

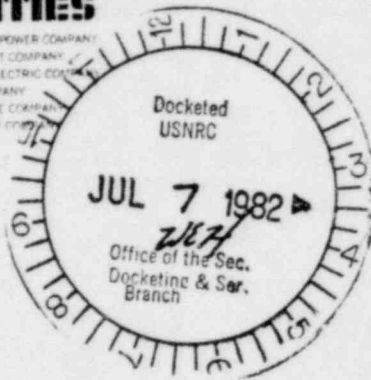
# NORTHEAST UTILITIES



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

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July 6, 1982

Docket. Nos. 50-213  
50-245  
50-336  
50-423  
B10531

Secretary of the Commission  
Attn: Docketing and Service Branch  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

DOCKET NUMBER PR-50  
PROPOSED RULE (47 FR 19543)

19

Reference: (1) 47 FR 19543, " Licensee Event Report System".

Gentlemen:

Haddam Neck Plant  
Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3  
Comments on Proposed Rule on Licensee Event Report System

In Reference (1), you provided the opportunity to comment on the proposed rule on your Licensee Event Report (LER) system. The proposed rule would codify existing LER requirements as stated per 10 CFR 50.73. On behalf of the Connecticut Yankee Atomic Power Company (CYAPCO) and the Northeast Nuclear Energy Company (NNECO) Northeast Utilities Service Company (NUSCO) hereby offers the following comments:

### GENERAL COMMENTS

1. The proposed LER rule should provide for a better understanding of reportable occurrences resulting in clearer, more detailed reports for end use by utilities, the NRC, and INPO.
2. The net effect of the new LER system on utility manpower should be minimal because, as the NRC indicates, about half of the present reportable occurrences should become exempt under the new detailed reporting criteria.
3. Active participation by all nuclear utilities in NPRDS should be evaluated in conjunction with the final LER rule. This is to provide for the trending of safety system component failures that may not be reportable under the new LER system. Coordination of NPRDS and the final LER rule needs to be considered by the NRC.

DSIO Frederick Hebdon  
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Acknowledged by card... 7/8/82.mdv

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SPECIFIC COMMENTS

1. 50.73(a) (1) requires the reporting of any event which results in the unplanned manual or automatic actuation of any Engineered Safety Feature (ESF) including the Reactor Protection System (RPS).

While we agree that such events should be trended and analyzed, we do not believe that they deserve to be singled out as events of special significance. Such events should be treated like single component failures, i.e., they should be reported to a system such as NPRDS, operated outside the regulatory framework.

2. 50.73 (a)(2) requires reporting of, "Any instance of personnel error, equipment failure.... that alone could prevent the fulfillment of the safety function of structures or systems that are needed to....(iii) Control the release of radioactive material."

As presently worded, this statement is too broad and could lead to a large number of reports not necessarily required by the intent of the regulation. There are many individuals who consider leakage from any system a lack of control of radioactive material and that this in itself is a safety function. Hence, common operational events such as valve packing leaks in radwaste systems could be considered reportable by these individuals. It should be clarified that this particular requirement applies only to those Category 1 safety systems designed to mitigate the consequences of an accident (i.e, failure to isolate containment or failure of emergency filtration systems). System leaks or other similar events are adequately covered by other reporting criteria such as the proposed 10CFR50.72(b)(6) or 10CFR50.73(a) (8) and (9) which are appropriately related to consequences and not cause.

3. We suggest that the following definition be used in place of the present definition in 50.73(a)(4): "Any nuclear plant shutdown required by Plant Technical Specifications or any operation with a condition prohibited by the Technical Specification."
4. 50.73 (a)(7) requires reporting of, "Any radioactive release that requires the evacuation of a room or building."

This requirement should be modified by explanatory statements in the regulation similar to the paragraph-by-paragraph explanation in the Federal Register notice. For example, precautionary evacuations that subsequent evaluation determines were not required need not be reported is a very important idea and should be included in the regulation.

5. 50.73(a)(9) requires reporting of, "Any event for which the quantity of radioactive materials released during an unplanned offsite release is more than 1 curie of radioactive material in liquid effluents, more than 150 curies of noble gas in gaseous effluents, or more than 0.05 curies of radioiodine in gaseous effluents."

This specification is vague and should either be rewritten or deleted. Deletion is preferred as it is either redundant or overconservative when compared to 50.73 (a) (8) which requires reports when Technical Specification limits are exceeded. The Technical Specifications contain limits for both release rates and total cumulative releases. Exceeding any of these limits requires a report. These limits are based on levels which are considered "significant" even though they are well below any values which have significance in regard to public health and safety. If significant releases occur, they will be reportable per 50.73(a)(8), and hence, 50.73(a)(9) is redundant. Reports per 50.73(a)(9) could be required at levels less than Technical Specification limits, however these are levels that are truly insignificant and should not be reportable.

If the requirement is not to be deleted, then it needs to be rewritten. The 1 curie of liquid releases should be exclusive of tritium and dissolved noble gases. The 0.05 curies of radioiodine should be either I-131 or dose-equivalent I-131. The definition of "event" should be clarified, particularly in terms of time frame. For example, a BWR will often lose its offgas treatment system for periods of hours to days and have to operate with the original 30 minute holdup system. During this period of time, much more than 150 curies of noble gas can be released (with insignificant dose consequences). Is this considered a reportable, unplanned event?

6. 10 CFR 50.73(b) (2) (v) requires the reporting of "The Energy Industry Identification System (EIIS) component function identifier and system name of each component or system referred to in the LER."

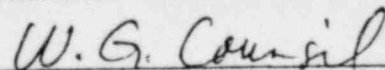
This is great burden on the licensee and no justification is offered for this reporting burden. Since the EIIS is not widely used, justification for this should be made explicit in your value-impact analysis.

7. The information required in 50.73(b)(2)(vi) and (vii) should not be a requirement of the LER system. This information is readily available in licensee's documents previously submitted to the NRC and is available for reference. The typical documents that contain this information are the licensee's FSAR and Technical Specifications. The licensee should not be expected to provide FSAR/Technical Specifications information with every LER submitted.

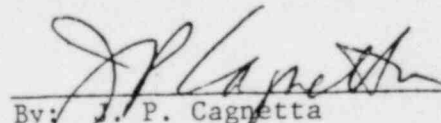
We trust that you will find these comments beneficial to the development of this proposed rule. We remain available to discuss with you, further details on these comments.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY  
NORTHEAST NUCLEAR ENERGY COMPANY



W. G. Council  
Senior Vice President



By: J. P. Cagnetta  
Vice President Nuclear and  
Environmental Engineering