



EDISON DRIVE
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November 19, 1979

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

Attention: Office of Nuclear Reactor Regulation
Mr. Harold R. Denton, Director

Reference: Plant Modifications to Comply with Short Term
Lessons Learned

Dear Sir:

Consistent with your request, the subject modifications will be completed at the earliest possible opportunity.

We are exerting every effort to finalize the design and procure the necessary material. However, due to component availability and engineering design constraints, they cannot be completed prior to the objective January 1, 1980 date. I'm sure you will concur that these important plant modifications should be carefully thought out and reviewed to assure they meet the desired objective and do not somehow result in a degradation of safety.

The Maine Yankee plant is scheduled to begin an extended maintenance-refueling shutdown the evening of January 11, 1980. All of the subject modifications will be completed prior to startup.

We understand that the NRC is considering forcing a shutdown of nuclear units that cannot meet a January 1, 1980 objective date for the completion of the subject modifications. In our view, such an action if applied to Maine Yankee would serve no useful purpose and would jeopardize the power supply of Maine and New England during the peak demand period of the year.

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United States Regulatory Commission
Mr. Harold R. Denton

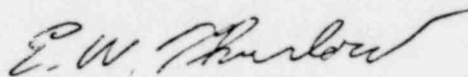
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Such a forced shutdown would necessitate the burning of an additional 40,000 bbls. of oil per day, much of it #2 oil, and all of it imported. It would, of course, aggravate the current critical oil situation. Replacement power for Maine Yankee sponsors would result in substantially higher customer costs.

Enclosed is a letter from the New England Power Exchange that addresses the impact of advancing the shutdown to January 1, 1980.

Therefore, we request that Maine Yankee be granted a time extension for the implementation of the Short Term Lessons requirements which would permit continued operation until January 12, 1980.

Very truly yours,



E. W. Thurlow
President

Enclosure

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NEPEX

NEW ENGLAND POWER EXCHANGE
174 BRUSH HILL AVENUE
WEST SPRINGFIELD, MASSACHUSETTS 01089
TELEPHONE (413) 785-5871

HARRY H. MOCHON, JR.
DIRECTOR

November 16, 1979

Mr. Charles E. Monty, Vice President
Maine Yankee Atomic Power Company
Edison Drive
Augusta, Maine 04336

Dear Mr. Monty:

This letter is in response to your request to determine the effects of moving the beginning of the Maine Yankee refueling outage from 12 MDT, January 11, 1980, to 12 MDT, December 31, 1979. As you are aware, the NEPEX overhaul schedule is pretty well set through 1980. The most critical period during the 1980 overhaul is in January.

The NEPEX Maintenance Scheduling Task Force (MSTF) develops the overhaul schedule in accord with NEPEX Operating Procedure No. 5, Unit Outages. One of the criteria in the Procedure prevents the MSTF from granting outages unless a specified MW margin remains for unscheduled outages after the scheduling. That number is now 2,800 MW. The average unscheduled outage for the past three months has been 3,370 MW, far above the specified margin. If Maine Yankee were to be removed from service on December 31, 1979, the margin for the week ending January 5, 1980 would be 2,435 MW, and the margin for the week ending January 12, 1980 would be 2,046 MW. These margins are well below the required margin set by the NEPOOL Operations Committee for reliability purposes. Therefore the MSTF and the NEPEX staff cannot grant scheduled outage for the period from December 31, 1979 to January 11, 1980 because it results in an unacceptably low level of reliability in the operation of the Pool. In addition to the above, other outages have already been rejected for the same reasons.

During the period in question, Maine Yankee would be expected to generate about 175,000 MWhr. Because the outage is being requested during the peak season and the Pilgrim is also down during this period, part of the energy would have to be replaced by internal combustion unit generation. Not only does this impose a financial penalty of 40-50 mills/KWhr, but it also utilizes #2 fuel oil during the height of the heating season. Since all New England states are urging conservation of fuel to insure enough home heating oil during this period, the outage is not in the public interest. The replacement cost of energy will approximate \$1,000,000/day in January, whereas the replacement cost of energy in March is estimated to be \$750,000/day.

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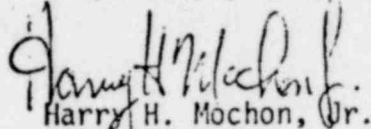
Mr. Monty

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November 16, 1979

In summary, NEPEX strongly opposes advancing the beginning of the Maine Yankee outage from January 11, 1980 to December 31, 1979 for reliability, public interest and economic aspects.

Very truly yours,


Harry H. Mochon, Jr.
Director-NEPEX

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