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February 2, 1983

Docket No. 50-245 50-336 A02981

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

Reference:

- (1) W. G. Counsil letter to D. G. Eisenhut, dated March 1, 1982.
- (2) W. G. Counsil letter to D. G. Eisenhut, dated July 16, 1982.
- (3) D. M. Crutchfield letter to W. G. Counsil, dated January 6, 1983.
- (4) W. G. Counsil letter to D. G. Eisenhut, dated January 15, 1983.
- (5) W. G. Counsil letter to D. G. Eisenhut, dated January 31, 1983.

Gentlmen:

Millstone Nuclear Power Station,
Unit Nos. 1 and 2
Draft Fire Protection Safety
Evaluation Reports

By Reference (1) and (2), Northeast Nuclear Energy Company (NUSCO) provided to the NRC Staff an assessment of the fire protection features at the Millstone Nuclear Power Station, Unit Nos. 1 and 2, including requests for exemptions from certain provisions of Appendix R to 10CFR Part 50. By Reference (3), the NRC Staff provided its draft SER evaluating NNECO's submittals and preliminarily recommending denial of several exemption requests. The Staff requested that NNECO review the draft SER evaluation and inform them within three weeks of actions proposed to resolve such outstanding issues. The purpose of this correspondence is to provide NNECO's response.

To put this matter in perspective, to date Northeast Utilities has expended in excess of \$10 million including 15,000 manhours to comply with 10CFR 50.48 Appendix R and other fir protection issues through plant modifications and exemption requests. The remaining outstanding items raised by the Staff in Reference (3) constitute only a very small prion of the total fire protection program at Millstone. It is our desire to resolve these few remaining issues in as expeditious and resource effective manner as possible.

To that end, NNECO has reviewed the NRC Staff's draft SER with a view toward bringing all outstanding issues to a close. In our review we have identified several areas of misunderstanding where the NRC Staff apparently does not fully appreciate the precise configurations present in the plant. Further, in some instances, we have found that suggestions made by the Staff may be helpful in bringing issues to a close. In an attempt to clarify the issues presented and bring ail such issues to a close, we request a working-level meeting with the NRC Staff, along the lines of the meeting which we believe led to the resolutions of outstanding issues at the Haddam Neck Plant as outlined in References (4) and (5). Based upon our experience at the Haddam Neck Plant, we plan to prepare a draft response to Reference (3) which will serve as a foundation for the meeting.

In summary, we feel confident that such a meeting would lead to expeditious resolution of all outstanding issues. In the event that the NRC Staff proposes to take action to deny any of the unresolved exemption requests, pursuant to Reference (3) NNECO hereby requests a formal appeal meeting with Mr. Richard Vollmer.

My Staff remains available to assist you by any means in this regard.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

W. G. Counsil

Senior Vice President

cc: R. H. Vollmer