

Northeast
Utilities System

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June 17, 1994

Docket Nos. 50-213
50-336
B14792

Re: GL 88-20, Supp. 4

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

Haddam Neck Plant
Millstone Nuclear Power Station, Unit No. 2
Revision to the Individual Plant Examination
for External Events Schedule

Purpose

The purpose of this letter is to inform the NRC Staff that Connecticut Yankee Atomic Power Company (CYAPCO) and Northeast Nuclear Energy Company (NNECO) have found it necessary to revise our Individual Plant Examination for External Events (IPEEE) submittal schedules for the Haddam Neck Plant and Millstone Unit No. 2. This letter also discusses our plans regarding new seismic hazard estimates contained in NUREG-1488.

Summary

For reasons presented in the discussion section of this letter, CYAPCO finds it necessary to revise the submittal schedule of the Haddam Neck IPEEE report to the fourth quarter of 1994. Similarly, NNECO finds it necessary to revise the IPEEE submittal schedule for Millstone Unit No. 2 to the fourth quarter of 1995. Additionally, NNECO has reviewed NUREG-1488, regarding revised seismic hazard estimates, and believes it appropriate to change the Millstone Unit No. 2 seismic classification from a "focused scope" to a "reduced scope" plant.

Background

In a letter dated December 23, 1991,⁽¹⁾ CYAPCO and NNECO provided the NRC Staff the IPEEE submittal schedules on behalf of the Haddam Neck Plant and Millstone Unit No. 2 conditional on the Staff issuance of the Supplemental Safety Evaluation Report for

(1) J. F. Opeka letter to the U. S. Nuclear Regulatory Commission, "Haddam Neck Plant, Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3, Response to Generic Letter 88-20, Supplement 4, Revised Response to Generic Letter 88-20, Supplement 1, Individual Plant Examinations (IPE) for Severe Accident Vulnerabilities," dated December 23, 1991.

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the Seismic Qualification Utility Group--Generic Implementation Procedure. In letters dated June 30, 1992,⁽²⁾⁽³⁾ the NRC Staff accepted those schedules. In a subsequent letter dated September 18, 1992,⁽⁴⁾ CYAPCO and NNECO stated that we planned to adhere to the schedules proposed in the December 23, 1991, letter and that we would keep the Staff informed of any changes in either the schedule or the methodology.

On April 29, 1994, the NRC Staff issued NRC Information Notice (IN) 94-32: Revised Seismic Hazard Estimates⁽⁵⁾ to alert licensees to NUREG-1488, "Revised Livermore Seismic Hazard Estimates for 69 Sites East of the Rocky Mountains." The Staff expected that recipients would review the information for applicability to their facilities, with regard to IPEEEs. The Staff stated that the results of the new study are substantially different from those of the previous study (described in NUREG/CR-5250). They also consider the results of the new study to represent the best available information on seismic hazard estimates. It was also stated that the Staff is reviewing this new seismic information, which may identify plants whose scope of investigation can be reduced, based on the new hazard information.

Discussion

In the letter dated December 23, 1991, CYAPCO identified that the Haddam Neck Plant IPEEE would be submitted during the second quarter of 1994. The transportation and nearby facility accidents, external flooding, and tornado and high winds sections of the IPEEE are complete. The seismic, fire, and other external events sections are largely complete. Because of the work performed to date, we are not reclassifying the Haddam Neck Plant

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- (2) A. B. Wang letter to J. F. Opeka, "Review of Response to Generic Letter 88-20, Supplement 4 - Individual Plant Examinations for External Events - Haddam Neck Plant (TAC No. M83626)," dated June 30, 1992.
 - (3) G. S. Vissing letter to J. F. Opeka, "Review of Response to Generic Letter 88-20, Supplement No. 4 --Individual Plant Examinations for External Events - Millstone Unit No. 2 (TAC No. M83642)," dated June 30, 1992.
 - (4) J. F. Opeka letter to the U. S. Nuclear Regulatory Commission, "Haddam Neck Plant, Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3, Response to Request for Additional Information (TAC Nos. M83626, M83641, M83642, M83643)," dated September 18, 1992.
 - (5) B. K. Grimes Notice to All holders of operating licenses or construction permits for nuclear reactors, "NRC Information Notice 94-32: Revised Seismic Hazard Estimates," dated April 29, 1994.

as a "reduced scope" plant. However, we now find it necessary to revise the submittal schedule, due to reasons which were not anticipated at the time of the December 23, 1991 letter. During the later part of 1993, we reorganized our engineering division to make long term improvements in the allocation of engineering resources to each of our nuclear units. However, this reorganization has had an impact on the conduct of our IPEEE's due to the reassignment of some personnel. Other unanticipated resource demands, such as the development of a unit "risk monitor," the Millstone Unit No. 3 Supplementary Leak Collection and Release System support, and shutdown risk management support have also diverted valuable in-house resources.

The Millstone Unit No. 2 IPEEE was planned, in series with and following the Haddam Neck Plant, for submittal during the second quarter of 1995, as discussed in the December 23, 1991, and September 18, 1992 letters. The transportation and nearby facility accidents section of the IPEEE is complete. As a result of our review of NUREG-1488 and IN 94-32, NNECO believes it appropriate to change the Millstone Unit No. 2 seismic classification from a "focused scope" to a "reduced scope" plant. The basis for our reclassification is that the revised Lawrence Livermore National Laboratories seismic hazards results, provided in NUREG-1488, are now considered the best available information for seismic hazards estimates. As such, NNECO will fulfill the seismic requirements section of the Millstone Unit No. 2 IPEEE, in accordance with the guidance of NUREG-1407. Although a detailed probabilistic risk assessment (PRA) will not be performed, detailed plant walkdowns will be performed similar to that of a "focused scope" plant. Based on studies and evaluations conducted to date, plant walkdowns will effectively capture the seismically weaker elements which may require modifications. We believe that detailed plant walkdowns are the most cost effective and beneficial aspect of an IPEEE seismic margins assessment. Assessments are on-going to evaluate the benefits of performing the seismic margin evaluations in accordance with the focused scope methods.

Conclusions

For the previously discussed reasons, we have revised the submittal schedule of the Haddam Neck Plant IPEEE to the fourth quarter of 1994. For the reasons stated above, we also have rescheduled the Millstone Unit No. 2 submittal for the fourth quarter of 1995. At this time, we do not anticipate any impact on completion of the Millstone Unit No. 1 IPEEE, currently scheduled for submittal during the second quarter of 1996.

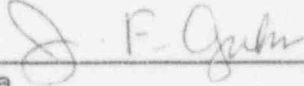
Although we regret having to modify these schedules, we believe that the reasons stated justify the schedule adjustments, given the basic intent of Generic Letter 88-20. We also believe that our experience in the field of PRA and IPE/IPEEE and our IPE submittals to date, further support this conclusion. If you have

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any questions regarding these schedule changes, please contact
Mr. R. H. Young at (203) 665-3717.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY

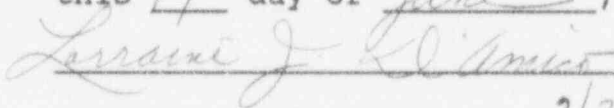


J. F. Opeka
Executive Vice President

cc: T. T. Martin, Region I Administrator
A. B. Wang, NRC Project Manager, Haddam Neck Plant
W. J. Raymond, Senior Resident Inspector, Haddam Neck Plant
G. S. Vissing, NRC Project Manager, Millstone Unit No. 2
P. D. Swetland, Senior Resident Inspector, Millstone Unit
Nos. 1, 2, and 3

Subscribed and sworn to before me

this 17 day of June, 1994



Lorraine J. DiAmico

Date Commission Expires: 3/31/98