

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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Jocket Nos. 50-213

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Director of Nuclear Reactor Regulation
Attn: Mr. Robert A. Clark, Chief
Operating Reactors Branch #3
Mr. Dennis M. Crutchfield, Chief
Operating Reactors Branch #5
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

- References: (1) W. G. Council letter to R. A. Clark and
D. M. Crutchfield, dated August 12, 1982.
- (2) E. L. Connor letter to W. G. Council, dated
May 28, 1982.
- (3) D. M. Crutchfield letter to W. G. Council, dated
August 11, 1982.

Gentlemen:

Haddam Neck Plant
Millstone Nuclear Power Station, Unit Nos. 1 and 2
Radiological Effluent Technical Specifications

In Reference (1), Northeast Nuclear Energy Company (NNECO) made application to revise the Millstone Unit Nos. 1 and 2 Technical Specifications to include the Radiological Effluent Technical Specifications (RETS). This application was made in fulfillment of a commitment delineated in Reference (2).

NNECO fully supports the concept embodied within Appendix I to 10CFR Part 50 to maintain radioactive materials in effluents released to unrestricted areas as low as reasonably achievable. NNECO does not however, believe that the RETS as currently proposed in Reference (1) is the optimum means of achieving the results required by Appendix I.

The license amendment proposed in Reference (1) involves the addition of numerous pages to each plant's Safety Technical Specifications, the majority of which do not represent limiting conditions for operation in the typical sense of Standard Technical Specifications. The mere volume of additional "Technical Specifications" which the Staff deems necessary to comply with Appendix I is not in concert with the NRC's proposed rule regarding changes to the content of Technical Specifications (47FR13369). In fact, with few exceptions, the proposed RETS require no limiting conditions on plant operation. As such, the concept of promulgation of the RETS provisions as Technical Specifications is questionable.

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Changes to the Technical Specifications are required to be made pursuant to the requirements of 10CFR50.90 and 10CFR50.59. The criteria of 10CFR50.59 to which one reviews a proposed technical specification change were not designed to accommodate the RETS. This concern arises out of the fact that the RETS are based on the ALARA concept while the 10CFR50.59 criteria for determining the existence of an unreviewed safety question are based on specific limits delineated in the safety analysis report or the Technical Specification bases. The ALARA concept together with the RETS provides guidance for radioactive effluent releases. They do not spell out specific limitations.

The RETS, as presently written, are unduly proscriptive regarding report content. Specific reporting requirements would be better placed in other NRC documents such as Regulatory Guides which can then be referenced in the Technical Specifications.

The imposition of controls on plant procedures such as the "Process Control Program", "Offsite Dose Calculation Manual", Solidification Procedures and the Interlaboratory Comparison Program is inappropriate considering the NRC imposes little or no control over plant emergency procedures. These programs should not be a subject within Appendix A to the facility licenses but of a licensee controlled document auditable by the NRC.

The RETS impose multiple reporting requirements on licensees since 30 day special reports are now prescribed without removing the current requirements for LER reporting.

It is NNECO's position that revisions to the current RETS could be made to reduce the number of new Technical Specifications while maintaining conformance to Appendix I to 10CFR50. Reducing the number of Technical Specifications associated with radioactive effluent control offers the additional advantage of fewer license amendments thereby reducing both Staff and licensee resource expenditures.


In Reference (1), NNECO requested further interaction between our respective Staffs to assure that the volume and content of the RETS are optimized. We reiterate our desire to explore the possibility of revising the proposed Technical Specifications of Reference (1) such that mutually agreeable Radiological Effluent Technical Specifications consistent with the NRC's proposed rule (47FR13369) are arrived at.

As such, NNECO respectfully requests that the NRC Staff postpone processing the license amendment application of Reference (1). A revised application reflecting the philosophy as briefly described herein will be forthcoming. Connecticut Yankee Atomic Power Company (CYAPCO) also intends to model the RETS application for the Haddam Neck Plant similarly. As such, additional time to complete the Haddam Neck Plant RETS application will be necessary. It is anticipated that the revised application for the RETS will be docketed on or about November 15, 1982 for both the Millstone Units and the Haddam Neck Plant. This schedule differs from that outlined in Reference (3) for the reasons noted above.

We remain open to your comments in this regard.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY


W. G. Council
Senior Vice President