

NORTHEAST UTILITIES

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

General Offices • Selden Street, Berlin, Connecticut

P.O. BOX 270
HARTFORD, CONNECTICUT 06141-0270
(203) 666-6911

May 15, 1984

Docket No. 50-336

A03992

Director of Nuclear Reactor Regulation
Attn: Mr. James R. Miller
Operating Reactors Branch #3
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

References: (1) J. R. Miller letter to W. G. Counsil, dated April 25, 1984.

Gentlemen:

Millstone Nuclear Power Station, Unit No. 2
Containment Purging and Venting

Reference (1) provided Northeast Nuclear Energy Company (NNECO) a restatement of the NRC Staff's positions regarding containment venting through the hydrogen purge system. Specifically, the Staff addressed three areas. Automatic valve closure by a high containment radiation signal, more frequent valve leakage surveillance, and vent valve qualification data. Regarding the position to modify the valves to close on a high containment radiation signal, the Staff requested NNECO to commit to installation of the necessary equipment or request an appeal meeting in accordance with the procedures outlined in Generic Letter 84-08. Our response to this particular item was requested within fifteen (15) days.

Evaluations of the need and potential consequences of venting the containment through the hydrogen purge system continue to support our historic position that the current system design and operation is adequate to ensure the health and safety of the general public. These evaluations include but are not limited to an analysis of consequences of events postulated by the Staff in their generic safety evaluation supporting modifications recommended in Item II.E.4.2.7 of NUREG-0737. Using plant specific design and operational characteristics as input, NNECO has calculated offsite dose consequences for various scenarios involving reactor coolant leakage into the containment while venting operations are underway. The results of these calculations support our contention that the plant backfit requested by the Staff is unsubstantiated for Millstone Unit No. 2.

As such, in accordance with the provisions outlined in Generic Letter 84-08, NNECO hereby requests an informal appeal meeting with the appropriate representatives within the NRC Staff to review the requested modification of the hydrogen purge valves to close on a high radiation signal.

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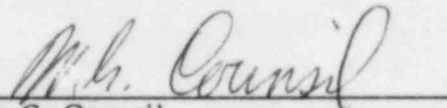
NNECO will continue its efforts to provide the Staff with the qualification data for the hydrogen purge valves requested in Reference (1).

NNECO will also address the issue of surveillance frequency for the containment purge valve and hydrogen purge valve seal leakage. The Millstone Unit No. 2 Project Manager will be contacted to determine the most appropriate means to resolve this item.

My staff will continue to interact with the NRC Staff as necessary to prepare for the requested appeal meeting. We are currently assembling the relevant documentation to thoroughly substantiate the bases for our positions. We look forward to achieving resolution on this matter.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



W. G. Council
Senior Vice President