



ATOMIC POWER COMPANY •

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July 12, 1985  
MN-85-133

GDW-85-198

Director of Nuclear Reactor Regulation  
United States Nuclear Regulatory Commission  
Washington, D. C. 20555

Attention: Mr. Hugh L. Thompson, Jr.  
Director, Division of Licensing

References: (a) License No. DPR-36 (Docket No. 50-309)  
(b) USNRC Letter to MYAPCo dated May 2, 1985 -  
Implementation of Integrated Schedules for Plant  
Modifications (Generic Letter 85-07)

Subject: Response to Questions Posed in Generic Letter 85-07 - Integrated  
Schedules

Gentlemen:

Maine Yankee Atomic Power Company appreciates the opportunity to comment on the NRC's statement of policy and planning concerning the implementation of integrated schedules for power reactor licensees. We also appreciate the positive approach outlined in the Generic Letter and the attitude of cooperation expressed therein.

Maine Yankee concurs with the concept of integrated strategic planning for the implementation of plant alterations, not only for regulatory requirements, but also for plant betterment projects. Such planning is an essential part of good management and the prudent husbandry of scarce resources in any field. It is particularly important in a capital intensive enterprise such as nuclear power generation. We do not believe, however, that implementation of such a schedule requires a license amendment, nor do we think that a license amendment approach is necessarily desirable. Maine Yankee has, in general, been successful at negotiating implementation schedules for backfits through our NRR Project Manager.

Several factors suggest that the rigidity of the license amendment is unnecessary. Plant alterations coming out of the experience of the Three Mile Island accident are nearly complete. We and others in the industry anticipate a significant reduction in the number of backfits required in the future.

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United States Nuclear Regulatory Commission  
Attention: Mr. Hugh L. Thompson, Jr., Director

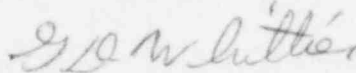
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Additionally, while the NRC's interest should only concern plant alterations which affect safety, by making the scheduling process a license condition, the Staff is inevitably drawn into management decisions which are outside their area of responsibility. We believe this is an untenable position for both the regulator and the licensee.

As we have done in the past, Maine Yankee will work cooperatively with our Project Manager and the NRC staff to develop appropriate schedules for implementation of backfits which are required to protect the public health and safety.

Very truly yours,

MAINE YANKEE ATOMIC POWER COMPANY



G. D. Whittier, Manager  
Nuclear Engineering & Licensing

GDW/bjp

Enclosure: 2 Pages

cc: Mr. Edward J. Butcher, Jr.  
Dr. Thomas E. Murley  
Mr. Cornelius F. Holden

ENCLOSURE 2

RESPONSE FORMAT - GENERIC LETTER 85-

PLANT NAME: Maine Yankee

UTILITY: Maine Yankee Atomic Power Company

I. INTENTIONS

- A. Intend to work with the staff to develop an ILS \_\_\_\_\_
- B. Have reservations that must be resolved before developing ILS \_\_\_\_\_
- C. Do not presently intend to negotiate an ILS with the staff X
- D. Plan to implement an informal ILS only \_\_\_\_\_

II. STATUS

A. If you answered I.A above:

1. Have you settled on a method for prioritizing the work at your plant(s)?

Circle One:      Yes              No

If yes, select best description:

Engineering judgement \_\_\_\_\_

Analytic Hierarchy process \_\_\_\_\_

Risk based analysis \_\_\_\_\_

Cost-benefit analysis \_\_\_\_\_

Other (please describe) \_\_\_\_\_

If no, provide estimated date for selecting a methodology: \_\_\_\_\_

Date

or

If not presently available, provide estimated date for scheduling the selection of a methodology: \_\_\_\_\_

2. What is your estimated date for making a submittal to the NRC- \_\_\_\_\_

or

If not presently available, planned date for scheduling a submittal to the NRC \_\_\_\_\_

B. If you answered I.B above:

1. Please explain your reservations on separate sheet(s)  
or provide your schedule for supplying an explanation

See separate sheet(s)

or

Separate submittal scheduled for

\_\_\_\_\_  
(Date)

2. If available to meet with the staff to discuss your concerns, propose a time frame for such a meeting and provide a contact that can make arrangements

Contact/Time Frame \_\_\_\_\_

Phone Number \_\_\_\_\_

C. If you answered I.C

1. Would you be willing to meet with the staff to discuss the development of an ILS for your facility(s)?

Circle One:

Yes

No

If yes, propose a time frame for such a meeting and provide a contact that can make arrangements.

Contact \_\_\_\_\_

Time Frame \_\_\_\_\_

Phone Number \_\_\_\_\_

If no, any constructive comments you have would be appreciated.

### III. ADDITIONAL ITEMS

Please make any suggestions you may have as to how a utility sponsored availability/reliability project might be credited for plant safety enhancement. Provide additional constructive comments as appropriate.