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General Offices • Selden Struet, Berlin, Connecticut

P.O. BOX 270 HARTFORD, CONNECTICUT 06101 (203) 666-6911

FHR

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July 24, 1981

Docket Nos. 50-213 50-245 50-336 A01823

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

References: (1) B. H. Grier letter to W. G. Counsil, dated July 1, 1981.

(2) W. G. Counsil letter to D. G. Eisenhut, dated February 13, 1981.

(3) A Feasibility Report on Evacuation of the Area Around the Haddam Neck Nuclear Power Station, dated March, 1980.

(4) A Feasibility Report on Evacuation of the Area Around the Millstone Nuclear Power Station, dated March, 1980.

Centlemen:

Haddam Neck Plant
Millstone Nuclear Power Station, Unit Nos. 1 and 2
Prompt Notifications and Instructions to the Public
in the Event of an Emergency

Pursuant to Section IV.D.3 of Appendix E to 10CFR50, administrative and physical means must be demonstrated for alerting and providing prompt instructions to the public within the plume exposure pathway emergency planning zones (EPZs) by July 1, 1981. The design objective for such capability is defined in Section IV.D.3 of Appendix E to 10CFR50 and Section B.2 of Appendix 3 to NUREG-0654/FEMA-REP-1, Revision 1 (NUREG-0654). In Reference (1), Connecticut Yankee Atomic Power Company (CYAPCO) and Northeast Nuclear Energy Company (NNECO) were requested to provide confirmation that the July 1, 1981 date has been met or, if not, to provide a description of the compensating actions that are being taken until such means for alerting and providing prompt instructions to the public exists. Additionally, if the July 1, 1981 date has not been met, CYAPCO and NNECO were requested to advise the NRC Staff of the schedule for compliance with the above design objective, a description of our means for compliance, and the reasons for delay in compliance.

In Reference (2), CYAPCO and NNECO informed the NRC Staff that even though work was progressing in a responsive and expeditious manner, compliance with the intent of the above design objective prior to early to mid 1982 is unlikely. In addition, CYAPCO and NNECO indicated the reasons for delay in such compliance. Therefore, as an update to Reference (2) and in response to Reference (1), the following information is provided.

Engineering studies have been performed for those areas within the plume exposure pathway EPZs of the Haddam Neck Plant and the Millstone Nuclear Power Station to determine what fixed alerting equipment already exists and how many local community vehicles with public address (PA) capability are available. The engineering studies also identified what additional fixed alerting equipment is required to comply : th the intent of the above design objective. These studies are presently being reviewed by the State of Connecticut and twenty-eight (28) of the twenty-nine (29) local communities within the plume exposure pathway EPZs. (Plum Island, New York is a Federal research center and due to the nature of its experimentation, adequate alerting capability, as well as an emergency plan, already exist). After completion of such review, the studies will be submitted to FEMA and the NRC Staff for review. Upon completion of FEMA and NRC Staff review, spec fications will be sent to potential vendors, their proposals will be reviewed, and a contract will be awarded. After delivery, installation, and testing of new equipment, it is intended that administrative and physical means exist for alerting and providing prompt instructions to the public within the plume exposure pathway EPZs will be demonstrated by early to mid 1982.

Regarding compensating actions between July 1, 1982 and early to mid 1982, a radio pager system has been available since June 1, 1981 at both the Haddam Neck Plant and the Millstone Nuclear Power Station to promptly (within 15 minutes) notify responsible licensee, State, and local community officials, including Plum Island, after an incident is classified. Therefore, CYAPCO and NNECO are already 1. compliance with portions of Section IV.D.3 of Appendix E to 10CFR50. During the above-mentioned interim period, public alerting capabilities within the plume exposure pathway EPZs of the Haddam Neck Plant and the Millstone Nuclear Power Station will consist of existing fixed and mobile alerting equipment. These capabilities are well known due to the efforts involved in preparing the engineering studies and in revising Annex V, State of Connecticut Radiological Emergency Response Plan (Connecticut RERP), to the State of Connecticut Emergency Operations Plan. In addition, public alerting capabilities within the low population zones of the Haddam Neck Plant and Millstone Nuclear Power Station are addressed in the Connecticut RERP currently in effect. Unce notified by the radio pager system, the local community responsible officials could use the current public alerting capabilities to alert the public to the emergency. The local Emergency Broadcast System (EBS), which is activated by the local community responsible officials, and/or local community vehicles with HA capability can be used to provide the affected public with the necessary instructions. The State Office of Civil Preparedness, under the direction of the Governor, can activate the State-wide EBS network.

Estimates of the time required to notify the public using only current public alerting capabilities within the plume exposure pathway EPZs of the Haddam Neck Plant and the Millstone Nuclear Power Station are well documented in References (3) and (4), respectively. Licensee, State, and local community officials are cognizant of these estimates and, as such, these estimates could be utilized to establish priorities for use of the mobile alerting capabilities in order to notify the affected public as quickly as possible.

As mentioned above, licensee, State, and local officials are knowledgeable of current public alerting capabilities within the plume exposure pathway EPZs of the Haddam Neck Plant and Millstone Nuclear Power Station as well as estimates of the time required to notify the public with such alerting capabilities since this information is contained in the current and draft revisions to the Connecticut RERP, References (3) and (4), and the engineering studies. In addition, the probability of requiring the use of public alerting capabilities that meet the intent of the design objective of Section IV.D.3 of Appendix E to 10CFR50 and Section B.2 of Appendix 3 to NUREG-0654 during the above-mentioned interim period for those incidences where the present public alerting capabilities would not be adequate are extremely small and are judged to be negligible. Therefore, CYAPCO and NNECO have concluded that there is reasonable as urance that there are no undue risks to the health and safety of the general public in the vicinity of either the Haddam Nock Flant or the Millstone Nuclear Power Station that are related to the above implementation dates.

We trust that this submittal adequately responds to Reference (1).

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

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY

W. G. Counsil

Senior Vice President

cc: Mr. Brian K. Grimes, Director Division of Emergency Preparedness U. S. Nuclear Regulatory Commission Washington, D.C. 20555