



**Northeast  
Nuclear Energy**

Rope Ferry Rd. (Route 156), Waterford, CT 06385

Millstone Nuclear Power Station  
Northeast Nuclear Energy Company  
P.O. Box 128  
Waterford, CT 06385-0128  
(860) 447-1791  
Fax (860) 444-4277

The Northeast Utilities System

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

Subject: Millstone Nuclear Power Station, Unit No. 1, Docket No. 50-245  
Change to Commitment on Fuel Assembly Movement

- References:
- (1) NNECO letter B16189, "Millstone Nuclear Power Station, Unit No 1 - Spent Fuel Pool Conditions," dated February 21, 1997
  - (2) NRC letter "NRC Combined Inspection 50-245/97-01;50-336/97-01;50-423/97-01 and Notice of Violation," dated April 11, 1997
  - (3) NNECO letter B18128, "Millstone Nuclear Power Station, Unit No. 1, Docket No. 50-245 - 10CFR50.71(e) Submittal of Defueled Safety Analysis Report and the 10CFR50.59 Annual Report for 1999," dated June 30, 2000

Millstone Unit 1 has changed an existing commitment concerning the movement of fuel assemblies in the spent fuel pool before the raised assemblies are fully seated. This commitment change was necessary to initiate activities to resolve the fuel pin accountability issue.

The prior commitment stated:

*No unaffected, irradiated fuel assemblies will be moved within the spent fuel pool until the raised fuel assemblies have been fully seated. In the event that an assembly cannot be fully seated, no unaffected, irradiated fuel assemblies will be moved until it is determined that either the assembly configuration has been previously evaluated, or an evaluation of the configuration is performed.*

This commitment was originally made in 1997 (Ref. 1 and 2) when Millstone Unit 1 expected to be restarted. At that time, Millstone Unit 1 intended to ensure unseated fuel assemblies were seated (or otherwise resolved) prior to any significant fuel movement such as reloading the reactor core for restart. The commitment was changed to the above text in 1999 to allow Unit 1 to remove the new, unirradiated fuel once decommissioning commenced. Notification of that change was submitted in the 1999 Annual Report (Ref. 3). The 10 CFR 50.59 safety evaluation supporting that change concluded that the configuration of the spent fuel pool with respect to the raised assemblies, and the movement of fuel with respect to the raised fuel assemblies is safe and is not an unreviewed safety question.

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The commitment has now been modified to state:

*No unaffected, irradiated fuel assemblies will be moved within the spent fuel pool until the raised fuel assemblies have been fully seated except to resolve regulatory or safety issues.*

*In the event that an assembly must be moved, the movement will not take place until it is confirmed that the proposed movement is bound by a previous evaluation, or an evaluation of the proposed movement is performed.*

*In the event that an assembly cannot be fully seated, no unaffected, irradiated fuel assemblies will be moved until it is determined that either the assembly configuration has been previously evaluated, or an evaluation of the configuration is performed.*

There was no safety significance associated with this change. This commitment is implemented in Unit 1 procedures as a restriction on use and movement of fuel assemblies. By procedure, each proposed fuel movement is reviewed against the restrictions to verify no conflict exists. The commitment change will ensure that the proposed fuel movement is either bound by the existing evaluation or a new analysis of the proposed move is conducted. This ensures that the potential safety consequences are appropriately evaluated prior to fuel movement.

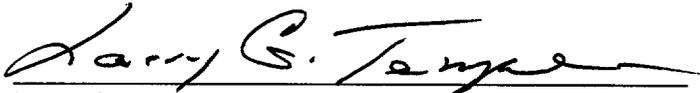
Millstone Unit 1 will continue to ensure that the irradiated fuel is safely maintained and the fuel movement and inspections necessary to resolve this issue are performed safely.

The Millstone Unit 1 commitment management procedure is based upon NEI 99-04 "Guidelines for Managing NRC Commitment Changes." Accordingly, notification of this commitment change should be included in the next Annual Report. In the interest of keeping the NRC fully informed of work activities within the Unit 1 spent fuel pool, Unit 1 is providing the NRC with early notice of the change.

If you have any questions regarding this letter, please contact Mr. Bryan S. Ford at (860) 437-5895.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



Larry G. Temple  
Unit 1 General Manager

cc: H. J. Miller, Region I Administrator  
J. B. Hickman, NRC Senior Project Manager, Millstone Unit No. 1  
T. J. Jackson, NRC Region I