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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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In the Matter of: : Docket No. 50-423-LA-3
: :
: : ASLBP No. 00-771-01-LA
: :
Northeast Nuclear Energy Company :
: :
(Millstone Nuclear Power Station, :
Unit No. 3) : June 30, 2000

**RESPONSE OF THE INTERVENORS, CONNECTICUT COALITION
AGAINST MILLSTONE AND LONG ISLAND COALITION AGAINST
MILLSTONE, TO ATOMIC SAFETY AND LICENSING BOARD PANEL'S
QUESTIONS PER MEMORANDUM, MAY 23, 2000**

Pursuant to the order set forth in the Atomic Safety and Licensing Board Panel's Memorandum of May 23, 2000, the Intervenor, Connecticut Coalition Against Millstone and Long Island Coalition Against Millstone, respond to the Board's questions as follows:

Contention 4

(1) Neither the NRC Staff, the nuclear industry nor any other entity has developed a systematic database of fuel mispositioning events. The Intervenor has assembled a partial record of such events, which is provided in Appendix B of the Intervenor's Summary.

In the absence of a systematic database, judgment must be used to determine the likelihood of a postulated event involving fuel mispositioning. The Intervenor's judgment is that mispositioning of one or more fresh or highly reactive fuel assemblies in the Millstone Unit 3 pool is likely.

At a particular plant, local factors will affect the likelihood of fuel mispositioning. However, generic factors will also be important. These considerations are reflected in the Intervenor's judgment for Millstone Unit 3, as stated above.

Contention 5

(3) See Section V of the Intervenor's Summary.

Contention 6

(1) There is no universally accepted definition of reactivity. The Intervenors define the reactivity of a finite group of fuel assemblies in a fuel pool as $1 - 1/K_{\text{effective}}$, where $K_{\text{effective}}$ is the neutron multiplication factor for this group of assemblies. Note that $K_{\text{effective}}$ is a dynamic parameter which is determined by fuel and water temperature, and by the physical configuration of the group of fuel assemblies and the surrounding materials.

(2) See Section VI of the Intervenors' Summary.

(5) In GDC 62, the phrase "physical systems or processes encompasses physical systems or processes whose functioning does NOT rely to a significant extent on ongoing administrative controls, and excludes physical systems or processes whose functioning does rely to a significant extent on ongoing administrative controls.

(6) See (5).

(7) No change is required if the Intervenors' contentions prevail in this proceeding.

Respectfully submitted,



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Against Millstone and Long Island

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Northeast Nuclear Energy Company	:	:
	:	:
(Millstone Nuclear Power Station, Unit No. 3)	:	June 30, 2000

I hereby certify that copies of "Response of the Intervenors, Connecticut Coalition Against Millstone and Long Island Coalition Against Millstone, to Atomic Safety and Licensing Board Panel's Questions Per Memorandum, May 23, 2000" in the above-captioned proceeding have been served on the following by E-Mail as indicated by asterisk and to all by conforming copy via U.S. Mail, postage pre-paid, on June 30, 2000:

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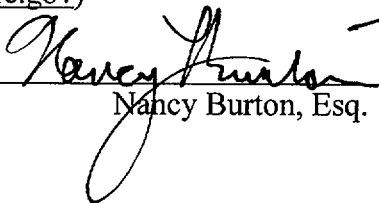
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