKSON

LETTER DATE: Apr 23 97 FILE CODE: IDR 5 MILLSONE

SUBJECT: OVERSIGHT OF THE MILLSTONE FACILITY

ACTION: Appropriate

DISTRIBUTION: CHAIRMAN

SPECIAL HANDLING: NONE

CONSTITUENT:

NOTES:

DATE DUE:

SIGNATURE: DATE SIGNED:
AFFILIATION: