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

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June 10, 1980

Docket Nos. 50-213
50-245
50-336
A01024

Darrell G. Eisenhut, Acting Director
Division of Operating Reactors
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

References: (1) D. G. Eisenhut letter to All Operating Reactor Licensees dated May 7, 1980.
(2) W. G. Counsil letter to B. H. Grier dated January 18, 1980.
(3) W. G. Counsil letter to D. G. Eisenhut dated October 18, 1979.
(4) D. L. Ziemann letter to W. G. Counsil dated April 18, 1980.

Gentlemen:

Haddam Neck Plant
Millstone Nuclear Power Station, Unit Nos. 1 and 2
Five Additional TMI-2 Related Requirements to Operating Reactors

By Reference (1), Connecticut Yankee Atomic Power Company (CYAPCO) and Northeast Nuclear Energy Company (NNECO) were provided with the implementation schedule of the NRC Staff for the five action items identified in the enclosures to Reference (1). CYAPCO and NNECO were further requested to provide commitments to meet the requirements and associated schedules.

In response to that request, Attachments 1, 2, and 3, for the Haddam Neck Plant, Millstone Unit No. 1, and Millstone Unit No. 2, respectively, are hereby provided. Each individual action item is addressed regarding applicability, intent to comply, and feasibility of proposed schedule.

Recent telephone discussions with the Staff resulted in clarification on three specific items as follows. Requirements II.K.3.25, II.K.3.29, and II.K.3.44 have been interpreted to be applicable only to Millstone Unit No. 1 and not to the Haddam Neck Plant or Millstone Unit No. 2. Additionally, the following general comments regarding preliminary assessment of Reference (1) are provided.

CYAPCO and NNECO are generally in agreement with the intent of the Reference (1) requirements and are allocating the necessary resources to be fully responsive. However, as is the case with many recent NRC requirements, more specific acceptance criteria are needed in many cases to ensure timely implementation of optimized modifications/procedures. Subsequent to the

evolution of the more specific acceptance criteria, the implementation schedules may be impacted due to the unavailability of resources for conducting the required studies and developing the required designs. Specific exception is taken to the Staff request regarding Item 1 (I.A.1.3), Shift Manning. As of this writing, CYAPCO and NNECO have not received the "separate correspondence" indicated to be forthcoming in Reference (1), and find it totally inappropriate to commit to complying with an undocumented requirement.

An integrated assessment of the collective impact of all the requirements of Reference (1), in conjunction with other previously initiated NRC requirements, has not yet been conducted. The appropriateness of such an assessment has been acknowledged by numerous task forces and other groups associated with the review of the TMI-2 accident. It is noted that this assessment is not a Reference (1) requirement. Subsequent to completion of this more comprehensive assessment, CYAPCO and NNECO may develop alternatives to the specific requirements of Reference (1) in the interests of optimizing design and minimizing impact on already strained resources. Consequently, the Staff is requested to retain flexibility in the requested implementation schedules for reasons which are anticipated to evolve during the implementation of the Reference (1) requirements. Nonetheless, within the constraints described above, it is the intention of CYAPCO and NNECO to comply as detailed in the attached information.

We trust you find this information responsive to the Reference (1) requests.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY

W. G. Counsil
Senior Vice President

Attachments

DOCKET NO. 50-213

ATTACHMENT 1

HADDAM NECK PLANT

FIVE ADDITIONAL TMI-2 RELATED REQUIREMENTS TO OPERATING REACTORS

JUNE, 1980

I.A.1.3 Shift Manning

Pending formal issuance of the modified NRC requirements on Shift Manning and overtime limitations, CYAPCO finds it inappropriate to commit to their implementation at this time.

I.A.3.1 Licensing Examinations

CYAPCO's review of the NRC March 28, 1980 letter on Qualifications of Reactor Operators has not yet been completed. Therefore, committing to the implementation of these requirements on the schedule mandated by the NRC is inappropriate at this time. Subsequent to completion of this review and its impact on other ongoing efforts, formal documentation of comments/commitments will be forwarded to the Staff.

I.C.5 Licensee Dissemination of Operating Experiences

CYAPCO will review and revise operating procedures as necessary to assure that operating information pertinent to plant safety originating both within and outside the utility organization is periodically supplied to operators and other personnel and is incorporated into training and retraining programs.

The guidelines found in Attachment I.C.5, Procedures for Feedback of Operating Experience to Plant Staff, will be used in the development of this program.

The review and modification to procedures deemed appropriate by the review is scheduled to be accomplished on the time schedule mandated by the NRC.

II.K Measures to Mitigate Small Break Loss of Coolant Accidents and Loss of Feedwater Accidents

II.K.3.1 Installation and Testing of Automatic PORV Isolation System

Implementation of this item has been deferred by the NRC pending the completion of the additional studies requested by NRC in Action Item II.K.3.2 to determine the necessity of such a system. As such committing to the installation of such a system by CYAPCO on the Haddam Neck Plant is inappropriate at this time.

II.K.3.2 PWR Vendor Report on PORV Failure Reduction

The preparation of a study documenting the various actions which have been taken to reduce the probability of PORV failure as well as the need for a PORV Isolation System is being pursued by CYAPCO through the Westinghouse PWR Owners' Group on generic basis. Results of this study will be passed on to the NRC as soon as they are available in consideration of Owners' Group activities already in progress.

II.K.3.3 Reporting of Safety and Relief Valve Failures and Challenges

CYAPCO has made the procedural changes necessary to promptly report safety and relief valve failures and properly report (in the annual report) Safety and Relief Valve Challenges to the NRC.

II.K.3.5 Automatic Trip of Reactor Coolant Pumps During LOCA

Implementation of this item has been deferred by the NRC pending the completion of additional studies to determine the criteria and necessity for early reactor coolant system pump trip. CYAPCO is pursuing the preparation of this study through the Westinghouse PWR Owners' Group. Results of this study will be passed on to the NRC as soon as they are available in consideration of Owners' Group activities already in progress. Committing to the installation of such a system is inappropriate at this time.

II.K.3.9 Proportional Integral Derivative (PID) Controller Modification

This item is applicable only to Westinghouse PWR's which possess a PID Controller on the PORV System. As such this item is not applicable to the Haddam Neck Plant.

II.K.3.10 Proposed Anticipatory Trip Modification

This item is applicable to Westinghouse PWR Licensees who have applied to the NRC to modify the turbine/trip reactor trip anticipatory trip scheme. As such this item is not applicable to the Haddam Neck Plant.

II.K.3.12 Confirm Existence of Anticipatory Trip Upon Turbine Trip

The Haddam Neck Plant is presently designed with a reactor trip (anticipatory trip) on turbine trip scheme. At the Haddam Neck Plant low turbine lube oil pressure, and turbine stop valve closure, either of which would indicate turbine trip, are sensed and initiate an automatic reactor trip. This trip scheme is inoperable below 10% power, in accordance with safety analysis assumptions and current NRC criteria.

II.K.3.13 Separation of HPCI and RCIC System Initiation Levels - Analysis and Implementation

This item is applicable only to BWR's with RCIC and HPCI systems. As such this item is not applicable to the Haddam Neck Plant.

II.K.3.14 Isolation of Isolation Condensers on High Radiation

This item is applicable only to BWR's with isolation condensers. As such this item is not applicable to the Haddam Neck Plant.

II.K.3.15 Modify Break Detection Logic to Prevent Spurious Isolation of HPCI and RCIC Systems

This item is applicable only to BWR's with HPCI and RCIC systems. As such this item is not applicable to the Haddam Neck Plant.

II.K.3.16 Reduction of Challenges and Failures of Relief Valves - Feasibility Study and System Modifications

This item is applicable only to BWR's. As such this item is not applicable to the Haddam Neck Plant.

II.K.3.17 Report on Outage of ECC Systems - Licensee Report and Proposed Technical Specification Changes

CYAPCO will take the actions necessary to secure the information requested on the Haddam Neck Plant ECC System outages and forward the results to the NRC on the time schedule mandated by the NRC.

II.K.3.18 Modification of ADS Logic - Feasibility Study and Modifications for Increased Diversity for Some Event Sequences

This item is applicable only to BWR's. As such this item is not applicable to the Haddam Neck Plant.

II.K.3.19 Interlock on Recirculation Pump Loops

This item is applicable only to non-jet pump BWR's. As such this item is not applicable to the Haddam Neck Plant.

II.K.3.24 Confirm Adequacy of Space Cooling for HPCI and RCIC Systems

This item is applicable only to BWR's with HPCI and RCIC Systems. As such this item is not applicable to the Haddam Neck Plant.

II.K.3.25 Effect of Loss of AC Power on Reactor Recirculation Pump Seals

This item is applicable only to BWR's. As such this item is not applicable to the Haddam Neck Plant.

II.K.3.28 Study and Verify Qualification of Accumulators on ADS Valves

This item is applicable only to BWR's. As such this item is not applicable to the Haddam Neck Plant.

II.K.3.29 Study to Demonstrate Performance of Isolation Condensers with Non-Condensibles

This item is applicable only to BWR's with isolation condensers. As such this item is not applicable to the Haddam Neck Plant.

II.K.3.30 Revised Small Break LOCA Method to Show Compliance with 10 CFR 50 Appendix K

Reanalysis of the small break LOCA using the revised analysis methods will be pursued by the appropriate NSSS Vendor and/or fuel supplier with the NRC independent of Owners' Group activities. Further comment by CYAPCO with regards to content and timing of analysis would be inappropriate.

II.K.3.31 Plant Specific Calculations to Show Compliance with 10 CFR 50.46

Should the revised NSSS vendor analysis models confirm that sufficient conservatisms in current methods exist, then expedited plant specific calculations would be an unnecessary expenditure of resources. In the above instance it would be the intention of CYAPCO to utilize the revised models the first time (i.e. refueling) if a reanalysis is necessary for some reason. Should a more expedited time table be appropriate it would be CYAPCO's intention to comply with the staff schedule assuming that the appropriate NSSS vendor/fuel supplier has the necessary resources available.

II.K.3.44 Evaluation of Anticipated Transients with Single Failure to Verify No Fuel Failure

This item is applicable only to BWR's. As such this item is not applicable to the Haddam Neck Plant.

II.K.3.45 Evaluation of Depressurization with Other Than ADS

This item is applicable only to BWR's. As such this item is not applicable to the Haddam Neck Plant.

II.K.3.46 Response to List of Concerns from ACRS Consultant by General Electric

This item is applicable only to BWR's. As such this item is not applicable to the Haddam Neck Plant.

II.K.3.57 Identify Water Sources Prior to Manual Activation of ADS

This item is applicable only to BWR's. As such this item is not applicable to the Haddam Neck Plant.

III.D.3.4 Control Room Habitability

CYAPCO will take the actions necessary to evaluate the habitability of the Haddam Neck Plant control room in accordance with requirements set forth in Item III.D.3.4, Control Room Habitability, of the NRC Action Plan NUREG-0660, May, 1980. It is CYAPCO's intention to complete this evaluation on the schedule requested by the NRC, i.e., January 1, 1981. Committing to the installation of modifications deemed appropriate by the evaluation is inappropriate until proper project definition is accomplished.

DOCKET NO. 50-245

ATTACHMENT 2

MILLSTONE NUCLEAR POWER STATION, UNIT NO. 1

FIVE ADDITIONAL TMI-2 RELATED REQUIREMENTS TO OPERATING REACTORS

JUNE, 1980

I.A.1.3 Shift Manning

Pending formal issuance of the modified NRC requirements on Shift Manning and overtime limitations, NNECO finds it inappropriate to commit to their implementation at this time.

I.A.3.1 Licensing Examinations

NNECO's review of the NRC March 28, 1980 letter on Qualifications of Reactor Operators has not yet been completed. Therefore, committing to the implementation of these requirements on the schedule mandated by the NRC is inappropriate at this time. Subsequent to completion of this review and its impact on other ongoing efforts, formal documentation of comments/commitments will be forwarded to the Staff.

I.C.5 Licensee Dissemination of Operating Experiences

NNECO will review and revise operating procedures as necessary to assure that operating information pertinent to plant safety originating both within and outside the utility organization is periodically supplied to operators and other personnel and is incorporated into training and retraining programs.

The guidelines found in Attachment I.C.5, Procedures for Feedback of Operating Experience to Plant Staff, will be used in the development of this program.

The review and modification to procedures deemed appropriate by the review is scheduled to be accomplished on the time schedule mandated by the NRC.

II.K. Measures to Mitigate Small Break Loss of Coolant Accidents and Loss of Feedwater Accidents

II.K.3.1 Installation and Testing of Automatic PORV Isolation System

This item is applicable only to PWR's. As such this item is not applicable to Millstone Unit 1.

II.K.3.2 PWR Vendor Report on PORV Failure Reduction

This item is applicable only to PWR's. As such this item is not applicable to Millstone Unit 1.

II.K.3.3 Reporting Safety and Relief Valve Failures and Challenges

NNECO has made the procedural changes necessary to promptly report safety and relief valve failures and properly report (in the annual report) Safety and Relief Valve Challenges.

II.K.3.5 Automatic Trip of Reactor Coolant Pumps During LOCA

This item is applicable only to PWR's. As such this item is not applicable to Millstone Unit 1.

II.K.3.9 Proportional Integral Derivative (PID) Controller Modification

This item is applicable only to Westinghouse PWR's which possess a PID Controller on the PORV System. As such this item is not applicable to Millstone Unit 1.

II.K.3.10 Proposed Anticipatory Trip Modification

This item is applicable to Westinhouse PWR Licensees who have applied to NRC to modify the turbine trip/reactor trip anticipatory trip scheme. As such this item is not applicable to Millstone Unit 1.

II.K.3.12 Confirm Existence of Anticipatory Trip Upon Turbine Trip

This item is applicable only to Westinghouse PWR's. As such this item is not applicable to Millstone Unit 1.

II.K.3.13 Separation of HPCI and RCIC System Initiation Levels - Analysis and Implementation

This item is applicable only to BWR's with HPCI and RCIC Systems. As such this item is not applicable to Millstone Unit 1.

II.K.3.14 Isolation of Isolation Condensers on High Radiation

The Millstone Unit 1 isolation condenser system design does not presently automatically isolate on high radiation in the steam line nor does it monitor radiation at that point. Millstone Unit 1 presently monitors the isolation condenser atmospheric vent with a gross gamma detector with procedural provisions for manual system isolation should the monitor indicate high activity and the operator determine that continued operation of the isolation condenser system is not necessary for a safe and orderly plant shutdown. NNECO believes this scheme allows the operator the greatest amount of flexibility and system availability to facilitate coping with all anticipated and unanticipated operational transients. As such NNECO has determined that implementation of an automatic Isolation Condenser System isolation scheme is unappropriate and has no intention of complying with this requirement. It is noted in addition to the above, NNECO submits that implementation of this requirement would be counterproductive to the intent of the study required by Item II.K.3.16.

II.K.3.15 Modify Break Detection Logic to Prevent Spurious Isolation of HPCI and RCIC Systems

This item is applicable only to BWR's with HPCI and RCIC Systems. As such this item is not applicable to Millstone Unit 1.

II.K.3.16 Reduction of Challenges and Failures of Relief Valves - Feasibility Study and System Modifications

NNECO has already taken actions which have significantly reduced challenges and failures to the Millstone Unit 1 relief valves. These changes can be found documented in W. G. Counsil letter to B. K. Grimes dated August 20, 1979.

In addition the preparation of a study further investigating the feasibility of reducing challenges and failures of relief valves and any design modification deemed appropriate is being pursued by NNECO through the General Electric BWR Owners' Group on a generic basis. Results of this study and any design modifications resulting from this study will be forwarded to the NRC as soon as they are available in consideration of Owners' Group activities already in progress. Committing to the installation of design modifications as yet undefined by NNECO would be inappropriate at this time.

II.K.3.17 Report on Outage of ECCS Systems - Licensee Report and Proposed Technical Specification Changes

NNECO will take the actions necessary to secure the information requested on Millstone Unit 1 ECC System outages on the time schedule mandated by the NRC.

II.K.3.18 Modification of ADS Logic - Feasibility Study and Modifications for Increased Diversity for Some Event Sequences

The preparation of a study investigating the feasibility of modifying the ADS logic to eliminate the requirement for manual actuation and any design modifications deemed appropriate is being pursued by NNECO through the General Electric BWR Owners' Group on a generic basis. Results of this study and any design modifications resulting from this study will be forwarded to the NRC as soon as they are available in consideration of Owners' Group activities already in progress. Committing to the installation of design modifications as yet undefined by NNECO would be inappropriate at this time.

II.K.3.19 Interlock on Recirculation Pump Loops

This item is applicable only to BWR's without jet pumps. As such this item is not applicable to Millstone Unit 1.

II.K.3.20 Loss of Service Water for Big Rock Point

This item is applicable only to the Big Rock Point Plant. As such this item is not applicable to Millstone Unit 1.

II.K.3.21 Restart of Core Spray and LPCI Systems on Low Level - Design and Modification

The design modification required to allow the Core Spray and LPCI Systems to restart automatically on loss of water level following manual intervention is being pursued by NNECO through the General Electric BWR Owners' Group on a generic basis. Results of this design effort will be forwarded to the NRC as soon as they become available in consideration of Owners' Group activities already in progress. Committing to the installation of design modifications as yet undefined by NNECO would be inappropriate at this time.

II.K.3.22 Automatic Switchover of RCIC System Suction - Verify Procedures and Modify Design

This item is applicable only to BWR's with RCIC Systems. As such this item is not applicable to Millstone Unit 1.

II.K.3.24 Confirm Adequacy of Space Cooling for HPCI and RCIC Systems

This item is applicable only to BWR's with HPCI and RCIC Systems. As such this item is not applicable to Millstone Unit 1.

II.K.3.25 Effect of Loss of AC Power on Pump Seals

The analysis to ascertain the effect of loss of AC power on the cooling of the Reactor Recirculation pump seals is being pursued by NNECO through the General Electric BWR Owners' Group on a generic basis. Results of this analysis will be forwarded to the NRC as soon as they are available in consideration of Owners' Group activities already in progress.

II.K.3.27 Provide Common Reference Level for Vessel Level Instrumentation

NNECO will take the actions necessary to modify the existing Reactor Vessel level instrumentation scales so that all level instruments are zeroed at the same reference point. This modification will be effected following the upcoming Millstone Unit 1 refueling outage presently scheduled to begin in September 1980.

II.K.3.28 Study and Verify Qualification of Accumulations on ADS Valves

In Reference (2) NNECO responded to the NRC concerns outlined in IE Bulletin 80-01. In this submittal NNECO had supplied documentation stating that air supply to the ADS Valves is qualified for post accident operation from its source (bottled air supply system) through the accumulator to the ADS Valves. The subject I&E Bulletin was comprehensively addressed by NNECO in Reference (2) and as such no further action is planned.

II.K.3.29 Study to Demonstrate Performance of Isolation Condensers with Non-Condensibles

Information demonstrating the performance of isolation condensers with non-condensibles present was documented by NNECO in Reference (3). Subsequent approval of this information by the NRC can be found in Reference (4). As such NNECO is taking no further action on this item.

II.K.3.30 Revised Small-Break LOCA Methods to Show Compliance with 10CFR50, Appendix K

Development of the revised small break LOCA models is the responsibility of the appropriate NSSS vendor/fuel supplier with the NRC, independent of Owners' Group activities. Further comment by NNECO with regards to content and timing of analysis submittal is inappropriate.

II.K.3.31 Plant Specific Calculations to Show Compliance with 10CFR 50.46

Should the revised NSSS vendor analysis models confirm that sufficient conservatisms in current methods exist, then expedited plant specific calculations would be an unnecessary expenditure of resources. In the above instance it would be the intention

of NNECO to utilize the revised models the first time (i.e. refueling) if a reanalysis is necessary for some reason. Should a more expedited time table be appropriate it would be NNECO's intention to comply with the staff schedule assuming that the appropriate NSSS vendor/fuel supplier has the necessary resources available.

II.K.3.44 Evaluation of Anticipated Transients with Single Failure to Verify No Fuel Failure

The evaluation of Anticipated Transients with Single Failure to Verify No Fuel Failure is being pursued by NNECO through the General Electric BWR Owners' Group on a generic basis. Results of this evaluation will be forwarded to the NRC as soon as they are available in consideration of Owners' Group activities already in progress.

II.K.3.45 Evaluation of Depressurization with Other than ADS

The evaluation of Reactor Coolant System Depressurization with systems other than ADS is being pursued by NNECO through the General Electric BWR Owners' Group on a generic basis. Results of this evaluation will be forwarded to the NRC as soon as they are available in consideration of Owners' Group activities already in progress

II.K.3.46 Response to List of Concerns from ACRS Consultant

Response to the ACRS Consultants concerns as they relate to BWR's has been forwarded to the NRC in General Electric Company letter (R. H. Buckholz) to the NRC (D. F. Ross) dated February 21, 1980. After review by NNECO, this letter has been found to be responsive to the NRC concerns and applicable to the Millstone Unit 1 design.

II.K.3.57 Identify Water Sources Prior to Manual Activation of ADS

Procedural Guidelines, recently received from General Electric Company through the General Electric BWR Owners' Group, for determining the adequacy of core cooling have also identified appropriate procedural guidelines to assure adequate water sources are available prior to manual activation of ADS. After review by NNECO those guidelines applicable to Millstone Unit 1 will be incorporated into the appropriate plant procedures. These procedural changes will be in effect on Millstone Unit 1 following the upcoming refueling outage presently scheduled to begin in September 1980.

III.D.3.4 Control Room Habitability

NNECO will take the actions necessary to evaluate the habitability of Millstone Unit No. 1 control room in accordance with requirements set forth in Item III.D.3.4, Control Room Habitability, of the NRC Action Plan NUREG-0660, May, 1980. It is NNECO's intention to complete this evaluation on the schedule requested by the NRC, i.e., January 1, 1981. Committing to the installation of modifications deemed appropriate by the evaluation is inappropriate until proper project definition is accomplished.

DOCKET NO. 50-336

ATTACHMENT 3

MILLSTONE NUCLEAR POWER STATION, UNIT NO. 2

FIVE ADDITIONAL TMI-2 RELATED REQUIREMENTS TO OPERATING REACTORS

JUNE, 1980

I.A.1.3 Shift Manning

Pending formal issuance of the modified NRC requirements on Shift Manning and overtime limitations, NNECO finds it inappropriate to commit to their implementation at this time.

I.A.3.1 Licensing Examinations

NNECO's review of the NRC March 28, 1980 letter on Qualifications of Reactor Operators has not yet been completed. Therefore, committing to the implementation of these requirements on the schedule mandated by the NRC is inappropriate at this time. Subsequent to completion of this review and its impact on other ongoing efforts, formal documentation of comments/commitments will be forwarded to the Staff.

I.C.5 Licensee Dissemination of Operating Experiences

NNECO will review and revise operating procedures as necessary to assure that operating information pertinent to plant safety originating both within and outside the utility organization is periodically supplied to operators and other personnel and is incorporated into training and retraining programs.

The guidelines found in Attachment I.C.5, Procedures for Feedback of Operating Experience to Plant Staff, will be used in the development of this program.

The review and modification to procedures deemed appropriate by the review is scheduled to be accomplished on the time schedule mandated by the NRC.

II.K Measures to Mitigate Small Break Loss of Coolant Accidents and Loss of Feedwater Accidents

II.K.3.1 Installation and Testing of Automatic PORV Isolation System

Implementation of this item has been deferred by the NRC pending the completion of the additional studies requested by NRC in Action Item II.K.3.2 to determine the necessity of such a system. As such committing to the installation of such a system by NNECO on Millstone Unit 2 Neck Plant is inappropriate at this time.

II.K.3.2 PWR Vendor Report on PORV Failure Reduction

The preparation of a study documenting the various actions which have been taken to reduce the probability of PORV failure as well as the need for a PORV Isolation System is being pursued by NNECO through the Combustion Engineering PWR Owners' Group on generic basis. Results of this study will be forwarded to the NRC as soon as they are available in consideration of Owners' Group activities already in progress.

II.K.3.3 Reporting of Safety and Relief Valve Failures and Challenges

NNECO has made the procedural changes necessary to promptly report safety and relief valve failures and properly report (in the annual report) Safety and Relief Valve Challenges to the NRC.

II.K.3.5 Automatic Trip of Reactor Coolant Pumps During LOCA

Implementation of this item has been deferred by the NRC pending the completion of additional studies to determine the criteria and necessity for early reactor coolant system pump trip. NNECO is pursuing the preparation of this study through the Combustion Engineering PWR Owners' Group. Results of this study will be forwarded to the NRC as soon as they are available in consideration of Owners' Group activities already in progress. Committing to the installation of such a system is inappropriate at this time.

II.K.3.9 Proportional Integral Derivative (PID) Controller Modification

This item is applicable only to Westinghouse PWR's which possess a PID Controller on the PORV System. As such this item is not applicable to Millstone Unit 2.

II.K.3.10 Proposed Anticipatory Trip Modification

This item is applicable to Westinghouse PWR Licensees who have applied to the NRC to modify the turbine/trip reactor trip anticipatory trip scheme. As such this item is not applicable to Millstone Unit 2.

II.K.3.12 Confirm Existence of Anticipatory Trip Upon Turbine Trip

This item is applicable only to Westinghouse PWR's. As such this item is not applicable to Millstone Unit 2.

II.K.3.13 Separation of HPCI and RCIC System Initiation Levels - Analysis and Implementation

This item is applicable only to BWR's with RCIC and HPCI systems. As such this item is not applicable to Millstone Unit 2.

II.K.3.14 Isolation of Isolation Condensers on High Radiation

This item is applicable only to BWR's with isolation condensers. As such this item is not applicable to Millstone Unit 2.

II.K.3.15 Modify Break Detection Logic to Prevent Spurious Isolation of HPCI and RCIC Systems

This item is applicable only to BWR's with HPCI and RCIC systems. As such this item is not applicable to Millstone Unit 2.

II.K.3.16 Reduction of Challenges and Failures of Relief Valves - Feasibility Study and System Modifications

This item is applicable only to BWR's. As such this item is not applicable to Millstone Unit 2.

II.K.3.17 Report on Outage of ECC Systems - Licensee Report and Proposed Technical Specification Changes

NNECO will take the actions necessary to secure the information requested on Millstone Unit 2 ECC System outages and forward the results to the NRC on the time schedule mandated by the NRC.

II.K.3.18 Modification of ADS Logic - Feasibility Study and Modifications for Increased Diversity for Some Event Sequences

This item is applicable only to BWR's. As such this item is not applicable to Millstone Unit 2.

II.K.3.19 Interlock on Recirculation Pump Loops

This item is applicable only to non-jet pump BWR's. As such this item is not applicable to Millstone Unit 2.

II.K.3.24 Confirm Adequacy of Space Cooling for HPCI and RCIC Systems

This item is applicable only to BWR's with HPCI and RCIC Systems. As such this item is not applicable to Millstone Unit 2.

II.K.3.25 Effect of Loss of AC Power on Reactor Recirculation Pump Seals

This item is applicable only to BWR's. As such this item is not applicable to Millstone Unit 2.

II.K.3.28 Study and Verify Qualification of Accumulators on ADS Valves

This item is applicable only to BWR's. As such this item is not applicable to Millstone Unit 2.

II.K.3.29 Study to Demonstrate Performance of Isolation Condensers with Non-Condensibles

This item is applicable only to BWR's with isolation condensers. As such this item is not applicable to Millstone Unit 2.

II.K.3.30 Revised Small Break LOCA Method to Show Compliance with 10 CFR 50 Appendix K

Development of the revised small break LOCA models is the responsibility of the appropriate NSSS Vendor and/or fuel supplier with the NRC independent of Owners' Group activities. Further comment by NNECO with regards to content and timing of analysis is inappropriate.

II.K.3.31 Plant Specific Calculations to Show Compliance with 10 CFR 50.46

Should the revised NSSS vendor analysis models confirm that sufficient conservatisms in current methods exist, then expedited plant specific calculations would be an unnecessary expenditure of resources. In the above instance it would be the intention of NNECO to utilize the revised models the first time (i.e. refueling) if a reanalysis is necessary for some reason. Should a more expedited time table be appropriate it would be NNECO's intention to comply with the staff schedule assuming that the appropriate NSSS vendor/fuel supplier has the necessary resources available.

II.K.3.44 Evaluation of Anticipated Transients with Single Failure to Verify No Fuel Failure

This item is applicable only to BWR's. As such this item is not applicable to Millstone Unit 2.

II.K.3.45 Evaluation of Depressurization with Other Than ADS

This item is applicable only to BWR's. As such this item is not applicable to Millstone Unit 2.

II.K.3.46 Response to List of Concerns from ACRS Consultant by General Electric

This item is applicable only to BWR's. As such this item is not applicable to Millstone Unit 2.

II.K.3.57 Identify Water Sources Prior to Manual Activation of ADS

This item is applicable only to BWR's. As such this item is not applicable to Millstone Unit 2.

III.D.3.4 Control Room Habitability

NNECO will take the actions necessary to evaluate the habitability of Millstone Unit No. 2 control room in accordance with requirements set forth in Item III.D.3.4, Control Room Habitability, of the NRC Action Plan NUREG-0660, May, 1980. It is NNECO's intention to complete this evaluation on the schedule requested by the NRC, i.e., January 1, 1981. Committing to the installation of modifications deemed appropriate by the evaluation is inappropriate until proper project definition is accomplished.