



State of Connecticut
NUCLEAR ENERGY ADVISORY COUNCIL

REPRESENTATIVE TERRY CONCANNON
Co-Chair
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Room 4035
Legislative Office Building
Capitol Avenue
Hartford, CT 06106

October 22, 1996

The Honorable Shirley Ann Jackson
Chairman, Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Dear Dr. Jackson:

Thank you for your letter of October 10, 1996. We appreciate the support and cooperation we have received from your staff. It has been extremely helpful as we work to fulfill the charge given us by the Connecticut State Legislature.

Your presence in Waterford on August 6, was most welcome and your concept of the Independent Corrective Action Verification Program (ICAVP) was well received by the community. As further details have been discussed in public meetings/hearings with Northeast Utilities, the NRC and our NEAC, it has become obvious that there are real and perceived concerns regarding the "independence" of the ICAVP.

As a result, we believe that certain aspects of the ICAVP require further modification. The areas which we recommend for review include:

1. The process whereby the ICAVP team is selected: With Northeast Utilities selecting and paying for this team, the public considers that limiting the NRC's role to that of a veto power is inadequate. The presence of a third independent entity in the process is called for.
2. The participation of the NRC: The manner in which the NRC participates in the process needs to be monitored in addition to monitoring Northeast Utilities.
3. The selection of the systems to be reviewed/examined: It must include all systems most vital for protecting the reactor's integrity. It must be random and statistically significant in number, and must not be divulged ahead of time under any circumstances.

It would appear that the 'third independent entity' could facilitate the project in all three areas. We understand that the NEAC representatives will then act as independent observers of the work undertaken by the ICAVP as it executes its mission.

As you mentioned in August, this is the first time that an independent review team has been used to evaluate an 'operating' reactor. We are breaking new ground and thus, the NEAC strongly believes that resolution in these areas will add needed credibility to the process thereby reducing the concerns of the public.

We look forward to early discussions with you and/or your staff so that we can move ahead with the task.

For the Nuclear Energy Advisory Council

Terry Concannon
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