

**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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May 15, 1984

Docket No. 50-423  
B11181

Mr. Darrel G. Eisenhut, Director  
Division of Licensing  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Mr. Eisenhut:

Millstone Unit 3 Meeting, May 4, 1984

I would like to take this opportunity to express my appreciation for the time that you spent with me discussing key licensing issues relative to Millstone Unit 3 on May 4, 1984. I feel the meeting was most productive and allowed us to share respective views on the status of this plant. As explained to you during the meeting, I have previously directed my staff to work closely with the NRC Division of Licensing to reach resolution on key issues for Millstone Unit 3. This process has been extremely productive, and I believe that you will share with me the view that at the present time the Millstone 3 licensing process is on schedule.

As was discussed during the meeting, I am concerned with the apparent slipping in schedule of the release of the Draft Environmental Impact Statement. The Staff's conclusion on our severe accident considerations required by the Commission's NEPA Policy Statement is the single item delaying the DES. I anticipate that the NRC Staff will continue to provide timely closure of this item and recover as much schedule time as possible. During the meeting we confirmed that, regardless of the issue date of the DES, the issuance of the Final Environmental Statement will be met as noted in the most recent quarterly report to Congressman Bevil.

We also discussed our concern over the limited availability of various NRR staff reviewers required to review our submittals and discuss with us the resolution of remaining open items. During the last several months we have become increasingly concerned that NRR resources should not be shifted away from the Millstone Unit 3 project on to other projects. We realize there are plants in the licensing process that require priority treatment. However, unless adequate resources are provided on the Millstone Unit 3 project, Millstone 3 will soon be in the dilemma that these plants are. With our current schedule and level of plant investment we must expect NRC management attention to ensure adequate NRC Staff resources are applied. We discussed and agreed on several areas where

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NRR is currently evaluating this situation and will be recommending corrective actions to EDO.

The New Brunswick earthquake and its relationship to the Millstone Unit 3 docket was also reviewed. At the present time this item is being treated as a plant-specific issue. Although the NRC Staff has had some questions relative to the Millstone Unit 3 site, the application of the New Brunswick earthquake to the Millstone site and its ramifications are truly a generic issue and should not be part of this docket. We reached agreement on this issue and anticipate that in the very near future we will receive acceptable staff conclusions regarding Millstone 3 in this area. Extensive NRC efforts and much industry activity is currently taking place with the intent of bringing generic seismicity issues to closure. Northeast Utilities is actively participating in these efforts and we anticipate a successful closure.

Meaningful discussions were also held in the area of fire protection. Millstone Unit 3 has fire protection design concepts which were designed into the plant early in its design phase. One element of this design is the use of a carbon dioxide fire suppression system in the Cable Spreading Area. At the present time Appendix R allows the use of this method of fire suppression. In contrast, the current Branch Technical Position (a staff guidance document) prescribes the use of water as the preferred agent. My staff has prepared substantial technical justification for the use of carbon dioxide, and we are currently beginning an informal appeal process with the Staff to present our position to NRC management. We intend to pursue this item to completion.

Northeast Utilities' development of the Technical Specifications for Millstone Unit 3 was also discussed. We are actively preparing sections of the Technical Specifications based on Revision 4 of the Westinghouse STS. A meeting between our respective staffs in June, 1984 would be beneficial to review the possible impact of proposed rule change on Technical Specifications and the potential development of Revision 5 of the STS. We intend to actively interface with your Staff to ensure a complete draft will be submitted by November, 1984 and found acceptable to the staff. Extensive in-house staff resources are now being applied to ensure that it is submitted in a timely fashion.

Northeast Utilities has a long record on the Shift Technical Advisor issue and the degree requirements of our second SRO on shift. We intend to continue our philosophy on Millstone Unit 3 that we have developed for the three operating plants. We are available to meet with your Staff to review this area in detail. We also intend to aggressively pursue this item to completion on a NU-specific basis.


In summary, I feel our meeting was extremely worthwhile and productive. I feel that the exchange was open and very beneficial to both concerns. I intend to have my licensing staff follow-up each of these items with your Staff.

I also indicated in the meeting that we intend to meet with you and your Staff in the near future to discuss the initiatives we have taken to improve our SALP performance. At this meeting I intend to review these initiatives and provide you with our plans for the balance of 1984 and 1985 with the intent of obtaining improved SALP ratings. I will be contacting you in the near future to schedule this meeting.

Please feel free to contact me directly if you have any further questions.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

  
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W. G. Council  
Senior Vice President

cc: H. R. Denton  
T. A. Novak  
B. J. Youngblood  
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