

# NORTHEAST UTILITIES



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

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January 9, 1979

Docket No. 50-336

Director of Nuclear Reactor Regulation  
Attn: Mr. R. Reid, Chief  
Operating Reactors Branch #4  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

References: (1) D. C. Switzer letter to R. Reid dated February 23, 1978.  
(2) W. G. Counsil letter to R. Reid dated December 15, 1978.  
(3) R. Reid letter to W. G. Counsil dated December 8, 1978.

Gentlemen:

Millstone Nuclear Power Station, Unit No. 2  
Cycle 2 Radiological Consequences Evaluation

In Reference (1), Northeast Nuclear Energy Company (NNECO) proposed to revise the Millstone Unit No. 2 Technical Specifications by increasing the response time of the Enclosure Building Filtration System (EBFS). Since the EBFS filters radioactive releases following a postulated LOCA, an increased response time would increase the calculated offsite doses. Reference (1), therefore, also included a dose calculation utilizing the increased EBFS response time. All assumptions used in that calculation are consistent with Regulatory Guide 1.4.

However, new X/Q values were computed using meteorological data gathered over the past several years. It is in the development of these X/Q's that an error has been discovered. The (0 - 1) hour X/Q for the site boundary did not take the effect of fumigation into account. The correct X/Q for this time period is, therefore,  $1.03 \times 10^{-4}$  sec/m<sup>3</sup> rather than the  $2.14 \times 10^{-6}$  sec/m<sup>3</sup> reported for this time interval in Table 2 of Reference (1). Therefore, the calculated site boundary doses for this incident, assuming the increased EBFS initiation time, are 151 rems to the thyroid and 3.8 rems whole body, rather than the 116 rems to the thyroid and 1.2 rems whole body reported in the Reference (1) letter. These corrected doses are identical to those reported in Reference (2) in support of the power uprating effort and no correction to that submittal is necessary. Note that these corrected doses have incorporated dose conversion factors from Regulatory Guide 1.109 as discussed in Reference (2).

Since in Reference (3) the NRC's Safety Evaluation approved the Technical Specification change proposed in Reference (1) and calculated doses of 210 rems to the thyroid and 7 rems whole body, the effect of this letter is merely to correct our analysis of Reference (1). The corrected doses remain bounded by the NRC calculations and are within the limits of 10CFR Part 100. Note also that the

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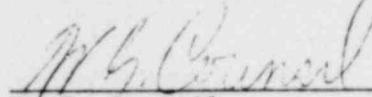
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analyses of both Reference (1) and (2) were performed at the stretch power level of 2700 MWt. Therefore, no changes to the NRC's evaluation of this incident are anticipated to be necessary to review that portion of Reference (2) which evaluates the radiological consequences of the LOCA at 2700 MWt, since the Reference (3) SER is bounding.

Please be advised that NNECO does not concur with the NRC Staff that the correct doses for the LOCA are the Reference (3) values, but rather, contends that the values of 151 rems thyroid dose and 3.8 rems whole body dose as reported in Reference (2) are appropriately conservative. NNECO's lack of concurrence in this regard does not invalidate the determination that the Reference (3) values are bounding for this analysis.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

A handwritten signature in cursive script, appearing to read "W. G. Counsil", is written over a horizontal line.

W. G. Counsil  
Vice President