

# NORTHEAST UTILITIES



THE CONNECTICUT LIGHT AND POWER COMPANY  
THE HARTFORD WATER LIGHT AND POWER COMPANY  
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50-336

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(45 FR 13434)

Secretary of the Commission  
Nuclear Regulatory Commission  
Washington, D.C. 20555

Gentlemen:

Haddam Neck Plant  
Millstone Nuclear Power Station, Unit Nos. 1 and 2  
Reporting of Significant Events at Operating  
Nuclear Power Reactors

Recently, the NRC amended 10CFR Parts 20 and 50 to require timely and accurate information exchange between the Staff and licensees following significant events at operating nuclear power reactors. The final rule, published in the Federal Register dated February 29, 1980, was issued without a prior public comment period. However, the Commission has invited interested parties to comment on the final rule and may consider modifying the rule following a review of any comments which have been submitted.

In accordance with the above, Northeast Utilities Service Company (NUSCO) provides the following comments on 10CFR Part 50.72.

10CFR Part 50.72(a.6) stated that, "Personal error or procedural inadequacy which, during normal operations, anticipated operational occurrences, or accident conditions, prevents or could prevent, by itself, fulfillment of the safety function of those structures, systems, and components important to safety that are needed to (i) shutdown the reactor safely and maintain it in a safe shutdown condition, or (ii) remove residual heat following reactor shutdown, or (iii) limit the release of radioactive material to acceptable levels or reduce the potential for such release".

NUSCO interprets 10CFR Part 50.72(a.6) to require reports of events where, for example, both trains of a safety-related system were out of service due to procedural or personal error. As written, the rule would require a report if one HPSI pump were inoperable. This circumstance is already addressed in Technical Specifications, and merely results in the use of an action statement. NUSCO has determined that 10CFR Part 50.72(a.6) should be clarified to permit plant operation pursuant to Technical Specifications without requiring that reports be made to the Commission.

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NUSCO is concerned with the extreme broadness in scope of what is reportable. For example, 10CFR50.72(a.7) states, "Any event . . .". In this instance, "Any event . . ." would include surveillance testing, normal shutdown, and various routine operation of the Engineered Safety Features and Reactor Protection Systems. The rule, as presently worded, will generate numerous reports of essentially all unusual events, no matter how insignificant, to assure compliance with the regulation. This will create a burden not only on the utility staff but also on the Staff in the preparation and acceptance of numerous reports. This can only detract from the true purpose of the new rule.

The requirement of 10CFR Part 50.72(a.8) to report, "Any accidental, unplanned, or uncontrolled radioactive release" should include a minimum quantity of radioactive material (curie limit) which must be released before a report pursuant to 10CFR50.72 is required. By quantifying this reporting requirement, only significant events of this type, as determined by the Commission, will be reported and immediate reports of non-significant events will be avoided.


It can be postulated that plant safety could be compromised by the requirement of a report within one hour following an incident. In many instances, a significant amount of time is required to assess the plant condition, including potential releases. Operators will be distracted from the assessment process by considering the time for reporting to the Staff resulting in incomplete assessments of the plant condition prior to initiating the reporting procedure.

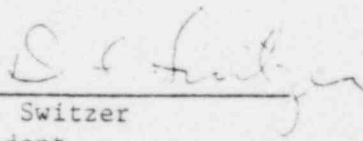
NUSCO judges current regulations as adequate in requiring that only significant events affecting public health and safety be reported promptly to the NRC Staff. Those incidents confined to the plant, with no public health consequences, are presently required to be reported within twenty-four (24) hours. The current regulation maximizes the resources available at the plant to both assess the plant condition and prepare a timely, complete report to the Staff.

We trust you will find these comments useful should the Commission determine a revision to 10CFR Part 50.72 is appropriate.

Very truly yours,

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