

NORTHEAST UTILITIES



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THE HARTFORD ELECTRIC COMPANY
WESTERN MASSACHUSETTS ELECTRIC COMPANY
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September 12, 1980

Docket No. 50-245
B10072

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

Gentlemen:

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

Northeast Utilities has reviewed its projected involvement in the Interim Reliability Evaluation Program (IREP), including our notes of the August 4, 1980 meeting and your letter dated August 15, 1980. We find that we cannot fully support, at this time, the Staff's current plans and schedules for the IREP Program as they apply to Millstone Unit No. 1. This letter explains our main concerns.

We are unable to supply full-time, dedicated NU personnel as requested. We feel it is too great an imposition on our personnel to spend extended periods away from their job and families. As an alternative, we suggest that the NRC's contractor could arrange for a temporary office in Connecticut where access to the NU professional people will be greatly facilitated. This will allow easy access to various experienced people, latest revised drawings and documents, plant inspections, etc. Arrangements can be made for contractor personnel to have office space, communication facilities, secretarial assistance, etc.

We feel this arrangement will also benefit NU much more than having the study performed at the contractor's office. NU and the NRC will have a better end product; since more of the knowledgeable, experienced people will provide input to the study; there will be better assurance that the latest information is being used; review of material can be performed on a more timely basis; and management of the study will be more closely scrutinized by NU.

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The approach suggested by the Staff Procedure and Schedule Guide limits the study to core melt scenarios only. We do not feel that this limited scope fully justifies the type of study proposed. We feel the event trees should be developed for the various plant systems interactions with individual system fault trees developed as required. Developing event trees, which describe the plant systems interactions, will yield a document of continuing use in that revisions to systems can be checked for their effect on plant operation. Development of event trees will reduce dependence on large unwieldy fault trees and will place more emphasis on engineering analysis of systems rather than mathematical manipulation of fault trees. We feel these benefits should be realized by NU to justify NU participation.

We also object to not having any input into the contractor selection process, since NU personnel will have to work closely with contractor personnel and NU will have to utilize the results of the contractor work. NU should have been given the opportunity to comment on selection of contractor.

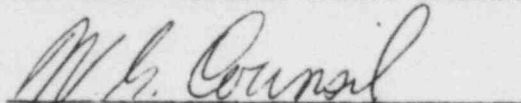
We reiterate our previous concern that the large effort being forced by the Staff is overtaxing the limited quantity of experienced personnel, as witnessed by the Crystal River Study which we understand is being re-done, for the third time.

Our position is that we will fully support an IREP on Millstone Unit No. 1 if: (1) it is performed in, or near NU facilities; (2) NU has a role in contractor selection; and (3) the schedule is modified to allow NU to build up our staff so that we can follow most of the analysis work. NU is committed to establishing a competent risk assessment group. We have manpower positions approved and are actively pursuing obtaining experienced people to join our staff.

We view risk assessment analysis of systems as an important development of our technical capability and a viable tool to better understand and predict plant inter-system actions. We would appreciate the opportunity to discuss these matters with you personally.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



W. G. Council
Senior Vice President