

NORTHEAST UTILITIES



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

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January 5, 1983

Docket No. 50-213

50-245

50-336

A02862

A02821

Mr. Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

- References:
- (1) D. G. Eisenhut letter to All Licensees and Applicants For Operating Power Reactors and Holders of Construction Permits, dated October 1, 1982.
 - (2) D. G. Eisenhut letter to All Licensees and Applicants For Operating Power Reactors and Holders of Construction Permits, dated October 30, 1982.
 - (3) W. G. Council letter to G. H. Smith, dated July 30, 1982.
 - (4) W. G. Council letter to G. H. Smith, dated May 28, 1982.

Gentlemen:

Haddam Neck Plant
Millstone Nuclear Power Station, Unit Nos. 1 and 2
Response to Generic Letters 82-17 and 82-23

References (1) and (2) noted that Standard Technical Specifications in use by a number of licensees and some existing plant-specific Technical Specifications require an independent audit of licensee emergency plans and safeguards contingency plans to be carried out every 24 months. The Staff noted that reviews of emergency plans and safeguards contingency plans are required to be carried out every 12 months in accordance with 10CFR50.54(t) and 10CFR73.40(d), respectively, and thus requested licensees to assure that their provisions for carrying out these audits are in accordance with the applicable provisions of 10CFR.

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The Haddam Neck Plant Technical Specifications require the offsite Nuclear Review Board (NRB) to conduct an audit at least once per two years of both the Facility Emergency Plan and implementing procedures and the Facility Security Plan and implementing procedures. Similarly, the Millstone Unit 1 and Millstone

Unit 2 Technical Specifications require the offsite Site Nuclear Review Board (SNRB) to have an audit conducted under their cognizance at least once per two years of both the Site Emergency Plan and implementing procedures and the Site Security Plan and implementing procedures. The NRB and SNRB serve as independent advisory groups for their respective stations to the Senior Vice President, Nuclear Engineering and Operations. As such, audits performed for the NRB and SNRB are not performed to meet 10CFR requirements but rather to assist these groups in the performance of their advisory functions.

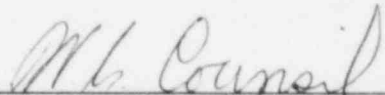
As noted in Reference (3), an audit of the Millstone Nuclear Power Station Emergency Plan is conducted at least annually by an independent section of the corporate Radiological Assessment Branch (RAB). RAB also performs an annual audit of the Haddam Neck Emergency Plan as identified in Reference (4). The requirement of 10CFR50.54(t) is thus fulfilled for both the Haddam Neck Plant and Millstone Units 1 and 2. Similarly, an annual audit of both the Security Plan (and Safeguards Contingency Plan when approved) is performed for the Haddam Neck Plant, Millstone Unit 1, and Millstone Unit 2 by an independent group under cognizance of the Northeast Utilities Service Company Director of System Security which fulfills the requirement of 10CFR73.40(d). Thus, although the frequency of audits required by Technical Specifications for the NRB and SNRB differs from that required by regulation, this does not represent an inconsistency since these particular Technical Specification required audits are not intended to satisfy the pertinent regulations.

Therefore, since annual audits of both emergency plans and security plans are performed at our facilities in accordance with the provisions of 10CFR50.54(t) and 10CFR73.40(d), changes to our facilities Technical Specifications are not warranted.

We trust this resolves the Staff's concerns on these matters. Should you have any questions on this matter, please feel free to contact us.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY



W. G. Council
Senior Vice President