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August 24, 1992

Atomic Safety and Licensing Board Panel
Nuclear Regulatory Commission
Washington, D.C. 20555
RE:Docket no.50-336-OLA (design of Spent Fuel Pool)
FOL. No. DPR-65, ASLBP No. 92-665-02-OLA

Dear Administrative Judges:

We have four primary contentions:

1. There is no basis for the NRC to rule that "no significant risk" is involved in the issuance of the design change that was issued to address the criticality errors found at Millstone 2.

2. An environmental and health study is needed so we can know the effects from releases of varying amounts of the current allowable radioactive inventory of the spent fuel pool.

3. Immediate installation of criticality monitors is needed.

4. Immediate action is needed to stop NU from contaminating the new steam generators until our concerns for the safe storage of the spent and new fuel is addressed.

Please see the following material and the attached documentation and affidavits of Dr. Gordon Thompson and Dr. Michio Kaku in support of these contentions.

CONTENTION 1: There is no basis for the NRC to rule that "no significant risk" is involved in the issuance of the design change that was issued to address the criticality errors found at Millstone.

The accident scenarios used in the safety analysis reports assume the use of the "neutron flux trap" principle as valid, but this principle as applied at the Millstone 2 spent fuel pool has been called into question by LER 92-003-00.

In the May 1986 safety analysis it was assumed that the issue

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of inadvertent criticality in the pool was unlikely and therefore was not considered in the accident scenario.

CONTENTION 2: An environmental and health study is needed so we can know the effects from releases of varying amounts of the current allowable radioactive inventory of the spent fuel pool.

The use of Boroflex as the neutron-flux trap in use in the old Region 1, which has been renamed Regions A and B by amendment 158, is now considered by us to be under serious question.

NU has failed to release to us there criticality calculations that support their contention that pool redesign meets current NRC safety standards. NU insists that their calculations were not the basis of the redesign, but that the design is based on Holtec's work which is verified by Holtec's quality assurance program. Dr. Stanley Turner of Holtec said the calculations and runs were independently verified by Professor Vernetson from the University of Florida under contract with Holtec. Dr. Turner told us that the inhouse runs and calculations are considered proprietary and neither Northeast Utilities or the NRC has them.

Since we have been told Holtec's information is the basis for the safety of the redesign allowed by amendment #158 we need the assistance of the NRC to access those experiments and calculations that were done by Holtec, Inc.

Without this information from NU and Holtec we cannot know if the redesign improves or makes worse the criticality situation for all of Region 1, or the newly sectioned Regions A and B as it is now used or will be used.

Since the NRC does not have this information they cannot be certain either. Therefore we feel that the issuance of this license amendment is premature.

CONTENTION 3: Immediate installation of criticality monitors is needed.

The removal of requirements for neutron flux monitors in the Millstone 2 spent fuel pool was improper in light of the fact that before the license amendment was issued to allow no inpool criticality monitors, the NRC was aware that the criticality safety margins were being questioned. Therefore we contend that without criticality monitors in that pool we

will have no prior warning if a dangerous neutron multiplication is happening.

ACCIDENT SCENARIOS

There are several backup systems that can add water to the pool if the level gets too low. Even if all the usual automated systems that add water to the pool fail because of power loss and reactor shutdown, there is always the fire main from which water can be drawn.

Consequently neither the NRC or the Industry consider loss of coolant water to warrant thorough analysis. At times when the NRC and Industry are forced to consider coolant loss or forced cooling system failure, as during the proceedings related to safety analyses of increased thermal load to spent fuel pool that make boiloff a plausible concern, they get around it by considering only the consequences of a partial boiloff without justifying that position.

The worst case boiloff considered for the Millstone 2 pool is described in their May 1986 documentation for rerack license #117. In the safety analysis a PARTIAL BOILOFF leaves water of 10 feet over the assemblies which acts as a radiation shield. These parameters generate misleading information on the extent of exposure to people and the environment in the case of a more severe partial boiloff or a full boiloff of the spent fuel pool water. With a partial boiloff that were to expose the tops of the assemblies, sufficient releases would be expected and there would be a need to complete evacuation plans for such an event. This wasn't done.

The worst accident scenario analyzed in the FSAR for the spent fuel pool is a cask dropped into the pool which causes the rupture of 500 rods. There is no loss of water and the damaged rods remain under water and the radiation is mostly contained in the water. The water acts as a radiation shield and what does get released into the air is filtered through automatically activated air ventilation and filtration systems that are assumed to be working.

This postulated incident does not happen concurrent with a fire, or while major problems with the reactor are taking precedence over the pool. No criticality is occurring concurrently and the cooling system is working. Nobody forgets and leaves the bay door open to the outside.

Consequently the worst case scenario results in theoretically low levels of exposure to the public. This scenario does not consider forced coolant failure, similar to what happened on July 6th, to occur simultaneously with the dropped cask or at the time of an emergency full-core offload or recent refuel. It does not consider the heat and radiation from a localized criticality at the time the cask is dropped nor when there is a cooling failure.

Some situations, such as criticality which are considered improbable because of design safeguards, become possible because of design or material failure, as is the case now with the uncertainties associated with the mathematical modeling and the Boroflex breakdown and erosion which we understand the NRC has reports on in addition to LER 92-003-00. These additional reports have to do with the erosion in the Boroflex panels that was observed when the panels were pulled for inspection. We need the NRC and the company to release this information.

In the real world hardly ever does just one thing go wrong at a time. Since the worst case senario that the industry and the regulators use to assess damage and risk to the environment and people is predicated on only one thing going wrong at once, then it cannot be considered to realistically predict risk and damage to the public.

** July 6,1992 Spent Fuel Pool Event**

On July 6, 1992 the forced cooling system of the pool at Millstone 2 became non-operational because of a power loss and the Shutdown Coolant System backup failed to operate. The loss of power that led to loss of forced cooling was not compounded by other situations like a fire or problems with an operating reactor. Yet 3 days before, on July 3rd, the full-core had been placed in the pool which greatly increased the thermal load of the pool. When the cooling system failed the Water temperature rose rapidly.

Because the Shutdown Coolant System was not properly activated, no backup cooling was provided and ten thousand gallons of water were siphoned out of the pool causing the level to drop 1 1/2 feet. There existed the potential, if not the actualization, of localized boiling. If the water that was inadvertently siphoned out of the pool was not pumped back or other water added quickly, there was danger of a complete pool boiloff in less than the 30 hours quoted by NU.

The pool temperature at start of event (8:55) was 88 degrees and when cooling was resumed 2-1/3 hours later, the temperature had climbed 4 degrees F. These are average or bulk temperatures. Since we don't have the actual temperatures at different levels in Region A where the full-core is being stored, we can't know how close to a localized boiloff the pool came or if there was in fact localized boiling.

Because no other compounding events happened concurrently that prevented people from replacing the water that had been lost and restarting the cooling system, no major boiloff occurred.

Our current understanding of July 6 is as follows:

1. The control room priority was to restore power after a 1460 kv line was accidentally lost during a maintenance procedure. One of the backup generators was down for maintenance and the other started, but failed to generate electricity. They had to manually transfer power from somewhere else.

2. Three valves were manually opened from the control room to allow water to be suctioned from the pool, sent through one of the shutdown heat exchangers, and returned to the pool.

3. The water went from the SF pool to the reactor vessel (which had no fuel in it) and lifted off the top or head of the reactor.

4. The spent fuel water, now mixed with primary coolant water, overflowed into the fuel transfer canal that had recently been drained.

5. The sump valve had been left open in the saddle of the canal which is about six feet lower than the canal floor. The water flowed into the saddle, through the open valve into a sump area 22 feet below the containment.

6. The sump pump could not handle the flow.

7. The water then backed up and overflowed onto the containment floor.

8. The workers in the containment called the control room to let them know that water was flowing from around the reactor vessel.

9. After power was restored they pumped this water back into the

SFP even though it was mixed with primary coolant.

10. The NRC said there was no danger to the public, but would investigate why NU took over an hour after power was restored to operate the cooling system in the pool.

11. On August 5, thirty days after the event, NU filed their report, LER 92-012-00, with NRC. But the document is unavailable to us at this time because of delays in getting it microfiched.

The May 1986 safety analysis report referenced the use of Shutdown Cooling System (SDC) Operating Procedure UP2310 that was utilized by the control room in the July 6th event. This Shutdown Cooling System is needed as backup for the pool's forced cooling system because the thermal load of the pool is increased by the 1986 rerack without increasing the volume of coolant water or the capacity of the pools cooling pumps.

Because the allowable number of assemblies to be stored has been increased over the years from 301 assemblies to 1965 assemblies, it is anticipated that the cooling needs of the pool can not be met by the forced cooling system as designed. The shutdown coolant system is needed not just as backup should the pool cooling fail, but as augmentation of the operating pool cooling system when the thermal load of the pool is as high as the rerack will allow. Times to boiloff without forced cooling are calculated as 9 3/4 hours with a recent refuel and 4 hours with an emergency full-core offload.

The worst case mentioned in the 1986 license safety analysis for boiloff is an emergency full-core offload into a pool at capacity. This is noted to reach boiloff in 4 hours. Yet it is the refuel senario with its 9 3/4 hours to boiloff that is used in the safety analysis.

Even though boiloff is considered possible, a full boiloff is not analyzed. The examples of 10 feet and 1.4 feet of water left over the fuel assemblies is not indicative of a full boiloff senario. It is not clear if the 9 3/4 hour time given for a boiloff is the time it takes to boil off only 1/2 of the water in the pool to leave 10 feet over the fuel, or to start it boiling, or to boil off all water. Also it may be that the time to reach 10 feet reference (approximate 1/2 of a full boiloff) was not 9 3/4 hours but was half of that time or 4-7/8 hours.

Also they do not make use in their safety analysis using 1.4 feet

over the fuel assemblies with the 4 hour boiloff time when predicting the environmental impact of the boiloff situation with the loss of spent fuel cooling and in the case of the 1.4 feet elevation the shutdown coolant system is considered to be available for pool cooling.

We need to know current thermal load of the pool so we can ascertain the time to boiloff and the risk of boiloff with the present load in the pool under the new design.

It is confusing and seems deceptive to have presented for environmental analysis of radiation releases a boiloff that is not complete with 10 feet of water left over the assemblies after an undisclosed period of time after the forced cooling system fails as the worst case when they present at the same time full boiloff figures.

*** END OF ACCIDENT SCENARIOS**

Continuation of Contention 3:

Under the new design (amendment #158) Region 2 (renamed C)) is filled with fuel assemblies and the old Region 1 (new Regions A and B) storage limitations allow no room for another full-core-offload. Resection B of Region 1 is licensed under #158 to accept new fuel only. It will be filled with new fuel at the time of refueling in September or October of 1992. Resection A of region 1 is currently filled with the full-core offload while steam generator replacement is ongoing.

Also, since only bulk temperatures are reported, we do not know if a localized boiloff in Region A where the full-core is placed, was considered a possibility during the 2-1/3 hour forced cooling stopage and coolant water loss of July 6.

Our concerns about criticality continue to exist because we are uncertain of the extent of erosion of boron from the Boroflex panels, the accuracy or availability of Boroflex benchmarking upon which rest the modeling for the multiplication factor (Keff), and the inherent uncertainties in the mathematical modeling used.

When the Keff was found to be too high to meet NRC safety standards, it seemed that attention was given only to the safe placement of new fuel, and the calculation of Keff was readjusted to allow space in the pool for safe placement of the

new fuel only. Keff may not have been calculated for Region 1 in its entirety. With a full core offload in the resection called A, the pool can be at or approaching a dangerous level resulting in not only a Keff greater than .95, but a Keff greater than 1. This means that we may be in immediate danger from a criticality and a full boiloff at Millstone 2 because of Amendment #158.

Therefore we feel justified in asking for an immediate stay to prevent further use of that pool until it can be made evident that no immediate danger exists. Since there are no monitors in the pool so that a situation can be seen to be developing that would necessitate the movement of the fuel, we ask that monitors be immediately placed in the pool to allow information on the existing Keff in the pool.

CONTENTION 4: Immediate action is needed to stop NU from contaminating the new steam generators until our concerns for the safe storage of the spent and new fuel is addressed.

Amendment # 158 allows for the continued use of the pool without regard to the added cost of removal of the contaminated new steam generator system which this license in affect permits.

NU asked in their April 16th application for their request to be expedited because of their need to offload the core to begin the steam generator replacement. The cost of this replacement is over 190 million dollars.

If in fact this amendment does not fully address the safe storage of spent and new fuel, NU may need to provide other means of storage for the waste currently in the pool. If the plant is to continue operating, provisions must be made for waste generated during the lifetime of the plant.

This license assumes that the waste generated in the next 2 cycles can be safely accommodated. Beginning with the refuel cycle that will start with renewed operation of the reactor, NU looses full-core offload capabilities which they claim is their corporate and engineering policy to maintain.

If in fact the waste can no longer be stored in the pool safely, the ratepayers and stockholders need to be financially able to carry the cost of providing safe storage. Their choices should not be unfairly limited by failure of oversight from the NRC.

In early September,1992 NU expects to be able to use refuel water

which is radioactive to test the new steam generators. This will contaminate them.

If further production of spent fuel created by the operation of Millstone 2 is considered economically and environmentally unsound because of the cost to safely store this fuel onsite, then NU will need to treat its $190,000,000 dollar steam generator system investment as low-level waste if they are allowed to test it with radioactive water.

Because we cannot be sure of what added costs will be arising from the criticality errors that have recently surfaced, it is unfair to allow NU to contaminate an otherwise good piece of equipment.

If the cost of safely storing the fuel that Millstone 2 has generated and will generate is not considered economically or environmentally feasible by the ratepayers, stockholders, and state regulatory agencies, that decision should not saddle the ratepayers, stockholders and taxpayers with unusable and unsalable contaminated steam generators. Nor with the cost of disposing of them as low-level waste. They should not be denied the option of selling the steam generators to assist them financially in providing safe storage of the current inventory of spent fuel and any other needs such as decommissioning costs that would arise in that position.

For the health and safety of the people, the protection of the environment, and the economic liability of the ratepayers and stockholders, we contend that immediate action should be taken by the NRC, since it is under NRC amendment # 158 that NU justifies continued operations.

Until our safety concerns are addressed, most importantly those involving the use of the "neutron-flux trap" principle as practiced at Millstone 2, we do not know that storage in the spent fuel is safe.

**** BACKGROUND ****

The following is a brief summary of NRC and other actions that we feel are relevant to the amendments and actions we are contesting.

The Millstone II power plant is a pressurized Combustion Engineering reactor. Engineering and construction was performed

by Bechtel Engineering Corporation. The Turbine was supplied by General Electric Corporation and is capable of producing 870 megawatts of power net.

1975
Millstone unit 2 begins operation, the spent fuel pool storage capacity is 301 spent fuel assemblies (about 1.3 full cores).

1976
Spent fuel processing plants will not be available in near future, discharged fuel is filling the pool. A capacity expansion of the pool is needed to support the engineering practice and NU corporate policy of reserving storage space in the spent fuel pool to receive an entire discharged reactor core ("full-core-offload") should it become necessary due to operational considerations.

1977
Amendment #109 allows reracking in Millstone 2 pool and increases the storage capacity to 667 spent fuel assemblies. The storage locations or "cells" now have a center to center spacing of 12.19 inches.

1982
Nuclear Waste Policy Act requires fuel owners to provide on-site spent fuel storage until a government repository is available.

1985
After the sixth offloading of 1/3rd of the reactor core fuel (cycle 6 refuel), the pool no longer has space for a "full-core-offload". A full-core offload contains 217 assemblies.

1986
NU states in their fuel consolidation application that "current circumstances in the back-end of the nuclear fuel cycle make it necessary that fuel owners establish and implement a plan for "life-of-reactor-storage" of spent fuel".

NU begins under amendment #117 to utilize a region strategy with a two region design, increasing storage to 1112 unconsolidated fuel assemblies.

Region 1 contains the high enrichment core-offload assemblies. The rack design employs the use of borated neutron absorber material (Boroflex) as the "neutron flux trap." The Boroflex poisoned fuel racks allows for 384 storage cells to store 384 assemblies, with a nominal center to center spacing of 9.8

inches, and 4 out of 4 pattern.

Region 2 spent fuel rack design is now based on criticality acceptance criteria allowing credit for reactivity depletion in the spent fuel. This region is reserved for fuel with 85% design burnup and allows 962 storage cells to be used in a 3 out of 4 pattern, with the empty blocked cell acting as a "neutron-flux trap." These cells have a center to center spacing of 9.0 inches and can store 728 unconsolidated fuel assemblies, in a 3 out of 4 pattern with the unused blocked cell serving as a "neutron flux trap."

Before the 1986 acceptance of spent fuel pool regionalization, the physics criteria for fuel stored in the spent fuel pool had been defined by the maximum unirradiated initial enrichment of the fuel.

1987
August 11, 1987, Northeast Utilities (NU) states that they reviewed the hot consolidation process as demonstrated by the program generically and determined the project safe and technically acceptable. They state that the process and associated risks and accident analyses are essentially the same regardless of the scope of consolidation.

NRC amendment # 117 approves the storage of consolidated fuel in cells of Region 1 and Region 2 and permits the use of Region 2 blocked cells for consolidated fuel allowing 1346 cells for storage. 1277 cells may contain consolidated fuel (cans) and each can will contain material from two fuel assemblies (2:1).

The assemblies to be used in the consolidation process need to be out of the reactor for at least five years and have undergone 85% burnup. The waste from the consolidation process (skeletons) will be compacted into waste consolidation cans and treated as Class C+ radioactive waste.

With storage restrictions imposed by the need to avoid criticality through consideration of neutron-flux trap material and storage configuration, and with thermal load restrictions imposed by the pool cooling system, the allowable storage capacity of the spent fuel is: 1965 assemblies as follows:

10 "spare cells" for damaged fuel
362 cells with fuel assemblies less than 5 years decay
688 cells with consolidated fuel from 1376 assemblies
217 empty cells in region 1 for full-core-offload

1277 total cells at capacity with 1965 fuel assemblies

1988
NRC issues Amendment #128 which deletes the footnote that had limited storage of consolidated fuel to five consolidated canisters. It also requires NU to request approval to use temporary Spent fuel storage racks for long term storage. Temporary spent fuel storage racks are utilized during the consolidation process and are emptied when a consolidation "run" is completed.

1991
NU requests relief from compliance with 10 CFR 20.74a at their four Connecticut nuclear power plants to remove requirements for criticality monitoring in the spent fuel pools. Other applications follow to remove from Technical Specifications references to the criticality monitors.

1992
February 14 NU notifies the NRC that design errors had been found in the spent fuel reracked area which contains boroflex panels. This error was found by an independent contractor who was hired to do blackness testing on the Boroflex.

February 28 - Aseea, Brown, Boveri (ABB), formerly Combustion Engineering who was the designer of the pool rerack, notifies the NRC of their explanation for the discrepancy noted by independent contractor Holtec, Inc., of errors in the spent fuel pool criticality calculations. This discrepancy puts Millstone II pool out of compliance since Keff is now calculated to be over .95.

April 16 - NU applies for a resection of Millstone II pool to allow a section just for new fuel. This in effect reduces the area available for the freshly offloaded spent fuel.

April 24 - NRC issues Amendment #67 for Millstone 3 removal of references to criticality monitors in spent fuel pool.
May 20 NRC issues Amendment #157 for Millstone 2 permitting NU not to have criticality monitors in the spent fuel pools.

April 28 - the Federal Register notices the NRC decision that redesign of the Millstone 2 pool entails "No Significant Risk."

May 28 - CCMN asks NRC to delay issuing the amendment to give time to verify the calculations upon which the safety of the redesign depends and to insure that the risk of criticality is in fact

decreased by the amendment rather than inadvertently increased. This is denied by John Stoltz, NRC projects director. Requests for hearing and intervention were submitted by Earthvision (Patricia Nowicki), Mary Ellen Marucci (CCMN), and Michael Pray (CCMN).

June 3 - certificate of compliance issued for shipment of radioactive steam generators from Millstone 2.

June 4 - NRC issues Amendment # 158 allowing the redesign.

July 3 - the full-core offload is put in Region A of the pool as resectioned by amendment # 158. There is 40% less space for spent fuel than what was available prior to the resection amendment # 158.

July 6 - Power is lost and the pool forced cooling system stops operating. see LER 92-012-00 issued August 5. Also, see our notes under Accident Scenarios in this paper.

July 15 - CCMN and other citizens meet with NU and are promised by NU within four days the calculations that NU, ABB-CE, and Holtec have done to support amendment #158.

CCMN also requests NU to:

1. place criticality monitors in the pool.
2. make public daily their current releases of radioactivity to the environment,
3. Provide Connecticut Department of Environmental Protection, Data Analysis Division, with online information from the two weather towers at the Connecticut nuclear power plant sites.
4. Provide information that will help determine the radioactive inventory of the Millstone 2 spent fuel pool for the use of CT Department of Health Services and others who need to assess the health effects from a Spent fuel pool accident.

* See CCMN letter July 22, 1992, and NU letter August 7, 1992.

July 29 - the Atomic Safety and Licensing Board Panel gives petitioners August 14 deadline to file supplemental amendments to petitions to intervene to include contentions.

August 5 - Thirty days after July 6 loss of cooling event in spent fuel pool of Millstone II, NU files LER 92-012-00. It is not available as of August 21 in NRC document rooms because of delays

in microfiching by NRC.
**see Accident Senario, Event of JULY 6,1992 **

August 7 - NU reneges on releasing the calculations to CCMN and claims that the calculations NU and ABB-CE did are not relevant to the license amendment. NU claims Holtec calculations are the basis for their license amendment and claim Holtec's quality assurance program did the verification.

NU releases some Benchmarking information that is incomplete with references to inhouse documentation that NU may consider as proprietary and has not sent.

NU provides information of radioactive content of one 85% burnup assembly from which an estimate of the radioactive content of the pool can be calculated.

NU refuses to make available real time data from their weather towers and refuses to notify the public of planned releases claiming that what is legally required is all they will do.

NU will not address evacuation plans other than what their accident senario of one completely ruptured assembly under a pool full of water will require (nothing) and thereby imply their unwillingness to revisit the worst case accident scenarios of the SFP to include criticality and enough water loss to expose the fuel.

NU claims that calculations done by them and ABB are not relevant to the license amendment and are refusing to release them to CCMN. NU claims that the The Holtec calculations are the basis for the license amendment and claims that Holtec's quality assurance program did the relevant verification.

August 13 - CCMN submits contentions with expert testimony to be submitted by August 24.

August 14 - an extension is granted to CCMN to submit contentions by August 24, 1992. CCMN to show concerns are real and good cause exists to suspect that amendment #158 not only may not improve safety margins enough to bring the pool up to NRC standards, but may in fact increase risk and consequences of a spent fuel pool accident.

August 19 - CCMN receives a phone call from Judge Ivan Smith of the NRC's Atomic Safety and Licensing Board Panel requesting that

all people and organizations that are represented by CCMN have their materials submitted not directly to his panel but through CCMN to the NRC. Also, CCMN should clarify who is represented by them.

August 21 - Dr. Stanley Turner of Holtec claims information on the inhouse runs and calculations done for the Millstone 2 pool redesign are proprietary. He states they were made available to Professor Vernetson, University of Florida, who checked the Keff calculations for HOLTEC.

August 24 - CCMN submits supplement to contentions and expert testimony of Dr. Gordon Thompson and Dr. Michio Kaku.

*** End of Background ***

Summary and immediate needs:

Our contentions, submitted on August 14 and supplemented with supporting expert documentation in and attached to this document dated August 24, show our concerns for our safety are real, and there is good reason to suspect Amendment #158 does not meet NRC safety criteria and that the redesign it allows may have increased risk significantly placing us now in immediate danger.

Because we believe we may be in imminent danger, we request the following relief:

Amendment #157 needs to be invalidated or amended.

Criticality monitors are needed in the pool NOW to give us some warning that will allow enough time to take needed action to prevent an inadvertent criticality.

Amendment #158 needs full review and public hearings in Connecticut.

Action is needed before October to stay the movement of new fuel into the pool because of unresolved criticality issues affecting the safety of people in the Northeast.

The use of radioactive water in September to test the new steam generators must be stopped for both safety and economic reasons.

Action is needed in September to stop the radioactive

contamination of the new steam generators by NU using radioactive water in testing them. Unwarranted production of radioactive waste should neither be encouraged nor permitted by public utility regulators or by nuclear regulators without public participation in these decisions affecting their health, safety and economy.

Drs. Gordon Thompson and Michio Kaku are sending notarized copies of their affidavits by separate mail to the NRC panel. They faxed CCMN copies of their testimony which we submit at this time in support of our contentions.

This supplement to contentions with supporting expert testimony will be mailed first class to those people on the attached service list.

We hope this matter before your panel gets the time a attention it needs to assure the safety and well being of the people of this area and we look forward to your cooperation in this matter.

We anticipate that a hearing will be held soon and that you will expedite our requests for information and necessary action.

Sincerely,

Mary Ellen Marucci

Mary Ellen Marucci,
coordinator,
Co-operative Citizen's
Monitoring Network, Inc.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'92 SEP 14 P4:12

In the Matter of

NORTHEAST NUCLEAR ENERGY COMPANY

(Millstone Nuclear Power Station,
Unit No. 2)

Docket No.(s) 50-336-OLA

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Final Version CCMN LTR 8-24-92 have been served upon the following persons by U.S. mail, first class, except as otherwise noted and in accordance with the requirements of 10 CFR Sec. 2.712.

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