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November 28, 1979

Docket No. 50-336

Mr. Darrell G. Eisenhut, Acting Director
Division of Operating Reactors
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

- References: (1) D. G. Eisenhut letter to W. G. Council dated October 22, 1979.
- (2) W. G. Council letter to D. G. Eisenhut dated October 18, 1979.
- (3) W. G. Council letter to H. Denton dated November 21, 1979.

Gentlemen:

Millstone Nuclear Power Station, Unit No. 2
NRC Requirements for Auxiliary Feedwater Systems

In Reference (1), NNECO was requested to review Millstone Unit No. 2 against the applicable requirements of Enclosure (1) of Reference (1) to determine the current degree of conformance. The results of this evaluation and a schedule and commitment for implementation of changes was also requested. In addition, NNECO was requested to respond to a generic request for additional information regarding auxiliary feedwater systems, provided as Enclosure (2) of Reference (1). In response to these requests, the following information is provided.

The recommendations of Enclosure (1) are addressed below, in accordance with the numbering system utilized in Reference (1).

Short Term

1. Recommendation GS-4

Applicable emergency procedures are scheduled to be revised by January 1, 1980 to reflect the requirements for transfer to alternate sources of auxiliary feedwater supply for the cases presented in the recommendation.

2. Recommendation GS-5

Emergency procedures are scheduled to be revised by January 1, 1980 to contain the information required to provide auxiliary feedwater flow from one pump, independent of any alternating current power source, for at least two hours. Adequate

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portable lighting and communication are available in the control room for the prescribed manual actions.

3. Recommendation GS-6

The auxiliary feedwater system procedures and valve lineups are scheduled to be revised by January 1, 1980 to require that different operators perform the independent flow path verifications, if both alignments are completed at the same time. In other words, one operator will perform the flow path verification for train A, and a different operator will perform the flow path verification for train B. This level of independence is consistent with the requirements on other safety systems, and has been demonstrated to be adequate to ensure that safety related systems are operable when required. In addition, a Technical Specification change will be proposed by April 1, 1980 to add a surveillance requirement for an auxiliary feedwater flow test to be performed after a cold shutdown of greater than one month duration.

4. Recommendation GS-8

NNECO continues to believe that this recommendation is inappropriate as documented in References (2) and (3). A detailed response will be provided in a letter from W. G. Counsil to H. Denton, scheduled to be docketed November 29, 1979.

Additional Short Term Recommendations

1. The currently installed level instrumentation on the condensate storage tank, consisting of low level alarm and a low-low level alarm in the control room, fulfills the intent of this recommendation.
2. The significant financial impact associated with this recommendation far exceeds the benefits with respect to reliability verification, in that the auxiliary feedwater pumps have been operated reliably for extended periods at hot standby as a result of normal plant evolutions. By January 1, 1980, operating records will be reviewed to document those periods of operation. Subsequent to completion of this review, the potential appropriateness of supplemental endurance tests will be addressed.
3. NNECO's response to this recommendation is documented in References (2) and (3).
4. This recommendation is not applicable, as local manual valve realignment is not required for periodic testing.

Additional Long Term Recommendations

1. NNECO continues to believe that this recommendation is inappropriate as documented in References (2) and (3). A detailed response will be provided in a letter from W. G. Counsil to H. Denton, scheduled to be docketed November 29, 1979.

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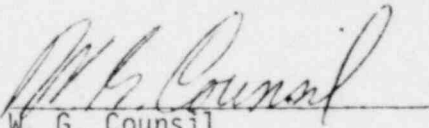
2. NNECO concurs that it is appropriate to eliminate the existing alternating current power source (AC) dependency of one auxiliary feedwater (AFW) system pump and its associated flow path; therefore, this aspect of the recommendation will be implemented by January 1, 1981. However, NNECO does not concur that initiation must be automatic, as noted above.

With regard to Enclosure (2) of Reference (1), NNECO is committed to respond to the information requests identified in that enclosure. NNECO is currently in contact with the NSSS vendor, to formulate the work scope and schedule for this endeavor. At the conclusion of these discussions, we will advise the Staff as to the schedule for completion of the effort.

We trust you find the above information responsive to your requests.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY


W. G. Council
Vice President

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