

NORTHEAST UTILITIES



THE CONNECTICUT LIGHT AND POWER COMPANY
WESTERN MASSACHUSETTS ELECTRIC COMPANY
HOLYOKE WATER POWER COMPANY
NORTHEAST UTILITIES SERVICE COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY

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September 3, 1985
RWW-85-57

Mr. Charles E. Rossi, Chief
Events Analysis Branch
Division of Emergency Preparedness
and Engineering Response
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Rossi:

The following comments are provided, from the CEOG Steering Committee, in response to your request regarding IE Draft Bulletin: "MOV Failures During Plant Transients Due To Improper Switch Settings". It should be noted that these are informal comments only and do not represent an official position or consensus of the CEOG since limited time was available for response.

1. In reviewing various NRC correspondence concerning the Davis Besse June 9, 1985 event, it is clear that there are numerous other potential generic items under review by the NRC. It is recommended that action on this draft bulletin be integrated and coordinated with review and resolution of all these potential generic concerns so as to maximize the effectiveness of any subsequent industry corrective actions. The CEOG would welcome an opportunity to interact with the NRC in this integrated review.
2. The substitute "prototypical testing" discussed in Bulletin Action Item C, should be better defined and also clarified as to what justification is acceptable to the NRC. Clarification is also needed as to acceptable justification for "alternate testing" and acceptable alternate testing methods.
3. The scope of the bulletin should be limited to only those safety-related valves which see significantly more severe loading during design basis events than they are normally tested to as part of routine inservice testing (Section XI).
4. An accurate assessment of the utility burden imposed by this bulletin will require both specific resolution of Items 2 and 3, and additional review time. If additional time is made available, the CEOG would be willing to undertake this assessment.

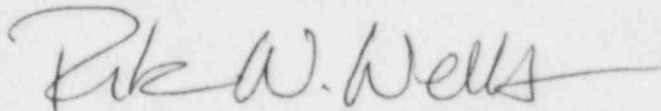
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We appreciate this opportunity to comment on this draft bulletin, and as previously noted would also appreciate an ongoing opportunity to review and comment on further developments regarding this or other generic concerns resulting from the Davis Besse event. Should you wish to discuss this further please call me at (203) 665-3614.

Very truly yours,

A handwritten signature in dark ink, reading "Rik W. Wells". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Rik W. Wells, Chairman
CE Owners Group

RWW/drg

cc: A. Bivens (AIF)
F. Maraglia (NRC)
J. Pfeifer (CE)
J. Taylor (B&W)