NORTHEAST UTILITIES
THE CONNECTICUT LIGHT AND POWER COMPANY
THE HARTFORD ELECTRIC LIGHT COMPANY
WESTERN MASSACHUSETTS ELECTRIC COMPANY
HOLYOKE WATER POWER COMPANY
NORTHEAST UTILITIES SERVICE COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY

P.O. BOX 270
HARTFORD, CONNECTICUT 06101
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February 2, 1979

Docket No. 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:

Millstone Nuclear Power Station, Unit Nos. 1 and 2
Proposed Revisions to Environmental Technical Specifications

On February 3, 1978 and October 20, 1978, pursuant to Section 5.6.3 of the Millstone Unit No. 1 (License No. DPR-21) and Unit No. 2 (License No. DPR-65) Environmental Technical Specifications (ETS), Northeast Nuclear Energy Company (NNECO) proposed to incorporate various proposed revisions into the ETS.

On December 5, 1978, you advised us that you plan to defer action on these requests so that they can be reviewed concurrent with radiological effluent specifications developed during Appendix I implementation for Millstone Nuclear Power Station. We concur with that position with respect to our request of October 20, 1978; however, we request that certain portions of the February 3, 1978 submittal be separately reviewed as they will not be affected by the radiological effluents changes.

Also, on January 12, 1979, you approved changes to ETS Section 5.1 with respect to corporate reorganization and title changes. These approved changes have eliminated the necessity for several of the revisions proposed on February 3, 1978. Therefore, those changes are withdrawn as indicated in Enclosure 1.

All of the other changes proposed in our February 3, 1978 submittal are listed in Enclosures 2 and 3. Enclosure 2 to this letter identifies those proposed changes for which your review may proceed because they will not be affected by the radiological effluents changes. We agree that proposed revisions to Sections 3.2 and 5.6, indicated on Enclosure 3, may be reviewed concurrent with radiological effluents specifications review.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

W. G. Counsil
Vice President

7902120189

Enclosures

Cook 1/1 ADD LIST

Enclosure 1 - Changes Superseded and Withdrawn (February 3, 1978 Submittal)

Page	Section	Change
5.1-2 5.1-2 5.1-2 5.1-2 5.1-2	5.1.5.1, 5.1.5.4, 5.1.5.5.1, 5.1.5.5.2, 5.1.5.5.3	The title of "Vice President of Systems Operations," is changed to "Vice President of Systems Production," to be consistent with Company organization.
5.1-2 5.1-2 5.1-2 5.1-2	5.1.5.4, 5.1.5.5.1, 5.1.5.5.2, 5.1.5.5.3	The title of "NUSCO, Manager of Generation Technical Services," is changed to "NUSCO Director of Nuclear and Environmental Engineering," to be consistent with Company organization.
5.1-5	Figure 5.1-1	The organization chart is updated.

Enclosure 2 - Changes not Affected by Appendix I Implementation Review
(February 3, 1978 submittal)

Page	Section	Change
1.1-1	1.1	The definition of "Unreviewed Environmental Impact" is added and is required for Environmental Technical Specification, Section 5.
5.1-1	5.1.2	"The plant Superintendent. . ." is changed to "Each Unit Superintendent . . ." to be consistent with Safety Technical Specifications.
5.1-1	5.1.2	". . . to an Assistant Plant Superintendent or . . ." is deleted to reflect current plant organization.
5.1-3 5.1-3 5.1-3	5.1.6 5.1.6.1, 5.1.6.1.3	". . . Plant Superintendent," is changed to ". . . Unit Superintendent," to be consistent with Safety Technical Specifications.
5.1-3	5.1.6.1	"Station Procedures . . ." is changed to "Unit Procedures . . ." to be consistent with Safety Technical Specifications.
5.1-3	5.1.6.1	". . . except common site and Services Groups procedures . . ." is added to clarify procedure review, in order to indicate the review required for procedures common to both Units.
5.1-3	5.1.6.1.3	". . . 7 days . . ." is changed to ". . . 14 days . . ." to be consistent with Safety Technical Specifications.
5.1-3 5.1-3	5.1.6.2 5.1.6.2	". . . Unit except Services Groups . . ." is added for the same reason as the Section 5.1.6.1 change, above.
5.1-3	**5.1.6.3**	**Original specification is deleted because sections 1 and 2 are now reviewed by SORC and section 5.1.6.4 through 5.1.6.7 are renumbered.**
5.1-3	**5.1.6.4**	**". . . not common to both Units . . ." is added for clarification between PORC and SORC duties.**
5.1-3	**5.1.6.4**	**"Plant Superintendent" is added to improve the distribution of reports.**
5.1-3	**5.1.6.5**	**". . . Unit . . ." is added for clarity.**
5.1-4	**5.1.7**	**". . . or applicable to the Services Groups, . . ." is added for clarification of SORC review duties.**
5.1-4	**5.1.7.1**	**Original specification is deleted and incorporated into the new section 5.1.7.1 which reads, "Perform all functions listed in Sections 5.1.6.1 through 5.1.6.5 which are common to both Units or applicable to the Services Groups."**

Page	Section	Change
5.1-4	5.1.7.2	Specification 5.1.7.2 is renumbered. Previously was numbered 5.1.7.3.
5.1-4	5.1.7.3	"Review all proposed changes to the Environmental Technical Specifications" is added for clarification between PORC and SORC duties.
5.3-1	5.3	The entire Review and Audit section is revised to clarify Environmental Review Board duties including the elimination of inconsistencies in the area of procedure review.
5.5-1	5.5.3	Entire section is revised for the same reason as above.
5.5-1	5.5.4	Section 5.5.4 is added for the same reason as above. The ERB, being similar to the NRB, should not be responsible for the routine review of new and revised procedures. Rather, the ERB function is to provide a semi-annual audit of procedures.
5.7-1	5.7.1.b	". . . processed . . ." is added for clarity.

Enclosure 3 - Proposed Changes Held for Radiological Effluents Specification
(February 3, 1978 Submittal)

Page	Section	Change
3.2-1	3.2.3.1	". . . thyroid . . ." is added for clarity.
3.2-1	3.2.3.1	The reference to Regulatory Guide 1.42 is deleted since it became obsolete with the development of new Guides (1.109 and 1.111). No reference to the newer Guides is made in order to eliminate the need for similar changes in the future.
3.2-2	3.2.3.2	". . . dispersion . . ." is changed to ". . . deposition . . ." since, with new models, the milk pathway doses are calculated at the location of maximum deposition rather than χ/Q.
3.2-2	3.2.6	Report frequency was changed from "semi-annual" to "annual".
3.2-2	3.2.8	The following words are added, ". . . and can be attributed to an increase in plant related radioactivity, . . ." This will eliminate the requirement to submit anomalous measurement reports for situations similar to the Chinese fallout situation of October, 1976.
3.2-3	3.2.9(a)	". . . plant related . . ." is added for the same reason as above.
3.2-3	3.2.9(a)	". . . of I-131 . . ." is added for clarity.
3.2-3	3.2.9(a)	". . . from the end of the quarter . . ." is added for clarity.
3.2-3	3.2.9(b)	". . . plant related . . ." is added for the same reason as the Section 3.2.8 change, above.
3.2-3	3.2.9(b)	". . . one week . . ." is changed to ". . . 10 days from confirmation of results . . ." for clarity.
3.2-5	Figure 3.2-2	Changed location #24 to reflect the change in goat farm location used.
3.2-7	Table 3.2-1	Changed goat farm distance and direction for same reason as above.
3.2-7	Table 3.2-1	Footnote added, "j. Due to sample collection arrangement, air particulate filters may be changed less frequently than once per week." Sample collection is done by outside individual on Fisher's Island. This change prevents a Technical Specification violation if the filter is not changed at precise weekly intervals.

5.6-1	5.6.1.a	Eliminate ". . . preoperational studies, operation controls (as appropriate), and . . ." The preoperational studies are now seven years old. Comparisons are not always appropriate or possible due to changes in the program. The proposed wording, ". . . comparison with previous environmental surveillance reports . . ." permits relevant comparisons.
5.6-1	5.6.1.a	The reference to Table 5.6-1 is eliminated and replaced with a new paragraph. Table 5.6-1 is based on the reporting of data in a "less than" (<) technique. The data is now reported as statistically valid and thus the format is different. It is better to simply list the required data as done in the new paragraph to allow for flexibility.
5.6-2	5.6.1.b	". . . 60 days . . ." is changed to ". . . 90 days. . ." Due to the time required to obtain Sr results and the extensive dose modeling required by Regulatory Guide 1.109, this change is necessary based on the desirability of a complete and accurate report.
5.6-3	5.6.2.b(1)	". . . during any annual report period, . . ." is eliminated for clarity.
5.6-3	5.6.2.b(1)	The following is added. ". . . and can be attributed to an increase in plant related activity . . ." This will eliminate the requirement to submit anomalous measurement reports for situations similar to the Chinese fallout situation of October, 1976.
5.6-3	5.6.2.b(2)	". . . plant related . . ." is added for the same reason as above.
5.6-3	5.6.2.b(2)	". . . of I-131 . . ." is added for clarity.
5.6-3	5.6.2.b(3)	". . . plant related . . ." is added for the same reason as the Section 5.6.2.b(1) change, above.
5.6-3	5.6.2.b(3)	". . . one week . . ." is changed to ". . . 10 days from confirmation of results, . . ." for clarity.
5.6-4	5.6.3.a	". . . would have a significant effect on the environment or involve an environmental matter or question not previously reviewed and evaluated by the NRC," is replaced with, ". . . constitutes an Unreviewed Environmental Impact." This change clarifies reporting requirements since an Unreviewed Environmental Impact is defined in 1.1.
5.6-5	Table 5.6-1	Table 5.6-1 is eliminated for the reason discussed in the Section 5.6.1.a change, above.