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May 31, 1979

Docket No. 50-336

Director of Nuclear Reactor Regulation
Attn: Dr. Denwood F. Ross, Jr.
Assistant Director for Reactor Safety
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

References: (1) B. H. Grier letter to W. G. Counsil dated April 14, 1979, transmitting I&E Bulletin 79-06B.

(2) W. G. Counsil letter to B. H. Grier dated April 24, 1979.

(3) W. G. Counsil letter to B. H. Grier dated May 24, 1979.

Gentlemen:

Millstone Nuclear Power Station, Unit No. 2 Stationing of Special Operator at Auxiliary Feedwater Controls

In Reference (1), the NRC documented the requirement of stationing a full-time, specially instructed operator at the auxiliary feedwater controls, with direct communication with the Main Control Room operators. This was instituted at Millstone Unit No. 2 following receipt of the referenced bulletin.

Northeast Nuclear Energy Company (NNECO) has determined that this requirement does not enhance the ability of the control room operators to initiate auxiliary feedwater. As stated in References (2) and (3), the control room operators are fully qualified to initiate auxiliary feedwater in a timely fashion if required, as demonstrated by previous plant conditions which have resulted in its use. All main and auxiliary feedwater systems are operated and controlled from the Main Control Board in the Main Control Room.

However, as a result of verbal discussions with the NRC Staff, NNECO hereby proposes that a minimum of two licensed reactor operators be in the Main Control Room at all times, one of whom has direct responsibility for control and operation of all main and auxiliary feedwater systems. If at any time this requirement cannot be met, a designated auxiliary feedwater operator would be stationed at the Main Control Board as an alternate means of fulfilling the intent of the Reference (1) requirement.

NNECO is prepared to commit to these manning requirements until permanent resolution is obtained on the question of auxiliary feedwater control.

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Your timely and favorable response to this request will be greatly appreciated.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

W. G. Counsil Vice President

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