

**NORTHEAST
UTILITIES**

NORTHEAST UTILITIES SERVICE COMPANY
P. O. BOX 270
HARTFORD, CONNECTICUT 06101
203-666-6911

February 13, 1979

Docket Nos. 50-245
50-336

Director of Nuclear Reactor Regulation
Attn: Mr. D. L. Ziemann, Chief
Operating Reactors Branch #2
Mr. R. Reid, Chief
Operating Reactors Branch #4
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Gentlemen:

- References:
- (1) B. K. Grimes letter to All Power Reactor Licensees dated July 11, 1978.
 - (2) W. G. Counsil letter to B. K. Grimes dated July 26, 1978.
 - (3) B. K. Grimes letter to All BWR Power Reactor Licensees dated July 28, 1978.
 - (4) B. K. Grimes letter to All BWR Licensees dated November 15, 1978.
 - (5) B. K. Grimes letter to All PWR Licensees dated November 15, 1978.

Millstone Nuclear Power Station, Unit Nos. 1 and 2
Radiological Effluents Technical Specifications

In Reference (1) Northeast Nuclear Energy Company (NNECO) was provided with model Appendix I Technical Specifications and was requested to submit a license amendment application incorporating the applicable specifications into Appendix A. The response date requested in Reference (1) was December 8, 1978. In Reference (2), NNECO advised the NRC Staff of several factors complicating the effort, and indicated these could adversely affect the schedule. By Reference (3), the Staff advised NNECO of certain corrections to Reference (1).

By References (4) and (5), the Staff forwarded NUREG-0472 and NUREG-0473, Draft Radiological Effluent Technical Specifications, and NUREG-0133, Preparation of Radiological Effluent Technical Specifications. References (4) and (5) revised the requested submittal date to February 13, 1979, for both Millstone Units.

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As previously indicated in telephone conversations with the NRC Staff, the requested submittal date cannot be achieved. The following items contributed to this delay:

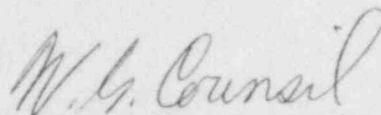
1. The Millstone Site is unique in that one BWR and one PWR with shared effluent release paths are involved. This situation resulted in some difficulties in incorporating plant specific features into the generic specifications, as the model specifications were not tailored to such a configuration.
2. Millstone Units 1 and 2 have identical Appendix B Specifications, but totally unique Appendix A Specifications. It is desirable but difficult to maintain the same degree of consistency between the two units with respect to the specifications involved.
3. NUSCO personnel involved in the coordination of the project and customizing the specifications were responsible for authoring the recently docketed Haddam Neck Plant Radiological Effluent Technical Specifications. In addition, these same individuals are involved in the preparation of the Semi-Annual Radiological Effluent Reports required to be submitted for both Haddam Neck and Millstone by March 1, 1979.
4. During the meeting with NRC personnel from the Office of Inspection and Enforcement Region 1 on December 8, 1978, NNECO was advised that additional guidance would be forthcoming in such areas as LLD's for in-plant samples, preparation of Offsite Dose Calculation Manuals, calculations required to demonstrate compliance with 40CFR190, etc. Certain sections were delayed in anticipation of obtaining this guidance; however, it has not been forwarded in a timely fashion.
5. Numerous requests for License Amendments in the areas of radiological effluents and environmental monitoring have been docketed over the past two years, and many have not been dispositioned by the NRC Staff. Incorporation of these proposed changes in a fragmented manner within the new specifications has resulted in additional delays.
6. Although References (4) and (5) are dated November 15, 1978, they were not received until November 29 and December 18, respectively.

In light of the above considerations, NNECO proposes to provide the Radiological Effluent Technical Specifications on or about March 9, 1979 in the case of Millstone Unit No. 1, and on or about March 23, 1979 in the case of Millstone Unit No. 2.

We trust you find the above information sufficiently detailed to justify the proposed schedule.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



W. G. Council
Vice President