

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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August 15, 1980

Docket No. 50-245
A01126

Mr. Boyce H. Grier, Director
Region 1
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

- Reference: (1) B. H. Grier letter to W. G. Council dated July 18, 1980.
(2) W. G. Council letter to B. H. Grier dated August 7, 1980.
(3) W. G. Council letter to B. H. Grier dated July 27, 1980,
IEB 80-14.
(4) W. G. Council letter to B. H. Grier dated July 27, 1980,
IEB 80-17, Supplement 2.

Gentlemen:

Millstone Nuclear Power Station, Unit No. 1
Response to Supplement 1 of IEB 80-17

This letter provides the second of three responses required by I&E Bulletin No. 80-17 Supplement No. 2. The first response was submitted August 7, 1980. Specifically, NNECo is responding to the action item from Reference (1), as described further below.

As requested in Reference (1), and to assist the NRC in evaluating the value/impact of this Bulletin Supplement, we have determined that the manpower expended in conduct of the review and preparation of the report required by this portion of the Supplement is 20 professional man-days for Millstone Unit No. 1.

NRC Required Action

Install a system to continuously monitor water levels in all scram discharge volumes. Continuous recording and alarm features must be included in the design. Consideration should be given to use of diverse level sensors in this (these) system(s). The design installed should represent the design with the highest level of reliability compatible with completion of installation by September 1, 1980. Provide a written description of the system design to the NRC Regional Office. If installation by September 1, 1980 is not possible, by August 15, 1980, submit to the NRC Regional Office:

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1. Documentation in detail why the installation cannot be completed by 9/1/80.
2. A commitment to a firm schedule for installation.
3. A commitment to equipment changes and/or surveillance requirements in addition to those now in effect that will provide adequate assurance of SDV operability in the interim until installation is completed.

NNECo Response

1. Installation of a permanent, continuous monitoring, recording and alarm system by September 1, 1980 is not possible due to the unavailability of equipment, short delivery time required, and performance requirements specified by the NRC for this specialized monitoring equipment. However, until such time as an acceptable permanent system is defined and installed, NNECo maintains that the current daily surveillance requirements are adequate to ensure the scram discharge system operability. This system has operated trouble-free for over 10 years at Millstone Unit No. 1.

NNECo has been extensively involved in industry efforts to develop and improve upon current systems for permanent, continuous monitoring, recording and alarm capability for the scram discharge system, as evidenced by participation in the following:

- a. Meeting in San Jose, to review GE program on BF-3, 7/9/80.
- b. Meeting in Westboro, Mass. with BWR 3's to review potential SDV backfits, 7/17/80.
- c. Meeting in San Jose, to review GE findings on BF-3 and recommended fixes, 7/29/80.
- d. Meeting with I&E in Bethesda to review MP-1 SDV design, 8/4/80.
- e. Meeting with GE & NRR in Bethesda to review BF-3 and recommended fixes, 8/6/80.
- f. Meeting in Boston with BWR 3's to develop SDV backfit plan and draft criteria for industry consideration, 8/13/80.
- g. Transmittal of eight letters thus far to I&E within the last five weeks responding to I&E requirements on this subject.
- h. Numerous in-house meetings, consultation with other utilities and GE, and continuous engineering review of potential SDV modifications, continuing since the Brown's Ferry-3 incident.

2. We have verified the SDV's properly drain to the instrument volume with 10 years of successful operation, and additional, intensive, special testing performed under Bulletin 80-17 requirements, and now with daily U.T. surveillance. Since the SDV's properly drain to the instrument volume, the instrument volume is the first, logical place to monitor for water accumulation, and thus, dedicated SDV monitoring is viewed as a backup. Therefore, the permanent, continuous, monitoring, recording, alarm and scram features that already exist on the instrument volume, and the daily U.T. surveillance on the SDV's provides more than adequate assurance as to whether the SDV's contain water, or are drained. Because of this existing capability, NNECo maintains that sufficient time should be allowed to ensure that the modifications under consideration are properly designed, engineered and reviewed prior to their installation. We will not make modifications that have not been sufficiently evaluated to ensure that plant safety is not degraded.

The schedule for modification is to install the features that improve scram system performance (including additional instrumentation for monitoring the SDV/instrument volume) in several phases; 1) during the 1980 refueling commencing October 4, 1980, 2) during potential unanticipated outages during the next cycle which are of sufficient duration for modifications and 3) during the subsequent refueling outages.

3. NNECo has performed equipment modifications and instituted additional surveillance requirements described in References (3) and (4), which were not in effect at the time Reference (1) was received. These changes provide further adequate assurance of SDV operability, and will remain in effect until installation of the permanent features are installed.

Should you have any questions, please contact us.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

W. G. Council

W. G. Council
Senior Vice President

By: *W. F. Fee*

W. F. Fee
Executive Vice President