

# 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

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August 26, 1982

Docket No. 50-245  
A02547

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

- References:
- (1) J. J. Shea letter to W. G. Council, dated June 3, 1982.
  - (2) W. G. Council letter to D. G. Eisenhut, dated September 14, 1981.
  - (3) W. G. Council letter to D. G. Eisenhut, dated April 28, 1982.
  - (4) W. G. Council letter to D. M. Crutchfield, dated June 9, 1981.

Gentlemen:

Millstone Nuclear Power Station Unit No. 1  
SEP Topic VI-2.D, Mass and Energy Release for Possible Pipe  
Break Inside Containment  
SEP Topic VI-3, Containment Pressure and Heat Removal Capability

Via Reference (1), the Staff forwarded the draft evaluations of SEP Topics VI-2.D, Mass and Energy Release for Possible Pipe Break Inside Containment, and VI-3, Containment Pressure and Heat Removal Capability, for Millstone Unit No. 1. Northeast Nuclear Energy Company (NNECO) has reviewed Reference (1) and has the following comments.

Section VI of Reference (1) states that: "The calculated temperature response for a 0.1ft<sup>2</sup> MSLB exceeds the 320°F value (by 8°F at the peak) for approximately eight minutes. This is not significant when the overall qualification envelopes of 320°F for two hours is considered." NNECO disagrees with this approach.

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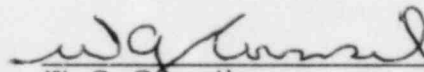
In Reference (2), NNECO informed the Staff that the appropriate maximum containment temperature for the purposes of environmental qualification was 273°F. In Reference (3), NNECO stated that due to a non-conservative assumption in the modeling used to determine the temperature profile, a new peak temperature of 310°F would be used for qualification of equipment. This value was established in accordance with the option of Generic Letter 82-09 and previous Commission guidance documents regarding determination of appropriate peak temperatures within the drywell for boiling water reactors. This NRC-approved option consists of utilizing a temperature which is 20 degrees higher than the saturation temperature associated with the calculated peak pressure for any design basis accident initiated within the drywell.

The inference of the Staff's conclusions in this SEP Topic is that the value of 320°F ought to become the new plant design basis. It is NNECO's position that the analyses and information presented in References (2) and (3) are sufficient to justify the use of 310°F as the appropriate temperature for equipment qualification. Should the Staff disagree, NNECO requests that the Staff specifically consider the docketed plant-specific information and analyses rather than rely on non-plant-specific analyses to determine the appropriate qualification parameters. Significant NNECO resources were expended to provide the Staff with data such as that contained in Reference (4) to facilitate plant-specific evaluations. Due to the lack of information provided in Reference (1), NNECO is unable to verify the values calculated by the Staff.

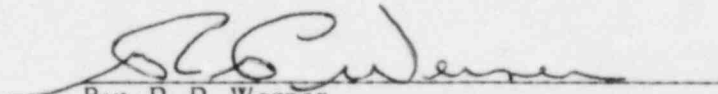
We trust the Staff will find the above information sufficient to concur with NNECO's calculation of the maximum containment temperature resulting from a main steam line break.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



W. G. Council  
Senior Vice President



By: R. P. Werner  
Vice President  
Generation Engineering and Construction