

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 7, 1985

Docket No. 50-423
B11538

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

- References: (1) W. G. Council letter to B. J. Youngblood, Request for Exemption from General Design Criterion 4, dated September 12, 1984.
- (2) W. G. Council letter to B. J. Youngblood, Modification to Request for Exemption from General Design Criterion 4, dated October 18, 1984.

Dear Mr. Youngblood:

Millstone Nuclear Power Station, Unit No. 3
Request for Scheduler Exemption From General Design Criterion 4

In Reference (1), Northeast Nuclear Energy Company (NNECO) submitted its request for a partial exemption to General Design Criterion (GDC) 4 in order to take advantage of the "leak before break" concept to eliminate postulated reactor coolant system breaks from the structural design bases for certain portions of the Millstone Unit No. 3 design.

In Reference (2), NNECO modified its request to eliminate the A and B reactor coolant pump P-1 snubber embedments from the scope of the exemption.

It has come to our attention that the Staff is prepared to grant limited exemptions to GDC-4 which are of a scheduler nature while a change to GDC-4 is pursued via the rulemaking process. We, therefore, request that the exemption requested in Reference (1), and as modified by Reference (2), be granted for the first two cycles of operation for Millstone Unit No. 3.

As noted in the Reference (1) submittal, approval of the requested exemption would result in significant reductions in both plant costs and occupational radiation exposure. These benefits will be severely limited by further delays in Staff action on this issue for Millstone Unit No. 3. As such, we request that the Staff take prompt action in approving the requested relief.

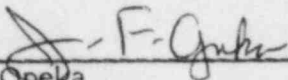
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We remain available to discuss this issue with the Staff as necessary.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



J. F. Opeka
Senior Vice President