

# NORTHEAST UTILITIES



THE CONNECTICUT LIGHT AND POWER COMPANY  
THE HARTFORD ELECTRIC LIGHT COMPANY  
WESTERN MASSACHUSETTS ELECTRIC COMPANY  
NEW YORK WATER POWER COMPANY  
NORTHEAST UTILITIES SERVICE COMPANY  
NORTHEAST NUCLEAR ENERGY COMPANY

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November 13, 1979

Docket No. 50-336

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

References: (1) W. G. Council letter to R. Reid dated August 22, 1979.  
(2) W. G. Council letter to R. Reid dated August 24, 1979.  
(3) W. G. Council letter to R. Reid dated August 24, 1979.  
(4) R. Reid letter to W. G. Council dated August 25, 1979.  
(5) W. G. Council letter to R. Reid dated September 28, 1979.  
(6) W. G. Council letter to R. Reid dated October 22, 1979.  
(7) W. G. Council letter to R. Reid dated October 24, 1979.  
(8) W. G. Council letter to R. Reid dated October 26, 1979.  
(9) W. G. Council letter to R. Reid dated November 5, 1979.

Gentlemen:

Millstone Nuclear Power Station, Unit No. 2  
Feedwater System Piping

In References (1), (2), and (3), Northeast Nuclear Energy Company (NNECO) documented its detailed response to I&E Bulletin No. 79-13, summarizing the nature of the linear indications detected on the feedwater piping system at Millstone Unit No. 2 and provided the basis for continued plant operation without repair. These References, coupled with meetings with the NRC Staff and numerous telephone conversations, resulted in the issuance of Reference (4).

In Reference (4), the Staff documented the acceptability of operation of Millstone Unit No. 2 with the feedwater line indications. Included with Reference (4) was the NRC Staff Safety Evaluation and a listing of seven commitments which served as a basis for the Staff conclusion. Each of these seven commitments was adhered to/fulfilled on the schedule required by Reference (4). It is noted that Item (5) of Reference (4) required an approach to cold shutdown by October 31 to perform a re-examination of the affected welds using ultrasonic techniques.

As well as fulfilling Commitment (4) of Reference (4), Reference (5) documented NNECO's acceptance criterion for plant operation after October 31 as verbally requested by the Staff. The following is quoted from Reference (5):

"A succinct statement regarding NNECO's acceptance criterion is that no confirmed crack growth in the through-thickness direction (depth) is permissible."

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During the month of October, our respective Staffs expended significant effort in an attempt to ensure that fulfillment of this conservative acceptance criterion would result in subsequent plant operation without repair. The basis for NNECO's conclusion was supplemented in References (6) and (7). In Reference (8), NNECO unsuccessfully attempted to secure authorization to operate Millstone Unit No. 2 without re-examination until November 3, 1979. The basis for this request was a projected generating capacity shortage in the New England area. In Reference (9), NNECO documented its conclusion that no confirmed crack growth was evidenced, and plant operation was, therefore, justified. The culmination of these efforts occurred during a meeting in your offices on November 6, 1979. NNECO participants in this meeting believe it correct to characterize the Staff's evaluation of NNECO's presentation from a technical standpoint as adequate. The absence of documentation from the Staff on this point, despite our verbal requests, renders this determination subjective. Subsequent to a Staff caucus following NNECO's presentation and a question-and-answer session, the Staff advised NNECO that it would be "prudent" to effect a repair at this time. The statement was not characterized as a Staff requirement, but rather a "strong recommendation". NNECO queried the Staff as to the basis for this decision. Although no succinct basis was provided, reference to the term "prudent" continued.

The purpose of this letter is to advise the NRC that NNECO finds the above course of events extremely disappointing and disconcerting. In light of the economic impact of this decision, which when asked by the Staff during the meeting was estimated to be in the range of fifteen million dollars, it appears that a documented basis is in order. The consensus of a group of Staff members that was verbally transmitted to NNECO representatives clearly is not indicative of the existence of a regulatory process which can be transacted and executed effectively. Therefore, NNECO respectfully requests that the basis for the Staff decision on this issue be documented.

Additional motivation for the above attitudes and request is provided by the following points:

- (1) During an ACRS meeting held on November 5, 1979, the NRC Staff erroneously advised the ACRS sub-committee that the indications re-examined at Millstone Unit No. 2 had increased significantly and that repair was necessary.
- (2) The apparent basis for the decision was such that it could have been rendered before October 31, 1979. As noted previously, both of our respective Staffs attempted to preclude this development, as it resulted in a delay of the initiation of the repair option of approximately five days. The validity of this contention is supported by the actions of a member of senior NRC management, who was not in attendance during the November 6 meeting. Within thirty minutes of the conclusion of the meeting, NNECO representatives were advised that this individual strongly believed that repair was essential and by no means would an appeal process reverse this decision. Clearly there was insufficient time for all relevant technical details to be explained and evaluated within that interval. Again, in the absence of documentation to the contrary, it can only be surmised that the repair option was the inevitable foregone conclusion of the Staff, independent of the results of the re-examination. Therefore, a timely Staff decision could have prevented five days of plant downtime.

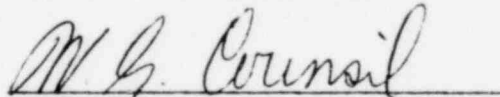
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Especially in light of the many challenges affecting the nuclear industry at this time, NNECO believes it imperative that NRC decisions be based on technical merits and documented as such. To that end, a reply to this letter at your earliest convenience would be greatly appreciated. Such a letter could facilitate recovery of the costs associated with this effort by appropriate future action on the part of the State of Connecticut's Public Utilities Control Authority. Should you require clarification of any of the above, we remain available to do so promptly.

Lastly, please be advised that the repair program is in progress at this time. This program was described in detail in Reference (5). Because the feedwater piping system will be restored to its original design condition in conformance with applicable ASME code requirements, Millstone Unit No. 2 will return to service promptly upon completion of this effort without instrumenting the repaired welds.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

A handwritten signature in cursive script, reading "W. G. Council", is written over a horizontal line.

W. G. Council  
Vice President

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