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Vice President
312-269-6078

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Project No. 9583-100

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Northeast Nuclear Energy Company
Millstone Nuclear Power Station, Unit No. 3
Independent Corrective Action Verification Program

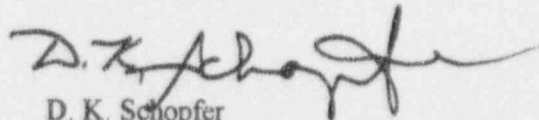
United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

I have enclosed the following three (3) discrepancy reports (DRs) identified during our Programmatic Review activities for the ICAVP. These DRs are being distributed in accordance with the Communications Protocol, PI-MP3-01.

DR No. DR-MP3-0001
DR No. DR-MP3-0002
DR No. DR-MP3-0005

Please direct any questions to me at (312) 269-6078.

Yours very truly,


D. K. Schopfer
Vice President and ICAVP Manager

Copies:
E. Imbro (1/1) Deputy Director, ICAVP Oversight
T. Concannon (1/1) Nuclear Energy Advisory Council
J. Fougere (1/1) NU

AODI 1/1

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PDR ADUCK 05000423
P PDR



080048

Review Group: Programmatic

DR VALID

Review Element: Change Process

Discipline: Other

Discrepancy Type: Design Control Procedure

System/Process: N/A

Potential Operability Issue

☐ Yes

☒ No

Date FAXed to NU:

Date Published:

Discrepancy: Consistency with Technical Specifications

Description: We have reviewed Millstone Station Procedure DC 1, Rev. 5 (effective 3/3/97), titled "Administration of Procedures and Forms". Based on this review, we have noted the following discrepancies.

1. This procedure is not consistent with Technical Specification 6.8.3.c. This section of the technical specification requires, in the case of temporary, non-intent changes to procedures required by Technical Specification 6.8.1, that the change be approved by the Station Qualified Reviewer Program Manager or Nuclear Unit Director or Senior Vice President - Millstone Station within 14 days. Paragraph 1.6.3 a.4 of procedure DC 1 requires that non-intent procedure changes be approved (including Independent Review and Safety Evaluation Screening) by the Department Head, Responsible Individual, PORC or SORC within 14 days. These requirements are inconsistent with the Technical Specification requirements.
2. Section 1.1 of procedure DC 1 has an obsolete quotation. This section quotes Section 6.8.1 of the Technical Specifications as requiring procedures for Security Plan and Emergency Plan implementation. Amendment No. 128 to the Technical Specifications, dated 4/24/96, deleted these requirements. This is an editorial discrepancy since these types of procedures are required by other regulations and Millstone commitments, e.g., 10 CFR 50, Appendix E, and Regulatory Guide 1.33.

	Valid	Invalid	Review Needed	Date
Initiator: Sheppard, R. P.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	6/11/97
VT Lead: Ryan, Thomas J	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	6/13/97
VT Mgr: Schopfer, Don K	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	6/30/97
IRC Chmn: Singh, Anand K	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	7/3/97

Date:

INVALID:

Date:

ESOLUTION:

	Accept	Reject	Review Needed	Date
Initiator: Sheppard, R. P.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
VT Lead: Ryan, Thomas J	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
VT Mgr: Schopfer, Don K	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
IRC Chmn: Singh, Anand K	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

Date:

REJECTION:

Review Group: Programmatic

DR. VALID

Review Element: Change Process

Potential Operability Issue

Discipline: Mechanical Design

☐ Yes

Discrepancy Type: Design Control Procedure

☒ No

System/Process: N/A

Date FAXed to NU

Date Published

Discrepancy: Use of Later Versions of ASME Section XI

Description: We have reviewed Station Administrative Procedure WC-3, Revision 0, titled "ASME Section XI Repair and Replacement Program" with Changes 1, 2 and 3 effective February 3, 1997 and Nuclear Group Procedure NGP 7.05, Revision 4, titled "ASME Section XI Program for Repair, Replacement, and Modification Activities" effective September 21, 1994. Based on these reviews we have noted the following discrepancies.

1. These procedures are ambiguous concerning the need to obtain prior NRC unit specific approval before using a later edition of ASME Section XI for a repair, replacement or modification. The edition and addenda of ASME Section XI required for repair, replacement and modification at each unit is defined in its Inservice Inspection (ISI) Program. The ISI Program we have for Unit 3 (has 5/12/96 stamp) shows the 1983 Edition of Section XI with the Summer of 1983 Addenda, except that Class 2 welds are examined per the Summer of 1985 Addenda.

Section 1.1 of procedure WC-3 and paragraph 6.1.1 of procedure NGP 7.05 state that subsequent editions and addenda (of Section XI) may be used provided they are accepted by the enforcement and regulatory authorities.

10 CFR 50.55a(g)(4)(iv) is referenced in Unit 3's ISI Program. This regulation allows the use of subsequent editions and addenda of Section XI incorporated in 10 CFR 50.55a(b), subject to Commission approval on a unit specific basis. Thus, it is not sufficient that the later edition use be accepted on the basis of 10 CFR 50.55a(b) alone.

(Side Note: Draft Regulatory Guide DG-1050 issued February, 1997 (draft Revision 12 to Regulatory Guide 1.147) endorses Case N-389-1 without exceptions. Therefore, when this revision is issued and when a commitment to this Case is incorporated into Unit 3's ISI Program, the necessity to obtain prior NRC approval of the use of later editions of Section XI for repair, replacements and modifications will be precluded.)

2. The note on Attachment 5 to WC-3 references Regulatory Guide 1.83. This should be Regulatory Guide 1.85. This is a typographical error only.

3. The training requirements for Revision 0 to Procedure WC-3 and changes thereto are inconsistent. Changes 1 and 3 to Revision 0 of the procedure, which are minor changes, state under training: "Familiarization required". Revision 0 to WC-3, the initial issue of the procedure, states: "No familiarization required".

	Valid	Invalid	Review Needed	Date
Initiator: Sheppard, R. P.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	6/13/97
VT Lead: Ryan, Thomas J	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	6/13/97
VT Mgr: Schopfer, Don K				6/30/97

Northeast Utilities
Millstone Unit 3

ICAVP
Discrepancy Report

DR No. DR-MP3-0002

VT Mgr: Schopfer, Don K	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	6/30/97
IRC Chmn: Singh, Anand K	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	7/3/97

Date:

INVALID:

Date:

ESOLUTION:

	Accept	Reject	Review Needed	Date
Initiator: Sheppard, R. P.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
VT Lead: Ryan, Thomas J	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
VT Mgr: Schopfer, Don K	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
IRC Chmn: Singh, Anand K	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

Date:

REJECTION:

ICAVP Discrepancy Report

Review Group: Programmatic
Review Element: Change Process
Discipline: Operations
Discrepancy Type: O & M & T Procedure
System/Process: N/A

DR VA ID

Potential Operability Issue

☐ Yes

☒ No

Date FAXed to NU:

Date Published:

Discrepancy: Internal Procedure Inconsistencies

Description: This discrepancy relates to Millstone General Operating Procedure OP 3265, Rev.5 (effective 9/20/93), titled "EOP Change and Revision Process" which controls Emergency Operating Procedures (EOPs) and other EOP supporting procedures. This procedure is self contradictory in some fundamental requirements regarding the reviews required for procedure changes.

1. The procedure is internally inconsistent regarding the need for engineering reviews and safety evaluations for setpoint changes. Paragraph 2.2.13 of procedure OP 3265 states that an intent change is, "a modification which alters method, scope, or safety of a procedure. Setpoint changes are considered intent changes." Further, notes 2 to paragraphs 4.3.2 and 4.3.3 state that setpoint changes do not require an engineering review or an integrated safety evaluation.

Contrary to the above procedural requirements, Attachment 1 to OP 3265 flow chart shows that all intent changes require an engineering review and an integrated safety evaluation.

2. The procedure is ambiguous concerning the necessity to verify and validate intent changes. The notes to paragraphs 4.3 and 4.3.6 of OP 3265 state that the EOP Coordinator decides whether procedure verification or validation is required and whether it will be full or partial. Thus, intent changes to procedures can be made without verification or validation.

Contrary to the above procedural requirements, Attachment 1 to OP 3265 shows a procedure flowchart which indicates that all intent changes receive verification, validation, local validation, engineering review and integrated safety evaluation.

	Valid	Invalid	Review Needed	Date
Initiator: Sheppard, R. P.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	6/30/97
VT Lead: Ryan, Thomas J	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	6/30/97
VT Mgr: Schopfer, Don K	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	6/30/97
IRC Chmn: Singh, Anand K	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	7/3/97

Date:

INVALID:

Date:

RESOLUTION:

	Accept	Reject	Review Needed	Date
Initiator: Sheppard, R. P.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
VT Lead: Ryan, Thomas J	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
VT Mgr: Schopfer, Don K				

Northeast Utilities
Millstone Unit 3

ICAVP
Discrepancy Report

DR No. DR-MP3-0005

VT Mgr: Schopfer, Don K
IRC Chmn: Singh, Anand K

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Date:

REJECTION: