

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 30, 1981

Docket No. 50-245
A01662



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

- References:
- (1) W. G. Council letter to D. G. Eisenhut, dated December 31, 1980.
 - (2) D. G. Eisenhut letter to D. B. Waters, dated April 6, 1981.
 - (3) W. G. Council letter to D. G. Eisenhut, dated May 26, 1981.

Gentlemen:

Millstone Nuclear Power Station, Unit No. 1
TMI Action Plan Item II.K.3.27
Common Water Level Reference

In Reference (1), Northeast Nuclear Energy Company (NNECO) indicated that the viability of modifying Millstone Unit No. 1 reactor vessel water level instrumentation such that all level instruments would be referenced to the same point had been investigated through the BWR Owners' Group. The results of this investigation were forwarded to the NRC on December 29, 1980 by the BWR Owners' Group. NNECO further indicated in Reference (1) that after reviewing this information, it had concluded that identification of a common water level reference was not vital to ensure safe reactor operation and as such, no modifications to the current control room water level instrumentation were planned.

In Reference (2), the NRC Staff informed BWR licensees (by copy of the NRC Staff's letter to Mr. D. B. Waters) that the NRC Staff did not agree with the BWR Owners' Group conclusion that "the current BWR water level indication system is fully adequate to allow plant operators to respond properly under all postulated reactor conditions."

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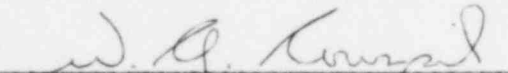
Although NNECO still believes that identification of a common water level reference is not vital to ensure safe reactor operation, NNECO indicated in Reference (3) that plant modifications are planned such that reactor water level instruments will be referenced to the same point. NNECO further indicated in Reference (3) that additional time was necessary for implementation of this requirement than that specified in NUREG-0737 and Reference (2), and that NNECO intended to submit a schedule by July 1, 1981 for completion of such plant modifications and corresponding procedural changes, and for submittal of any required technical specification changes.

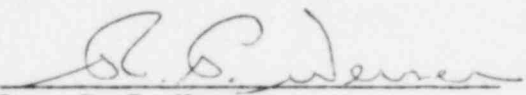
Therefore, NNECO intends to establish a common water level reference of 482.5 inches above the bottom of the reactor vessel. This choice will present minimal impact on plant operations since instrumentation used during normal plant operating conditions will not need to be changed. Necessary technical specification change requests are scheduled for submittal to the NRC Staff by August 1, 1981. NNECO intends to complete the required plant modifications as well as corresponding procedural changes within one (1) month after NRC Staff approval of our technical specification change requests or by October 1, 1981, whichever is later.

Should you have any questions on the above, please feel free to contact us.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY


W. G. Counsil
Senior Vice President


By: R. P. Werner
Vice President Generation Engineering
and Construction