

NORTHEAST UTILITIES

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THE HARTFORD ELECTRIC LIGHT COMPANY
WESTERN MASSACHUSETTS ELECTRIC COMPANY
NEW YORK WATER POWER COMPANY
NORTHEAST UTILITIES SERVICE COMPANY
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July 24, 1980

Docket No. 50-245
B10042

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Reference: D. G. Eisenhut letter to IREP Participants dated May 23, 1980.

Gentlemen:

Millstone Nuclear Power Station, Unit No. 1
Interim Reliability Evaluation Program

The referenced letter informed us that Millstone Unit No. 1 has been selected to participate in the second phase of the Interim Reliability Evaluation Program (IREP) and that this phase would be completed within six months by a specialized team of analysts hired by the NRC.

On June 12, 1980, a meeting was held in your offices with the IREP participants to discuss the conduct of the program. Mr. Roger Mattson opened the meeting calling for a spirit of cooperation from the utility participants. It became obvious during the meeting that there would be very little opportunity for a spirit of cooperation in that the Staff was dictating what they expected, on their schedule, and with no apparent regard for the licensees' interests and concerns that were expressed at the meeting. We left the June 12 meeting with the following concerns:

- (1) There is a conflict between the spirit of cooperation and mutual learning described in Mr. Eisenhut's letter of May 23, 1980, and the lack of receptivity shown by the Staff members during the June 12, 1980 meeting.

Mr. Eisenhut's letter stated, ". . . the experience you gain from this interaction would be beneficial for evaluating the remainder of your nuclear plants in the final phase of this program". This is contradicted by the Staff's schedule which may not allow us to become effectively involved in developing, reviewing, or improving upon the methodology to be used.

Mr. Eisenhut's letter also states, ". . . the owner-utility should be intimately involved throughout the effort. . ." It is apparent from the meeting that the Staff interprets this to mean the utilities should provide a participant whose sole duty is to respond to Staff requests for information. There is little to no indication of cooperation

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in the learning phase. In fact, the Staff has taken a "cook book" type of attitude to IREP; i.e., the Staff will provide us with a methodology and input sequence. This is not a good process for learning and understanding.

- (2) There is no ultimate goal set by the NRC. IREP, as a research program, is risk-oriented without regard for consequences.
- (3) There is no established, quantified, consequence impact of the accident scenarios upon which to judge the acceptability of risk.
- (4) We have not seen any publications which answer the concern raised in the NRC IREP brief (Reference: FIN No: A-1241); "The principal barriers to the widespread application of probabilistic safety analysis appear to lie in a paucity of experienced practitioners of the techniques and in the absence of clear procedures that describe the competent and efficient use of these techniques". In the face of this statement, the Staff intends to have six teams of six-to-eight "experienced practitioners" perform studies of various plants as well as have us participate and indeed be "intimately involved" in the Program. We have no evidence to lead us to believe that the amount of expertise necessary to perform the required studies, and the clear procedures describing the competent and efficient use of the techniques have been developed in such a short time.
- (5) The Crystal River 3 study was intended to be the basis for IREP methodology and is now undergoing peer review. This study was received by us on June 27, 1980, in a working-draft form. It is hardly conceivable that any thorough or logical review can be made by the utilities before initiating the second IREP phase on the arbitrarily determined schedule presented by the Staff on June 25, 1980.
- (6) It is not clear what use will be made of information obtained from IREP. Without the risk/consequence question answered, it seems doubtful that rational decisions can be made.

The above six items discuss our very basic concerns with IREP. There appears to be a definite conflict between Mr. Eisenhut's cooperative intent and the Staff's pursuit of IREP. The benefits of IREP to the utility industry are questionable since there appears to be no relationship between IREP-developed risks and consequences. The Staff's pursuit seems frantic in light of:

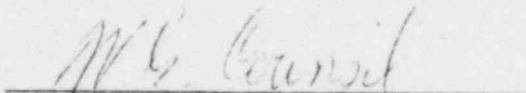
- a) the just published draft Crystal River Study;
- b) the lack of agreed-upon methodology;
- c) the lack of experienced personnel; and
- d) the incompleteness of Phase One of the IREP Brief.

Yet, we are being asked to provide an experienced member of our Staff to be in residence at your contractor's facility for six months. In light of the urgent need for our experienced personnel at our own facilities to address TMI requirements and the increasing number of generic safety issues being raised, we feel this would be ineffective and inefficient utilization of our manpower.

Because of the above, we question our level of involvement in IREP and the possible objectives. We recommend that the Staff review their approach and pursuit of IREP, keeping in mind Mr. Eisenhower's intent that the utilities benefit from the Program. We would appreciate meeting with you to review the conduct of IREP and our participation in the Program.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



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