CRITHEAST NUCLEAR ENERGY COMPANY

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February 21, 1984

Docket No. 50-423 B11044

Director of Nuclear Reactor Regulation Mr. B. J. Youngblood, Chief Licensing Branch No. 1 Division of Licensing U. S. Nuclear Regulatory Commission Washington, D. C. 20555

> Millstone Nuclear Power Station Unit No. 3 Licensing Schedule for Draft Environmental Statement

Northeast Nuclear Energy Company is exerting every effort to maintain the licensing schedule for Millstone Unit No. 3. An important element of the schedule is the issuance of the Draft Environmental Statement by the NRC on April 17, 1984. We have been extremely responsive to NRC staff requests for additional information and for meetings both at the site and in Bethesda, Maryland in furtherance of our commitment to the licensing schedule. We have been fully supportive of all requests including the answering of approximately 100 questions on the Probabilistic Safety Study (PSS); we conducted a presentation to the NRC and coordinated several other meetings and site tours for the NRC reviewers on this subject. It should be noted that this study is only one of many documents referenced in the Environmental Report. The PSS was referenced to provide backup information for the risk curves contained in Section 7.1.9 of the Environmental Report.

When the Probabilistic Safety Study was submitted to the NRC on August 1, 1983 we noted that the information contained in the study on the seismic fragilities input data was overly conservative. Such conservatism existed because this information was originally prepared using analytic techniques similar to that employed in design basis safety analysis. However, this level of conservatism was determined to be inappropriate because it was not consistent with the "best estimate," nominal failure rate approach employed in a probabilistic safety study. This new information will result in a consistent assessment of risk resulting from seismic fragilities considerations with that resulting from other contributors to the overall risk.

Northeast Nuclear Energy Company has developed revised seismic fragilities data and will be completing the study of its effect on the overall risk curves in the Environmental Report within several days. An amendment to the Environmental Report, Section 7.1.9, incorporating the results of this work is scheduled to be docketed by March 1, 1984.

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In supporting the staff review of the Safety Study we agreed to periodically hold meetings with the Staff and review the Safety Study in addition to answering all pertinent questions. This we have done. In the interest of supporting the staff review of the revised fragilities, we plan to cover this portion of work in a meeting scheduled in our offices which was arranged through the NRC Project Manager for March 5, 1984.

We have various reasons to believe the NRC Staff is concluding they cannot support issuance of the DES on schedule, including the consideration of risk curves that reflect realistic seismic fragilities information. We are deeply concerned about this, as we believe the Staff will have sufficient information to reach necessary conclusions to support the licensing schedule. We will adjust the agenda for the March 5 meeting to support Staff concerns, and we will do everything else possible to maintain the licensing schedule. Should you perceive that the Staff will be unable to do so, please inform us immediately so that appropriate steps can be agreed upon to support the licensing schedule.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY ET AL

By NORTHEAST NUCLEAR ENERGY COMPANY Their Agent

W. G. Counsil

Senior Vice President