

**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 9, 1985

Docket Nos. 50-213

50-245

50-336

50-423

B11677

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

Gentlemen:

Haddam Neck Plant  
Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3  
ATWS Rule Schedule required by 10CFR50.62(d)

Generic Letter 85-06<sup>(1)</sup> provided quality assurance guidance for ATWS equipment that is not safety related and initiated the schedule detailed in 10CFR50.62(d). Specifically, 10CFR50.62(d) requires all light-water-cooled nuclear power plants to develop and submit a proposed schedule for meeting the requirements of 10CFR50.62 paragraphs (c)(1) through (c)(5). This letter is intended to advise you of Connecticut Yankee Atomic Power Company's (CYAPCO's) and Northeast Nuclear Energy Company's (NNECO's) current plans to address the requirements of 10CFR50.62.

Haddam Neck Plant

Pursuant to H.L. Thompson's July 31, 1985 letter<sup>(3)</sup>, compliance with 10CFR50.62 for the Haddam Neck Plant will be evaluated as Topic 1.16 in the Integrated Safety Assessment Program (ISAP) review being performed for the Haddam Neck Plant. Among the inputs to this topic evaluation is a plant specific analysis provided to the NRC on February 28, 1975.<sup>(2)</sup> This analysis demonstrated that Haddam Neck would have a mild plant response to ATWS transients. In addition, plant modifications since 1975 (e.g. installing larger pressurizer PORVs) have further reduced the calculated consequences of an ATWS event. Our final plans and associated technical justifications will be submitted during the course of review of ISAP Topic 1.16 for the Haddam Neck Plant.

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- (1) Generic Letter 85-06, H. L. Thompson to all applicants and licensees for power reactor licenses, dated April 16, 1985.
- (2) D. C. Switzer letter to A. Giambusso, dated February 28, 1975.
- (3) H. L. Thompson letter to J. F. Opeka, dated July 31, 1985.

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### Millstone Unit No. 1

10CFR50.62 specifies three separate requirements that are applicable to boiling water reactors. These are:

- (1) Each boiling water reactor must have an alternate rod injection (ARI) system that is diverse from the reactor trip system from sensor output to the final actuation device. The ARI system must have redundant scram air header exhaust valves. The ARI must be designed to perform its function in a reliable manner and be independent from the existing reactor trip system from sensor output to the final actuation device.
- (2) Each boiling water reactor must have a standby liquid control system (SLCS) with a minimum flow capacity and boron content equivalent in control capacity to 86 gallons per minute of 13 weight percent sodium pentaborate solution. The SLCS and its injection location must be designed to perform its function in a reliable manner. The SLCS initiation must be automatic and must be designed to perform its function in a reliable manner for plants granted a construction permit after July 26, 1984, and for plants granted a construction permit prior to July 26, 1984, that have already been designed and built to include this feature.
- (3) Each boiling water reactor must have equipment to trip the reactor coolant recirculation pumps automatically under conditions indicative of an ATWS. This equipment must be designed to perform its function in a reliable manner.

Millstone Unit No. 1 has an alternate rod insertion system that satisfies the requirements of item (1), above. Millstone Unit No. 1 also has equipment to trip the recirculation pumps under conditions indicative of an ATWS that satisfies the requirements of item (3), above. Millstone Unit No. 1 is equipped with a Standby Liquid Control System (SLCS); however, the capacity of the SLCS does not meet the requirements of item (2) above. The Millstone 1 SLCS has an equivalent control capacity of 43 gpm of 13 weight percent sodium pentaborate solution, which is half of the effective capacity required by 10CFR50.62.

Millstone Unit No. 1 is currently in compliance with the requirements of 10CFR50.62 concerning alternate rod insertion and recirculation pump trip systems. Millstone Unit No. 1 does not meet the SLCS capacity requirement of 10CFR50.62. In accordance with Enclosure 2 to H.L. Thompson's July 31, 1985 letter<sup>(3)</sup> the significance of this difference and the need to increase the SLCS capacity will be evaluated as Topic 1.18 in the Integrated Safety Assessment Program (ISAP) review being performed for Millstone Unit No. 1.

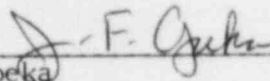
### Millstone Unit Nos. 2 and 3

NNECO, pursuant to the paragraph (d) of 10CFR50.62, plans to request schedular relief from the completion date requirements of 10CFR50.62 for Millstone Unit Nos. 2 and 3. Details of the extension requests, including proposed schedule for implementation and justification for delay, will be submitted by October 14, 1985. It is noted that the lengthy delay in the issuance of Generic Letter 85-06 is a key factor regarding the need for additional time to complete implementation.

We trust you will find this information satisfactory. Should you have any questions, my staff is available to assist you.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY  
NORTHEAST NUCLEAR ENERGY COMPANY

  
\_\_\_\_\_  
J. F. Opeka  
Senior Vice President

cc: Mr. John A. Zwolinski, Chief  
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