

NORTHEAST UTILITIES

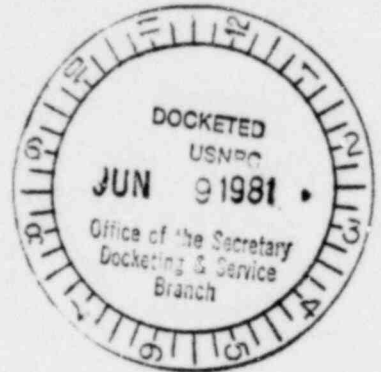


THE CONNECTICUT LIGHT AND POWER COMPANY
THE HARTFORD ELECTRIC LIGHT COMPANY
WESTERN MASSACHUSETTS ELECTRIC COMPANY
HOLYOKE WATER POWER COMPANY
NORTHEAST UTILITIES SERVICE COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY

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June 4, 1981

Docket Nos. 50-213
50-245
50-336
B10216



Dr. Joseph Hendrie, Chairman
U. S. Nuclear Regulatory Commission
1717 H Street
Washington, D.C. 20555

- References:
- (1) G. Lainas letter to W. G. Council, dated February 13, 1981 (Docket No. 50-213).
 - (2) G. Lainas letter to W. G. Council, dated February 13, 1981 (Docket No. 50-245).
 - (3) W. G. Council letter to G. Lainas, dated February 27, 1981.
 - (4) T. M. Novak letter to W. G. Council, dated April 14, 1981.
 - (5) W. G. Council letter to T. M. Novak, dated April 30, 1981.
 - (6) R. A. Clark letter to W. G. Council, dated May 27, 1981.
 - (7) D. G. Eisenhut letter to All Licensees of Operating Plants and Applicants for Operating Licenses and Holders of Construction Permits, dated January 19, 1981.

Gentlemen:

Haddam Neck Plant
Millstone Nuclear Power Station, Unit Nos. 1 and 2
Environmental Qualification

The issue of environmental qualification has consumed a very substantial fraction of the manpower and resource capabilities of the nuclear industry during the past several years. Since the initiation of significant activity on this subject in late 1977 as part of the Systematic Evaluation Program, Connecticut Yankee Atomic Power Company (CYAPCO) and Northeast Nuclear Energy Company (NNECO) have expended many thousands of man hours of resources to respond to the concerns and requirements of the Nuclear Regulatory Commission.

The vehicles the NRC has elected to utilize to promulgate its requirements have trended towards increased levels of specificity and rigidity with the passage of time. The initial thrust of Commission activity was unique to the SEP plants in the latter part of 1977, and in 1978, the issue of environmental qualification was handled as an IE circular. In early 1979, the Circular was elevated to Bulletin status. The second revision to the Bulletin was issued in January, 1980 as 79-01B, and similar requirements were imposed on the SEP plants by letters dated February 15, 1980. The May 23, 1980 Memorandum and Order provided detailed instructions to the Staff regarding actions to be taken to address the issue. This Memorandum and Order was ultimately used as the basis for subsequent docket-specific Orders, License Amendments, and Technical Specification changes which were issued to all operating reactors. During this same interval, three Bulletin supplements were issued, and additional clarification letters were provided to the licensees by the Staff.

The single most important conclusion resulting from licensee evaluations of the requirements is that the June 30, 1982 deadline for full compliance is neither appropriate, realistic, nor attainable. The Commission had previously elected to require compliance with the June 30, 1982 deadline by making it a license condition. At this time the status of the environmental qualification issue is such that Commission action is necessary to relax the deadline. The basis for our request follows.

Issuance of the May 23, 1980 Memorandum and Order established several key dates as milestones in the qualification process. As stated in the Memorandum and Order, the June 30, 1982 date recognized the sequential relationship between:

1. Full and complete licensee qualification submittals by November 1, 1980.
2. Equally comprehensive NRC Staff Safety Evaluation Reports by February 1, 1981.
3. Allowance of an approximate seventeen month interval (i.e. February 1, 1980 to June 30, 1982) from the period of time that the qualification status was fully documented and understood until implementation of the required changes was completed.

The basis for this request for relaxation of the June 30, 1982 deadline is that Item (1) above has been fulfilled by the industry on schedule, while Item (2) above has not been fulfilled by the Staff. As a minimum, the deadline for full compliance should be delayed by the originally established seventeen month period after issuance of plant-specific SER's.

In support of this position, your attention is called to the transcript from the April 15, 1980 Commission briefing on Environmental Qualification. During the meeting, the Staff identified five unique tasks in the qualification effort and established milestones for each. The entire process was estimated by the Staff to require 29 months from the issuance of 79-01B to achieve full compliance. This 29 month interval included an 18 month allowance (one refueling cycle) to "allow replacement of marginal components." After having dealt with the issuance of environmental qualification for well over a year, in April of 1980 the Staff estimated that eleven months after the issuance of 79-01B, a mutually-acceptable qualification status would be published for each operating reactor. To date some 16 months have elapsed, and the goal has not yet been attained by the Staff.

It is emphasized that while the recently issued Equipment Evaluation Reports (EER's) provide some insight into the Staff's position on environmental qualification, they are by no means a substitute for the SER's. The stated purpose of the EER's was to enable the licensees to reevaluate continued safe operation using Staff identified equipment deficiencies as a basis for that evaluation. It was not promulgated as a substitute document for SER's, which were due originally on February 1, 1981. The information contained within the EER's was often incomplete or in error, and it was frequently impossible to establish a one-to-one correlation between the EER evaluation and the November 1, 1980 license submittals.

A detailed basis for the above characterization of the EER's can be obtained by reviewing Reference (1) through (5). The errors contained within the EER's were numerous and significant, and the lack of technical bases for the Staff's position on qualification status precludes completion of the major task remaining, i.e. defining those corrective actions necessary and sufficient to respond to the existing license condition and the June 30, 1982 deadline.

Equally distressing is one statement made in the recently received SER for Millstone Unit No. 2, which was transmitted by Reference (6). The Staff states that the additional information provided by NNECO's letters of January 30, 1981 and April 30, 1981 has not been incorporated into the content of the SER. These two documents represent a substantial amount of qualification data, and compliance with the deadline is further delayed with the continued lack of a documented Staff evaluation of this information.

To further support this request, there remain numerous technical considerations which also justify further extensions of the June 30, 1982 deadline, pending the resolution of these technical matters. Among the considerations are:

- o The evolutionary nature of the Staff's environmental qualification requirements. The groundrules for evaluating equipment qualification have changed considerably with time by the issuance of circulars, bulletins, bulletin revisions, bulletin supplements, clarification letters, orders for modification of licenses, Technical Specification changes, etc. The Staff has also conducted both regional and plant-specific meetings. In some instances, the DOR guideline requirements and NUREG-0588 were superseded by other regulatory requirements identified in the EER's. The dynamic nature of the relevant criteria has not been conducive to completing the qualification review in an expeditious, efficient, or effective fashion.
- o The issue of equipment in mild environments. The license conditions require resolution for all safety-related electrical equipment, yet the long-awaited SER's will not even address such equipment. The industry position on this issue will be the subject of separate correspondence.
- o The issue of replacement parts.
- o The appropriateness of the Staff's aging requirements.
- o The issue of calculation of containment profiles.
- o The technical basis for the Staff position for operating period plus one hour.
- o The adequacy of the seventeen month interval to engineer, procure, and install qualified equipment, assuming it is available. It is also not clear that the timing of a planned refueling outage will be compatible with the availability of qualified equipment within the seventeen month interval.

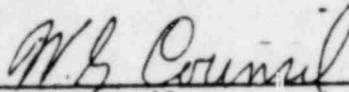
In summary, it is our position that CYAPCO and NNECO have fulfilled their portion of the review schedule identified in the Memorandum and Order, and licensees should be provided relief from the June 30, 1982 deadline because of the inability of the Staff to meet the February 1, 1981 deadline for SER issuance and its failure to resolve the many technical issues identified above. A minimum of seventeen months after SER issuance should be allowed to achieve compliance. Pending the outcome of the above technical considerations and detailed review of the SER's, once they are issued, it is possible that additional delays may be necessary or appropriate.

The Staff has repeatedly stated that the Commissioners imposed the June 30, 1982 deadline, and that the Staff is not authorized to grant extensions to this schedule. Reference (7) is an example of this position. It is, therefore, essential that the Commission recognize the serious implications of this matter promptly, and initiate the steps necessary to extend the June 30, 1982 deadline. In this manner, realistic, achievable, and justifiable corrective actions and schedules can be established and implemented.

We appreciate the opportunity to provide our input on this most pressing issue, and intend to assist the Commission in resolving the above-mentioned technical issues. We remain available to provide any other assistance you may require in this regard.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY



W. G. Council
Senior Vice President

cc: Commissioner P. A. Bradford

Commissioner V. Gilinski

Commissioner J. Ahearne

Mr. J. Carson Mark
Chairman, Advisory Committee on Reactor Safeguards

Mr. Bruce Babbitt
Chairman, Nuclear Safety Oversight Committee