

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 • Seiden Street, Berlin, Connecticut

P.O. BOX 270
HARTFORD, CONNECTICUT 06141-0270
(203) 665-5000

October 11, 1985

Docket Nos. 50-213

50-245

A05282

Mr. Hugh L. Thompson, Jr., Director
Division of Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Gentlemen:

Haddam Neck Plant
Millstone Nuclear Power Station, Unit No. 1
Exemptions from 10CFR50.71(e), FSAR Updates

This letter is in response to your letter of October 2, 1985⁽¹⁾, regarding our request for a scheduler exemption from the requirements of 10CFR50.71(e), the FSAR update rule. It is intended to be fully responsive to the conditions established in the October 2, 1985 letter, and the plan set forth below will ultimately result in full and complete compliance with 10CFR50.71 for both Haddam Neck and Millstone Unit No. 1.

Formal Completion Date

Pursuant to 10CFR50.12, Connecticut Yankee Atomic Power Company (CYAPCO) and Northeast Nuclear Energy Company (NNECO) hereby request a scheduler exemption from the requirement to submit an updated FSAR until March 31, 1987 for Millstone Unit No. 1, and June 30, 1987 for the Haddam Neck Plant. As discussed in our September 13, 1985 letter⁽²⁾ we continue to plan to provide an update more detailed and comprehensive than that literally required to meet 10CFR50.71. While we do not plan to adopt the Regulatory Guide 1.70 Revision 3 format in its entirety, the update will be based largely on this format and address most of its elements to the extent possible with existing plant system configurations. For example, we do not plan to include a Chapter 14, Initial Test Program, as specified in Regulatory Guide 1.70. We believe that adoption of expanded formats will result in more comprehensive and useful documents than might otherwise result from a minimal compliance effort. The discussion provided below is based upon that formats rather than the existing formats for the FSAR and FDSA. The final completion date identified above is accompanied by the following milestones.

- (1) Hugh L. Thompson, Jr., letter to J. F. Opeka, dated October 2, 1985, Exemption from 10CFR50.71(e), FSAR updates.
- (2) J. F. Opeka letter to Hugh L. Thompson, Jr., dated September 13, 1985, Request for exemption from 10CFR50.71(e), FSAR updates.

8510220186 851011
PDR ADOCK 05000213
P PDR

A05282
1/10

Stand-Alone Documents

A number of documents are required to be maintained current pursuant to other Commission regulations and will be incorporated by reference into the updated FSAR. The FSAR itself will only contain a concise description of the program or plan in question and provide a current reference to the document itself. The items falling into this category are as follows:

- o The Radiological Effluent Monitoring and Offsite Dose Calculation Manual (REMOCM) and Plant Process Control Program (PCP), which are required to be maintained in accordance with the Radiological Effluent Technical Specifications (RETS) - FSAR Chapter 11.
- o Radiation Protection - FSAR Section 12
- o Emergency Planning - FSAR Section 13.3
- o Industrial Security - FSAR Section 13.6
- o Technical Specifications - FSAR Chapter 16
- o Quality Assurance - FSAR Chapter 17

For both the Haddam Neck Plant and Millstone Unit No. 1, this information will be provided by April 30, 1986.

Accident Analyses

As discussed in our September 13, 1985 letter, we are continuing with our effort to completely revise and update the accident analyses for the Haddam Neck Plant. We hereby reaffirm our previous commitment to provide this information by June 30, 1986. This submittal will be the principle foundation for Chapter 15 of the updated FSAR for the Haddam Neck Plant.

System Descriptions and Piping and Instrument Diagrams

By July 1, 1986, for both the Haddam Neck Plant and Millstone Unit No. 1, current system descriptions and piping and instrument drawings will be provided. The scope of this submittal will include all safety-related systems and the major balance-of-plant systems. This submittal may not necessarily represent the final form of the system descriptions that will be provided in the updated FSARs, however, they will serve the purpose of providing the NRC Staff with sufficient information to facilitate the conduct of day-to-day regulatory staff functions. These descriptions will be of sufficient detail to allow their use by our engineering, operations, and training personnel.

Additional Interim Milestone

In accordance with your October 2, 1985 letter, we plan to provide a major part of the FSAR updates by December 31, 1986 for Millstone Unit No. 1 and March 31, 1987 for the Haddam Neck Plant. Portions of the updated FSAR which fall into this category for both units include the following:

- o Chapter 1 - Introduction and General Description of Plant
- o Chapter 2 - Site Characteristics

- o Chapter 4 - Reactor
- o Chapter 7 - Instrumentation and Controls
- o Chapter 8 - Electric Power
- o Chapter 10 - Steam and Power Conversion System
- o Chapter 11 - Radioactive Waste Management
- o Chapter 12 - Radiation Protection
- o Chapter 13 - Conduct of Operations
- o Chapter 15 - Accident Analyses
- o Chapter 16 - Technical Specifications
- o Chapter 17 - Quality Assurance

With respect to the above items, there may be some additional editing and changes to ensure overall document consistency which will occur following the milestone dates identified above, but each will be complete in all substantive respects by the above dates. The balance of the FSAR chapters will be submitted with the completed FSARs on March 31, and June 30, 1987.

Conclusion

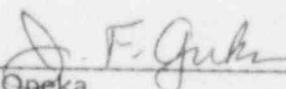
Based upon our review of the October 2, 1985 letter and subsequent discussions with the NRC Staff, it is our understanding that this submittal is fully responsive to your request and, as such, the issue of non-compliance and potential enforcement action is considered resolved. If the above understanding is not correct, we would appreciate prompt notification so that the appropriate steps can be taken to respond to any remaining Staff concerns.

We, therefore, reiterate our request for formal relief from the requirements of 10CFR50.71(e) until March 31, 1987 for Millstone Unit No. 1 and June 30, 1987 for the Haddam Neck Plant. As this request only pertains to temporary schedular relief, it is consistent with the proposed rule change to 10CFR50.12(3).

Pursuant to the requirements of 10CFR170.21, enclosed is the application fee of \$300.00.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY



J. F. Opeka
Senior Vice President

(3)See 50FR 16506.