

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 22, 1983

Docket No. 50-336

B10810

Director of Nuclear Reactor Regulation
Attn: Mr. Robert A. Clark, Chief
Operating Reactors Branch #3
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Reference: W. G. Council letter to R. A. Clark, dated April 13, 1983.

Gentlemen:

Millstone Nuclear Power Station, Unit No. 2
Failed Fuel Impact on Cycle 6
Safety Analyses

Following startup in March, 1982 from the last refueling outage, Northeast Nuclear Energy Company (NNECO) identified elevated levels of radioiodine and other fission products in the reactor coolant system of Millstone Unit No. 2 indicative of failed fuel rods. NNECO will be completely off-loading the entire core during the current refueling outage to affect the 10 year inservice inspection program. Fuel sipping will be performed on all off-loaded fuel assemblies to determine which assemblies contain defective cladding. The assemblies determined to contain defective fuel rods are planned to be replaced for Cycle 6 operation.

The need to replace defective fuel assemblies with new assemblies or previously discharged fuel from Cycle 1 operation could impact the analyses performed to support Cycle 6 operation. The results of these analyses and the technical specifications for Cycle 6 operation were docketed in Reference (1). The magnitude of the impact on the safety analyses and the need to revise or supplement the Reference (1) license amendment application will be determined by the number and core location of the assemblies determined to be defective. Of course, every effort will be made to remain within the envelope of the docketed analyses.

At this time, the Reference (1) application and analyses remain appropriate.

The current schedule for outage activities will result in the defective fuel inventory to be available on or about July 5, 1983. These data will be evaluated to determine the need for reanalysis of any safety analyses currently under review by the Staff. In addition, this evaluation will determine whether revised

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or additional technical specifications will be necessary for Cycle 6 operation. The NRC Staff will be promptly apprised of the results of these evaluations and the schedule for docketing any further information to support Cycle 6 operation with the replacement fuel assemblies. The various activities of fuel shuffling operations, revisions to the core loading pattern, impact on safety analyses, and impact on technical specifications are sequential in nature. Potential minor adjustments to the Reference (1) amendment request would represent the last step in the chain of events.

NNECO has met with its fuel vendor and has been assured that priority attention will be devoted to any reanalysis effort required as a result of the defective fuel at Millstone Unit No. 2. It is NNECO's opinion that the current information contained in Reference (1) will remain valid given the probable scenarios regarding the defective fuel assemblies. At the present time, any revisions to the analyses and technical specifications (if required) are expected to be minor, only altering the operational flexibility of the plant with regard to various limiting conditions for operations.

Nevertheless, it is conceivable that upon completion of the fuel replacement process, minor adjustments to the Reference (1) amendment request may be needed. Moreover, because of the sequential nature of the activities discussed above, there may be insufficient time prior to plant startup to utilize the full public notice and comment and state consultation procedures specified in 10 C.F.R. Section 50.91. Should this occur, we believe that it is incumbent upon NRC to process the amendment request in a manner which will not adversely impact plant startup.

Section 50.91 and Section 12 of Public Law 97-415, pursuant to which that regulation was promulgated, provide that in the event of emergency or exigent circumstances the notice and comment and state consultation process can be expedited to avoid plant derating or shutdown. The Statement of Consideration specifies that an emergency situation exists where failure to act on an amendment request would result in plant derating or shutdown (48 FR 14876). We believe that there is no practical difference between a situation where failure to act on an amendment request would result in plant shutdown and where failure to act on an amendment request would preclude a plant from resuming operation.

NNECO believes this is particularly true in this case. Our initial amendment request was docketed in a timely manner, some one hundred and forty days before scheduled startup. In addition, as indicated above, our best efforts are being applied to ascertain in the first instance whether minor adjustments to the amendment request are needed. Therefore, under these circumstances we believe that no impediment exists to expediting the process set forth in Section 50.91 in order for that process not to adversely impact plant startup.

We are also concerned with another aspect of the new license amendment process which has the potential to adversely impact plant startup. In the past it has not been uncommon for the Staff to express its preference for technical specifications, in addition to those proposed by licensees in their refueling license amendments, only days before such amendments are to be issued. In many instances we did not share the Staff's view that such additional provisions were necessary. However, we nevertheless accepted them in the interest of obtaining timely authorization for plant startup.

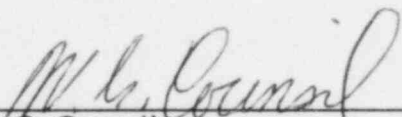
In view of the procedures established by Section 50.91, we believe that the Staff must institute procedures to assure that it identifies the need for such license amendments in a timely manner. Moreover, in those cases where the Staff perceives towards the end of the review process that such additional license amendments are required, we believe that NRC must expedite the notice and comment and state consultation process if, absent such action, that process would impact adversely plant startup.

We intend to keep the Staff informed of pertinent developments through the course of all of our refueling outages. In addition, the NRC resident inspector is able to provide information to the NRC Staff based in Washington. Every effort has been and will continue to be made to use our "best efforts" to identify and process license amendment requests. However, we will never be able to predict with certainty when the NRC Staff may adopt the position that additional technical specification provisions are necessary. As a result, it is our view that when the Staff identifies the need for an additional license amendment towards the end of the review, measures must be taken to assure that the amendment process does not adversely impact plant startup.

My Staff will keep you apprised of any developments in this regard through the Millstone Unit No. 2 Project Manager.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



W. G. Council
Senior Vice President

cc: D. G. Eisenhut
D. M. Crutchfield
T. F. Dorian, Esq.