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December 11, 1984

Docket No. 50-423 B11390

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

Reference: (1) B. J. Youngblood to W. G. Counsil, Transmittal of Contractors Draft Report on Millstone-3 Probabilistic Safety Study (PSS) and Request for Additional Information on PSS Seismic Analysis dated September 26, 1984.

Dear Mr. Youngblood:

Response to Jack R. Benjamin & Associate's Review Comments on Revised Millstone Unit 3 Probabilistic Safety Study Seismic Fragility and Response to Request for Additional Information on the PSS Seismic Analysis - Question 720.92

Reference (1) transmitted copies of the following draft reports prepared by the Staff's contractors as part of the review of the Millstone Unit 3 Probabilistic Safety Study (PSS).

- "A Review of the Millstone 3 Probabilistic Safety Study," prepared by Lawrence Livermore Laboratory, May 30, 1984.
- (2) "Preliminary Review and Evaluation of the Millstone 3 Probabilistic Safety Study," prepared by Brookhaven National Laboratory, December 19, 1983.
- (3) "Containment Failure Matrix and Radiological Source Term for the Millstone - 3 DES," prepared by Brookhaven National Laboratory, April 3, 1984.

Additionally, in Reference (1), the Staff requested clarification regarding our response to Question 729.77. Please note this new request was numbered 720.92 in error. A previous question from the Reliability and Risk Assessment Branch was also numbered 720.92. Enclosure 2 contains Northeast Nuclear Energy Company's response to Question 720.92.

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8412310011 841211 PDR ADUCK 05000423 A PDR Northeast Nuclear Energy Company's response was requested within three weeks of the transmittal date of Reference (1). We did not receive the request until October 10, 1984. Ms. E. L. Doolittle was unavailable to discuss our request for additional response time and the matter was discussed with Mr. Paul O'Conner, acting Project Manager during Ms. Doolittle's absence. A due date was not established, however, it was agreed that an extension of time was in order.

Northeast Nuclear Energy Company herein submits (Enclosure 1) for the Staff's consideration our comments on the Review of the Revised Millstone Unit No. 3 Probabilistic Safety Study Seismic Fragility prepared for Lawrence Livermore National Laboratory by Jack R. Benjamin & Associates (Appendix A to Report (1) above). We would like to reiterate that the seismic hazard analysis contained in the PSS has been subsequently reevaluated and submitted to NRC, therefore, Section 4.1.1 of Report (1) does not reflect current information.

If you have any questions related to the information provided herein, please contact our licensing representative directly.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY, et. al.

BY NORTHEAST NUCLEAR ENERGY COMPANY, Their Agent

W. G. Counsil Senior Vice President

cc: Mr. Nilesh Chockshi, NRC, Structural and Geotechnical Engineering Branch Mr. Leon Reiter, NRC, Geosciences Branch Mr. Ashok C. Thadani, Reliability and Risk Assessment Branch

STATE OF CONNECTICUT ) ) ss. Berlin COUNTY OF HARTFORD )

Then personally appeared before me W. G. Counsil, who being duly sworn, did state that he is Senior Vice President of Northeast Nuclear Energy Company, an Applicant herein, that he is authorized to execute and file the foregoing information in the name and on behalf of the Applicants herein and that the statements contained in said information are true and correct to the best of his knowledge and belief.

btary Public

My Commission Expires March 31, 1989