

Docket No. 50-245

Attachment 1

Safety Assessment Report

SEP Topic 11-1.A, Exclusion Area Authority and Control

April, 1981

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Millstone Nuclear Power Station, Unit No. 1
SEP Safety Assessment Report

Topic 11-1.A - Exclusion Area Authority and Control

1.0 Introduction

The safety objective of this topic is to assure that appropriate exclusion area authority and control are maintained by the licensee as required by 10CFR Part 100. The review was conducted in accordance with the guidance given in SRP 2.1.2. The capability of the plant to meet the dose criteria of 10CFR Part 100 at the exclusion area boundary will be evaluated in the Design Basis Event phase of the SEP review.

2.0 Criteria

Standard Review Plan Section 2.1.2 states that:

Prior to the issuance of a construction permit or limited work authorization, the applicant must demonstrate that it has the authority within the exclusion area as required by Part 100.3(a), or must provide reasonable assurance that it will have such authority prior to start of construction. Absolute ownership of all lands within the exclusion area, including mineral rights, is considered to carry with it the required authority to determine all activities on this land and is acceptable.

Standard Review Plan Section 2.1.2 also states that:

Where the designated exclusion area extends into bodies of water such as a lake, reservoir, or river which is routinely accessible to the public, the reviewer must determine that the applicant has made appropriate arrangements with the local, state, federal, or other public agency having authority over the particular body of water and the arrangements made provide for the exclusion and ready removal in an emergency, by either the applicant or the public agency in authority, of any persons on these portions of the body of water which lie within the designated exclusion area.

3.0 Discussion

Millstone Unit No. 1 is located in the town of Waterford in New London county, Connecticut, on the north shore of Long Island Sound. The 500 acre Millstone site is 3.2 miles west-southwest of New London town limits and 40 miles southeast of Hartford, Connecticut. The exclusion area, which is defined as the area within the site boundary, is wholly owned by the Licensees, who have complete control of activities including mineral rights within the exclusion area except for the passage of trains along the

Penn Central railroad track which runs east-west through the site. Provisions have been made with Amtrak, as described in the Millstone Nuclear Power Station Emergency Plan, to divert train traffic away from the Millstone site and to enforce traffic control, should the need arise. No public highways traverse the exclusion area. The site is shown in Figure 2.2.1-6 of the Millstone Unit No. 1 FSAR, which is included as Figure 1. The distance from the Unit 1 stack to the nearest exclusion area boundary on the landward side of the plant is 503 meters.

NNECO maintains an area within the exclusion area assigned as a wildlife preserve as well as swimming and fishing areas. The recreational areas, however, have been closed due to the construction activities at Millstone Unit No. 3.

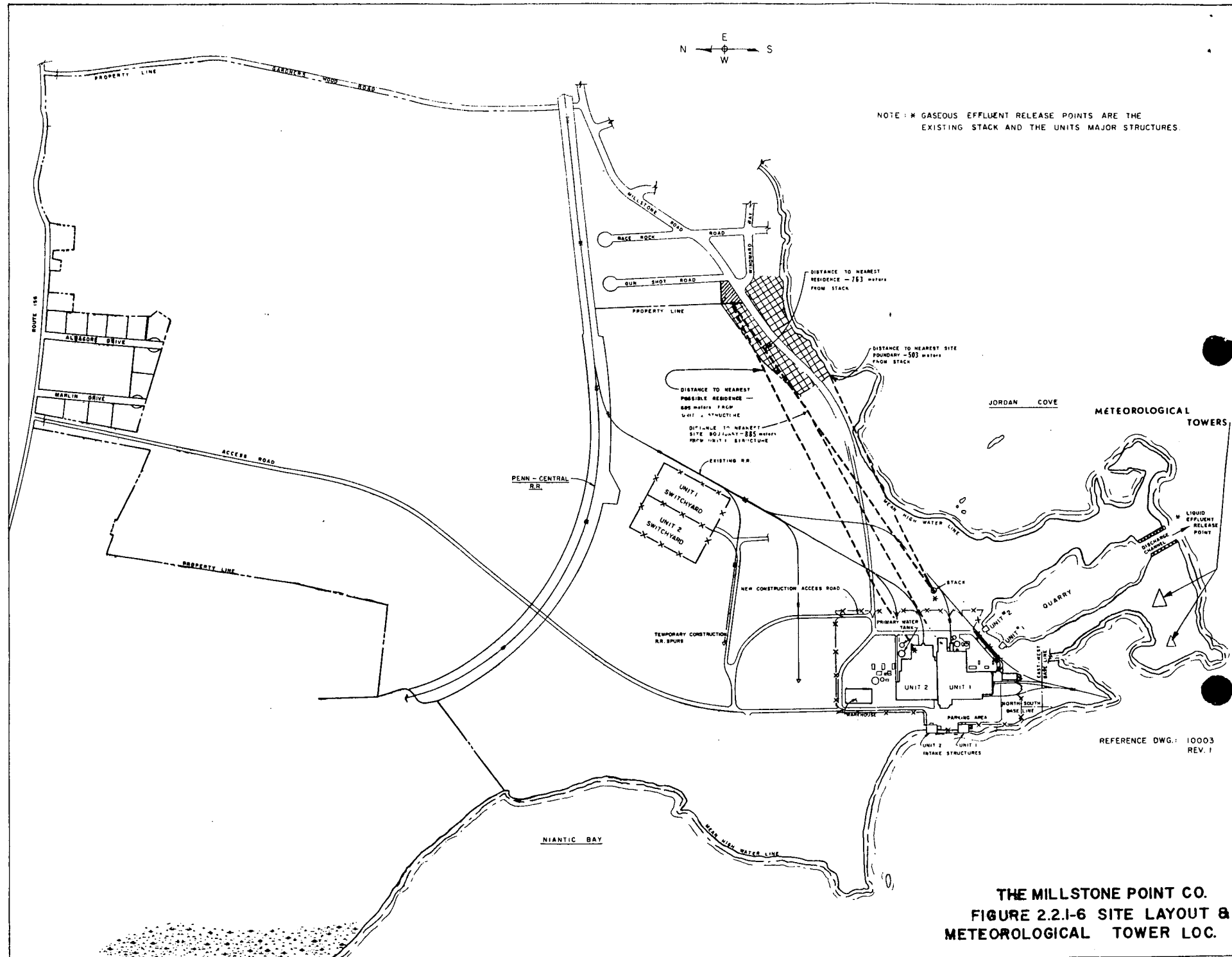
The exclusion area is not defined over the waters of Long Island Sound adjacent to the site; however, there are provisions in the Millstone Nuclear Power Station Emergency Plan and the State of Connecticut Emergency Plan, for control of water traffic in the vicinity of the Millstone site in the event of an emergency. The NRC Staff in recent cases involving shore front sites has interpreted the definition of an exclusion area in 10CFR Part 100 as applying to the entire area surrounding a reactor including the overwater portion. In these cases, licensees or applicants have been required to make appropriate arrangements to control water traffic within the exclusion area in the event of a plant emergency. The lack of a defined exclusion area over the water adjacent to the plant site is a deviation from the Staff's current interpretation of the criteria in 10CFR Part 100; however, arrangements with the U. S. Coast Guard as stated above meet the intent of the criteria of Topic 11-1.A. This deviation does not constitute a significant safety issue for the SEP review. Extension of the exclusion area to offshore waters will be evaluated during integrated assessment as part of Topic 11-2.c.

4.0 Conclusions

The conclusion reached is that NNECO has the proper authority to determine all activities within the exclusion area, as required by 10CFR Part 100. Although the Staff has interpreted 10CFR Part 100 as applying to the entire area surrounding a reactor, including the overwater portion, NNECO has demonstrated the ability to control water traffic near the plant. Thus, the intent of this requirement is met.

5.0 References

1. Millstone Nuclear Power Station, Unit No. 1 Final Safety Analysis Report, Section 2.2.1.
2. Standard Review Plan, Section 2.1.2, September, 1975.
3. Millstone Nuclear Power Station Emergency Plan, Revision 6, January 1, 1980.
4. Millstone Nuclear Power Station Emergency Plan, Draft Revision 7, February 13, 1981.
5. D. L. Ziemann letter to D. Bixel, dated November 27, 1979.



NOTE: * GASEOUS EFFLUENT RELEASE POINTS ARE THE EXISTING STACK AND THE UNITS MAJOR STRUCTURES.

REFERENCE DWG.: 10003 REV. 1

THE MILLSTONE POINT CO.
 FIGURE 2.2.1-6 SITE LAYOUT &
 METEOROLOGICAL TOWER LOC.