

NORTHEAST UTILITIES



THE CONNECTICUT LIGHT AND POWER COMPANY
THE HARTFORD ELECTRIC LIGHT COMPANY
WESTERN CONNECTICUT ELECTRIC COMPANY
WATERBURY WATER POWER COMPANY
SOUTHWEST CONNECTICUT LIGHT AND POWER COMPANY

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September 21, 1979

Docket No. 50-336

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

References: (1) R. W. Reid letter to W. G. Council dated July 23, 1979.
(2) D. C. Switzer letter to G. Lear dated September 21, 1976.

Gentlemen:

Millstone Nuclear Power Station, Unit No. 2
Secondary Water Chemistry

In Reference (1), the NRC Staff requested that Northeast Nuclear Energy Company (NNECO) propose an amendment to operating license No. DPR-65, for Millstone Unit No. 2, to incorporate a license condition in accordance with the model provided as an attachment to Reference (1). The requested license condition would require the implementation of a secondary water chemistry monitoring and control program including appropriate procedures and administrative controls.

Previously, NNECO was requested to propose Technical Specifications to control secondary water chemistry in an attempt to inhibit corrosion of steam generator tubes. In Reference (2), NNECO determined that it would not be appropriate to propose Technical Specifications for the purpose of controlling secondary water chemistry.

NNECO has evaluated the acceptability of such a license condition and determined that no benefits would be realized based on the following:

- (1) The overall integrity of the steam generator pressure boundary is adequately assured by the requirements of Technical Specifications relating to steam generator tube integrity.
- (2) A secondary water chemistry program has been in existence at Millstone Unit No. 2 with procedures which address the proposed items in the NRC Staff's model license condition.
- (3) A condensate polishing system has been backfitted and remains in operation.

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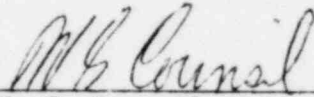
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In addition, as yet, the technical bases utilized to quantify parameters that are necessary in the determination of critical contaminant levels are not sufficiently concise to substantiate a license condition. As such, the proposed license condition would of necessity be qualitative in nature and inappropriate for inclusion in DPR-65.

Therefore, NNECO has concluded that there is insufficient justification to submit a license amendment concerning secondary water chemistry monitoring at this time. NNECO's past actions have demonstrated that the appropriate level of attention has been devoted to secondary water chemistry parameters. Inclusion of this topic as a license condition is viewed as superfluous without improving overall plant safety.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



W. G. Council
Vice President

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