

# NORTHEAST UTILITIES



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

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Docket Nos. 50-213  
50-245  
A01746



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

Reference: (1) D. M. Crutchfield letter to All SEP Licensees, dated  
May 27, 1981.

Gentlemen:

Haddam Neck Plant  
Millstone Nuclear Power Station, Unit No. 1  
Systematic Evaluation Program Integrated Assessment

Connecticut Yankee Atomic Power Company (CYAPCO) and Northeast Nuclear Energy Company (NNECO) have recently received a copy of Reference (1), which outlined the Staff's plans for the Integrated Assessment Phase of the SEP. CYAPCO, as licensee for the Haddam Neck Plant, and NNECO, for Millstone Unit No. 1, have reviewed the proposed method, as amplified in verbal discussions, for the Integrated Assessment and offer the following comments for the Staff's consideration.

In general, the Staff's proposal is an excellent attempt to outline an approach and document a method by which a truly integrated evaluation can be conducted. The Staff's proposed approach recognizes the interdependency of not only the 137 SEP topics but also other Commission activities including the TMI Action Plan and Appendix R to 10CFR50. It is notable that the Staff's proposal, in keeping with the philosophy of an integrated assessment, recognizes that still more backfits may be pending within an individual utility and allows the licensee an interval of time to comment on the draft assessment and develop an "integrated fix package." The approach of allowing the licensee an opportunity to comment on the Staff's assessment and to integrate backfit requirements in one package is a process lacking in many other NRC-related requirements.

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In the interest of potentially improving this document further, CYAPCO and NNECO offer two general comments for the Staff's consideration.

First, it is our view that the proposed priority ranking system should include consideration of the occupational exposure which may be required to install a modification or perform subsequent maintenance and inspections. The ranking system recognizes the importance of considering licensee capital and manpower resources but has no provisions for considering man-rem expenditures. Such a provision would be in concert with the ALARA philosophy. Failure to include consideration of radiation exposure in the priority ranking system eliminates the capability to perform the necessary cost/benefit evaluation regarding the ALARA program. A number of studies have been performed to determine the equivalent dollar value per man-rem. Although there exists a wide variation in the values used, a typical value is \$5,000 per man-rem. Therefore, an exposure of 200 man-rem is considered equivalent to a capital expenditure of \$1,000,000. Since this represents a significant expenditure, it should be given due consideration in determining the appropriateness of any potential modifications.

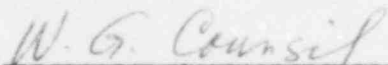
The second general comment is that there is no provision in the ranking system for probabilistic risk input. The safety significance of a proposed modification is the strongest single influence in the ranking system, however, there is no apparent consideration of probabilistic risk in assigning a level of safety significance. Quantification of input from a probabilistic perspective may be difficult at this stage. Rather than revise the ranking system to include probabilistic risk factors, the Staff could plan to use this input at a later stage in the Integrated Assessment. Input from probabilistic risk studies such as IREP are a potentially valuable resource which could be to our mutual benefit and which should be considered in the Integrated Assessment of the SEP. This comment is especially relevant to Millstone Unit No. 1, which is the only facility involved in both the SEP and IREP programs.

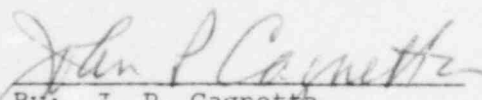
In conclusion, CYAPCO and NNECO find the Staff's proposal to be reasonable and in keeping with the original philosophy of conducting a genuinely integrated assessment of items of safety significance. However, we trust the Staff will consider the afore-mentioned comments as we believe they represent significant factors which will enhance the safety review process.

We trust these comments will receive due consideration.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY  
NORTHEAST NUCLEAR ENERGY COMPANY

  
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