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NORTHEAST UTILITIES
THE CONNECTICUT LIGHT AND POWER COMPANY
WESTERN MASSACHUSETTS ELECTRIC COMPANY
HOLYOKE WATER POWER COMPANY
NORTHEAST UTILITIES SERVICE COMPANY
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February 7, 1994

S. Klementowicz
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Docket Nos. 50-213
50-245
50-336
50-423
B14737

Chief, Rules Review and Directive Branch
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Gentlemen:

Haddam Neck Plant
Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3
Comments on Draft Generic Letter: Guidance for
Modification of Technical Specifications

On December 23, 1993,(1) the U.S. Nuclear Regulatory Commission published for public comment a draft generic letter, "Guidance for Modification of Technical Specifications to Reflect (A) Revisions to 10CFR Part 20, 'Standards for Protection Against Radiation' and 10CFR50.36a, 'Technical Specifications on Effluents from Nuclear Power Reactors,' and (B) Related Current Industry Initiatives, and (C) Miscellaneous Related Editorial Clarifications." The draft generic letter provides guidance in the form of model technical specifications for preparing a license amendment request to modify technical specifications in order to reflect changes to 10CFR20 and 10CFR50.36a.

Connecticut Yankee Atomic Power Company (CYAPCO), on behalf of the Haddam Neck Plant, and Northeast Nuclear Energy Company (NNECO), on behalf of Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3, have reviewed the draft generic letter. Enclosed as Attachment 1 are CYAPCO and NNECO's comments.

We hope you find these comments helpful in finalizing the generic letter, and we appreciate the opportunity to participate in this process.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY

J. F. Opeka
Executive Vice President

cc: See Page 2

(1) 58 Federal Register 68170, December 23, 1993.

cc: T. T. Martin, Region I Administrator
A. B. Wang, NRC Project Manager, Haddam Neck Plant
J. W. Andersen, NRC Acting Project Manager, Millstone Unit No. 1
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U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

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Attachment 1

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

Comments on Draft Generic Letter: Guidance for
Modification of Technical Specifications

February 1994

Attachment 1

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

Comments on Draft Generic Letter: Guidance for
Modification of Technical Specifications

GENERAL COMMENTS

The NRC has requested comments on whether there should be a time limit on the allowable continued use of pre-1994 10CFR20, Appendix B, or if for consistency purposes, a date for switching to the new 10CFR20 should be specified. Northeast Utilities believes that, in the long term, consistency between 10CFR20 and the effluent specifications is desired. However, true consistency will not be obtained until 10CFR50, Appendix I is also modified to provide dose limits in terms of TEDE limits. Concurrent with a rulemaking effort to change 10CFR50, Appendix I, modifications to the codes used for dose calculations (GASPAR, LADTAP) should be made to provide results in TEDE/CDE terminology. Other modifications to the codes are also warranted based on 20 years of user experience, recommendations, and updated factors and assumptions.

Northeast Utilities recommends that a change to the new 10CFR20 concentration limits not be mandated until the changes to 10CFR50, Appendix I and dose codes are finalized. At that time, one consolidated and consistent change can be made to the RETS/ODCM and implementing procedures. The time required for this is dependent on the priority and resources assigned by the NRC to revising 10CFR50, Appendix I, but would be expected to take at least 2-3 years. It is expected that all recommended changes will be administrative in nature in that no further reductions in effluents will be necessary, or additional controls or requirements imposed. The changes will simply ensure consistency. Since there is no real public safety benefit to be gained, there is no concern in allowing continued use of existing technical specifications for a few years until one consolidated change can be made. Although many licensees may choose to implement the wording of the Generic Letter in 1994/95, there may be other licensees who feel that the administrative burden to revise the technical specifications, ODCMs, and implementing codes and procedures twice (once in 1994/95 and again in 1997 assuming a change to 10CFR50, Appendix I) would not be justified given the lack of any public safety benefit.

Connecticut Yankee Atomic Power Company and Northeast Nuclear Energy Company have not fully implemented Generic Letter 89-01 or model improved Standard Technical Specifications for the Haddam Neck Plant and Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3. Therefore, the comments provided herein are limited to Enclosure 1, Model Standard Technical Specifications. However, many of the comments provided would likely also apply to Enclosures 2 and 3.

SPECIFIC COMMENTS ON ENCLOSURE 1

Definition 1.16 — Member of the Public and Definition 1.38 — Unrestricted Area

These definitions add confusion rather than clarification to the current state of understanding of dose limits for various members of the public. For example, all "members of the public" are not those defined by 10CFR20.1003. Also, the definition of "unrestricted area" is not consistent with 10CFR20. The definition of areas (unrestricted vs. restricted) must be consistent. The definition of "members of the public" needs to be expanded to clarify the applicability of the various dose limits. The following definition is recommended:

Member of the Public

a. For 40CFR190 compliance, a Member of the Public is anyone at or beyond the site boundary.

b. For 10CFR50.36a and 10CFR50, Appendix I compliance, a Member of the Public shall include all persons who are not occupationally associated with the plant. This category does not include employees of the licensee, its contractors, or vendors. Also excluded are persons who enter the site to service equipment or make deliveries. This category does include persons who use the site for recreational, occupational, or other purposes not associated with the plant.

c. For 10CFR20 compliance, a Member of the Public is defined in 10CFR20.1003.

Without the above clarification, it could be interpreted that individuals outside the restricted area, but within the Site Boundary and occupationally associated with the site, would have to meet the technical specification dose limits that implement 10CFR50, Appendix I; e.g., 5 mrem/year from airborne effluents. This would be a backfit requirement in that the current definition of "Member of the Public" only applies such limits to individuals not occupationally associated with the plant and hence typically on site for much less than 1000 hrs/year.

Definition 1.17 — ODCM

For licensees not implementing Generic Letter 89-01 (Enclosure 1), the second half of the ODCM definition is inappropriate.

Section 5.1.3

This section is confusing and inconsistent. For example, the statement "Exclusion (fenced) Area Boundary, as defined in 10CFR100.3(a)" is misleading in that the 10CFR100 exclusion area boundary, is typically not fenced. The

fence represents the "Protected Area" for security controls and is not necessarily related to radiological controls. Also, it implies that 10CFR50.36a calculations need only be performed for beyond the site boundary, whereas current requirements address individuals on site for purposes not associated with the plant; i.e., recreational.

As noted above, most of this confusion results from the different limits applied to "Members of the Public." The appropriate solution is to expand the definition of "Member of the Public" as recommended above and not to have two different "Restricted Areas."

Section 6.9.1.2

The date for the report should be changed from March 31 to April 30 of each year to be consistent with the reporting requirements of 10CFR20.2206c since the footnote states that it supplements the 10CFR20 report.

Section 6.9.1.2a reads "The dose assignments to various duty functions may be estimated based on pocket dosimeter, TLD, or film badge measurements." This statement needs to be expanded to include electronic dosimetry systems.

Section 6.9.1.4

The sentence "This same report shall also include an assessment of the radiation doses from radioactive liquid and gaseous effluents to Members of the Pubic due to their activities inside the Site Boundary during the report period" should be deleted. The report presents the dose from liquid and gaseous effluents to the maximum individual "Member of the Public" as defined in current Technical Specifications. For some sites, this may be an onsite individual and hence that dose would be reported. However, for most sites, the onsite occupancy time would be low enough that the nearest resident is the maximum individual. There is no need for these sites to calculate onsite doses.

The paragraph requiring dose reporting for compliance with 40CFR190 should be deleted. Section 3.11.4.a only requires calculations of this dose if effluent doses exceed twice the quarterly/annual design guideline. In nearly all cases, doses are much less than the design guidelines and 40CFR190 doses need not be calculated.

Section 6.11

The footnotes should allow for English units; i.e., 30 cm (12 inches) and one meter (3 feet).