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Washington, DC 20555

Millstone Nuclear Power Station, Unit Nos. 1, 2 and 3
Haddam Neck Plant
Comments on Draft Regulatory Guide DG-1051,
Monitoring the Effectiveness of Maintenance at Nuclear Power Plants

The Nuclear Regulatory Commission (NRC) issued Draft Regulatory Guide DG-1051, "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," for review and comment in August, 1996. Draft Regulatory Guide DG-1051 is a proposed Revision 2 to Regulatory Guide 1.160. This letter transmits comments on Draft Regulatory Guide DG-1051 on behalf of Northeast Nuclear Energy Company (NNECO) and Connecticut Yankee Atomic Power Company (CYAPCO) for Millstone Unit Nos. 1, 2 and 3, and Haddam Neck Plant, respectively.

Millstone Unit Nos. 1, 2 and 3, and Haddam Neck Plant agree with the general intent of the draft Regulatory Guide to endorse Revision 2 to NUMARC 93-01. In addition, the following two specific comments are provided:

1. The wording in the last paragraph in the "Emergency Diesel Generators" section conflicts with that provided in NUMARC 93-01. Specifically, Draft Regulatory Guide DG-1051 states that "All SSCs within the scope of the rule are subject to the requirements of 10CFR50.65(a)(3), including (1) periodic evaluation, (2) balancing reliability and unavailability, and (3) assessing the impact....." The conflict is with item (2) of this statement. Section 12.2.4 of NUMARC 93-01 states that the (a)(3)

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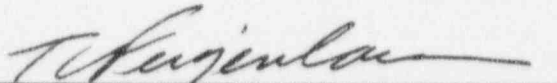
requirement for balancing reliability and unavailability only applies to risk significant Structures, Systems and Components (SSC) and not all in-scope SSCs as indicated in Draft Regulatory Guide DG-1051. Unavailability is only monitored for risk significant systems.

2. It is not clear why this paragraph is provided in the "Emergency Diesel Generator" (EDG) section as this discussion on the requirements of 10CFR50.65(a)(3) is a generic issue and not specific to the EDGs.

Should you have any comments or questions regarding this matter, please feel free to contact Mr. Kevin Hastings, Maintenance Rule Project Manager at (860) 447-1791, ext. 5204 or Mr. Steve Scafe at ext. 5372.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY
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