

NORTHEAST UTILITIES



THE CONNECTICUT LIGHT AND POWER COMPANY
THE HARTFORD CONNECTICUT GAS COMPANY
THE HARTFORD CONNECTICUT WATER COMPANY
THE HARTFORD CONNECTICUT ELECTRIC COMPANY
THE HARTFORD CONNECTICUT TELEPHONE COMPANY
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July 1, 1980

Docket Nos. 50-213
50-245
50-336
B10030

Director of Nuclear Reactor Regulation
Attn: Mr. Dennis M. Crutchfield, Chief
Operating Reactors Branch #5
Mr. Robert A. Clark, Chief
Operating Reactors Branch #3
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

References: (1) D. L. Ziemann letter to W. G. Council (CYAPCO) dated March 11, 1980.
(2) D. L. Ziemann letter to W. G. Council (NNECO) dated March 11, 1980.
(3) W. G. Council letter to D. L. Ziemann dated April 28, 1980.

Gentlemen:

Haddam Neck Plant
Millstone Nuclear Power Station, Units 1 and 2
Safeguards Contingency Plan

In response to your telephone call of June 24, 1980, Connecticut Yankee Atomic Power Company (CYAPCO) and Northeast Nuclear Energy Company (NNECO) have re-reviewed their positions with regard to their respective Safeguards Contingency Plans. We have again reached the conclusion that additional detail, as requested by References (1) and (2), is inappropriate.

To ensure that our collective position is clearly understood and to confirm discussions by telephone between our respective Staffs, CYAPCO and NNECO offer the following bases for our conclusion:

1. The Plans are purposely generic in nature, with the specifics of implementation left to be detailed in the Procedures. These site-specific Procedures which implement the Plans are available for audit by NRC at any time. Changes are made to the Procedures on an on-going basis to ensure and facilitate smooth execution of the Plans. Inclusion of too much detail in the Plans, as suggested by References (1) and (2) and by discussions with the Staff, could be counterproductive by inhibiting these changes.

To quote from 10CFR73, Appendix C, "Although the implementing procedures (the fifth category of Plan information) are the culmination of the planning process, and therefore are an integral and important part of the safeguards contingency plan, they entail operating details subject to frequent changes. They need not be submitted to the Commission for approval, but will be inspected on a periodic basis."

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2. It is not our desire to involve management personnel in non-productive efforts of processing changes of a trivial nature in documents required by facility licenses (e.g., the Safeguards Contingency Plans). For example, changes in security force personnel should not require changes in NRC-approved and license-required plans.
3. 10CFR73, Appendix C reads, in part, "4. Responsibility Matrix. This category of information consists of detailed identification of the organizational *entities* responsible for each decision and action associated with specific responses to Safeguards contingencies. For each initiating event, a tabulation shall be made for each response *entity* depicting the assignment of responsibilities for all decisions and actions to be taken in response to the initiating event..... The tabulations in the Responsibility Matrix shall provide an overall picture of the response actions and their interrelationships." (Emphasis added)

CYAPCO and NNECO submit that the Responsibility Matrix in their respective Safeguards Contingency Plans does precisely that.

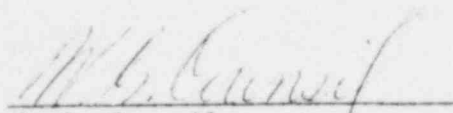
4. NRC's Office of Nuclear Material Safety and Safeguards (NMSS) has said, in informal conversations, that the security of anything we send them cannot be absolutely guaranteed. Therefore, inclusion of more detail on the specifics of Contingency Plan execution is an unnecessary compromise of the security of the plants; it would be in direct conflict with the purpose of the Plans.

CYAPCO and NNECO are anxious to resolve this matter. However, we wish to point out that we are firm in our conclusion that further revision of the respective Plans is ill-advised and unnecessary, unless the Staff can delineate specifically where and how we do not meet the intent of the regulation on Safeguards Contingency Plans.

We look forward to your written response.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY



W. G. Council
Senior Vice President