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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June 26, 1989

Docket Nos. 50-213
50-245
50-336
B13268

Re: 10CFR50.90

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Reference: (1) E. J. Mroczka letter to the U.S. Nuclear Regulatory Commission, Proposed Revision to Technical Specifications, dated April 25, 1989.

Haddam Neck Plant
Millstone Nuclear Power Station, Unit Nos. 1 and 2
Additional Information - Proposed Revision to Technical Specifications
Administrative Controls--High Radiation Area (TAC No. 73145)

Pursuant to 10CFR50.90, Connecticut Yankee Atomic Power Company (CYAPCO) and Northeast Nuclear Energy Company (NNECO) proposed amending Operating License Nos. DPR-61, DPR-21, and DPR-65 by incorporating the changes identified in Reference (1) into the plant Technical Specifications for the Haddam Neck Plant and Millstone Unit Nos. 1 and 2, respectively.

As a result of a conference call with the staff on May 5, 1989, we are providing the following additional information concerning our April 25, 1989 submittal regarding High Radiation Areas.

Discussion

In order to provide an improved and consistent program for High Radiation Areas, Connecticut Yankee Atomic Power Company and Northeast Nuclear Energy Company proposed to specify the current methodology used to determine locked High Radiation Areas. In past practice, dose rates for High Radiation Areas (nonlocked) were defined as greater than 100 mR/h but less than 1000 mR/h in contact with the radiation source. As proposed, each High Radiation Area, as defined in 10CFR Part 20, in which the intensity of radiation is equal to or less than 1000 mR/h will now be measured at 18 inches from the radiation source. The proposed changes will now additionally define locked High Radiation Areas as those with dose rates greater than 1,000 mR/h at 18 inches from the radiation source. This proposed enhancement to the radiological control program at Haddam Neck and Millstone plants provides more appropriate controls for these areas. In addition, it provides uniformity for the determination of locked High Radiation Areas at all four of our nuclear plants.

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In addition to the three changes discussed in our April 25, 1989 letter (Reference (1)), there is a fourth change proposed:

- In past practice, dose rates for High Radiation Areas (nonlocked) were defined as greater than 100 mR/h but less than 1000 mR/h in contact with the radiation source. As proposed, each High Radiation Area, as defined in 10CFR Part 20, in which the intensity of radiation is equal to or less than 1000 mR/h will now be measured at 18 inches from the radiation source. The proposed changes will now additionally define locked High Radiation Areas as those with dose rates greater than 1,000 mR/h at 18 inches from the radiation source.

The 18-inch measurement from the radiation source has been in use at our Millstone Unit No. 3 nuclear plant since its license was approved. The Technical Specification sections defining High Radiation Areas are approved Westinghouse Standard Technical Specifications. We have also implemented the 18-inch measurement from the radiation source at Millstone Unit Nos. 1 and 2[1] and the Haddam Neck Plant[2] prior to submitting proposed Technical Specification changes for these plants. Therefore, the 18-inch measurement from the radiation source has been in use since those letters were sent to the Commission and since our existing Technical Specifications did not preclude this clarification.

As indicated in Reference (1), CYAPCO and NNECO had reviewed the proposed changes in accordance with 10CFR50.92 and have concluded that they do not involve a significant hazards consideration. Since the proposed changes do not affect the consequences of any accident previously analyzed, there is no reduction in the margin of safety. In past practice, dose rates for High Radiation Areas (nonlocked) were defined as greater than 100 mR/h but less than 1000 mR/h in contact with the radiation source. As proposed, each High Radiation Area, as defined in 10CFR Part 20, in which the intensity of radiation is equal to or less than 1000 mR/h will now be measured at 18 inches from the radiation source. The proposed changes will now additionally define locked High Radiation Areas as those with dose rates greater than 1,000 mR/h at 18 inches from the radiation source. The proposed change will incorporate the current practice of specifying the measurement distance from the radiation source to determine dose rates.

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(1) E. J. Mroczka letter to the NRC, dated April 22, 1988.

(2) E. J. Mroczka letter to the NRC, dated July 27, 1988.

We believe the above information, coupled with the information provided in Reference (1), provides a complete basis for approval of the requested amendment. Of course, should the Staff have any additional questions, we are available to discuss the Staff's concerns at your earliest convenience.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY

E. J. Mroczka
Senior Vice President

cc: Kevin McCarthy, Director
Radiation Control Unit
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W. T. Russell, Region 1 Administrator
M. L. Boyle, NRC Project Manager, Millstone Unit No. 1
G. S. Vissing, NRC Project Manager, Millstone Unit No. 2
A. B. Wang, NRC Project Manager, Haddam Neck Plant
W. J. Raymond, Senior Resident Inspector, Millstone Unit Nos. 1, 2, and 3
J. T. Shedlosky, Senior Resident Inspector, Haddam Neck Plant

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

Then personally appeared before me, E. J. Mroczka, who being duly sworn, did state that he is Senior Vice President of Connecticut Yankee Atomic Power Company and Northeast Nuclear Energy Company, Licensees herein, that he is authorized to execute and file the foregoing information in the name and on behalf of the Licensees herein, and that the statements contained in said information are true and correct to the best of his knowledge and belief.

Sheila M. Oates
Notary Public

MY COMMISSION EXPIRES MARCH 31, 1992