

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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Docket No. 50-213

50-245

50-336

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

Gentlemen:

Haddam Neck Plant
Millstone Nuclear Power Station, Unit Nos. 1 and 2
Radioactive Iodine Source Terms and Potassium Iodide Issuance

Connecticut Yankee Atomic Power Company (CYAPCO) and Northeast Nuclear Energy Company (NNECO) operate the Haddam Neck Plant and the Millstone Nuclear Power Station, Unit Nos. 1 and 2, respectively. We have been assisting the State of Connecticut and the local communities in developing and maintaining their emergency response plans for nuclear reactor incidents over the past several years. Successful full-scale emergency preparedness exercises were conducted at both sites in early 1982. As a result of these exercises and their review of the State and local emergency response plans, the Federal Emergency Management Agency (FEMA) identified a significant deficiency in the State and local plans in that no State policy exists for potassium iodide (KI) distribution in accordance with the guidance contained in Sections II.J.10.3 and II.J.10.f in NUREG-0654/FEMA-REP-1, Revision 1. The purpose of this letter is to identify our belief that prudent and responsive NRC action is warranted on the issues of radioiodine source terms and KI distribution.

We are aware of NRC contractor studies (i.e. ORNL, SANDIA) that are underway on the quantification of radioactive iodine releases during nuclear reactor emergencies. These studies were prompted by the small iodine releases from the Three Mile Island incident. We are also aware that these studies to date show that the radioactive iodine source terms are significantly less than values contained in current NRC Regulatory Guides on design basis accident analyses and 10CFR100 accident analyses source terms. SANDIA studies (i.e., NUREG/CR-1433, dated March 1981) using the old source terms (i.e., Reactor Safety Study, WASH-1400) have shown that potassium iodide usage for the public is not cost-beneficial. Use of the more recent ORNL findings on iodine releases in these types of cost-benefit analyses would provide additional information and would be expected to show even more conclusively that potassium iodide usage for the public is not cost-beneficial. The existence of a NRC Proposed Interim policy on these topics (i.e., Brian Grimes letter to James Montgomery, Chairman, Inter-Organization Committee on Radiological Emergency Planning and Preparedness, dated May 5, 1980) is also known to us. A recent briefing on November 12, 1982 by Brian Grimes to the ACRS Subcommittees on Reactor Radiological Effects and Site Evaluation indicated that the NRC does not favor predistribution of KI to the public. In addition, recent statements by Richard Krimm of FEMA indicate that FEMA is accepting state policies that do not require stockpiling/ predistribution of KI.

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The State of Connecticut is presently developing a policy on KI usage for institutionalized people, emergency workers and the general public. We have discussed the above mentioned recent developments with them. It is our belief that the State of Connecticut and local communities need definitive statements from the NRC regarding recent studies on iodine releases prior to developing a KI usage policy.

We recommend that the NRC issue a status report on their contractor studies and, as appropriate, a clearly stated position on the iodine source terms. If it is appropriate, and adequate information is available, the NRC should also issue a statement on KI distribution to the public. We believe that these NRC reports should be consistent with the findings of industry studies. It is counterproductive to have the States and local communities develop and maintain costly and time consuming programs of periodic KI predistribution to the public and the attendant complex public education program, if these are not really necessary. We believe such to be the case, especially in light of the previously mentioned NRC contractor studies.

We hope that the NRC Staff will consider our viewpoints and act in a timely and responsive fashion to help resolve this complex issue for State and local community emergency preparedness personnel.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY

W. G. Council

W. G. Council
Senior Vice President

C. Frederick Sears

By: C. F. Sears
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