

# 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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August 31, 1984

Docket No. 50-423  
B11300

Mr. Harold Denton, Director  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
7920 Norfolk Avenue  
Bethesda, MD 20014

Dear Mr. Denton:

Millstone Nuclear Power Station, Unit No. 3  
Use of Probabilistic Safety Study (PSS)  
in Operating License Proceedings

Recent discussions have been held with the Nuclear Regulatory Commission (NRC) staff, and the Advisory Committee on Reactor Safeguards (ACRS) and its consultants on the use of the Millstone Unit No. 3 Probabilistic Safety Study (PSS) in the licensing process. We believe that it is important for all concerned to understand our position regarding the proper use of the Millstone Unit No. 3 Probabilistic Safety Study in operating license proceedings.

As you requested in a letter dated September 21, 1981, a design-specific risk study was performed for Millstone Unit No. 3. The primary objectives of the PSS performed for Millstone Unit No. 3 were:

1. To characterize the public risk associated with the operation of Millstone Unit No. 3 resulting from both internal and external events, and to compare internal risks to those predicted in the Reactor Safety Study (RSS) as being representative of Pressurized Water Reactor (PWRs);
2. To develop a set of technical tools to support management decision-making in a continuing program designed to assure the effectiveness of future plant betterment projects aimed at improving safety.

The PSS that was prepared, and provided to the NRC Staff, meets these objectives. The study provides a comprehensive, quantitative assessment of relative public risk from the operation of this plant and documents that the operation of Millstone Unit No. 3 compares favorably with the RSS reference plant. It also provided an engineering tool that has already proven to be valuable in helping us to better understand the integrated performance of the plant systems and to identify ways where improved reliability can improve safety in a cost effective manner. We recognize the value of the PSS and we intend to continue our interface with the NRC staff to resolve issues involving the PSS. However, it is our position that these activities are outside licensing requirements and should not be used to attempt to resolve generic issues on a plant specific basis.

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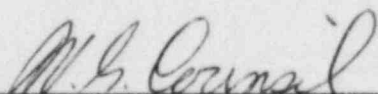
We are actively involved in the development of the Integrated Safety Assessment Program (ISAP) for our operating plants. Continued dialogue with NRR Staff on the Millstone Unit No. 3 PSS is diverting limited resources from our ISAP activities with the result that we cannot continue to be responsive to every request from the NRR Staff on the Millstone Unit No. 3 PSS. In the future we will be evaluating NRR requests for further evaluation on the PSS with this intent in mind. Items which in our judgement will add to the long-term value of the PSS will be considered. Those that do not will not be considered further.

The Commission stated in its March 14, 1983 safety goals policy statement that conformance to NRC regulatory requirements is "the exclusive licensing basis for plants". The Commission cautioned in that statement against using PRAs in safety analyses of nuclear facilities, despite inferences which might be drawn from comparing PRA results to design objectives of plant systems and structures, because of the large uncertainties inherent in the PRA analysis. The NRC's April 8, 1983 proposed Policy Statement on Severe Accidents further supports our position that the PRA should not be used in a licensing proceeding by indicating that "individual licensing proceedings are not appropriate forums for a broad examination of the Commission's regulatory requirements relating to control and mitigation of accidents more severe than the design basis."

In summary, Northeast Nuclear Energy Company remains available to explain the PSS performed for Millstone Unit No. 3 with the NRC Staff and the ACRS. However, it is our position that in licensing proceedings the exclusive basis for the safety review is current NRC regulatory requirements and therefore, discussion of the PSS should be done on a parallel path and not be considered part of the licensing process for this plant.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

  
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Senior Vice President

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