

PROJECT
INSTRUCTION

Sargent & Lundy

INSTRUCTION PI-MP3-01
REV. 2

Client: Northeast Utilities

Station: Millstone Unit 3

Title: **INDEPENDENT CORRECTIVE ACTION VERIFICATION PROGRAM
COMMUNICATIONS PROTOCOL**

☒ **Safety-Related**

☐ **Non-Safety-Related**

Reviewed By:

Approved By:

System Lead

Programmatic
Lead

O&M Lead

Accident
Mitigation
Lead

QA Engineer

Internal Review
Committee
Chairman

Verification Team
Manager

Date: 6-27-97

Description

Rev. 2

- Revised NRC and NU Contacts
- Revised RFI form
- Added walkdown assistance and NU activity observation items
- Revised press/media communications
- Add Internet address for Millstone ICAVP websites

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1.0 PURPOSE

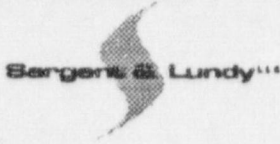
The purpose of employing an independent reviewer for the Independent Corrective Action Program (ICAVP) is to obtain an unbiased assessment of the Millstone Unit 3 configuration management and corrective action programs. Therefore, every reasonable effort will be made to assure that the observations and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

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

2.0 ORGANIZATIONAL-POINTS OF CONTACT

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

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

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2.1 Northeast Utilities

NU to NRC Contact: Richard Laudenat, ICAVP Licensing Director
 Phone - 860-444-5248
 Fax - 860-440-2091
 e-mail - laudert@gwsmtpl.nu.com
 Overnight mail - Northeast Utilities
 Millstone Nuclear Power Station
 Rope Ferry Road
 Waterford, Connecticut 06385

Primary Contact: Joe Fougere, ICAVP Project Manager
 Phone - 860-444-5526
 Fax - 860-437-5813
 e-mail - fougerej@gwsmtpl.nu.com
 Overnight mail - Northeast Utilities
 Millstone Nuclear Power Station
 Rope Ferry Road
 Waterford, Connecticut 06385

Backup Contact: Tom McCarthy, Unit 3 ICAVP Supervisor
 Phone - 860-447-1791 X6812
 Fax - 860-437-5813
 e-mail - mccartf@gwsmtpl.nu.com
 Overnight mail - Northeast Utilities
 Millstone Nuclear Power Station
 Rope Ferry Road
 Waterford, Connecticut 06385

2.2 Nuclear Regulatory Commission

Primary Contact: Gene Imbro, Deputy Director, ICAVP Oversight
 Phone - 301-415-1200
 Fax - 301-415-1222
 e-mail - exi@nrc.gov
 Overnight mail - Nuclear Regulatory Commission
 Mail Stop 014D4
 11555 Rockville Pike
 Rockville, Maryland 20852-2738

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Backup Contact: Steve Reynolds, Branch Chief ICAVP Oversight
Phone - 301-415-1332
Fax - 301-415-2260
e-mail - sar1@nrc.gov
Overnight mail - Nuclear Regulatory Commission
Mail Stop 014D4
11555 Rockville Pike
Rockville, Maryland 20852-2738

Site Contact: Harold Eichenholz, ICAVP Site Coordinator
Phone - 860-437-2324
Backup - 860-701-3468
Fax - 860-437-2325
Backup - 860-443-5893
Mail - Nuclear Regulatory Commission
P.O. Box 513
Niantic, CT 06353

2.3 Nuclear Energy Advisory Council

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

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

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2.4 Sargent & Lundy

Primary Contact: Don Schopfer, Verification Team Manager
Phone - 312-269-6078
Fax - 312-269-2617
e-mail - don.k.schopfer@slchicago.infonet.com
Overnight mail - Sargent & Lundy
55 E. Monroe Street
Chicago, Illinois 60603

Backup Contact: Bryan Erler, ICAVP Project Director
Phone - 312-269-7132
Fax - 312-269-2208
e-mail - bryan.a.erler@slchicago.infonet.com
Overnight mail - Sargent & Lundy
55 E. Monroe Street
Chicago, Illinois 60603

3.0 RULES FOR VARIOUS TYPES OF COMMUNICATIONS

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

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

- * The S&L Verification Team Manager, or one of the Review Leads, will submit all requests for information to the NU primary contact in writing. This may be via fax, e-mail or overnight mail, however, the method preferred by NU is e-mail. Each request shall be on a standard form developed for this purpose and shall be provided with a sequential number for tracking (See Attachment 5.1). NU's response to the

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requests shall be submitted in duplicate to the S&L primary contact, one copy to Chicago and one copy the office space provided by NU to S&L near the Millstone station. NU shall provide an index of all documents submitted, including a revision number or identifying date.

- * In order to ascertain the availability of information or to identify the appropriate documents containing required information, the S&L Verification Team Manager or one of the Review Leads may contact one of the NU contacts or a designated Document Control personnel via phone. This type of informal contact shall only be made in the process of preparing, submitting, or clarifying a request for information.
- * There may occasionally be a need for S&L to discuss administrative issues with NU, such as arrangements for access training and badging of personnel, arrangements for access to NU computer databases, and issues related to the local office facility. This type of communication is permitted directly between S&L and NU primary contacts or their designees without NRC or NEAC involvement.

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

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

3.3 Walkdown Assistance/NU Activity Observation - S&L will do walkdowns of the selected systems and will observe certain NU maintenance, operations and testing activities. These activities will require interface between S&L and NU personnel.

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- * When S&L requires assistance from NU personnel to accomplish their walkdown tasks (e.g. erecting scaffolding, opening electrical panels, etc.) the S&L Configuration Review Group (CRG) Lead shall contact the NU primary contact to make the necessary arrangements. The CRG Lead shall also notify the NRC ICAVP Site Coordinator to allow him to participate/observe the interface.
- * When S&L selects to observe certain NU maintenance, operations, and testing activities, the S&L Operations Review Group (ORG) Lead shall contact the NU primary contact to identify the activities to be observed and make the necessary arrangements. The S&L ORG Lead shall also notify the NRC ICAVP Site Coordinator of the scheduled observations to allow him the opportunity to participate. A minimum of 24 hour advanced notice shall be provided to the NRC. No notes shall be issued as a result of this type of interface.

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

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

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

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

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

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

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

- * Requests for interviews with the press or media shall be referred to the Project Director or the Verification Team Manager. One of them shall notify the NU and the NRC primary contact of the request. The Director or Manager shall respond appropriately to the press or media requests. S&L will provide the NRC and NEAC with an advanced copy of any written press releases related to the ICAVP.

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

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

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

4.0 PUBLIC ACCESS TO ICAVP INFORMATION ON THE INTERNET

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

5.0 ATTACHMENTS

5.1 ICAVP Request for Information (1 page)

Northeast Utilities
Millstone Unit 3

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

To: Mr. Joe Fougere, ICAVP Project Manager
cc: Mr. Tom McCarthy, Unit 3 ICAVP Supervisor

RFI Number:

Requested By:

Date Needed By:

Submitted By:

Request Date:

Item Number	Document Title or Description.	Document / Revision Number
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