

NUCLEAR REGULATORY COMMISSION

August 20, 1990

Docket No. 50-245

Mr. Edward J. Mroczka
Senior Vice President
Nuclear Engineering and Operations
Connecticut Yankee Atomic Power Company
Partheast Nuclear Energy Company
P.O. Box 270
Hartford, Connecticut 06141-0270

Dear Mr. Mroczka:

SUBJECT: REQUESTED DELAY OF DECISION TO INSTALL HARDENED WETWELL VENT FOR MILLSTONE NUCLEAR POWER STATION UNIT 1 (TAC NO. 74872)

On September 1, 1989, the NRC staff issued Generic Letter 89-16, "Installation of a Hardened Wetwell Vent," requesting that Mark I containment utilities, within 45 days, volunteer to install a hardened wetwell vent. For utilities not electing to voluntarily incorporate changes, the Commission directed the staff to perform plant-specific backfit analyses. In your letter dated October 30, 1989, you stated that you would not commit to make voluntary modifications to harden the wetwell vent until completion of the Individual Plant Examination (IPE); that evaluation in the Integrated Safety Assessment Program process would be utilized to develop the implementation priority of any justifiable modifications; and that plant-specific design details, if warranted, would be developed in parallel with the IPE.

The NRC letter dated January 22, 1990, informed you that sinc you do not intend to install the hardened vent on a voluntary basis at this time, the staff would complete a plant-specific analysis for the Millstone Nuclear Power Station, Unit No. 1. If the completed analysis supported the conclusion that modifications meet the requirements of the NRC backfit rule, a copy of the NRC staff analysis would be sent to you to provide you with another opportunity to make the modifications under the provisions of 10 CFR 50.59. The NRC letter dated June 15, 1990, transmitted the staff's backfit analysis and the staff's conclusion based on the analysis that the backfit is justified for Millstone, Unit No. 1.

At your request, on July 24, 1990, you and other owners of plants with isolation condensers who had not volunteered to install a hardened wetwell vent met with the NRC staff to provide additional information to support your request that the recommended improvement be evaluated as part of the IPE program; and that a decision to install the vent be delayed until completion of the IPE program (mid-December 1990).

After careful consideration of the additional supporting information provided regarding the isolation condenser plants, the staff continues to believe that Millstone, Unit No. 1 and the other similar plants should proceed without delay with the installation of the hardened wetwell vents. Our decision to proceed is based, in part, on the importance of the venting sequences and their role in

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Mr. Edward J. Mroczka Northeast Nuclear Energy Company

cc:

Gerald Garfield, Esquire
Day, Berry and Howard
Counselors at Law
City Place
Hartford, Connecticut 06103-3499

W. D. Romberg, Vice President Nuclear Operations Northeast Utilities Service Company Post Office Box 270 Hartford, Connecticut 06141-0270

Kevin McCarthy, Director Radiation Control Unit Department of Environmental Protection State Office Building Hartford, Connecticut 06106

Bradford S. Chase, Under Secretary Energy Division Office of Policy and Management 80 Washington Street Hartford, Connecticut 06106

S. E. Scace, Nuclear Strtion Director Millstone Nuclear Power Station Northeast Nuclear Energy Company Post Office Box 128 Waterford, Connecticut 06385

J. P. Stetz, Nuclear Unit Director Millstone Unit No. 1 Northeast Nuclear Energy Company Post Office Box 128 Sterford, Connecticut 06385 Millstone Nuclear Power Station Unit No. 1

R. M. Kacich, Manager Generation Facilities Licensing Northeast Utilities Service Company Post Office Box 270 Hartford, Connecticut 06141-0270

D. O. Nordquist
Director of Quality Services
Northeast Utilities Service Company
Post Office Box 270
Hartford, Connecticut 06141-0270

Regional Administrator Region I U. S. Nuclear Regulatory Commission 475 Allendale Road King of Prussia, Pennsylvania 19406

First Selectmen Town of Waterford Hail of Records 200 Boston Post Road Waterford, Connecticut 06385

W. J. Raymond, Resident Inspector Millstone Nuclear Power Station c/o U. S. Nuclear Regulatory Commission Post Office Box 811 Niantic, Connecticut 06357 Mr. Edward J. Mroczka

mitigating a large radiological release. Many of these sequences are applicable to Millstone, Unit No. 1 since the isolation condenser could not be assured to be operable/available for these sequences. Examples of events leading to these sequences include stuck open SRV transients as well as the complete spectrum of primary system pipe ruptures. Under these depressurized conditions, the isolation condenser is not expected to function. Therefore venting is necessary under these conditions to maintain decay heat removal capability and minimize challenges to the containment.

Millstone, Unit No. 1 has Emergency Operating Procedures (EOPs) which call for venting of the containment for a wide range of plant conditions. The venting procedures and pathway should be as reliable as possible to assure that the operators will be able to carry out the EOP instructions. To this end the operator should not be faced with the potential of further plant damage or possible radiological impacts on personnel when venting is a consideration. Therefore, we view the hardening of the pathway as an important step in reducing the negative consequences of venting. Based on the above, our discussions during the July 24, 1990 meeting, and our preliminary review of your August 8, 1990 letter, we still conclude that the results of our backfit analysis remain valid. We believe that proceeding without delay with the installation of the hardened wetwell vent is a prudent course of action.

Accordingly, we will be initiating an Order based on the staff's backfit analysis directing you to implement the hardened vent at Millstone 1, unless we receive a commitment from you within two weeks from the date of this letter that you will voluntarily install a hardened vent capability at Millstone 1.

Our Order will include the results of our review of your August 8, 1990 letter.

Sincerely,

Original signed by James G. Partlow

James G. Partlow Associate Director for Projects Office of Nuclear Reactor Regulation

cc: See next page

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	See previous SPLB:DST CNichols;cf 8/ /90	concurrences SPLB:DST JKudrick* 8/ /90	in Oyster D:DST AThadani* 8/ /90	Creek			PD1	-	D:PD JSto 8/	1-4	