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May 16, 1980

Docket No. 50-245

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

Reference: (1) W. G. Counsil letter to H. R. Denton dated December 31, 1979.

Gentlemen:

Millstone Nuclear Power Station, Unit No. 1 TMI-2 Short-Term Lessons-Learned Implementation Item 2.1.6(b), Shielding Design Review Modifications

In Reference (1), Northeast Nuclear Energy Company (NNECO), as a result of the shielding design review, identified two modifications which would be required to allow proper plant recovery following a major accidence.

The first change involves modifications to six valves between the condensate storage tank and torus; in order to facilitate operation of the valves and, thus, addition of water to the torus from a remote location.

The second change involves modifications or relocation of the Cleanup Filter Control Panel; in order to permit filter replacement from a remote location. Further investigation into the appropriateness of this change has determined that it is unnecessary.

The Reactor Water Cleanup System of which the Cleanup Filter System/Control Panel is a part is designed to maintain Reactor Coolant System water purity within acceptable limits during normal plant operation.

During NNECO's original review of the events at TMI, it was erronecusly determined that use of the Reactor Water Cleanup System in post-accident situations would be of significant benefit in reducing RCS contaminants. A recent reevaluation of this situation has indicated that use of this system under the accident conditions mandated by the NRC Staff would render the system ineffective in very short order without significantly reducing RCS contaminants. Therefore, since use of this system is no longer contemplated, the modification committed to in Reference (1) is no longer appropriate and is hereby withdrawn. This letter supersedes the information provided in Section 2.1.6(b) of Reference (1).

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Regarding the former modification, NNECO notes that as no indication from the Staff regarding our request to integrate this modification into the SEP backfit effort has been received, NNECO is proceeding with the design, engineering, and procurement effort associated with this change on a schedule commensurate with the NRC-mandated implementation date of January 1, 1981. Should the Staff acknowledge the merits of this request in the near future to allow the orderly integration of this project into the SEP Backfit Program, such information would allow NNECO to reallocate manpower to other TMI Implementation Projects in order to provide additional assurance of proper and timely implementation in those areas.

We trust you find the above information sufficient to comprehend our position.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

W. G. Counsil Vice President