

NORTHEAST UTILITIES

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

General Offices • Selden Street, Berlin, Connecticut

P.O. BOX 270
 HARTFORD, CONNECTICUT 06141-0270
 (203) 665-5000

December 10, 1990

Docket No. 50-245

A09130

Re: GL 89-10, Supplement 3
ISAP Topic 1.111

U.S. Nuclear Regulatory Commission
 Attention: Document Control Desk
 Washington, DC 20555

Gentlemen:

Millstone Nuclear Power Station, Unit No. 1
 Generic Letter 89-10, Supplement 3
Safety-Related Motor-Operated Valve Testing and Surveillance

The purpose of this letter is for Northeast Nuclear Energy Company (NNECO) to respond to the NRC Staff's Generic Letter 89-10, Supplement 3, "Consideration of the Results of NRC-Sponsored Tests of Motor-Operated Valves," dated October 25, 1990, (1) on behalf of Millstone Unit No. 1. Supplement 3 requests that boiling water reactor (BWR) licensees have available a plant-specific safety assessment that addresses concerns raised by recent NRC Staff-sponsored full flow motor-operated valve (MOV) testing of valves used in BWRs. This letter is being provided in accordance with 10CFR50.54(f).

Item No. 1: 30-day Response

NNECO hereby certifies that we have available in our files a plant-specific safety assessment report for Millstone Unit No. 1 that addresses the issues raised in GL 89-10, Supplement 3. This safety assessment was previously performed for Millstone Unit No. 1 as a result of valve failures that occurred at Millstone Unit No. 3. In LER 89-005 dated March 20, 1989, (2) NNECO reported to the NRC Staff an event at Millstone Unit No. 3 during which there

- (1) J. G. Hartlow letter to All Licensees of Operating Nuclear Power Plants and Holders of Construction Permits for Nuclear Power Plants, "Generic Letter 89-10, Supplement 3, 'Consideration of the Results of NRC-Sponsored Tests of Motor-Operated Valves,'" dated October 25, 1990.
- (2) S. E. Scace letter to the U.S. Nuclear Regulatory Commission, "Facility Operating License No. NPF-49, Docket No. 50-423, Licensee Event Report No. 89-005-00," dated March 20, 1989.

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was an inadvertent safety injection and two MOVs failed to operate properly. As part of the follow-up of this event, an evaluation of valve operability was performed for all the nuclear units in the Northeast Utilities system, including Millstone Unit No. 1. This evaluation was documented in an operability determination pursuant to corporate procedures. This operability determination documented that there is reasonable assurance that all safety-related MOVs at Millstone Unit No. 1 would perform their intended safety function. This will be further verified under the MOV testing program in accordance with GL 89-10. In a letter dated December 15, 1989,⁽³⁾ NNECO committed to complete the initial GL 89-10 testing by the third refueling outage (i.e., 1995) as requested by GL 89-10. The operability determination evaluated all gate-type MOVs which could impact the core-melt frequency (CMF) for Millstone Unit No. 1. The evaluation considered the concerns identified by the NRC-sponsored testing and documented in GL 89-10, Supplement 3.

NNECO has also performed a probabilistic risk assessment-based evaluation of the valves at Millstone Unit No. 1 that are applicable to the GL 89-10 program. NNECO has determined that the highest priority valves are the four isolation condenser (IC) system valves and three valves in the reactor water cleanup (RWCU) system. NNECO has concluded that there are no MOVs with a greater potential safety significance based on the following criteria:

1. Valves with a potentially high differential pressure across them.
2. Valves that would allow an unisolated loss-of-coolant accident outside of containment if they failed to close.
3. Valves presenting the potentially greatest risk when both probability and consequences are considered.

Please note that Millstone Unit No. 1 does not have either a high-pressure coolant injection (HPCI) system or a reactor core isolation cooling (RCIC) system.

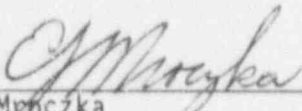
(3) E. J. Mroczka letter to the U.S. Nuclear Regulatory Commission, "Haddam Neck Plant, Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3, Generic Letter 89-10, Safety-Related Motor-Operated Valve Testing and Surveillance," dated December 15, 1989.

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We trust that the above information fully addresses Item No. 1 of GL 89-10, Supplement 3. Please contact us if you have any questions.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

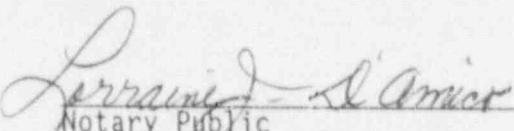


E. J. Mroczka
Senior Vice President

cc: T. T. Martin, Region I Administrator
M. L. Boyle, NRC Project Manager, Millstone Unit No. 1
W. J. Raymond, Senior Resident Inspector, Millstone Unit Nos. 1, 2, and 3

STATE OF CONNECTICUT)
) ss. Berlin
COUNTY OF HARTFORD)

Then personally appeared before me, E. J. Mroczka, who being duly sworn, did state that he is Senior Vice President of Northeast Nuclear Energy Company, a Licensee herein, that he is authorized to execute and file the foregoing information in the name and on behalf of the Licensee herein, and that the statements contained in said information are true and correct to the best of his knowledge and belief.



Notary Public
My Commission Expires March 31, 1993