

# NORTHEAST UTILITIES



THE CONNECTICUT LIGHT AND POWER COMPANY  
THE HARTFORD ELECTRIC LIGHT COMPANY  
WESTERN MASSACHUSETTS ELECTRIC COMPANY  
HOLYOKE POWER COMPANY  
NORTHEAST UTILITIES SERVICE COMPANY  
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August 25, 1981

Docket No. 50-245  
A01825

Director of Nuclear Reactor Regulation  
Attn: Mr. Dennis M. Crutchfield, Chief  
Operating Reactors Branch #5  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Reference: (1) D. M. Crutchfield letter to W. G. Counsil, dated  
July 30, 1981.  
(2) D. M. Crutchfield letter to W. G. Counsil, dated  
April 10, 1981.

Gentlemen:

Millstone Nuclear Power Station, Unit No. 1  
SEP Topic VI-7.A.3, ECCS Actuation System

Reference (1) forwarded the Staff's evaluation of SEP Topic VI-7.A.3, ECCS Actuation System, for Millstone Unit No. 1. Northeast Nuclear Energy Company (NNECO) was requested to review Reference (1) and inform the Staff of differences between Millstone Unit No. 1 and the licensing basis used in the Staff's evaluation. Accordingly, NNECO has reviewed the Reference (1) evaluation and offers the following comments.

All motor operated valves in the core spray and LPCI systems are cycled each month, and each pump is started manually and verified to operate at rated flow using the full flow return lines once per month. A simulated automatic actuation test is performed each refueling. These overlapping tests meet the requirements of General Design Criterion 37 and Regulatory Guide 1.22.



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The Staff's evaluation states that the core spray & LPCI systems do not comply with current criteria since these systems are "not tested from the automatic actuation devices through to the establishment of flow through to the test bypass valve during reactor operation", that NNECO has not established that the test would adversely affect safety or operability, and that NNECO has not established that the probability of core spray failure is acceptably low without regular testing during nuclear operation. NNECO does not agree with the Staff's conclusion since Section D.4 of Regulatory Guide 1.22 only applies to actuated equipment that is not tested during reactor operation. Both core spray and LPCI are tested during operation, as noted above.

In addition, Standard Review Plan Section 7.3, Appendix A, Section 11.b specifically indicates that overlapping tests are acceptable.

A change to the technical specification governing pump and valve operability surveillance for the core spray and LPCI systems was approved by the NRC Staff in Amendment 76 to DPR-21, dated April 16, 1981. The technical specification now indicates that such surveillance is performed under our In-Service Inspection Program, which was approved by the NRC Staff in Reference (2).

The APR system has been modified to actuate four valves, not three as stated in the Reference (1) evaluation. The Staff issued revised Technical Specifications for this change in Amendment 73 to DPR-21.

We trust these comments will be appropriately incorporated into a revised evaluation for this SEP topic.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



W. G. Council  
Senior Vice President