

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 • Selden Street, Berlin, Connecticut

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

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Docket No. 50-213

50-245

50-336

A04880

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 Nos. 1 and 2
Response to Generic Letter 85-07, Implementation of Integrated Schedules
for Plant Modifications

Generic Letter 85-07⁽¹⁾ provided a description of the position of the NRC Staff with respect to the concept of integrated scheduling for plant modifications and requested that Licensees provide their views, intentions, and concerns regarding an integrated schedule for their facilities. Accordingly, Connecticut Yankee Atomic Power Company (CYAPCO) and Northeast Nuclear Energy Company (NNECO), on behalf of the Haddam Neck Plant and Millstone Unit Nos. 1 and 2 are providing the attached completed survey form, as requested by the subject Generic Letter.⁽¹⁾ The additional comments requested by Section III of the survey are provided below.

CYAPCO and NNECO have for some time advocated the concept of integrated evaluation and scheduling of nuclear power plant modifications. Presently, the Haddam Neck Plant and Millstone Unit No. 1 are participating with the Staff in the Integrated Safety Assessment Program (ISAP). Briefly, ISAP consists of an integrated evaluation of planned plant modifications, both regulatory-driven and utility-initiated plant betterment projects. The evaluation includes both deterministic and risk-oriented assessments of safety issues, and also considers alternate means for addressing a given issue or issues to achieve the optimum and most cost effective resolution. The results of this assessment are then developed into an integrated implementation schedule that reflects the relative priorities of individual projects.

We believe that this integrated assessment process is a logical predecessor to the development of a "living schedule." While other licensees have utilized methods for prioritizing plant modifications, the scope of what is considered in the process is usually limited to existing plant-specific issues. In comparison, the

(1) H. L. Thompson, Jr. letter to All Operating Reactor Licensees, dated May 2, 1985, transmitting Generic Letter 85-07.

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scope of the ISAP review is established at the beginning and provides for an integrated review of all significant aspects of plant design. This results in a more comprehensive evaluation of overall plant safety and thus, we believe, a more sound basis for making balanced backfitting decisions. For this reason, the ISAP Program Plan as described in SECY-84-133 includes not only an assessment of priority for individual modifications for the purpose of developing an integrated schedule, but also an evaluation of the need (on a plant specific basis) to implement regulatory mandated modifications at all. The inclusion of a plant-specific probabilistic safety study in ISAP represents another source of topics or issues which should reveal potential plant modifications which can result in improvements in public safety that may otherwise go undetected.

While implicit in the above description, we believe it is important to highlight the fact that the ultimate objective of ISAP is to address all outstanding requirements in a way that is both cost effective and which results in the greatest increase in safety in the most efficient manner. Of necessity, ISAP will result in some number of NRC-driven plant backfits being deferred for some period of time while they are subjected to additional evaluation and integration. While this may have the appearance of deferring indefinitely safety-related improvements, the end result of the process will be a greater near-term increase in safety than would result from addressing each issue in isolation. It is also certainly possible that an integrated review of all planned plant improvements will determine that some existing NRC required projects are not required when evaluated on plant-specific basis or are far less cost effective than other projects and thus may be deferred for some period of time in order to permit better integration and overall resource management. We view this to be a significant and desirable difference between the ISAP concept and the approach to Integrated Schedules described in Generic Letter 85-07.

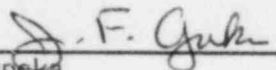
It is also important to recognize that there are limits to the volume and extent of change that can be successfully introduced into a nuclear plant⁽²⁾ during any individual outage. Attempting to implement too many changes at once carries with it the potential for inadvertent negative impacts. This limit needs to be recognized when integrated modification schedules are developed; not all changes can be done immediately because they are all priority one.

(2) See, for example, NUREG-0839. In this senior NRC management survey of selected licensees on the safety impact of NRC activities, many concerns were expressed regarding the number of new requirements being imposed and the lack of coordination in design, installation, and operation. Licensees commented that "a more coordinated approach to the issuance of regulatory requirements, both in their technical content and in their schedule for completion, would have resulted in better safety-related modifications at less cost and without diversion of their finite technical talent from other safety tasks."

In summary, we strongly endorse the efforts of the Staff in the area of integrated schedules. We will be working with the Staff in the near future on the ISAP review for Haddam Neck and Millstone Unit No. 1, at the conclusion of which we will propose long-term integrated schedules for each unit. Although the current scope of the NRC ISAP review is limited to Haddam Neck and Millstone Unit No. 1, we plan to apply the ISAP evaluation process to Millstone Unit No. 2 after we have gained experience in the process on the other two facilities. We remain available to discuss this further if you so desire.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY



J. F. Opeka
Senior Vice President

ENCLOSURE 2

RESPONSE FORMAT - GENERIC LETTER 85-07

PLANT NAME: Haddam Neck, Millstone Unit Nos. 1 and 2

UTILITY: Northeast Utilities

I. INTENTIONS

- A. Intend to work with the staff to develop an ILS X
- B. Have reservations that must be resolved before developing ILS
- C. Do not presently intend to negotiate an ILS with the staff
- 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	<u>X</u>
Analytic Hierarchy process	<u> </u>
Risk based analysis	<u>X</u>
Cost-benefit analysis	<u>X</u>
Other (please describe)	<u> </u>

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-

(See cover letters)

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.