

# 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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April 25, 1983

Docket Nos. 50-213

50-245

50-336

B10763

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

Haddam Neck Plant  
Millstone Nuclear Power Station, Unit Nos. 1 & 2  
Public Law 97-415

Gentlemen:

On April 6, 1983, the NRC promulgated two interim final rules in accordance with the requirements of Public Law 97-415. These regulations imposed additional requirements governing preparation and issuance of license amendments. In accordance with the Federal Register Notice associated with these requirements, we intend to provide the detailed comments on or before May 6, 1983. However, we believe that one issue merits considerable attention on the part of you and your Staff at this time, and the purpose of this letter is to bring this matter to your attention.

These new regulations require a determination regarding the no significant hazards consideration on the part of both licensees and the NRC, require interaction with the affected State, and the opportunity for public comment on all proposed amendments. Especially during the initial stages of implementation of these new rules, we perceive that there will be considerable confusion on the part of both the NRC Staff and the States. While this confusion is not a cause for concern regarding amendments of a non-emergency nature, we foresee major difficulties developing concerning amendments which are required to be issued on an expedited basis.

While there clearly is no substitute for gaining experience with these new procedures, prudence dictates that procedures outlining the steps to be taken by the various Staff members involved should be developed and issued. It is our sincere hope that if the Northeast Utilities organization is in need of an amendment on an expedited basis after May 6, 1983, that our assigned project managers will be familiar with the steps to be taken to insure its issuance in a timely fashion. We see no safety benefit being derived by delaying plant operation because of procedural issues rather than safety issues. We are therefore encouraging the NRC to take steps now to minimize the potential for this situation developing. Such measures would likely include the preparation

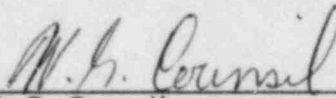
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of internal procedures identifying specific additional steps to be taken upon by NRC personnel upon receipt of an amendment request of an emergency or exigent nature.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY  
CONNECTICUT YANKEE ATOMIC POWER COMPANY

A handwritten signature in cursive script, appearing to read "W. G. Council", is written over a horizontal line.

W. G. Council  
Senior Vice President