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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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June 23, 1989

Docket Nos. 50-213
50-245
50-336
50-423
B13215

Re: Emergency Preparedness

U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406
Attention: W. T. Russell

Gentlemen:

Haddam Neck Plant
Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3
Emergency Notification System (ENS) and Health Physics Network (HPN)

In letters dated, August 31, 1987,(1) November 16, 1987,(2) December 15, 1988,(3) and February 23, 1989,(4) the NRC Staff reiterated its position that each licensee was responsible to provide qualified individuals to maintain open, continuous communications with the NRC Staff during a plant emergency. These qualified individuals would be required not only for the Emergency Notification System (ENS), but also for the Health Physics Network (HPN) whenever the NRC Staff requests that this phone system be established. As outlined by the Staff, the ENS would be the primary channel for communicating reactor safety and other related emergency information between licensee emergency facilities and NRC Staff regional or headquarters response centers. If requested by the Staff, the HPN would be activated as the primary means of

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(1) T. T. Martin letter to E. J. Mroczka "NRC/Licensee Technical Information Flow During Exercises and Emergencies," dated August 31, 1987.

(2) NRC Information Notice No. 87-58, "Continuous Communication Following Emergency Notification," dated November 16, 1987.

(3) W. T. Russell letter to E. J. Mroczka, "Emergency Communications Systems - Health Physics Network (HPN)," dated December 15, 1988.

(4) "Health Physics Network," dated February 23, 1989, NRC Information Notice 89-19.

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communicating health physics and dose assessment information from licensees to the NRC Staff.

In a letter dated January 23, 1989,(5) the NRC Staff requested that Region I licensees provide the Region I Incident Response Center (IRC) with hard copies of periodic incident status reports during both emergency drills and actual events. It is our understanding that Region I will have the HPN system in their Incident Response Center for discussing this data. It is not clear if NRC headquarters also requires these same hard copies.

The purpose of this letter is for Connecticut Yankee Atomic Power Company (CYAPCO) and Northeast Nuclear Energy Company (NNECO) to respond to the Staff regarding the above referenced letters. At both Haddam Neck and Millstone, one technically qualified and trained individual per site will man the HPN and ENS telephone lines. We have taken this approach to ensure that the same information and the same interpretation of plant conditions is consistently provided to HPN and ENS users. This would minimize confusion and potentially conflicting information.

In contrast to the NRC Staff's letter dated January 23, 1989, CYAPCO and NNECO use a computer based information system to monitor plant status during drills or emergencies as opposed to "hard copy" data sheets or data sheets similar to the NRC Staff's (Reference 4). However, CYAPCO and NNECO will endeavor to provide the Staff with periodic transmittals of available hard copy data sheets as the Staff requests them during exercises or actual emergencies.

CYAPCO and NNECO would like to identify some concerns we have with the emergency communication systems established with the NRC Staff. With the communication vehicles proposed by the Staff, CYAPCO and NNECO believe communication will be confusing since similar information would potentially be supplied to the Staff from three sources, (1) ENS (to NRC headquarters), (2) HPN (to NRC Region I), and (3) face-to-face communications in the emergency facilities. These communications channels with the NRC Staff may lead to a possible mismatch of information and timing problems with information transfer. For this reason CYAPCO and NNECO have designated one qualified individual to serve both the ENS and HPN functions at the same time. Also, the Staff has recently stated its intent to publish a generic letter regarding voluntary Emergency Response Data System (ERDS) implementation. It is not clear how this system, if implemented, would affect the existing ENS/HPN communication mechanisms.

As stated above, CYAPCO and NNECO are taking steps to meet the intent of the Staff requests. However, we wish to apprise the Staff of potential problems we believe could surface during an actual emergency. Accordingly, CYAPCO and NNECO respectfully request that the Staff examine the system for the transfer

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(5) W. T. Russell letter to E. J. Mroczka, "Region I Incident Response Center Data Handling Capability," dated January 23, 1989.

of incident-related information from licensees to the Staff. Instead of operating this system through three separate channels, CYAPCO and NNECO propose that the ENS and HPN systems be consolidated into one system (e.g. one phone line at the sites open to any involved NRC Staff personnel). No response to this letter is expected. We appreciate your consideration of this matter and remain available to discuss it with you.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY

E. J. Mroczka
Senior Vice President

cc: A. B. Wang, NRC Project Manager, Haddam Neck Plant
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