

Dominion Nuclear Connecticut, Inc.
Millstone Power Station
Rope Ferry Road
Waterford, CT 06385



Dominion™

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United States Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Response to Request for Comments
Draft Safety Analyses of the Potential Inadvertent Disposal of
Two Spent Fuel Rods at Low-Level Radioactive Waste Facilities

In response to the NRC's request for comments (68 Fed. Reg. 588, January 6, 2003), Dominion Nuclear Connecticut, Inc. (DNC), the current Nuclear Regulatory Commission (NRC) licensee for Millstone Power Station, Units 1, 2 and 3 offers the following clarification to the draft safety analyses.

At several points in the draft safety analyses, the NRC attributes certain actions to DNC, which were, in fact, the actions of the former licensee and operator of Millstone Unit 1, Northeast Nuclear Energy Company (NNECO). For example, in the first sentence of each draft analysis, the NRC indicates that in November 2000, DNC as the licensee for Millstone Unit 1 informed the NRC that the location of two spent fuel rods could not be determined. In fact, at the time this notification was made in November 2000, NNECO was the licensee of Millstone Unit 1 who informed the NRC of the matter. As another example, the formation of an investigation team by NNECO and conclusions later reached in an October 2001 NNECO report regarding the two spent fuel rods that could not be located, are incorrectly attributed to DNC in the draft NRC safety analyses. Likewise, NNECO commissioned the safety analyses on the risks of the missing fuel (Second paragraph, third and fourth sentences of the draft NRC safety analyses).

The date of transfer of the NRC licenses for the Millstone units, including Millstone Unit 1, from NNECO to DNC was March 31, 2001. NNECO continued its work with respect to the fuel rods after DNC became the licensee for Millstone Unit 1. Subsequently, as the licensee, DNC later forwarded to the NRC the report of the results of the review

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performed by NNECO⁽¹⁾ and the response to the NRC's request for additional information⁽²⁾ completed by NNECO, and other submittals, with respect to this matter.

There are no regulatory commitments contained within this letter.

We appreciate this opportunity to provide this clarification to the draft safety analyses. Should there be any questions, please contact Mr. David W. Dodson at (860) 447-1791, extension 2346.

Very truly yours,

DOMINION NUCLEAR CONNECTICUT, INC.



J. Alan Price
Site Vice President - Millstone

cc: H. J. Miller, Region I Administrator
D. G. Holland, NRC Project Manager, Millstone Unit No. 1
J. R. Wray, NRC Inspector, Region I, Millstone Unit No. 1
Document Control Desk

⁽¹⁾ "Millstone Unit 1 – Issuance of a Final Report Pertaining to Unaccounted for Spent Fuel Rods," dated October 5, 2001.

⁽²⁾ "Response to a Request for Additional Information Regarding Safety Analysis of Millstone Unit No. 1 Missing Fuel Rods," dated May 15, 2002.