

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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Docket No. 50-423
AEC-MP3-242
B10228



B. J. Youngblood, Chief
Licensing Branch No. 1
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Reference: (1) 45 Federal Register 40101.

Gentlemen:

Millstone Nuclear Power Station, Unit No. 3
Probabilistic Risk Assessment

On June 25, 1981, members of the Northeast Utilities Staff met with the NRC Staff to discuss the subject of probabilistic risk assessment and how it applies to Millstone Unit No. 3. A draft NRC letter was given to our Staff for evaluation and comments. The purpose of this letter is to provide our comments.

Northeast Utilities was already considering performing a probabilistic risk assessment. As a result of this meeting, we have realized the necessity to increase both our scope and schedule of this effort. Our plans include utilizing the methodology developed from the NRC Interim Reliability Evaluation Program for Millstone Unit No. 1. The "procedures guide" being developed by the IEEE/ANS committee, which is scheduled for completion in Spring 1982 could be used if it is available as scheduled and, if practical, as a supplemental methodology guide. In addition to the IREP program, we will closely review the methodology and findings of the special studies performed on the Indian Point, Zion, and Limerick stations, and integrate these findings as we deem appropriate. We understand that in performing this study for Millstone Unit No. 3, a later NREP study will not be required.

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We understand you wish to directly compare the consequence results of the Millstone Unit No. 3 Probabilistic Risk Assessment, including consideration of external events, with the results for the base case WASH-1400 PWR. In our opinion, significant improvements in Probabilistic Risk Assessment consequence techniques have been made since WASH-1400 and should be used in a present day study. External event initiators (earthquakes, fires, floods, explosions, and tornados) should be included in such a study and as a result, would also require improved methodology over that provided in the WASH-1400 type of consequence analysis. A comparison to the WASH-1400 findings would also have to be provided in the study so that a judgment on the relative risk between the WASH-1400 base PWR and Millstone Unit No. 3 could be made.

In order that the Millstone Unit No. 3 Probabilistic Risk Assessment study can be used to assure appropriate protection for the public health and safety, it is essential that the acceptance criteria for the risk evaluation be firmly established in advance. If it is determined that the plant does not meet the acceptance criteria, then the plant should be modified to meet it on a schedule arrived at with due consideration to the level of deficiency found.

We believe such a study should be completed approximately one year after the FSAR and ER are submitted. Northeast Utilities recognizes the NRC Staff preference to have the risk evaluation submitted with the FSAR/ER. However, the alternate schedule is considered to be acceptable for the following reasons.

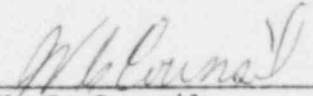
- o The risk evaluation would be based on a finalized plant design in order to provide a valid study. If it were to accompany the FSAR/ER, the evaluation would have to be based on a plant design as it exists today and would compromise the quality and validity of the report.
- o The intent of the risk evaluation is to assess the adequacy of the plant design from a probabilistic risk standpoint. The NRC Staff review of the design will commence with the FSAR/ER submittal. Confirmation of this review could be done via separate later review of the risk evaluation.
- o Northeast Utilities recognizes that the later submission of the Probabilistic Risk Assessment may define a need for modifications to already installed systems. Northeast Utilities will define a corporate commitment to modify the plant if necessary to meet the acceptance criterion described above.

A recent Commission policy statement requires Environmental Impact Statements, pursuant to the National Environmental Policy Act of 1969, Section 102.c.i, to include consideration of environmental risk at the facility (Reference (1)). The requirement is that equal attention shall be given to probability and to consequence. Since this policy effectively requires a risk evaluation to be included as part of the ER submitted by applicants, we would reference the risk evaluation in the ER but would not include it at the time of ER submittal. The detailed risk evaluation would have to be submitted approximately one year later, as discussed above.

Northeast Utilities is providing these comments and recommendations following our discussions with you, in the interest of working towards a mutually agreeable approach to risk assessment for Millstone Unit No. 3. We trust you will find our observations to be helpful in this effort.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



W. G. Council
Senior Vice President

cc: H. R. Denton