

**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

DOCKETED

General Offices • Selden Street, Berlin, Connecticut

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

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Docket Nos. 50-21350-24550-33650-423B10426

(19)

Secretary of the Commission  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555  
Attention: Docketing and Service Branch

DOCKET NUMBER  
PROPOSED RULE

PR-50

(46 FR 61894)

- References: (1) 46 FR 61894, "Immediate Notification Requirement for Operating Nuclear Reactors."  
(2) W. G. Counsil letter to B. H. Grier, dated March 27, 1981.

Gentlemen:

Haddam Neck Plant

Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3

Immediate Notification Requirements for Nuclear Power Plants

In Reference (1), the NRC solicited comments on a proposed rule to amend 10CFR50.54. The Commission is also proposing to clarify the list of reportable significant events in 10CFR50.72. On behalf of the Connecticut Yankee Atomic Power Company (CYAPCO) and the Northeast Nuclear Energy Company (NNECO), Northeast Utilities Service Company (NUSCO) hereby offers the following comments.

The proposed notification requirements are a significant improvement over previous requirements, however, deficiencies still exist in the list of significant events to be reported in 10CFR50.72. Specific comments on this proposed list of reportable events include the following:

(b)(4)(iii) "Any instance of personnel error, ... to control the release of radioactive material."

Although the NRC has changed the wording from limit to control, the requirement still remains too vague. Some reference to a limitation, i.e., a curie limit, coolant activity level, etc., should be incorporated into this requirement.

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(b)(5) "Any event resulting in manual or automatic actuation of Engineered Safety Features ... (... testing or normal reactor shutdown need not be reported)."

We do not agree all Reactor Protection System or Engineering Safety Features actuation (except during normal reactor shutdown or during surveillance testing) needs reporting. A spurious trip has no effect on the health and safety of the public and no obvious benefits for reporting. We recommend that spurious trips need not be reported.

(b)(6)(i) and (ii) "... Any accidental, unplanned, or uncontrolled radioactive release offsite that exceeds ... 25% of the Technical Specification limits (or 10CFR Part 20, Appendix B, Table II)."

The incorporation of a specific threshold value represents a significant improvement, however, there is still no guidance as to what constitutes an "accidental, unplanned, or uncontrolled" radioactive release as opposed to a normal or expected release. The problems associated with this lack of guidance were presented in Reference (2), which is attached for your convenience.

As indicated in Reference (2), the imposition of a one hour reporting requirement for this particular item would result in a number of unnecessary reports. NUSCO does not feel that one hour is always an adequate amount of time to determine whether or not an actual release has occurred, and whether the release was due to an "unplanned" or "expected" event. Rather, we suggest a time requirement of "promptly, but in no case more than 3 hours" which we feel would prevent unnecessary reports, yet still comply with the intent of 10CFR50.72. Releases that are significant public health and safety concerns are reported immediately per 10 CFR 50.72(a).

Reference (1) states that the reporting threshold of 25% of the applicable Technical Specifications was based on "... engineering judgment and experience as to what percentage level was appropriate to adequately protect the public health and safety." The basis for 10CFR20 Appendix B, Table II was that no public health and safety consequence would be recognized if individuals offsite were exposed to these specified concentrations continuously for an entire year. It is, therefore, contradictory to state that releases of 25% of these limits for a very small fraction of the year should be reported immediately to adequately protect the public health and safety. NUSCO suggests that the threshold limit be revised to the actual Technical Specification (or 10CFR Part 20, Appendix B) limits. This would still be conservative in regard to public health and safety, but would be consistent with other reporting criteria.

(b)(6)(iii) "Any accidental, unplanned, or uncontrolled ... that results in the evacuation of a building."

In many cases, a building is evacuated as a precautionary measure when airborne activity is detected and the immediate extent is not known. This requirement should be further defined to require reporting only in those cases which would result in personnel reaching a radiological limit, i.e., Maximum Permissible Concentration, if an evacuation was not conducted.

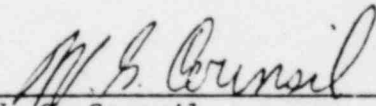
(b)(8) "Any personnel radioactive contamination requiring extensive ... routine decontamination procedures need not be reported."

This appears to allow a great deal of interpretation on what the word "extensive" means. One utility may determine two hours as extensive whereas another utility may determine 20 hours or assistance from a doctor (medical director) as extensive. It is recommended that additional guidance be given on this item.

We trust that you will find these comments beneficial to the development of this proposed rule. We remain available to discuss with the Staff, further details on these comments.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY  
NORTHEAST NUCLEAR ENERGY COMPANY  
NORTHEAST UTILITIES SERVICE COMPANY

  
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W. G. Council  
Senior Vice President