



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

NOV 23 1981

Docket Nos. 50-213, 50-245
and 50-336

Mr. W. G. Council, Senior Vice President
Nuclear Engineering and Operations
Connecticut Yankee Atomic Power Corporation
Northeast Nuclear Energy Company
Post Office Box 270
Hartford, Connecticut 06101

Ref: Status of NUREG-0737 Items II.F.1.1 and II.F.1.2 for Haddam Neck
Plant and Millstone Nuclear Power Station, Units No. 1 and 2

Dear Mr. Council:

Your letter of October 16, 1981 provided additional information which formally resolved the outstanding deviations from NUREG-0737 Items II.F.1.1 and II.E.1.2 requirements on effluent monitoring. The existence of deviations from our interpretation of your December 15 and 31, 1980 - submittals were addressed in our letter of September 30, 1981 and the deviations have been discussed with and resolved by conversations with your staff.

We appreciate your responsiveness in resolving these deviations. The NRC review of the equipment design and installation used to perform the effluent monitoring at your facilities will be reviewed by IE after the January 1, 1982 implementation date.

Sincerely,

Robert A. Clark, Chief
Operating Reactors Branch #3
Division of Licensing

cc: See next page

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PLANTS WITH DEVIATIONS
THAT HAVE BEEN RESOLVED

SAFETY EVALUATION REPORT

ACCIDENT MONITORING PROVISIONS FOR
DETERMINATION OF RADIOACTIVE GASEOUS EFFLUENTS

PLANT: _____
LICENSE NUMBER: DPR - _____
REQUIREMENTS: NUREG-0737, ITEM II.F.1, ATTACHMENTS 1 AND 2

BACKGROUND

As a result of the NRC investigation of the Three Mile Island nuclear plant accident of March 1979, and as a result of the staff's evaluation of potential accidents which could occur at other nuclear plants, the NRC has established requirements for the monitoring and sampling of radioactive gaseous effluents under accident conditions. These requirements are detailed in NUREG-0737, Clarification of TMI Action Plan Requirements, November 1980, under Item II.F.1, Attachments 1 and 2. The provisions of Item II.F.1, Attachments 1 and 2, require that each operating nuclear power plant install additional radioactive effluent monitoring equipment with capacity sufficient to permit determination of effluent releases from all identified release points under worst-case accident conditions. Operators of nuclear power plants who determined that their proposed systems involved technical deviations from the guidance of NUREG-0737 were to document such deviations and to describe their alternative proposals. Operators who did not submit deviation requests or who did not submit requests for relief from NUREG-0737 requirements were considered, under the terms of the NUREG-0737 transmittal, to be in conformance with those requirements.

DISCUSSION

The (utility) has submitted information to the effect that the licensee's provisions to meet the requirements of Item II.F.1, Attachments 1 and 2, contained technical deviations for the (plant).

In discussions and memoranda between (utility), the staff, and the staff's technical assistance contractor, the deviations have been resolved to the satisfaction of the staff and, therefore, the deviations either no longer exist or have been judged to be an acceptable alternative to the guidance of NUREG-0737. According to information submitted by the licensee, the equipment is scheduled to be installed and operational by (January 1, 1982) (). (The licensee has outlined operational procedures to be used in the operation, maintenance, and calibration of the installed equipment.) (By letter of (date), the licensee has submitted proposed modifications to the Technical Specifications for the (plant), license number DPR- .) (The licensee will be required to submit Technical Specifications covering Item II.F.1, Attachments 1 and 2, when OMB clearance is granted.)

EVALUATION

The licensee has submitted sufficient information to enable the staff to satisfactorily resolve deviations identified (by the licensee) (by the staff) in licensee provisions to meet the requirements of NUREG-0737, Item II.F.1, Attachments 1 and 2. On the basis of the information provided,

the staff has determined that the licensee is in conformance with the requirements of NUREG-0737, Item II.F.1, Attachments 1 and 2. (The staff has reviewed the licensee's submittals concerning equipment provisions for the implementation of NUREG-0737, Item II.F.1, Attachments 1 and 2. There are no unresolved deviations from the requirements or specifications of NUREG-0737, Item II.F.1, Attachments 1 and 2) (with the exception of a schedular deviation which is not being considered in this evaluation.)

Subject to after-the-fact on-site inspection of the installed equipment and evaluation of equipment performance under actual plant operational conditions, the staff finds the licensee's equipment (provisions) (commitments) to be satisfactory. (subject to submittal and approval of appropriate Technical Specification changes.)

(The staff has reviewed the _____ (plant) _____ proposed Technical Specification changes for the operation, calibration, maintenance, and alarm point settings for instrumentation to meet the requirements of NUREG-0737, Item II.F.1, Attachments 1 and 2. The Technical Specifications include action items requiring timely reporting to the NRC of instrument outages. The staff finds the licensee's proposed Technical Specification changes to be (acceptable) (_____).) (The staff will review the licensee's proposed Technical Specifications when they are submitted.)

SUMMARY

The staff has reviewed and evaluated the _____ (utility) submittals for the _____ (plant), license number DPR-_____, describing provisions for implementing the requirements of NUREG-0737 (and the proposed changes to the plant Technical Specifications necessary to implement the NUREG-0737 requirements.) (The licensee has filed/docketed deviations from the requirements of Item II.F.1, Attachments (1) (and) (2); however, these deviations were subsequently resolved to the satisfaction of the staff and, the staff finds the licensee's implicit commitments for provisions for the monitoring of radioactive gaseous plant effluents under accident conditions to be satisfactory.)

(The licensee has stated that there are no deviations from the requirements of Item II.F.1, Attachments (1) (and) (2).) (The licensee has provided descriptions of his provisions for meeting the requirements of Item II.F.1, Attachments (1) (and) (2) and our evaluation of those descriptions has confirmed that there are no deviations.) (The staff finds the licensee's (implicit commitment for) (description of his) provisions the monitoring of radioactive gaseous plant effluents under accident conditions to be satisfactory) (and recommends approval of the proposed Technical Specification changes.) (Since proposed Technical Specification changes are not to be submitted until OMB approval is obtained, the review of the proposed changes is being deferred until a later date.)

PLANTS WITH NO DEVIATIONS
OTHER THAN SCHEDULAR

SAFETY EVALUATION REPORT

ACCIDENT MONITORING PROVISIONS FOR
DETERMINATION OF RADIOACTIVE GASEOUS EFFLUENTS

PLANT: _____

LICENSE NUMBER: DPR - _____

REQUIREMENTS: NUREG-0737, ITEM II.F.1, ATTACHMENTS 1 AND 2

BACKGROUND

As a result of the NRC investigation of the Three Mile Island nuclear plant accident of March 1979, and as a result of the staff's evaluation of potential accidents which could occur at other nuclear plants, the NRC has established requirements for the monitoring and sampling of radioactive gaseous effluents under accident conditions. These requirements are detailed in NUREG-0737, Clarification of TMI Action Plan Requirements, November 1980, under Item II.F.1, Attachments 1 and 2. The provisions of Item II.F.1, Attachments 1 and 2, require that each operating nuclear power plant install additional radioactive effluent monitoring equipment with capacity sufficient to permit determination of effluent releases from all identified release points under worst-case accident conditions. Operators of nuclear power plants who determined that their proposed systems involved technical deviations from the guidance of NUREG-0737 were to document such deviations and to describe their alternative proposals. Operators who did not submit deviation requests or who did not submit requests for relief from NUREG-0737 requirements were considered, under the terms of the NUREG-0737 transmittal, to be in conformance with those requirements.

DISCUSSION

The (utility) (has not submitted) (has submitted information to the effect that the licensee has no) technical deviations from the requirements of NUREG-0737, Item II.F.1, Attachment(s) (1) (and) (2), for the (plant).

(In the absence of docketed information to the contrary, we have assumed that (According to information submitted by the licensee) this equipment is scheduled to be installed and operational by (January 1, 1982) (_____). (The licensee has outlined operational procedures to be used in the operation, maintenance, and calibration of the installed equipment.) (By letter of (date), the licensee has submitted proposed modifications to the Technical Specifications for the (plant), license number DPR-_____.) (The licensee will be required to submit Technical Specifications covering Item II.F.1, Attachments 1 and 2, when OMB clearance is granted.)

EVALUATION

(In the absence of docketed information to the contrary, the staff assumes that the licensee is in conformance with the requirements of NUREG-0737, Item II.F.1, Attachments 1 and 2.) (The staff has reviewed the licensee's submittals concerning equipment provisions for the implementation of NUREG-0737, Item II.F.1, Attachments 1 and 2.) (The licensee has stated that there are no deviations from the requirements of specifications of NUREG-0737, Item II.F.1, Attachments 1 and 2) (with the exception of a scheduler deviation which is not being considered in this evaluation.)

Subject to after-the-fact on-site inspection of the installed equipment and evaluation of equipment performance under actual plant operational conditions, the staff finds the licensee's equipment (provisions) (commitments) to be satisfactory. (Subject to submittal and approval of appropriate Technical Specification changes.)

(The staff has reviewed the _____ (plant) _____ proposed Technical Specification changes for the operation, calibration, maintenance, and alarm point settings for instrumentation to meet the requirements of NUREG-0737, Item II.F.1, Attachments 1 and 2. The Technical Specifications include action items requiring timely reporting to the NPC of instrument outages. The staff finds the licensee's proposed Technical Specification changes to be (acceptable) (_____).) (The staff will review the licensee's proposed Technical Specifications when they are submitted.)

SUMMARY

The staff has reviewed and evaluated the _____ (utility) _____ submittals for the _____ (plant) _____, license number DPR-_____, describing provisions for implementing the requirements of NUREG-0737 (and the proposed changes to the plant Technical Specifications necessary to implement the NUREG-0737 requirements.) (The licensee has not filed/docketed deviations from the requirements of Item II.F.1, Attachments (1) (and) (2). In the absence of such deviations, the staff finds the licensee's implicit commitments for provisions for the monitoring of radioactive gaseous plant effluents under accident conditions to be satisfactory.)

(The licensee has stated that there are no deviations from the requirements of Item II.F.1, Attachments (1) (and) (2).) (The licensee has provided descriptions of his provisions for meeting the requirements of Item II.F.1, Attachments (1) (and) (2) and our evaluation of those descriptions has confirmed that there are no deviations.) (The staff finds the licensee's (implicit commitment for) (description of his) provisions the monitoring of radioactive gaseous plant effluents under accident conditions to be satisfactory) (and recommends approval of the proposed Technical Specification changes.) (Since proposed Technical Specification changes are not to be submitted until OMB approval is obtained, the review of the proposed changes is being deferred until a later date.)