

**NORTHEAST UTILITIES**

THE CONNECTICUT LIGHT AND POWER COMPANY  
THE HARTFORD ELECTRIC LIGHT COMPANY  
WESTERN MASSACHUSETTS ELECTRIC COMPANY  
NEW YORK WATER POWER COMPANY  
NORTHEAST UTILITIES SERVICE COMPANY  
NORTHEAST NUCLEAR ENERGY COMPANY

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September 16, 1980

Docket Nos. 50-213  
50-245  
50-336  
A01162

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

- References:
- (1) D. G. Eisenhut letter to all Pressurized Water Reactor Licensees dated July 2, 1980.
  - (2) D. G. Eisenhut letter to all Boiler Water Reactor Licensees dated July 2, 1980.
  - (3) W. G. Council letter to D. M. Crutchfield dated August 27, 1980 (Docket No. 50-213).
  - (4) W. G. Council letter to R. A. Clark dated May 20, 1980 (Docket No. 50-336).
  - (5) W. G. Council letter to the Secretary of the Commission dated September 8, 1980.
  - (6) D. G. Eisenhut letter to All Licensees of Operating Plants and Applicants for Operating Licenses and Holder of Construction Permits dated September 5, 1980.
  - (7) T. Novak letter to All Westinghouse Pressurized Water Reactor Licensees dated August 15, 1980 (Docket No. 50-213).
  - (8) D. G. Eisenhut letter to All Operating Pressurized Water Reactor Licensees dated June 11, 1980.
  - (9) W. G. Council letter to D. M. Crutchfield dated September 9, 1980 (Docket No. 50-245).
  - (10) D. G. Eisenhut letter to All Operating Power Reactor Licensees dated August 7, 1980.
  - (11) W. O. Miller letter to W. G. Council dated September 2, 1980, (Docket No. 50-336).
  - (12) R. Reid letter to W. G. Council dated December 21, 1979 (Docket No. 50-336).
  - (13) W. G. Council letter to D. G. Eisenhut dated May 21, 1980.

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Gentlemen:

Haddam Neck Plant  
Millstone Nuclear Power Station, Unit Nos. 1 and 2  
Proposed Revisions to Technical Specifications  
TMI-Related Requirements

In References (1) and (2), Connecticut Yankee Atomic Power Company (CYAPCO) and Northeast Nuclear Energy Company (NNECO) were requested to submit license amendment requests for the Haddam Neck Plant, Millstone Unit No. 1, and Millstone Unit No. 2 regarding the Category A TMI-2 Lessons-Learned requirements. Accordingly, pursuant to 10CFR50.90, CYAPCO and NNECO hereby propose to amend their operating licenses, DPR-61, DPR-21, and DPR-65, by incorporating the revisions identified in Attachments 1, 2, and 3 into the Haddam Neck Plant, Millstone Unit No. 1, and Millstone Unit No. 2 Technical Specifications.

It is noted that the Attachments do not conform to the model specifications in their entirety. Reasons for these deviations are discussed either in the remainder of the forwarding letter or in the discussion section which accompanies each of the Attachments.

Regarding the Haddam Neck Plant and Millstone Unit No. 2, no specification changes regarding the auxiliary feedwater systems are proposed. Changes were proposed previously by References (3) and (4), respectively, and CYAPCO and NNECO are awaiting Staff action regarding these submittals and the question of implementation of control-grade auxiliary feedwater systems.

There are several requests made in References (1) and (2) which are not addressed in proposed changes. CYAPCO and NNECO take exception to incorporating requirements into Technical Specifications or the licenses which are not of immediate importance to safe operation of the facilities.

This matter is discussed in detail in Reference (5), which was docketed in response to a Commission request for comments concerning a proposed rulemaking regarding Technical Specifications. The Staff is referred to Reference (5) for the detailed basis for this position. Fundamentally, the concept of "immediate importance to safety" means that Limiting Conditions of Operation (LCO's) and Surveillance Requirements (SR's) should only be included if they are essential to and directly related to preservation of the accident analyses assumptions. Therefore, CYAPCO and NNECO conclude, for instance, that it is not appropriate to propose any model license conditions provided as Enclosure (2) to References (1) and (2). It is inconsistent to have the license require provisions, procedures, and training for systems integrity, iodine monitoring, and subcooling margin monitoring when equally as or more important requirements are not detailed in the license. Incorporating these provisions into the license results in no tangible increase in plant safety and serves to clutter these documents with inappropriate details. CYAPCO and NNECO recognize the importance of these and many other requirements,

and timely performance of these activities is correctly governed by plant procedures. Consideration by the Commission of conducting a rulemaking on Technical Specifications suggests an awareness that the specifications are evolving into an excessively voluminous compilation of requirements without proper focus. Although completion of a rulemaking process is clearly some time away, the current wording of 10CFR50.36 does not prohibit incorporation of some of the recommendations of Reference (5). This philosophy was utilized during CYAPCO and NNECO review of References (1) and (2) to determine how to respond to each of the specific requests.

Each of the Attachments contains a proposal to identify the Shift Technical Advisor (STA) as a member of the normal shift complement. The wording proposed in Specification 6.3.1 is identical to that of the model specification. However, the potential for misinterpretation of these words necessitates the following comments. The current method of fulfilling the STA function is viewed as interim; it is planned to supply details of conformance to the Reference (6) STA requirements by January 1, 1981. At that time, the long-term plans will also be detailed. Therefore, the proposed wording is intended to be applicable to the STA's currently on shift. CYAPCO and NNECO both utilize certain non-degreed personnel in this capacity, and it has been determined that all of these individuals comply with the term "or equivalent" in Specification 6.3.1. In other words, all current STA's are fully capable of performing their intended functions of accident assessment and operating experience feedback.

Previous experience with the Office of Inspection and Enforcement requires that the Staff concur in the above interpretation prior to issuance of the specification. Details of personnel qualifications, credentials, and on-going training programs are available on-site should this information be necessary to complete Staff evaluation. It is requested that any questions on this matter be identified and resolved prior to issuance of the specification. There exists no surplus of STA's such that disqualification of certain personnel on the basis of an individual I&E inspector's interpretation of Technical Specifications cannot be tolerated.

Regarding the Haddam Neck Plant and Reference (7), CYAPCO notes that current Technical Specifications do not contain Specification 3.9.10 or any other specification addressing the issue of depth of water above irradiated fuel assemblies. This matter is of no immediate concern as refueling operations are not contemplated for many months. In response to the Staff request, it is noted that specifications addressing this matter are being prepared in response to Reference (8). It is CYAPCO's intention to respond to Reference (7) in conjunction with proposing specifications regarding decay heat removal.

The specifications proposed in the Attachments have been reviewed pursuant to the requirements of 10CFR50.59, and have not been found to constitute any unreviewed safety questions. The attached changes have also been reviewed and approved by the Connecticut Yankee Nuclear Review Board, Millstone Unit No. 2 Nuclear Review Board, and Millstone Site Nuclear Review Board, as appropriate; the Boards have also concurred in the above determinations.

CYAPCO and NNECO have also reviewed the attached proposed changes pursuant to the requirements of 10CFR170, and have reached the following conclusions.

Regarding Millstone Unit No. 2, NNECO hereby clarifies the discussion in Reference (11) regarding payment for the Reference (4) submittal. It is noted that at the time of docketing of Reference (4), no specific Staff guidance on Part 170 was issued regarding Technical Specification changes relative to TMI requirements. In Reference (1), the Staff advised that such specifications were exempt from fees pursuant to 10CFR170.11. This statement was issued even though model specifications were provided and a request for amendment was first made by Reference (12), and the response was provided in Reference (4). By Reference (10), the Staff reversed the decision of Reference (1) and advised that 10CFR170.22 is applicable. Reference (11) states that each individual application requires a review and analysis by the Staff, such that future modifications or supplements to original applications are again subject to 10CFR170.22. The docketing of more than one application on one issue is much more likely to be necessary when Staff requirements on that issue are revised. It is also noted that the Staff originally requested implementation of automatic initiation of auxiliary feedwater by January 1, 1980. NNECO then received correspondence indicating that a safety evaluation would be issued by June 1, 1980. NNECO has yet to receive this evaluation. This discussion is relevant as it would be possible to consolidate applications if the Staff were to delineate all relevant requirements on a given issue at one time. Regarding this application, NNECO concludes the attached changes, the issue of Reference (11), and other supplements to TMI items which the Staff is likely to require constitute, in the aggregate, a Class IV amendment. Accordingly, payment in the amount of \$12,300 (twelve thousand three hundred dollars) is hereby provided. The basis for this determination is that the changes involve multiple safety issues of the Class III and II type.

Regarding the Haddam Neck Plant, CYAPCO notes that the rationale discussed above is applicable. No additional payment is provided as the Class IV fee was provided in Reference (3).

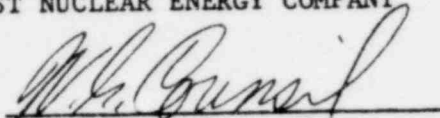
Regarding Millstone Unit No. 1, NNECO notes that the attached proposed change is a duplicate of that proposed for Millstone Unit No. 2. It is, therefore, concluded that this change constitutes a Class I amendment. Accordingly, enclosed is payment in the amount of \$400 (four hundred dollars).

In summary, enclosed please find payment in the amount of \$12,700 (twelve thousand seven hundred dollars), in full payment of the attached proposed changes.

We trust you find the attached information responsive to the requests of References (1) and (2).

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY  
NORTHEAST NUCLEAR ENERGY COMPANY

  
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W. G. Council  
Senior Vice President

Attachment

