

**NORTHEAST UTILITIES**

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

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November 6, 1981

Docket Nos. 50-213

50-245

50-336

A01426



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 Commissioner J. Hendrie, dated March 19, 1981.
  - (2) W. G. Council letter to D. G. Eisenhut, dated May 13, 1981.
  - (3) W. G. Council letter to D. G. Eisenhut, dated June 23, 1981.
  - (4) W. G. Council letter to D. G. Eisenhut, dated May 11, 1981.

Gentlemen:

Haddam Neck Plant  
Millstone Nuclear Power Station, Unit Nos. 1 and 2  
Fire Protection

In response to amendments to 10CFR Part 50 regarding the fire protection rule promulgated by the Nuclear Regulatory Commission, Connecticut Yankee Atomic Power Company (CYAPCO) and Northeast Nuclear Energy Company (NNECO) provided References (1) through (3). For reasons articulated in Reference (1), CYAPCO and NNECO requested exemptions pursuant to the provisions of 10CFR50.48(c)(6) and 10CFR50.12(a) regarding certain requirements of 10CFR50 Appendix R Sections III.G and III.L. Reference (3) indicated that the current schedule for compliance with 10CFR50.48(c)(5) is February 1, 1982.

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The scope and schedule for compliance for fulfilling the requirements of Sections III.G and III.L for alternate shutdown capability remain as indicated in Reference (3). It is our intention to provide the Staff with plans and schedules for meeting the provisions of Paragraphs 50.48(c)(2), (c)(3), and (c)(4) by February 1, 1982.

Because our plans for providing alternate shutdown capability for that equipment which does not comply with Appendix R criteria are not finalized, it is not clear which modifications will be made pursuant to 50.48(c)(2) or (c)(3) and which will be made pursuant to 50.48(c)(4). It is noted that a refueling outage at the Haddam Neck Plant commenced in late September, 1981, a refueling outage is scheduled to commence at Millstone Unit No. 1 in September, 1982, and a refueling outage is scheduled to commence at Millstone Unit No. 2 in December, 1981. To achieve compliance with the existing scheduler requirements of Appendix R, it would be necessary to implement those fire protection features governed by 10CFR50.48(c)(3) prior to startup from the scheduled refueling outages. However, it is not possible to implement such modifications as our plans and schedules have yet to be finalized.

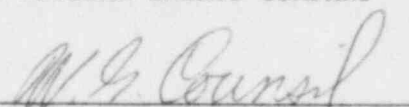
We believe that our Reference (1) exemption request implies that an exemption from the requirements from 50.48(c)(2) and (c)(3) is needed. The purpose of this letter is to document this implication. CYAPCO and NNECO hereby request an exemption from the requirements of 10CFR50.48(c)(2) and (c)(3) for the Haddam Neck Plant, Millstone Unit No. 1, and Millstone Unit No. 2. The effect of the exemption requested is an extension of deadlines prescribed in those regulations. It is not clear at this time which, if any, of the modifications scheduled to be submitted on February 1, 1982 will be governed by the provisions of 50.48(c)(2) or (c)(3). However, for any that are governed by that schedule, an exemption is requested. The basis for this request is that it is not possible to implement modifications prior to finalizing their design. The schedule for compliance will be provided as part of the planned February 1, 1982 submittal.

CYAPCO and NNECO have reviewed the above exemption request pursuant to the requirements of 10CFR.170 and have determined that no fee is applicable in this instance. The basis for this determination is that the appropriate fee was submitted in Reference (4).

We trust that you concur in our determination that the above exemption request will not endanger life or property or the common defense and security and are otherwise in the public interest.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY  
NORTHEAST NUCLEAR ENERGY COMPANY

  
W. G. Council  
Senior Vice President

STATE OF CONNECTICUT )  
 ) ss. Berlin  
COUNTY OF HARTFORD )

*November 6, 1981*

Then personally appeared before me W. G. Council, who being duly sworn, did state that he is Senior Vice President of Northeast Nuclear Energy Company, a Licensee herein, that he is authorized to execute and file the foregoing information in the name and on behalf of the Licensees herein and that the statements contained in said information are true and correct to the best of his knowledge and belief.

*Sheila M. Oates*  
Notary Public

My Commission Expires March 31, 1986